



---

## SMSWG MEETING VIA ZOOM – NOTES

Wednesday November 17, 2021 12:45-2:15 pm

---

### Anticipated Attendees:

Berwick – Tammy Bellman  
South Berwick – None  
Eliot – Steve Robinson, Sara Ouimet, Doug Blaisdell  
Kittery – Jessa Kellogg  
GZA – Aimee Mountain  
Maine DOT – Kerem Gungor  
MTA – Sean Donohue  
SMPDC – Abbie Sherwin  
PNSY – Adam Gagne  
York – Leslie Hinz, Dean Lessard  
Maine DEP – Rhonda Poirier  
Integrated Environmental Engineering, Inc. – Kristie Rabasca  
Pixels and Pulp – Elise Weeks, Danielle Hunter

### 1. Permit Year 9 activities:

#### a. Public Education:

##### i. Pixels and Pulp Update

- KR Intro – Elise and KLR worked together last spring and collaborated on Litterati app – reached out to improve the look and feel of the public education work that we do. Phase 1 – look and logo, phase 2 – develop templates for us to use in creating social media posts, website announcements and advertising our public participation activities.
- Pixels and Pulp Presentation/Discussion – Elise gave a brief intro and walked through process for developing logo/branding. Presentation included description of SMSWG, audiences, brand personality, logo attributes, and emotional attributes. Showed 2 logo concepts with some variations: (see attached presentation).



- :
- There was some general discussion and feedback: Jessa prefers concept 1B, Rhonda prefers concept 1B with the font from 1A, Dean wonders if the CB design will get confused with sewer,

Leslie prefers concept 1B, Aimee prefers 1B, Tammy prefers concept 2 as concept 1 looks like a sewer manhole. Kristie will take email feedback from everyone and consolidate and send the comments to Pixels and Pulp by November 29, 2021.

- ii. YardScaping Spring 2022: The remaining workshops for PY9 have been scheduled: Marshwood Adult Ed, Spruce Creek, and York Adult Ed (Lawns to Lobsters). See dates and times at end.
- iii. Litterati Update – SMSWG and ISWG were sharing a \$250/year license for PY8. We were notified by Litterati in October 2021 that costs were increasing to \$1000/year, and that we could no longer share the license (have multiple admins on our account). We agreed to pay \$500 per year each for a license for PY9, and asked Litterati to hold the future pricing (No price increases) to the \$1000 per year (\$200 per community for SMSWG) for the next 5 years to get us through the permit cycle. Ali Clift (ISWG Public Education Coordinator) and I let them know we were very disappointed in the change. We (Ali Clift and I) are assessing alternative platforms. We have a call this Friday 11/19 to review two more at a lower cost. Jessa Kellogg: Do we have to be tied to what ISWG does? KR: SMSWG doesn't have to choose the same option that ISWG chooses. More to come via email
- iv. Municipal meetings: - PBs will be done as part of Ordinance updates.
  - Post meeting note: Berwick: Selectmen meeting was held 7/13/2021.
  - Kittery and SB Town Council were waiting until after elections. Schedule in January?
  - Berwick - T. Bellman would like an email regarding the Berwick Board's presentations and will see if a joint meeting is possible
  - York – looking for Joint PB/Selectmen meeting.
- b. Construction/Post Construction –
  - Ordinance Updates – Abbie provided update: Phase I, we created a checklist for construction ordinance requirements, and are working on Phase 2 portion of the Grant. A final draft of ESC model language went out for comment and lots of comments were received – Jim K will do legal review – draft in early 2022 anticipated. LID model ordinance will be developed in 2022, input from FOCB and CBEP? – plan to have final draft by end of summer 2022 to meet the Permit Modification requirement to submit it to Maine DEP by 9/1/2021 (see discussion below in DEP Updates for MS4 Permit).
- c. IDDE
  - i. GIS updates (Maine DOT and others)
  - ii. Kerem Gungor: DOT made MS4 map available online when preparing NOI for MS4 permit. Work is continuing on updating the map – trying to

find agreement between municipal and MaineDOT mapping at interconnections. Urban compact areas can be confusing as to maintenance responsibility, trying to make sure efforts are not being duplicated and infrastructure is not being missed.

- d. Pollution Prevention Good Housekeeping
  - i. SWPPP Updates – Kittery, Berwick, and Eliot mostly complete, South Berwick up next.

