



The following table lists the comments received by the Department of Watershed Management during the public comment period from April 21 to May 1.

Please contact Spencer Peck (speck@atlantaga.gov; 404-546-1203) with any further questions or concerns.

#	Source	Question or Comment	Response
*Note: Section 523 has now been moved to Section 516. References to sections 524 and 525 will now be sections 523 and 524 respectively.			
1	Virtual Public Meeting Q&A	The State SMP Document states that "Channel Protection (CPv) control is not required for post-development discharges (in the 1 year recurring storm) less than 2.0 cfs at each individual discharge location." Does COA still plan to allow this interpretation?	No. The City feels there is real benefit in extended detention, both within the separate and combined sewer basins.
2	Virtual Public Meeting Q&A	How much discretion will DWM have in making determinations of "feasibility"? Will applicants have to make detailed and credible showings of alleged infeasibility under oath	The language in the ordinance (Section 524) and the Feasibility Policies (Runoff Reduction & Linear Transportation Project) contain non-exhaustive lists of documentation, calculations, and evidence required to obtain an approved Determination of Infeasibility. The Commissioner or her/his designee will review and approve or deny the request based on relevant provisions of the City's Code, the applicable Feasibility Policy, other Department policies, and the request for Determination of Infeasibility as submitted by the Applicant or Owner. Certain components of the Request for Determination of Infeasibility must be signed and sealed by either a Professional Engineer or Registered Landscape Architect. The use of seals by these professionals are regulated by State law.
3	Virtual Public Meeting Q&A	Each "Alternative Compliance option indicates Extended Detention for 48 Hours as opposed to the standard requirement of 24 hours, and specifies the 25 year return frequency vs. the one year return frequency. Is this intentional?	Yes. The Extended Detention requirement found in the Section 525 has three purposes: 1. It reduces pressure on the City's stormwater infrastructure during major storm events by detaining large volumes on-site for longer periods. 2. The capacity freed as a result of the detention will reduce localized flooding and the costs to operate and maintain the City' stormwater infrastructure. 3. It encourages plans/systems to meet the Runoff Reduction Standard, especially systems that use vegetated green infrastructure.



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4	Virtual Public Meeting Q&A	Do trails have to comply as of now or not until 1 July?	New trails and multi-use paths will have to comply as of the date these updates are adopted by the City Council.
5	Virtual Public Meeting Q&A	If Alternative 3 applied for example, would 75% of the runoff need to be managed via off-site detention/infiltration?	Each Alternative in Section 74-525 requires the designer to attempt to meet iteratively smaller runoff reduction volumes. Alternative 3 requires the Applicant to manage 25% of the Runoff Reduction volume on-site. The remaining runoff reduction volume must be treated to remove at least 80% TSS, and the Development must meet the Extended Detention standard (48-hour detention of the 25-year storm).
6	Virtual Public Meeting Q&A	Does the infeasibility of vegetated GI have to be proven in order to be allowed to use dry wells on SF residential projects? It should.	No. As written, this is for commercial development only. We will review this recommendation.
7	Virtual Public Meeting Q&A	Does a pre-developed site undergoing redevelopment need to manage storm water so that it mimics natural runoff conditions?	Redevelopment does not have to meet a standardized pre-development curve number (for example, CN 55), but it does have to reduce the peak rate of discharge depending on the area of existing impervious surface present in pre-development conditions. See Overbank Flood Protection in Section 513.
8	Virtual Public Meeting Q&A	Do new single-family developments have to detain water run-off from driveways?	New construction or replacement of an existing driveway to access a Single-Family Residential Development, not including parking pads or similar areas, that are 12 feet wide or less where Runoff is directed via sheet flow toward vegetated areas at least twice as wide as the paved area are exempt from compliance. See Section 504(d)(14).
9	Virtual Public Meeting Q&A	How is maintenance of GI is enforced on single-family residential properties?	Formal maintenance and inspection requirements as well as inspection and maintenance agreements apply to commercial sites and single-family residential development that installs or replaces more than 5,000 ft ² of impervious surface. For other single-family residential development, Section 513(j)(5) does not allow stormwater management measures to be removed without written permission from the City and such sites may be subject to enforcement action under Section 521.



