

CSRWG 9 June 2008

Jackson

From: Robert H. Jackson [mailto:rjackson@coastalgroupllc.com]

Sent: Thursday, June 05, 2008 4:54 PM

To: tom.reeder@ncmail.net

Subject: BUA Stormwater Rule Amendment, LID Measures 6(c)

Tom:

As discussed last week, please see if your group can agree with a text change to include the following accommodation within ½ mile or outside a ½ mile of SA as to the **Low Density Option**,

- “Built-upon area of 12 percent (24 percent outside ½ mile) or less; (for the purposes of this Rule, all impervious surfaces which are attributable to residential lots that are part of a common plan of development may be excluded from the Built Upon Area so long as they comply with Rule 6(c) specified in Subparagraph (1), (2), or (3).”
- For the **High Density Option** you would simply add the LID measures in 6(c) to the list of control systems approved for residential lots within a common plan of development.

Benefits;

- Science shows the LID measures are beneficial in these applications and they promote on site treatment to specific lots thereby further limiting any pollutants from reaching the vegetative conveyances and/or stormwater controls as may be applicable and reduce the volume.
- The LID measures have been sanctioned by all the interested parties, EMC, ERC, RRC, EPA, DWQ and all the environmental groups and many other municipalities. In fact, this scientific approach is in the Rule anyway to protect runoff on projects that would otherwise not fall under the typical low/high density common plan of development criteria.
- The Applicant/Land Owner would have option of utilizing this approach and mandating legally each lot owner to comply with the applicable measures. Otherwise, the BUA would be calculated in the typical format and each lot would have an agreed upon allocation for their BUA (the way it is done today).
- Flexibility that benefits the environment and the land owner.
- Promotes best practices. Every new study, especially the Reduced Reduction Method, indicates that measures which are simple and disconnect rooftops from the overall volume of runoff are preferred. LIDs that reduce runoff volumes (for the entire site) can do a better job of replicating pre-development hydrologic conditions, protecting downstream channels, and recharging ground water.
- The better storm water designs are not being “credited” in the current Rules and little is available to provide incentives to land owners and developers to use innovative approaches that really do make a difference. This is an area where we can combat a one size fits all methodology to better the site specific performance.

Thanks in advance for your consideration.

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