2. Permit Renewal/DEP Update –

- a. Draft Permit Modification proposed 9/14/2021 by Maine DEP. Updated 9/24/2021. Stakeholders worked to update language. EPA, DEP and representatives from MS4s on call 10/20/2021. Most MS4s, DEP, EPA and FOCB agreed to alternative language from what was proposed 9/24/2021 (see attached comment letter).
  - i. Low Impact Development Model Ordinance will be due to DEP 9/1/2022 (developed under Coastal Communities Grant) There was discussion about who would receive the Ordinance. That should be resolved when a new Coordinator is hired (see item C below).
  - ii. DEP will review, post for public comment, and approve before November 2022 (Note our comment letter specified 11/1/2022, but DEP indicated the new date may be 11/24/2022).
  - iii. MS4s may then incorporate the requirements into their ordinances.
- b. DEP is reviewing PY8 Annual Reports
- c. Municipal and transportation DEP Orders should be issued by 12/30/2021,
- d. State/Federal NOIs are due 12/31
- e. Rhonda Poirier, DEP Stormwater Coordinator, is retiring 12/30/2021.

3. Attendee updates

- a. Eliot – None
- b. Kittery – finishing paving 103 from Kittery point bridge to town line – lined 11 failing pipes. TV'ed Route 1 corridor which is set for MaineDOT work. IDDE work in Admiralty village.
- c. York – Seawall work started after labor day, just placed curb for sidewalk on Nubble road project, hope to complete in early December. CB cleaning is almost done. 4<sup>th</sup> DEP smart stream grant for culvert on Josias river
- d. S. Berwick – None
- e. Berwick – Tammy will check in with Kristie after this meeting
- f. Others present: MTA York toll work is still in progress and includes SW buffers and USFs, 14 BMPs were (or will be) implemented as part of that project
- g. PNSY – NOI is underway, lots of construction for the next several years.

## **SMSWG Agenda – 11/17/2021**

### **Upcoming Dates of Interest:**

12/7/2021 – LID Ordinance Committee Meeting

4/5/2022 – YardScaping Marshwood Adult Ed 6:30 – 7:30 pm

4/7/2022 – Lawns to Lobsters York Adult Ed 12-1pm

4/12/2022 – Lawns to Lobsters York Adult Ed 6:30 – 7:30 pm

### **Next Meetings:** (late Wednesday of Jan, Mar, May, July, Sept, Nov)

Wednesday January 19, 2022 – via Zoom again

Wednesday March 23, 2022 – via Zoom again

## Kristie Rabasca

---

**From:** Kristie Rabasca  
**Sent:** Monday, October 25, 2021 2:19 PM  
**To:** Wood, Gregg  
**Cc:** 'jcooper@oobmaine.com'; 'mfoster@oobmaine.com'; 'bnp@portlandmaine.gov'; 'Doug Roncarati'; 'NEG@portlandmaine.gov'; 'rkelton'; 'JKEENE@portlandmaine.gov'; 'Joseph A. Laverriere'; 'pfox@sacomaine.org'; 'ablanchette'; 'MShaw@scarboroughmaine.org'; 'SBuckley@scarboroughmaine.org'; 'jfitch@scarboroughmaine.org'; 'jotenti@smccme.edu'; 'dthomes@southportland.org'; 'Fred Dillon'; 'bweeks@southportland.org'; 'pruck@stillwaterenv.com'; 'robert.g.adams@maine.edu'; 'john.souther@maine.edu'; 'aaron.z.witham@maine.edu'; 'twilson@stillwaterenv.com'; 'edudley@westbrook.me.us'; 'KKelley@westbrook.me.us'; 'Lynn Leavitt'; 'drfortier@town.windham.me.us'; 'Gretchen A. Anderson'; 'Christine Rinehart'; 'sjohnson@yarmouth.me.us'; 'emoskowitz@gorham.me.us'; 'estreet@yarmouth.me.us'; Jessa Kellogg (jkellogg@kitteryme.org); Leslie Hinz (lhinz@yorkmaine.org); James Bellissimo; Amy Aiguier; Steve Robinson; 'planner@eliotme.org'; 'emoskowitz@gorham.me.us'; Ali Clift; Damon Yakovleff; Aimee Mountain (Aimee.Mountain@gza.com); Rebecca Graham; rebecca.graham22@gmail.com; Tony Plante (tplante@gpcog.org)  
**Subject:** Comments on MS4 Municipal Corrected Proposed Draft Permit Modification dated 9/24/2021  
**Attachments:** DEP Chapter 10 LID Draft 12-2-2020SM\_ISWGComments.docx

Dear Gregg,

Thanks for the opportunity to comment on the MS4 Permit Modification issued 9/14/2021 and updated 9/24/2021. We are providing comments on behalf of the Interlocal Stormwater Working Group (ISWG) and the Southern Maine Stormwater Working Group (SMSWG). Our comments are focused on the proposed changes to the MCM 5 language, item 5.a.i.

