



December 2, 2020

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MA Stormwater Advisory Committee
Massachusetts Department of Environmental Protection
1 Winter Street
Boston, MA 02108

RE: DCR Comments on proposed stormwater design regulatory changes

Department of Conservation and Recreation (DCR) has the following comments on the changes proposed by MassDEP related to stormwater management design.

A. Precipitation Projections

DCR's Office and Dam Safety and Flood Control have been embracing National Oceanic Atmospheric Association Atlas 14-Precipitation-Frequency Atlas of the U.S. Volume 10, Version 3.0: Northeastern States (NOAA Atlas 14) precipitation projections for some time and we are in favor of the Massachusetts Stormwater Handbook including the use of the Atlas 14 for hydrologic and hydraulic analyses. Just like Atlas 14 has been peer reviewed, we strongly encourage MassDEP to have the NOAA 14+ approach peer reviewed to fully vet the approach, gain support from the climate change community and understand the impacts on other stormwater design criteria and permitting (e.g. Bordering Land Subject to Flooding (BLSF) and Isolated Land Subject to Flooding (ILSF) and vernal pools boundaries; culvert hydraulic design) before it is adopted.

MassDEP should have a peer review performed on the NOAA 14+ approach.

B. Alignment with MS4 Permit

It was DCR's understanding that the main goal of these proposed stormwater standards changes was for alignment with post-construction treatment requirements in the MS4 permit. Instead the changes in the presentations include more stringent requirements for some standards that will make the implementation of the two criteria difficult and confusing. We have the following overall comments.

- Maintenance or improvement of existing roadways: Based on the existing Massachusetts Stormwater Handbook projects that are purely maintenance or improvement of existing roadways (i.e., widening less than a single lane, adding shoulders, correcting substandard intersections, improving existing drainage systems, and repaving projects) are considered redevelopment and required to meet the structural requirements of Standard 4 to the maximum extent practical (MEP). Similarly, the MS4

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