



POLICY STATEMENT AND CLARIFICATION

SUBJECT: DISCREPANCY BETWEEN DETENTION REQUIREMENTS AND WATER QUALITY REQUIREMENTS
DATE: APRIL 11, 2017

OVERVIEW:

The Colorado Springs Drainage Criteria Manual (DCM) Vol. 1 & 2 are in conflict regarding the definition of when detention is required, "Sites larger than 1 acre," and when water quality provisions are required, "Construction activities that disturb greater than 1 acre." It is believed that the intent of the DCM is to be consistent in these two definitions. As such, the question was discussed with the Colorado Department of Public Health and Environment (CDPHE) via telephone.

DETAILS:

DCM Volume 1

6.4 Detention Requirements

Detention facilities shall be provided for all new development sites larger than 1 acre unless an approved basin plan includes the site being developed. In cases where project-specific conditions cause detention to be infeasible or ineffective, a variance may be requested. Water quality treatment will be required as describe in Volume 2 of this Manual and may or may not be related to detention requirements.

6.4.2 Site Redevelopment

The redevelopment of a site of 1 acres or less shall not require on-site detention to be provided. The redevelopment of a site larger than 1 acre may require on-site detention to be provided if the downstream drainage system is shown to be inadequate to convey storm runoff for the entire site in compliance with this Manual. Increasing the capacity of the downstream conveyance system may be an alternative to onsite detention.

6.4.3 Site Expansion

Expansion of a site occurs when the impervious area on a partially developed site is increased by greater than 50% of the initial impervious area. The expansion of a site of 1 acre or less shall not require on-site detention to be provided. If the property is larger than 1 acre, there are two conditions that determine the on-site detention requirements.

DCM Volume 2

4.0 Four Step Process to Minimize Adverse Impacts of Urbanization

... The Four Step Process, as illustrated and described in the following, is applicable to all new and re-development projects with construction activities that disturb 1 acre or greater or that disturb less than 1 acre but are part of a larger common plan of development or sale.

1.0 Overview

... All new and significant redevelopment with construction activities that disturb equal to or greater than 1 acre, including projects less than one acre that are part of a larger common plan of development or sale must assess the existing and planned water quality treatment for the drainage basin in which the development lies.

POLICY:

Based on the consistent use of "Site disturbance greater than 1 acre" throughout the DCM, Urban Storm Drainage Criteria Manual and the MS4 permit, as well as conversations with Nathan Moore at CDPHE the definition of detention requirement will also be defined by site disturbance rather than site size.