Background for our comments:

As you may be aware, the ISWG and SMSWG have received a Maine Coastal Program Grant to Develop an LID Strategies Model Ordinance. The results of that effort are scheduled to be completed by the summer of 2022.

We formed an Ordinance Committee in 2020, which recently completed a checklist and similar model ordinance to address the MCM 4 requirements. We are opening up the Ordinance Committee to all other MS4 clusters and have received confirmation that both AVSWG and BASWG will have representatives on the committee. The goal of the model ordinance is to address these MCM 5 requirements as well as to incorporate recommendations from the Governor's Climate Council. We have enlisted a technical review panel to assist in developing the standards for the model ordinance. The technical review panel includes Maine DEP Land Bureau Staff to ensure consistency with Maine Chapter 500 requirements.

We have asked the Department throughout this 5-year permit development process to update Chapter 500 so these types of requirements are not just applicable in the Urbanized Areas of the MS4 municipalities. We understand the Department's Land Bureau has said time and again they do not have sufficient staff to complete the update of Chapter 500 and incorporate meaningful standards around LID and the Governor's Climate Council actions. We sincerely hope that after the MS4s create the LID Strategies Model Ordinance that the Land Bureau will incorporate its changes into Chapter 500 to benefit the environment in all areas of the state, not just the MS4 areas. We do not agree with this method of updating state regulations (making the municipalities do the work first), but we currently do not appear to have any choice in the matter. We are renewing our request that DEP update Chapter 500.

This significant effort clearly demonstrates our commitment to responsibly and seriously implementing the MS4 permit requirements in order to make a real difference in protecting our natural resources from the adverse impacts of development and making Maine more resilient to the devastating effects of climate change. As such, we are providing the following comments on the MS4 Permit Modification issued 9/14/2021 and updated 9/24/2021.

Comment #1: Please change the language in MCM 5 item 5.a.1 to read as follows: (new text is shown in blue and underlined, text to be removed is shown in ~~strikeout~~).

## 5. MCM5 - Post-Construction Stormwater Management in New Development and Redevelopment.

Each permittee must implement and enforce a program to address post construction stormwater runoff to the maximum extent practicable from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development that discharge into the MS4.

- a. The Permittee must implement strategies which include a combination of structural and/or non-structural BMPs appropriate to prevent or minimize water quality impacts as follows:

*On or before September 1, 2022, each permittee must develop a Model LID Ordinance for stormwater management on new and redevelopment sites which establishes performance standards for each of the LID Measures contained in Table 1 of Appendix F. The Model LID ordinance should, at a minimum, refer to Appendix F for guidance.*

*The Model LID Ordinance shall be submitted to the Maine DEP for review by September 1, 2022. DEP will post the model ordinance for public comments and approve it, with or without modifications, on or before November 1, 2022.*

*On or before July 1, 2024 each permittee shall adopt an ordinance or regulatory mechanism that is at least as stringent as the required elements of the Model LID Ordinance or incorporate all of its required elements into the permittee's code of ordinances or other enforceable regulatory mechanism.*

We reviewed this language with Friends of Casco Bay Baykeeper Ivy Frignoca several times between 10/14/2021 and 10/20/2021, including a meeting where Newton Tedder (USEPA), Gregg Wood (Maine DEP), and some members from each of the other regulated clusters were present. This language is acceptable to ISWG members and SMSWG members and FOCB recently submitted comments requesting the permit be modified to include this language; however, the other MS4 clusters may or may not comment on this language.

We appreciate your time in reviewing this language with us.

Comment #2: Please update Table 1 in Attachment F to include several missing "Planning for LID" concepts in the narrative of Attachment F, and a few key missing measures and techniques that resulted from the deletion of Table 2. (see attached version with suggested edits in track changes).

