


City of Alexandria, Virginia

MEMORANDUM

MEMORANDUM TO INDUSTRY NO 01-18

DATE: JANUARY 24, 2018

TO: DEVELOPERS, ARCHITECTS, ENGINEERS, AND SURVEYORS

FROM: WILLIAM SKRABAK, DEPUTY DIRECTOR, INFRASTRUCTURE AND ENVIRONMENTAL QUALITY, TRANSPORTATION AND ENVIRONMENTAL SERVICES 

SUBJECT: USE OF MANUFACTURED/PROPRIETARY STORMWATER BMPS

BACKGROUND: Stormwater Best Management Practices (BMPs) are facilities that are designed to treat stormwater before it is discharged into local waterways such as the Potomac River and Chesapeake Bay. These facilities remove pollutants such as phosphorous and nitrogen from runoff which improves water quality and helps the City to meet its Chesapeake Bay TMDL pollutant removal requirements. The City includes the implementation of new BMPs on development and redevelopment sites in its Chesapeake Bay Action Plan as a primary resource for meeting TMDL pollutant removal requirements.

RATIONALE: Manufactured Treatment Devices (MTDs), also referred to as proprietary stormwater BMPs, are commercially fabricated products that are used to treat stormwater runoff. While these devices have received interim approval from the Virginia Department of Environmental Quality (DEQ) via the Virginia BMP Clearinghouse to address state phosphorus reduction requirements for development and redevelopment, MTDs are not recognized by the U.S. Environmental Protection Agency (EPA) Chesapeake Bay Program as approved stormwater BMPs to be used for addressing pollutant removal requirements for the Chesapeake Bay Total Maximum Daily Load (TMDL). Further, MTDs do not reduce the volume of stormwater runoff. The continued use of these devices within the City of Alexandria for stormwater treatment hinders the City's ability to meet the Chesapeake Bay TMDL requirements.

Nonproprietary surface BMPs include all nonproprietary BMPs approved by the Virginia BMP Clearinghouse excluding sand filters. These include traditional BMPs such as wet ponds and wetlands and as well as urban green infrastructure BMPs such as green roofs, bioretention, and permeable pavement. These practices are approved by the EPA's Chesapeake Bay Program for pollutant removal. In addition to their water quality benefits, these practices provide increased quality of life benefits such as green space and wildlife habitats while often having lower life cycle costs than MTDs. Prioritizing the use of these practices is consistent with the City's Eco-City Charter guiding principle of protecting our water resources through the use environmentally responsible stormwater control, while addressing our Chesapeake Bay pollutant removal requirements.

ACTION REQUIRED: Beginning with the effective date of this memo for all new development and redevelopment:

- A minimum of 65% of the total phosphorus (TP) removal required by the Virginia Stormwater

Management Program (VSMP) must be achieved using nonproprietary surface BMPs approved by the Virginia Stormwater BMP Clearinghouse.

- A maximum of 35% of the TP removal required by the VSMP may be achieved using MTDs and/or sand filters approved by the Virginia Stormwater BMP Clearinghouse.
- Any approved BMP may be used to meet the balance of the Alexandria Water Quality Volume Default (WQVD).
- MTDs may not be used on single-family detached residential projects.

Concept 1 site plan submittals with conceptual stormwater layouts are encouraged to ensure plans meet these requirements early in the site plan process. This layout includes approximate locations and types(s) of facilities proposed. Projects must demonstrate compliance with the policies in this memo during the site plan process no later than Verification of Completeness for site plans and Final 1 for grading plans.

EXCEPTIONS: May be provided on a case-by-case basis where physical site constraints exist, such as high groundwater tables, that limit or preclude the use of nonproprietary, surface BMPs. A request must be submitted for the use of MTDs using the City's form to be approved by the Director of T&ES or his or her designee.

EFFECTIVE DATE: Site plans that submit a concept plan on or after April 1, 2018, must comply with this policy. Grading plans that submit a final 1 plan on or after April 1, 2018 must comply with this policy.

- Site plans that have submitted a concept plan and grading plans that have submitted a Final 1 plan, but that have not yet been accepted by the City: Applicant must work with staff to maximize compliance with this policy.