



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Horacio Tablada, Secretary
Suzanne E. Dorsey, Deputy Secretary

December 12, 2022

Dear Stakeholder Consultation Group Members,

The Maryland Department of the Environment (MDE) thanks you for your participation in the Advancing Stormwater Resiliency in Maryland (A-StoRM) Stakeholder Consultation Group. Having served on many of these types of workgroups myself, I sincerely appreciate the time and effort you have contributed.

Your work helps ensure our vulnerable communities and the Chesapeake Bay remain resilient in the face of climate change. The solution to flooding in Maryland will require a holistic and comprehensive effort that includes collaboration at all levels of government and with multiple stakeholders. Stormwater management plays a critical role in that effort.

As a member of the Stakeholder Consultation Group, you participated in three group meetings where MDE: (1) presented the stormwater driven flooding problems in Maryland; (2) identified potential regulatory and programmatic gaps; and (3) emphasized the need for data, tools, technology, education, and funding. MDE also presented the role Maryland's state stormwater management regulations play in developing solutions. Recordings for all three meetings are available on the [A-StoRM Hub](#) webpage.

Currently, MDE is requesting your feedback on the impacts of two proposed conceptual changes to the State stormwater management requirements. Implementing these changes will require an extensive effort to modify a number of sections and details in the [2000 Maryland Stormwater Design Manual](#) (Design Manual). Over the next few months MDE will develop draft revisions to the Design Manual that will be needed to implement these proposed changes. Once specific Design Manual changes are completed, MDE will provide you another opportunity for comment prior to any official posting for public comment.

The proposed conceptual changes were presented at the November Stakeholder Consultation Group meeting and are described below. Please refer to the recording of the November 15, 2022, meeting for further details.

1. Update design storm rainfall depths using 2006 Atlas 14 average values for each county.

MDE has identified the National Oceanic Atmospheric Administration's (NOAA) Atlas 14, Precipitation-Frequency Atlas of the United States, Volume 2, Version 3.0 (Geoffrey M. Bonnin *et al.*, 2006) (hereafter referred to as Atlas 14) as the most recent precipitation information for Maryland. MDE's conceptual proposal is to replace the design storm rainfall depths currently listed in Table 2.2 of the Design Manual with an updated table based on the Atlas 14 data. See the attached draft *Table 2.2 Rainfall Depths Associated with the 1, 2, 10 and 100-year, 24-hour Storm Events*, as updated based on Atlas 14. The original Table 2.2 is also attached, excerpted from the Design Manual. This draft Table is not an official draft of proposed regulations.

2. Increase the required ESDv to treat runoff from a rainfall depth of 3 inches. Currently the Design Manual requires a minimum environmental site design volume (ESDv) to be treated based on a rainfall depth of 2.7 inches. Numerous sections, graphs, and examples included in the Design Manual utilize the 2.7-inch standard. Because the Design Manual is incorporated in the Maryland Code of Regulations by reference, an update to the Design Manual will be necessary and will be referenced in the regulations as Supplement 2. An extensive amount of editing will be needed to make this change and the regulations will be modified to replace Supplement 1 with Supplement 2. Prior to making these extensive edits to the Design Manual, MDE would like to receive any comments you have on the impacts of this conceptual change. If MDE decides to go forward with these regulatory changes, a draft of Supplement 2 of the Design Manual will be provided to you in the future for consultation.

In addition, MDE welcomes any comments you have on stormwater quantity management beyond the two proposed conceptual changes outlined above. This includes: (1) considering if new information, such as meso-scale precipitation data, should be applied to better characterize rainfall patterns in Maryland; (2) whether MDE should set minimum State standards for conveyance system design; and (3) if shorter duration storms should be incorporated into future State regulatory requirements.

MDE asks that you submit any comments by February 15, 2023, to Raymond Bahr at raymond.bahr@maryland.gov. This date was extended to allow everyone sufficient time to review the information. Please note that the formal public promulgation process has not started yet. Currently, these are draft concepts solely under internal consideration and specific changes to the Design Manual will be developed and presented to you in a follow up correspondence. A formal public review and comment period for changes to the regulations is anticipated in 2023.

This concludes MDE's first phase of the formal Stakeholder Consultation Group process. MDE does not anticipate formally meeting with this group in the near future. However, as MDE proposes additional concepts and changes to State stormwater regulations regarding flooding, MDE will look to re-engage this Stakeholder Consultation Group and hope that you will be willing to participate with us in support of those efforts.

Again, please submit all comments by February 15, 2023. Any questions should be directed to Raymond Bahr at 410-537-3545 or raymond.bahr@maryland.gov. Thank you for your participation.

Sincerely,



Leslie Knapp, Jr.
Senior Local Advisor
Maryland Department of the Environment