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Washington, DC 20016  
April 24, 2013

District Department of the Environment  
Stormwater Management Division  
1200 First Street, N.E., 5th Floor  
Washington, DC 20002

Re: Informal Comments on revisions to  
DDOE NPR: Stormwater Management, Soil Erosion  
and Sediment Control and  
Stormwater Management Guidebook – August 2012

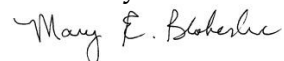
Dear Friends:

I appreciate the opportunity provided by the District Department of the Environment (DDOE) to review and provide comments on the April 1, 2013 draft of the proposed rulemaking on stormwater management and soil erosion and sediment control (the revised rule) and on the April 2, 2013 draft of the revised version of DDOE's proposed Stormwater Management Guidebook (the revised SWMG).

I believe that the changes to the proposed regulations and guidebook create a more understandable framework for property owners to incorporate control of stormwater, soil erosion, and sediment in planning and implementing new or significant modification construction projects. They also continue to support DDOE's efforts to establish programs for reducing stormwater runoff into the Potomac and Anacostia Rivers, their tributaries, and other impacted waters.

However, I still believe that the SWMG remains too technical for other property owners such as existing churches, condominiums, cooperatives, and private schools to understand and use. I also believe that its use in conjunction with the proposed regulation will inhibit properties with available land in the MS-4 areas of the city to voluntarily invest in on-site retention of stormwater due to the perceived complexity and costs involved in doing so.

Sincerely,



Mary E. Blakeslee

cc: Walter Smith, DC Appleseed Center for Law and Justice  
Rebecca Hammer, NRDC  
Mary Cheh, Ward 3 Councilmember  
George Hawkins, DC-Water