

**From:** Casille Systemans [cbsystemans@gmail.com]  
**Sent:** Thursday, November 08, 2012 11:25 PM  
**To:** [swrule@gc.gov](mailto:swrule@gc.gov); Guidebook, SW (DDOE)  
**Subject:** Stormwater Comments

**Agreeing** with the city on its plan to draft the regulatory requirement for new development and redevelopment projects to retain the volume of rainfall associated with a 1.2-inch storm, either on-site or through the use of off-site retention credits. This is both legally required (by the District's Municipal Separated Stormwater Sewer System, or the MS4) permit, and a smart approach to water management that will yield many benefits.

Allowing off-site retention credits (SRCs) to be "banked" indefinitely divorces the timing of actual, real-world retention from the time when credits are used to achieve regulatory compliance. As a result, the 1.2-inch storm volume obligation may not be met during each storm event or even during each year.

Payment-in-lieu fees should be collected in their own special revenue fund to ensure that they are only used to fund projects that achieve stormwater retention. An annual report should be produced to explain how these funds are being used. Projects funded through in-lieu payments should not be able to generate SRCs in order to avoid "double-counting" of required off-site retention volumes