

From: N/A [<mailto:rpickford@earthsolutionsllc.net>]
Sent: Wednesday, April 24, 2013 11:27 AM
To: VanWye, Brian (DDOE)
Subject: Revised Stormwater Management Rule

Brian,

Below is my only comment on the revised rule. Thank you for keeping me in the loop. I'm still working on comments on the revised guidebook and will get them to Rebecca before the 30th.

COMMENT :

In the preamble Summary of DDOE Calculation of In-Lieu Fee (Table 1, page 9), the department has decided to use an annualized life cycle ROI of 20 years for installed BMPs. This decision was described as "in the range of lifecycle time periods used by other jurisdictions and in the literature when making similar calculations." (footnote No. 9). In addition, however, the department also indicates that they may have the need to lease or buy land to install retention capacity if it becomes necessary to dramatically scale up its programs in response to the use of the In-Lieu Fee (footnote No. 7).

A simple search of nutrient or stormwater trading programs will indicate that none of them have generated substantial incentive for property owners to install BMPs. Most programs indicate moderate participation at the best. Most business equipment can be depreciated within a 10 year period and certain improvements made directly to land or added to it (such as shrubbery, fences, roads, sidewalks, and bridges) can be depreciated over a 15 year period. If the department is truly interested in encouraging public participation in installing stormwater BMPs on private property, they may want to re-calculate the In-Lieu Fee based on annualized life cycle ROI of no more than 15 years, and perhaps want to consider 10. In addition, a substantial number of property owners in the District will not own their properties for 20 years. Under this scenario, they would incur the full cost of installation, but not fully realize their ROI and thus may not be so inclined to pass the bulk of the return onto a future owner.

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From: N/A [<mailto:rpickford@earthsolutionsllc.net>]
Sent: Monday, April 29, 2013 7:00 PM
To: VanWye, Brian (DDOE)
Subject: RE: Revised Stormwater Managment Rule

Hi Brian,

After talking to a couple associates of mine, we did generate one other comment to the proposed rule. Correct me if we've miss interpreted this, but we were noticing that the credit application fees for a single family residence could be as much as \$700. That could be a fairly hefty fee for a homeowner especially when added to the cost of constructing an acceptable BMP. If you want to encourage these types of people to participate in the program, you may want to figure out a lower fee for them.

Again, thanks for considering my comments,

Ross