

LDC, Inc

Please see my attached comments.

Thanks!

Mark

Phase I, WW Phase II, and EWA PH II Formal Draft Comments

Document	Section	Page	Comment
Phase I	Controlling Runoff (WWA)	17	What is the applicability standards for projects in the middle of construction or permitting when these new requirements are adopted by the permitting jurisdictions? As was in the previous permit there needs to be a bright line of when and to what projects these new standards apply. For example if a project has started construction under the 2014 drainage manual and the local jurisdiction adopts the 2019 manual are any changes required to the design project to comply with this NPDES permit? Another example is a project has been submitted for preliminary plat approval and the permitting jurisdiction adopts the 2019 drainage manual does the applicant need to amend their project application to comply with the new manual?
WWA Phase II	Controlling Runoff (WWA)	33	What is the applicability standards for projects in the middle of construction or permitting when these new requirements are adopted by the permitting jurisdictions? As was in the previous permit there needs to be a bright line of when and to what projects these new standards apply.
Both WWA	Appendix 1	31	There should be a number of units or density of units per acre for multifamily projects. It doesn't make sense that a 3 unit townhome project needs to apply enhanced treatment.