

EISA Implementation Issues at Colorado Federal Facilities

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Holly - Below is a list of the EISA implementation issues/concerns I've heard from our Federal Facilities. I hope this helps you answer some of the questions you received on if GI/LID is working so far. Please let me know if you have any questions. Thanks! Amy

- Widespread lack of design and install knowledge, facilities have been trying to train and get the information out to many but the concept still doesn't entirely stick. Sometimes people will design and install some sort of stormwater BMP and if they can't do a thorough review then it can be tremendously flawed and then we are left with something worse than doing nothing.
- Lack of coordination between projects and challenges designing infrastructure to handle these systems.
- Maintenance and funding for it is also going to be difficult under numerous budget constraints.
- Numerous issues with weeds growing in installed LIDs, which also makes it extremely difficult to get the desired species to take and flourish.
- O&M issues - staff not being aware of specific O&M requirements for GI/LID (mowing vegetation down when it is needed, not vacuuming permeable pavement, etc.). One facility had a \$60K BMP destroyed because it was mowed down.
- Contract mechanism - Federal facility contract mechanisms are not flexible to move money around for GI/LID. Many projects have to go to congress for permission to move money around.
- Unable to get vegetation to take or grow in our climate without irrigation (which is impractical and not what we want). Cannot meet LEED standards (one year of irrigation) and have vegetation survive in the LID features. So, they end up with a lot of rock.

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-Soil conditions aren't conducive to infiltrate the 95th percentile storm event (which is ~1 inch for Denver). *** This is a big one in CO.***

- Regarding use of Option 2 (site-specific hydrologic analysis), there is concern about cost and expertise. Federal facilities budget's have been drastically reduced so many cannot afford to model or provide upkeep a Post wide model. Therefore, each project calculates its standard under Option 2 and then the federal facility reviews what the contractor has calculated.