RE: EISA Implementation Issues at Colorado Federal Facilites

Amy Clark

to:

sarah.eastin

07/15/2011 10:36 AM

Cc:

Andy.Boudreau, jessica.m.frank

Hide Details

From: Amy Clark/R8/USEPA/US

To: sarah.eastin@us.army.mil

Cc: Andy.Boudreau@aecom.com, jessica.m.frank@us.army.mil

Thank you all for your comments. I have forwarded them onto EPA HQ. Have a great weekend.

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----"Eastin, Sarah M CTR USA" <sarah.eastin@us.army.mil> wrote: -----

To: Amy Clark/R8/USEPA/US@EPA

From: "Eastin, Sarah M CTR USA" <sarah.eastin@us.army.mil>

Date: 07/14/2011 11:27AM

Cc: "Frank, Jessica M CIV US USA" < jessica.m.frank@us.army.mil > , "Boudreau, Andy"

<Andy.Boudreau@aecom.com>

Subject: RE: EISA Implementation Issues at Colorado Federal Facilities

Hi Amy-

Just a few comments based on what I've seen. There is a pretty widespread lack of design and install knowledge, we have been trying to train and get the info out to many but the concept still doesn't entirely stick. Sometimes people will design and install some sort of stormwater BMP and if we can't do a thorough review then it can be tremendously flawed and then we are left with something worse than doing nothing. I've also seen quite a 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 our numerous budget constraints. We also have lots and lots of weeds growing in all of our installed LIDs, which also makes it extremely difficult to get the desired species to take and flourish. I don't know much about the hydrologic analysis that would be something Andy Boudreau with AECOM or Jessica Frank could you some good feedback on. Hope that helps a bit.

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----Original Message----

From: Amy Clark [mailto:Clark.Amy@epamail.epa.gov]

Sent: Wednesday, July 13, 2011 11:44 AM

To: Frank, Jessica M CIV US USA; Eastin, Sarah M CTR USA; Boudreau,

Andy; Braus, Genevieve; smystkowski@samiro.com

Subject: EISA Implementation Issues at Colorado Federal Facilites

- All I have been asked to provide EPA HQ with a list of EISA implementation issues/concerns that have come up at CO federal facilities. Below is a list of what I have heard from you, however, if you have any additional information, could you please provide me with it by COB, July 14? Thanks.
- 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.)
- Contract mechanism Federal facility contract mechanisms are not flexible to move money around for ${\tt GI/LID}$
- -Unable to get vegetation to take or grow in our climate without irrigation (which is impractical and not what we want)
- -Soil conditions aren't conducive to infiltrate the 95th percentile storm event (which is ~1 inch for Denver)

Question

-Site specific hydrologic analysis - why aren't federal facilities using the site specific hydrologic analysis instead of Option 1 (retention of the 95th percentile) more often? Is it difficult to use, requires expertise, costly, etc? I have heard that the site specific hydrologic analysis can reduce your retention standard from the 95th percentile to the 30th-50th percentile (depending on the site specifics). Since it can reduce the volume need to be retained it would seem that all sites would want Option 2 over Option 1.

Thanks and please let me know if you have any questions!

Amy Clark Stormwater Coordinator - Temporary Detail EPA Region 8 1595 Wynkoop St. Mail Code: 8P-W-WW

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