

#### Town of Greenwich Drainage Manual

Low Impact Development and Stormwater Management





February 2012



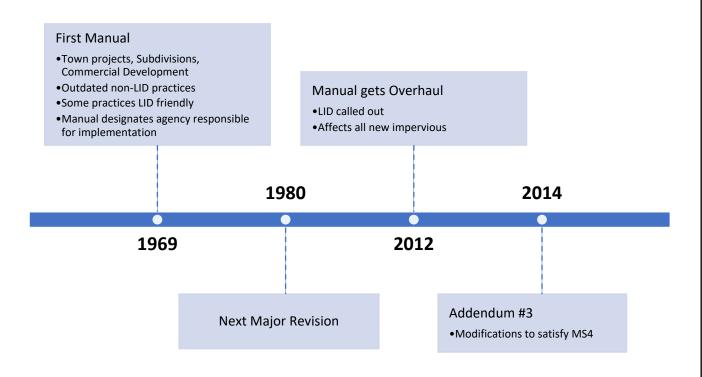
#### **December Disconnection Workshop Series**

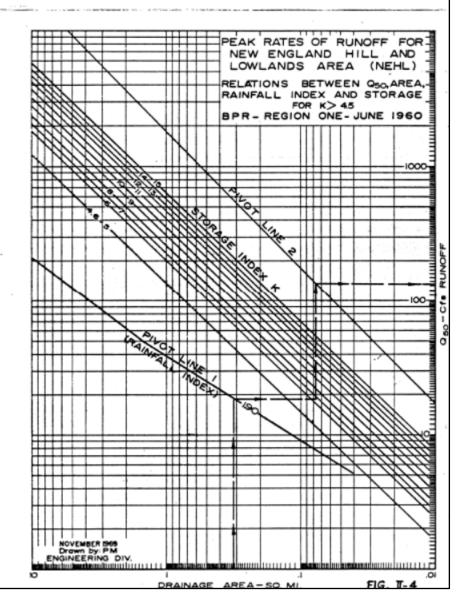
#### LID Implementation

December 2, 2020

Patricia Sesto Director of Environmental Affairs Town of Greenwich

#### Long History of Stormwater Management Requirements







## 2012 Drainage Manual

- Completely new manual
  - Coming MS4 precipitates action
  - Comprehensive
  - Municipal stakeholder input
  - Contracted with engineering firm to develop
  - Explicit priority for LID 60% requirement
  - All new impervious surfaces subject to review

## Implementation of Manual

- In Plan of Conservation and Development
- Regulators
  - Planning and Zoning Commission
  - Inland Wetlands and Watercourses Agency
  - Building Division
- All rely on staff engineers for review
- Manual only as good as its supporters

Inland Wetlands & Watercourses Agency
Application Checklist

#### And the following, as listed:

- \_\_\_\_\_ 11. Complete Set of Site Plans, including Erosion and Sedimentation Control Plan; (3 copies)\*
- 12. Evidence of compliance with the Town of Greenwich Drainage Manual including engineering reports, analysis and additional drawings; (2 copies)
- \_\_\_\_ 13. If applicant is not owner of the property, a letter of consent from the owner authorizing the applicant to act as the owner's agent; (the original letter signed by the owner)

# Requirements based on impervious coverage

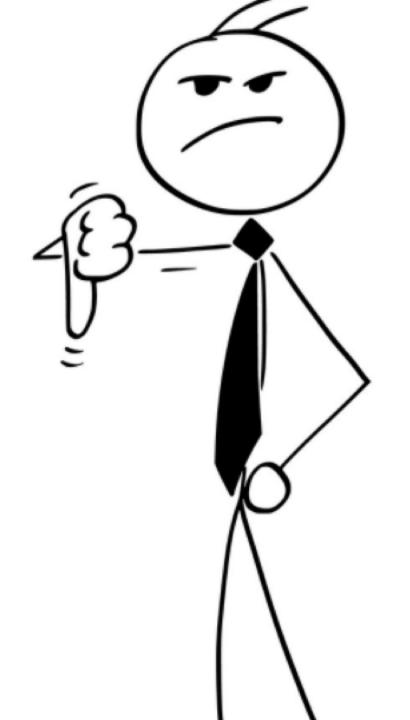
- Under 500 s.f. exempt
  - Requires engineer certification
- 500 1,000 s.f. disconnections
  - Requires plan and engineer certification
- Over 1,000 s.f. full management plan



### Allowances and Exemptions



- Exemption for 1,000 s.f. of new impervious coverage is cumulative
- Teardown exemption
  - Must keep to pre-existing footprint size
- Can remove existing impervious surface to compensate for new
- Decks can be considered pervious <u>if</u> area below is prepped



### Pushback and Burden

- Engineers had and still have lots to say
- Occasionally Manual requirements conflict with land use goals
  - Clearing more land to accommodate stormwater controls
- Cost added to project
  - Engineering
  - Stormwater management system

## Regulatory Shortcomings



Regulators not very good at enforcing subjective aspects

- Limit envelope of disturbance
- Maintain existing topography

Doesn't necessarily limit development

• If I can afford it, I can do it

Need to rely on consulting engineer if no staff resources available to verify manual compliance



#### Favored LID

- Rain gardens are #1
  - Lawn is technically allowable
  - Soil mixture equivalent to a sand trap needs revision
  - Can be under-drained and lined
  - P&Z and IWWA work to maximize value beyond Manual minimums
    - Consultants need to be reminded the Manual is not the last word



#### Favored LID

- Porous Pavement #2
  - Doesn't take up yard space
  - Options for its finish porous asphalt, pavers, gravel
  - Easy box to check
  - Not so sure about it's long term success



#### Short & Long Term Enforcement

- Permit conditions of approval
  - Require engineer sign off
    - Stormwater management system
    - Soil decompaction
    - Conditions must be met for bond release
    - Building Division won't issue building permit
- Deed restriction
  - Filing on land records required maintenance declaration
  - Filing includes 5-year maintenance submission
  - IWWA sends out reminder letter 80% compliance
- Homeowners' guide to management features
  - Questionable value, but it can't hurt



Lastly, Imperfections

- Applications to Building Division only no staff review
  - Report useful when something goes wrong
- No installation inspections
  - rely entirely on engineer of record
- No comprehensive follow up
  - Only IWWA sends letters
- No clear path for enforcement of 5-year inspections



#### Thank you!

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https://www.greenwichct.gov/242/Stormwater-Drainage-Manual