

From: Scarlett Sinclair [mailto:sinclair.scarlett82@gmail.com]
Sent: Thursday, November 08, 2012 11:51 PM
To: Rule, SW (DDOE); Guidebook, SW (DDOE)
Subject: Stormwater Draft Comment

To Whom It May Concern:

I agree 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.

However, I am concerned that 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 sewer shed.

Payment-in-lieu fees should be collected in their own special revenue fund to ensure that they are only used to fund projects that achieve stormwater retention. An annual report should be produced to explain how these funds are being used. Projects funded through in-lieu payments should not be able to generate SRCs in order to avoid "double-counting" of required off-site retention volumes.

Thank you.

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