



City of Detroit  
Detroit City Council - District 4

## MEMORANDUM

DATE: September 18, 2025

TO: Gary Brown, Director, DWSD

FROM: Latisha Johnson  
District 4 Councilmember

A handwritten signature in cursive script that reads "Latisha Johnson".

**SUBJECT: Questions regarding stormwater management policy**

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Good morning, Director Brown,

We recently learned at a Green Task Force meeting that DWSD is considering amending the Post-Construction Stormwater Management Ordinance (PCSWMO). I am also interested in proposing policy changes to the City's stormwater management processes that address gaps in the current ordinance as well as providing new pathways to encourage Detroit property owners to invest in green infrastructure and stormwater management. Your responses to the questions below will help inform these proposals:

- What changes to the PCSWMO and other stormwater management program are you considering?
- How many developers have opted for the payment of a fee in lieu option for compliance, referenced in Section 48-2-107-b(3)? Please provide a list with the amount of fees paid.
- How many developers have opted for the off-site mitigation alternative compliance option referenced in Section 48-2-107-b(1). Please provide a list with the percentages and amounts of drainage fees saved.
- How are the drainage fees calculated for offsite mitigation measures?

- How many approved shared management practices for nonresidential buildings are there?
  - How are the shared investments and drainage fees calculated?
  - What is the typical reduction in drainage fees from a shared management practice?
- How many shared management practices or offsite alternative compliance measures have occurred on land not owned by the developer or property owner receiving the credits?
  - What entities own the land these projects are located on?
- Are shared management practices allowed on vacant residentially zoned land?
- What, if any, role does DWSD play in helping broker partnerships between institutions interested in shared management practices?
- Why is the highest reduction in drainage fees 80%?
- Can you provide some examples of properties that have implemented stormwater management practices, on or off-site, and how much money they have saved in drainage fee reductions?
- In general, how are drainage fees calculated? What rates are used to calculate them?
- How much does the City pay in drainage fees for the buildings it owns, and is the City participating in any shared management practices or stormwater management practices to reduce these fees?
- Why were parking lots and roads excluded from the Post Construction Stormwater Management Ordinance?
  - Could we compel the County and State to follow an ordinance if roads were included?
  - Why don't we use the half acre threshold for construction projects impacting parking lots and roads?
- In Sec. 48-2-107 (a)-(1)-b. how would adjusting the infiltration rate below or above .20 inches per hour change the ability to do Stormwater management on site?
- How many developments have met the definition of having “extraordinarily difficult site conditions?”
  - Has DWSD ever considered density or percentage of impervious surfaces surrounding the environment as an “extraordinarily difficult site condition?”
- What education and outreach programs does DWSD have for residential downspout disconnection?

- Has DWSD considered allowing residential properties to receive drainage credits for stormwater management practices? Are there other incentives or engagement strategies DWSD is considering that would encourage residents to help with stormwater management?

I look forward to collaborating with you and your team on this important matter. If you have any questions, don't hesitate to get in touch with Erin Stanley, Policy Analyst at [erin.stanley@detroitmi.gov](mailto:erin.stanley@detroitmi.gov).