

From: Feiquan Luo [mailto:fluo@whga.com]
Sent: Tuesday, April 30, 2013 10:36 AM
To: Stack, Rebecca (DDOE)
Cc: Steven Pandish
Subject: Comments on the revised SWMG

Rebecca,

I have several comments on the revised SWMG for the informal comment period ending on April 30, 2013. The major concern I have is the consistency between the revised SW Rulemaking and the revised SWMG on the Stormwater Retention Volume requirements for projects in the Anacostia Waterfront Development Zone (AWDZ).

Based on my understanding of Section 524 of the revised SW Rulemaking, the performance requirements for major regulated projects in the Anacostia Waterfront Development Zone (AWDZ) are summarized as follows:

Activities	Stormwater Retention Volume (SWRv)	Water Quality Treatment Volume (WQTV)
Major Land Disturbing	1.2 inch (90 th percentile)	The difference between 1.7" and 1.2"
Major Substantial Improvement	1.0 inch (85 th percentile)	The difference between 1.7" and 1.0"

Here are some inconsistency I found in the revised SWMG.

1. In table 2.1 of Section 2.0 on page 9, the regulatory Trigger (P) for **major land-disturbing** activity located in AWDZ is **1.0"**, which is different from Section 524 of the revised SW Rulemaking.
2. The title of table 2.1 is "Sizing Criteria for Major **Land Disturbing** Activity Stormwater Management Performance Requirements", but it includes the regulatory trigger (P) for major **Substantial Improvement** activity, and it doesn't distinguish the project in AWDZ or not.
3. The purpose of table 2.1 is to provide a unified approach for sizing BMPs, so it should include the **WQTV** requirements for projects in AWDZ.

Thank you,

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