

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

MEMORANDUM

TO: Board of Zoning Adjustment

FROM: Tommy Wells *TW* 2-25-2022
Director, DOEE

DATE: February 15, 2022

SUBJECT: Stormwater Management Comments for BZA 20643 – The Maret School

ANC Commissioners Randy Speck and John Higgins sent questions to DOEE regarding The Maret School's BZA application, case 20643. DOEE's Stormwater team responded to these comments ahead of the ANC meeting on February 16, 2022. The five questions from Commissioners Speck and Higgins, along with DOEE's responses, are below.

1. Please explain how DOEE's permitting process relates to the BZA process. For instance, is it typical that the BZA order requires completion of the project in accordance with the DOEE permit? At what stage in a project does an applicant typically apply to DOEE for a stormwater management permit?

Response: DOEE reviews stormwater management plans for compliance when the project applies for a building permit, which is when reviews are conducted by DCRA and other sister agencies. Comments on a BZA case are usually high-level and based on sustainability goals due to the engineering plans not having been fully developed yet. We strongly encourage applicants to voluntarily meet with our stormwater team early in the design process to discuss general stormwater management strategies prior to submission for the building permit, which this project did in January.

2. What are the applicable regulatory requirements that Maret will have to satisfy in order to obtain the necessary permits for this project? Are these regulatory requirements modified in any way by the goals set forth in DOEE's Climate Ready DC Report (https://doee.dc.gov/sites/default/files/dc/sites/ddoe/service_content/attachments/CRDC-Report-FINAL-Web.pdf)? If there are changes in regulatory requirements, will Maret have to meet the regulatory requirements as of the time the permit is issued?

Response: As far as stormwater management is concerned, this project will generally need to:

- Retain the 1.2-inch storm (Hold runoff on site until it soaks into the ground or evaporates)
- Detain the 2-year storm, which is 3.2 inches (Release runoff slowly into the sewer system no faster than if the entire site were an undeveloped, grassy meadow)
- Detain the 15-year storm, which is 5.2 inches (Release runoff slowly into the sewer system no faster than the existing conditions)

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This athletic field can be exempted from the 1.2-inch retention standard only if the field is made available for use by the general public. Otherwise, it is regulated the same as the rest of the project. DOEE will base regulatory requirements on the time in which a project is submitted for building permit. We have not yet updated our storm sizes to account for regional climate change projections but are currently analyzing the impact of doing so.

3. Are the elements of Maret's stormwater management plan at this conceptual stage consistent with the EPA-DOEE RiverSmart program in terms of LID (Light Impact Development) and the 1.2-inch rainfall standard?

Response: The proposed stormwater management plan includes some bioretention facilities, tree planting, and tree preservation, all of which are considered LIDs. These practices are like those in the RiverSmart program, though more engineered. Though we were not provided any design calculations, the conceptual plan we reviewed appeared to generally provide sufficient stormwater management if the athletic field is exempt from the 1.2-inch standard. If the field is not exempted, we agreed the site likely needs more stormwater management by either adding facilities or making proposed facilities larger.

4. On stormwater management issues, is it your understanding that the Office of Planning provides DOEE's preliminary comments to the BZA for its consideration of an application? Does DOEE typically provide written comments on an application to the Office of Planning?

Response: Yes, DOEE typically provides written comments on BZA applications to the Office of Planning. We typically comment on the extent to which (and advocate for improvements on) a project will further DOEE's sustainability goals, such as those in Sustainable DC.

5. What is the practical difference in designing a stormwater management system to a 15-year storm, a 25-year storm, or a 50-year storm? What projects in the District, if any, have been designed for a 50-year or greater storm?

Response: Practically speaking, designing for larger storms means facilities and infrastructure will increase in size. For example, a project might need bigger pipes to convey larger storms; a bioretention will need to hold more stormwater by being designed deeper or with a larger footprint. Typically, the 15-year storm is the largest storm size DOEE requires designers achieve since this is the capacity of the District's sewer pipes. On a case-by-case basis, we require designing to the 100-year storm if it appears a project may cause flooding to a downstream property. Other agencies may base design requirements on different storm sizes.