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**To:** Rule, SW (DDOE)

**Cc:** Guidebook, SW (DDOE)

**Subject:**

**Agreeing** with the city on its plan to draft the regulatory requirement for new development and redevelopment projects to retain the volume of rainfall associated with a 1.2-inch storm, either on-site or through the use of off-site retention credits. This is both legally required (by the District's Municipal Separated Stormwater Sewer System, or the MS4) permit, and a smart approach to water management that will yield many benefits.

The lack of geographical restrictions on the location of credit-generating projects (in relation to the location of regulated, credit-purchasing sites) could lead to pollution hotspots or uneven environmental benefits, and could lead to failure to achieve the MS4 permit's 1.2-inch retention requirement if net retention were to be shifted outside the MS4 area into the combined sewershed.