



Potential Regulatory Changes

PWD is evaluating a series of stormwater regulation changes that would be the first significant enhancement to the regulations since 2008. Regulatory updates are necessary for the Department to meet federal and state water quality regulations, reduce combined sewer overflows and establish consistent development standards across the city. They will help PWD to keep pace with ongoing changes in land development and better align requirements for public and private stormwater management practices.

The changes being evaluated include:

1. Increasing the Water Quality volume management requirement city-wide from 1.0-inch to 1.5-inches of runoff from all Directly Connected Impervious Area (DCIA)
2. Lowering the Water Quality slow release rate requirement from 0.24 cfs/acre to 0.05 cfs/acre for DCIA in the combined sewer area
3. Requiring that 100% of non-infiltrated Water Quality volume pass through soil vegetation or equivalent filter device to meet pollutant removal requirements in the combined sewer area

Regulatory Change Analysis

We understand the significance of these potential changes. We also want to document and better understand their potential impacts on the development community and to discuss these issues with the DSC. To that end, we have been working with a technical consultant for the past six months to look at sixteen representative development sites with approved stormwater management designs. The sites were selected based on development type, size, and density, compliance approach and watershed. We also considered additional stormwater regulation components such as Channel Protection and Flood Control. For each site we have modeled fifteen different impact scenarios and we are currently evaluating the results. At our fall DSC meeting we will discuss the regulatory changes and the results of our very detailed analysis. We look forward to our discussion together.

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Submit Your Feedback

As part of the updates to the Stormwater Regulations, PWD is soliciting feedback on the current Guidance Manual. As of June, fifteen of the top twenty most frequently submitting engineering firms have responded with feedback about commonly used manual sections, policies in need of clarification, and requests for future manual content. To provide feedback on the manual, please email Vicki Lenoci at Victoria.Lenoci@phila.gov prior to September 1, 2014.

Plan Review Website Updates

PWD plans to add resources to the Plan Review Website towards the end of the summer. This will include revisions to regularly used forms including the Construction Certification Package and Checklist B, and an updated design guidance document as well as important resources for other PWD units. PWD will notify the development community when the update is complete.

Contract Kickoff for Regulatory Support

PWD has hired a consultant team to support the Stormwater Management Regulations update. To ensure the successful implementation of regulatory changes, PWD is seeking to make improvements across the entire program. We will:

- Evaluate existing technical policies and procedures, including a targeted analysis of Plan Review policies as they relate to the potential regulation changes.
- Update the Guidance Manual to reflect the potential regulatory changes as well as improvements to procedures and policies to ensure the manual remains a relevant resource for the development community.
- Explore incentives to incorporate into the Plan Review process, including expedited reviews based on SMP type as well as policies that allow “multiple paths to compliance.”
- Develop a modern Plan Review website that promotes easy access to relevant information, and one that is consistent with the updated Guidance Manual.

We recognize that with any significant change there is a need for the Department to engage in extensive outreach. We will continue our dialogue with the development community about the changes to the Stormwater Regulations through focus groups, surveys, workshops, presentations and news outlets.

Survey Results

In March we asked DSC members to answer survey questions about the DSC. Here is what you had to say:

- 100% of respondents find the DSC useful. Attendees said they appreciate the opportunity to communicate concerns and ideas, share input on potential changes, and understand perspectives from various audiences.
- Survey respondents ranked “manual improvements and process incentives” as the most relevant topic to discuss going forward.
- More than 85% of respondents feel that it is important to understand the technical basis for PWD’s design criteria, and are interested in an engineering discussion on each criteria.
- A majority of respondents agree with PWD in making green stormwater design a priority in the Plan Review program and members are interested in the expansion of expedited plan reviews for the use of green stormwater management practices.
- Over 85% of respondents are interested in PWD analyzing stormwater management costs for private development, and 60% are willing to offer private cost information.

Using the survey results as a guide, we plan to emphasize the technical basis for our decision making and seek the most input from the DSC on manual improvements and enhancements to the Plan Review process. Your feedback will not only influence our fall DSC presentation and future discussions, but will also impact how PWD progresses with the regulatory update.

Review Times

PWD strives to provide efficient and consistent review responses for all projects. In the first half of 2014, PWD reviewed more than 75% of conceptual review projects within 5 days or less and PWD reviewed 95% of technical review projects within 15 days or less.

Stormwater Pioneers

PWD is developing a recognition program to celebrate the best in stormwater management on private property. Each year PWD will select a few development or retrofit projects that demonstrate innovation, excellence, the ability to overcome technical challenges and dedication by the property owners, developers and designers to improving the environment and reducing stormwater runoff. Stormwater Pioneers will be recognized on PWD’s website, in our blog posts and emails to the development community and in local news articles. Stay tuned for the naming of our first Stormwater Pioneer this fall!