Note that we have also adjusted the last portion of the table to show that the buffers, infiltration, underdrained grass filters, underdrained filter bioretention, roofline filtration, roof greening and pervious pavements are all Example Techniques that should be applied to a Measure, which we named: Stormwater Quality and Retention Requirements. As such we created this new Measure and moved these items into the Example Techniques column.

Comment 3: If you change the Permit to incorporate these comments, please note that changes will need to be made to the Fact Sheet (pages 2, 4 and 5 at a minimum) with the final text.

Thank you for the opportunity to comment on this permit modification. Please respond to me to let me know you received this.

Respectfully submitted,

Integrated Environmental Engineering, Inc. on behalf of ISWG and SMSWG.



Kristie L. Rabasca, P.E  
Integrated Environmental Engineering, Inc.  
12 Farms Edge Road  
Cape Elizabeth, ME 04170  
207-415-5830

## Low Impact Development (LID)

LID is a process of developing land that mimic the natural hydrologic regime. LID begins at the design phase of a new development, incorporating planning techniques that minimize site clearing and impervious surfaces to reduce impact and stormwater runoff generated from the site. By reducing the volume of water leaving a site, the pollutant loading is also reduced. Other techniques that will reduce the volume and peak flow rates of runoff from the development are then incorporated throughout the site. LID is an effective tool that reduces pollutant loading, thermal impacts, stream flows, and minimizes stream channel erosion.

LID is not a rigid set of standards or a one size fits all approach and has many benefits:

- **Benefits to the Developer:** The owner and developer will see reduced costs for land clearing and grading, infrastructure and stormwater management while seeing an increased aesthetic value in the development.
- **Benefits to the Municipality:** The local government and community will benefit from reduced infrastructure maintenance costs and reduces property damage from flooding while having more open space, protected natural resources and better quality drinking water.
- **Benefits to the Environment:** The hydrologic cycle is preserved; streams are less prone to erosion; and stream flows are maintained while benefiting fish and wildlife.

LID goals and objectives shall be incorporated into the site planning process as early as possible. The following steps serve as a guideline to use in the planning stage:

- Identify and preserve sensitive areas that will affect the hydrology of the site. Features that should be protected are highly permeable soils.
- Minimize site disturbance and impervious areas with an alternative layout for the development.
- Minimize the impervious surfaces directly connected to drainage conveyance systems to reduce the time of concentration.
- Break the site into smaller drainage areas that can be handled through basic LID practices

### PLANNING FOR LID

**Minimize Site Clearing:** Development typically involves new impervious surfaces such as roads and buildings and landscaped areas for lawns. Avoid developing high-permeable soils by protecting areas that are less sensitive to disturbance and that will sustain groundwater recharge and reduce runoff. For example, developing a vegetated, tight clay soil area will have less impact on stormwater runoff than developing a forested area on sandy soils. Once the sensitive areas have been identified, the layout of the development should be aligned with the conservation of these areas.

**Minimize Impervious Areas:** The traffic distribution network (roadways, sidewalks, driveways, and parking areas) is generally the greatest source of site imperviousness and these should be the focus for reducing impervious area.



- Alternative Roadway Layout: Alternative road layouts can be used to reduce total pavement, while allowing for the same amount of development. Clustering will decrease imperviousness.
- Narrow Road Sections: The width of pavement can be reduced by including the primary driving surface, a pervious base for the shoulders, and ditch drainage swale in place of curb and gutter.
- Sidewalks: Sidewalks should be reduced to one side of the road or be eliminated.
- On-Street Parking: Reduction to one side or elimination of on-street parking can potentially reduce overall site imperviousness by 25 to 30 percent.
- Rooftops: The number and size of buildings dictates the impervious area associated with rooftops and vertical construction is preferred over horizontal construction.
- Driveways: Minimizing paved driveway area can be accomplished through narrower driveways or length reduction. Shared driveways will also reduce imperviousness. In addition, pervious materials would minimize runoff.

**Minimize Connected Impervious Areas:** The impacts from impervious surfaces can be minimized by disconnecting these areas from piped drainage networks and by treating these at the sources.

- Paved driveways and roads should be directed to stabilized, vegetated areas.
- Flows from large paved surfaces should be broken up and for on-site treatment of smaller flows. Breaking flows up allows the flows to be directed to vegetation as sheet flow.
- LID techniques should be dispersed throughout the development, such as at individual house lots to obtain the most benefit. They can be incorporated into the landscaping of the property to provide a natural treatment system.

