



1514a EISA Implementation Issues at Colorado Federal Facilities
SMystkowski to: Amy Clark

07/13/2011 05:46 PM

Amy,

Thanks for including me in this. The Replacement VA Medical Center has certainly been a challenge to implement EISA within an existing developed and master planned area most of which does not fall under EISA. Your comment about "Soil conditions aren't conducive to infiltrate the 95th percentile storm event (which is ~1 inch for Denver)" has been our main challenge.

Regarding use of Option 2, I think for us this first time it was a concern about cost and expertise. We had not implemented EISA before and it became a requirement after the start of a very long project, but early enough that it made sense to implement. If I had to do it again and knew that EISA was required and understanding that Option 2 may save some construction cost, I would probably suggest to the Government that we be paid to review both methods to see what was best for the particular site. It would not be a large design fee cost up-front, but would have been more difficult to go back and ask to review both methods as an additional service.

Steve

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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;

sarah.eastin@us.army.mil; Boudreau, Andy; Braus,

Genevieve; Steve Mystkowski

Subject: 1514 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

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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!

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