

CSRWG 19 June 2008

Prete

From: Phil.Prete@wilmingtonnc.gov [mailto:Phil.Prete@wilmingtonnc.gov]
Sent: Tuesday, June 17, 2008 12:47 PM
To: George Givens (Research)
Cc: tom.reeder@ncmail.net; Dave.Mayes@wilmingtonnc.gov
Subject: Fw: CSRWG - Additional Comments on Coastal Stormwater Rules

Dear George:

In reviewing the Coastal Stormwater Rules further and discussing with Dave Mayes, our Stormwater Services Director, there are a couple of issues that the City of Wilmington still would like to have resolved. My references are to the revision that was presented for the 6/16 meeting. Both of these issues were presented orally by Dave Mayes at the first CSRWG meeting and have not been addressed. Please consider these suggestions for the next draft.

1) Page 3 lines 23 through 26 {(2)(B)(iii)] read as follows:

(iii) Runoff in excess of the design volume must flow overland through a vegetative filter designed in accordance with Rule .1008 of this Section with a minimum length of 50 feet measured from mean high water of SA waters;
and

This requirement may be difficult to achieve from an engineering perspective in some instances and may cause more damage than good. In situations with a vegetated filter constructed in unconsolidated sandy soil proximal to surface waters the channel may be unstable and could blow out in a large storm event resulting in dumping sediment into the receiving waters . **Please revise with a performance-based standard to allow for other options.**

2) Page 4 lines 5 trough 8 [(2)(C) second sentence] read as follows:

"Any modification or redesign of a stormwater conveyance system within the contributing drainage basin must not increase the net amount or rate of stormwater discharge through existing outfalls to SA waters."

This is problematic and prohibitive of potential measures necessary for protection of public safety and property where it may be necessary to modify / redesign and retrofit drainage in existing developments to correct drainage problems. If not permitted to increase rate of flow through drainage system, may not be able to correct flooding problems. Please consider the following revision to this provision:

Any modification or redesign of a stormwater conveyance system within the contributing drainage basin must **be engineered so that it does** not increase the net **area drained into** ~~amount or rate of stormwater discharge through~~ existing outfalls to SA waters.

If these comments are unclear or if you or Tom need to discuss further, please let me know.

Many thanks for your efforts in this process.

Regards,

Phil Prete

City of Wilmington