**Maintain Time of Concentration:** When development occurs, the time of concentration (Tc) is often shortened due from the impervious area, causing greater flows over a shorter period of time. LID practices can maintain the pre-development Tc by:

- Minimizing land disturbance,
- Detaining flows on site,
- Increasing the flow length,
- Increasing the surface roughness of the flow path,
- Creating flatter slopes, or
- Disconnecting impervious areas, which will decrease their travel rates.

**Manage Stormwater at the Source:** The impact from a development should be mitigated at the source by reestablishing a more natural hydrologic cycle that sustains a clean stream base flow. Typically, the most economical and simplistic stormwater management strategy is achieved by controlling runoff at the source with a variety of small treatment structures that will result in the reduction of stormwater discharge and more flexibility in the site design.

#### **Soil Considerations:**

- Minimize Compaction: Compaction reduces the natural infiltrating ability of soils; and disturbance from heavy equipment should be avoided. If possible, impervious surfaces and development disturbances should be directed towards the more impermeable soils of a site, leaving the pervious soils to continue infiltrating runoff.
- Increase Organic Content of Soils: When constructing many of the LID vegetated techniques, a quality topsoil is necessary to optimize pollutant removal. The soil bed should consist of at least 20-30% organic material and 30% planting or topsoil. This highly organic layer traps contaminants, absorbs more runoff and provides a medium for biological activity that helps break down pollutants. Planting soil provides a healthy growing medium for vegetation by encouraging strong root growth. In addition, microbes found in healthy soils transform nutrients for plant growth. Compost or other organic amendments can be added at the site preparation level, typically by the truckload. It is also available for little or no cost from many community leaf compost programs. For rain gardens and

bioretention areas, compost addition is also valuable in absorbing and retaining moisture for plant life, filtering pollutants and providing an active layer for microorganisms to reside and reproduce. A healthy microorganism population is key to the decomposition of many pollutants, whether in the home rain garden or in a parking lot.

· **Avoid Pesticides/Herbicides:** Healthy soil is alive with microorganisms that decompose and inactivate pollutants, but these may be killed by excessive chemicals. Although the soil microorganisms are not typically the target of these chemicals, many of them may fall victim to the use of pesticides. Additionally, insect species that prey on pests are also killed by pesticides. Since the predatory species tend to have slower reproduction than the pest species, a natural defense against insect pests may be lost.

## LID TECHNIQUES

Many of the LID techniques rely on infiltration, retention, and evapotranspiration of stormwater to reduce runoff. When infiltration is not a possibility, the initial planning techniques described above should be the primary focus, followed by the use of small disconnected underdrained systems that rely on soil and vegetation to retain runoff. Examples of LID measures and techniques are shown on Table 1.

- **Filters (Bioretention Cells and Rain gardens):** Bioretention areas or rain gardens are built with a specific soil filter media (containing organic material and planted with vegetation that can handle wet and dry conditions) that will reduce the volume of runoff through absorption and evapotranspiration. A slight depression allows the ponding of stormwater as it filtrates through the soil media and into the groundwater or to an underdrain for surface discharge..
- **Infiltration:** Infiltration reduces runoff and mimics the natural hydrologic cycle by redirecting water into the ground rather than to a piped system. It is best to use many smaller infiltration basins that fit into the natural landscape.
- **Buffers:** Vegetated buffer use soils and vegetation to remove pollutants from stormwater. Buffers can be used as a stormwater BMP for small developments by minimizing the amount of runoff generated through infiltration and evapotranspiration. Filter strips are typically used as pretreatment devices for bioretention cells and other infiltration practices.
- **Collection Cisterns:** In a commercial setting, the collection of rain runoff can be put to use in the building to off-set the cost of their water supply. Cisterns can be located either above or below ground, and in out-of-the-way places that can easily be incorporated into a site design. Commercially available systems are typically constructed of high-density plastics and can include pumps and filtration devices. Rain barrels are inexpensive, effective, and easily maintainable when used in residential applications to capture roof runoff for later watering of lawns and gardens.
- **Vegetated Rooftops:** Vegetated rooftops provide three primary benefits: attenuation of stormwater runoff and peak flows, reductions of the heat island effects with an increase in building insulation, and a longer life expectancy for the base roof material. The stormwater benefit is the smaller more common storm events are absorbed, minimizing peak runoff and the net volume of runoff typically produced by roofs.
- **Porous Pavement:** Porous pavement is a permeable surface (pervious asphalt, concrete or pavers), a granular base, and subbase materials which allow the penetration of runoff into the underlying soils. The efficiency of pavement alternative systems depends on whether the pavement is designed to store and infiltrate most runoff, or only limited volumes of runoff (e.g., "first-flush") with the remainder discharged to a storm drainage system or overland flow. Maintenance is essential for long-term use

