



September 13, 2019

Lucinda J. "Cindy" Darrah  
492 Peterboro  
Detroit, MI 48201

Re: Public Comment – Questions to the DWSD Commission and Drainage Personnel

Dear Ms. Darrah,

Please accept this letter as a follow-up to your inquiries dated August 20, 2019 addressed to the City of Detroit, Board of Water Commissioners (BOWC). In your comment, you expressed concern regarding the information you received from the DWSD Consultant, OHM Advisors (OHM) during the Site Assessment/Engineering Analysis process at 492 Peterboro.

As advised by OHM, the site has insufficient space for installation of a new cost effective Green Stormwater Infrastructure (GSI) stormwater management practice. Therefore, OHM was unable to proceed or recommend any new GSI installation for the site. OHM also had several interactions with you in regards to the Site Assessment/Engineering Analysis for your property at 492 Peterboro to convey their findings/observations to you and further explain the site limitations.

Based on the existing conditions, the parcel may be eligible for a reduction in the impervious area (IA) and a Drainage Charge Credit for disconnected downspouts. Please fill out and submit the attached applications for IA Adjustment and Drainage Charge Credit with the required information and relevant photos. The applications can also be downloaded from [www.detroitmi.gov/drainage](http://www.detroitmi.gov/drainage).

### **Response to Items in the Letter**

Paragraph 1: "OHM told me my land was too small at 492 Peterboro to qualify for any of 40% annual rainfall credit."

*DWSD Response: Per our GSI Practice Guidelines, stormwater management practices (i.e. retention/detention) have a required setback of 10 feet from buildings, DWSD sewers, and parcel boundaries. No area meeting these criteria is available on the parcel at 492 Peterboro for a cost effective GSI.*

Paragraph 1: "OHM said a 4,500 gallon cistern used to flush toilets would qualify for the 40% 100 yr. event rainfall credit. Can this cistern not also qualify me for some or all of the annual stormwater credit?"

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*DWSD Response: The volume credit is for stormwater Retention, meaning water that does not enter our system; given the site limitations described above, this may not be possible. The suggested cistern, if installed, may qualify for a peak credit (Detention) up to a maximum of 40%, subject to the cistern design and capacity. Please note that because of the site constraints, a cistern would not be a cost effective GSI for the site.*

Paragraph 2 & 3: "OHM also told me that I cannot do a drainage field within 10' of my building or my sewer. I asked them if that was in the code, or where that was in writing. No response. I asked them whose policy this was; they said it was theirs; I said you contract with DWSD so it's their policy.

I went to the the plumbing inspector in the 4<sup>th</sup> floor Building & Safety Dept. He said there is nothing in the plumbing code prohibiting me from putting a drainage field over my sewer. My backyard is 14' wide and the sewer goes down the middle. If I stay more than 10' away from my building and 10' from the steel fire escape, I would be putting a drainage field over my sewer which is 10' or more deep by then."

*DWSD Response: Per our GSI Practice Guidelines, stormwater management practices (i.e. Retention/Detention) have a required setback of 10 feet from buildings, DWSD sewers, and parcel boundaries. There is no limitation on infiltrating over a private sewer. However, drainage credits will depend upon whether stormwater is being sent into DWSD's sewer system. Please note that per the current DWSD Drainage Policy, infiltrating GSI is not allowed in the right of way or street where DWSD infrastructure exists.*

The above responses, DWSD Drainage Team believes, should address your concerns; however, if you wish to have a meeting to further discuss the site assessment, please contact the Customer Care Team at 313-267-8000 (option 6) to schedule a meeting with DWSD Drainage Team.

Respectfully,

*Lisa Wallick*

Lisa Wallick, P.E.

Stormwater Management Group Program Manager

Cc: Board of Water Commissioners