



RE: EISA Implementation Issues at Colorado Federal Facilities  
(UNCLASSIFIED)

Frank, Jessica M CIV US USA to: Amy Clark

07/13/2011 03:43 PM

Classification: UNCLASSIFIED

Caveats: FOUO

Hi Amy,

You have summed up our issues very well.

We had a \$60K LID feature completely destroyed by a mower recently. We have an already over taxed O&M department.

Many projects have to go to congress for permission to 'move money around'

We cannot meet our LEED standards (one year of irrigation) and have our vegetation survive in our LID features. So, we end up with a lot of rock.

On one site, irrigation runoff occurred between the vegetative layer (that we just planted) and the clay layer underneath, and heaved the adjacent curb and parking lot (also newly installed - we are now installing an outlet for the irrigation water - an expensive fix.) So - yes - our soils are not conductive to infiltrate.

My program recommends Option 2 on all projects. However, my program can no longer afford to model and upkeep a Post wide model. Each project calculates its volumes, which I review.

Cheers!

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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 Facilities

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 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

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