and effectiveness. Pavement alternatives vary in load bearing capacities but are generally appropriate for low traffic areas such as sidewalks, parking lots, overflow parking and residential roads. It is important to choose a material appropriate for the desired use (light, moderate or heavy use).

*Other Techniques:* LID is about creativity. Multiple practices can be implemented and adapted into various sites and situations. However, they are mostly dependent upon the layout of the development and the disconnection of its individual elements.

**Table 1 – LID Measures and Techniques**

LID Measure	Example Technique	Design
<u>Minimize site clearing</u>	<ul style="list-style-type: none"> <li>• <u>Promote compact development on the site</u></li> <li>• <u>Place parking underneath or inside structures</u></li> <li>• <u>Avoid developing in areas with high-permeable soils to retain natural infiltration</u></li> <li>• <u>Align development layout with conservation of sensitive areas</u></li> </ul>	
Protect natural drainage system	<ul style="list-style-type: none"> <li>• Maintain a minimum 25 foot buffer on all natural water resources including intermittent channels</li> <li>• Do not divert stormwater from its natural sub-watershed</li> </ul>	<p>Design practices developed at the planning phase that will help mitigate environmental impacts. Ideally, these are cost-effective and environmentally friendly.</p>
Minimize the decrease in time of concentration	<ul style="list-style-type: none"> <li>• Break up or disconnect the flow of runoff over impervious surfaces</li> <li>• Sheet flow over pavement that is less than 100 feet</li> </ul>	
Minimize impervious area or the effect of impervious area	<ul style="list-style-type: none"> <li>• Go vertical with multi story buildings and parking garages</li> <li>• More than 25% of pavement area (overflow) in pervious pavement All pedestrian walkways are pavers or pervious pavement.</li> <li>• <u>Runoff from paved surfaces should be directed to stabilized, vegetated areas</u></li> <li>• <u>Disperse LID techniques throughout development and incorporate into the landscaping</u></li> <li>• <u>Infiltrate as much roof runoff as standards allow</u></li> <li>• <u>Minimize the use of paved areas (sidewalks, driveways and streets)</u></li> <li>• <u>Minimize the use of hardscaped areas.</u></li> </ul>	

Minimize soil compaction	<ul style="list-style-type: none"> <li>Minimize the construction window</li> <li>Rototilling all areas to be revegetated</li> </ul>	
Minimize lawns and maximize landscaping that encourages runoff retention	<ul style="list-style-type: none"> <li>Low maintenance Maine native plants</li> <li>No invasive plants</li> <li>No pesticides</li> <li>Fertilizer application only during initial planting and repair of damaged areas</li> </ul>	
Provide vegetated open-channel conveyance systems	<ul style="list-style-type: none"> <li>No curb/gutters and no roof gutters</li> <li>Level spreaders to buffers where possible</li> <li>Underdrained swales</li> </ul>	
<del>Rain-Collection Cisterns</del> <del>Rainwater is stored for later reuse for the building or landscape</del>	<del>Rainwater is stored for later reuse for the building or landscape</del> <del>Rain Collection Cisterns</del>	
<u>Stormwater Quality Treatment and Retention Requirements</u>	<u>Buffers</u>	<u>Design, size, install and maintain per the Maine recommended guidelines found in a document entitled <i>Maine Stormwater Management Design Manual, Technical Design Manual, Volume III, May 2016</i></u>
	<u>Infiltration (basins, trenches, dry wells, etc.)</u>	
	<u>Underdrained grass filters</u>	
	<u>Underdrained filter bioretention</u>	
	<u>Roofline filtration</u>	
	<u>Roof Greening</u>	
<u>Pervious Pavement</u>		

Formatted: Indent: Left: 0.07", First line: 0", Right: -0.01", Space Before: 0 pt, Line spacing: Exactly 11.3 pt, Tab stops: Not at 0.32"