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10	Virtual Public Meeting Q&A	Will the public have the ability to review applications and other documents on-line?	The Office of Buildings controls the permitting process. The online plan review process continues to evolve. The overall process should be similar to the previous process. Complete transparency is the goal.
11	Virtual Public Meeting Q&A	how will stamped plans be transmitted back to applicant	The Office of Buildings controls the permitting process. Site Development reviews will be included in the Office of Buildings package.
12	Virtual Public Meeting Q&A	How often are dry wells and other stormwater management systems inspected to ensure continued capacity and function	Several sections of the proposed ordinance require routine inspection and maintenance of Stormwater Management Systems. 1. Systems are inspected throughout the construction process and before final approval. (Section 519) 2. Once installed, the Operations and Maintenance Agreements require Systems be inspected at least annually. (Section 517) 3. Systems not subject to Operations & Maintenance Agreements (e.g. most Single-Family Residential Development) are subject to Section 513(j)(5) which does not allow stormwater management measures to be removed without written permission from the City and such sites may be subject to enforcement action under Section 521.
13	Virtual Public Meeting Q&A	Do GDOT projects have to comply with the new ordinance?	Consistent with opinions from the Attorney General for the State of Georgia, state entities are not subject to local ordinances that regulate post development stormwater management. However, GDOT does have post-construction stormwater management requirements imposed by GDOT's NPDES permit. More information about that can be found on GDOT's website and in their Design Manuals.
14	Virtual Public Meeting Q&A	When do you plan to implement incentives for rainwater harvesting such as increasing the rate for irrigation rate to the Metro District recommendations such as \$7.50/ccf similar to other utilities in the region. Also eliminate sewer fees for rainwater systems in commercial buildings. This would help.	DWM is exploring what other jurisdictions are doing, reviewing the City's existing code, and exploring incentives and policy options for rainwater harvesting and reuse. There is no set date for adopting these programs or incentives.



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15	Virtual Public Meeting Q&A	Is the net volume/rate impact to the system not the same with infiltration vs. vegetative measures? Is the intercepted runoff not the same regardless of system used?	The volume of runoff generated by on-site impervious surfaces is a “static” value (depending on the storm size & intensity). Vegetated green infrastructure BMPs are typically much easier to inspect to ensure function and maintain. Performance generally increases over time as plants mature. Vegetated GI also provide numerous co-benefits. The City has seen many challenges with construction and maintenance of large-scale underground detention systems designed to infiltrate. If systems like these become clogged, the only resolution is to excavate and replace the aggregate base, which is not typically feasible.
16	Virtual Public Meeting Q&A	Have you thought about increasing street sweeping frequency through out the utility. As a bike rider I have noticed in bike lanes as well as other streets debris, leaves and winter storm treatments remnants that stay on the streets sometimes for years. I see stormwater drains blocked and dirty. In bike lanes it helps with safety issues. Would not this type of prevention lower maintenance costs?	Street sweeping is a practice proven all over the world to reduce many negative impacts to stormwater management systems, including clogged inlets/pipes and improved water quality. The Department of Public Works Office of Sanitation conducts street sweeping throughout the City. DWM supplements funding for this program in order to meet regulatory compliance requirements related to the Consent Decree and MS4 permit. DWM and DPW entered into an agreement in April 2020 to adhere to Standard Operating Procedures that will improve oversight of the program. Alternatively, DWM’s Adopt-a-Drain program is a great way for our citizens to help. This program provides tools and safety equipment to volunteers who agree to monitor, clean, and report about stormwater inlets. Please consider joining this program; more information is available by clicking here.
17	Virtual Public Meeting Q&A	Will the exemption for single family driveway replacement still remain?	Yes. Newly constructed or replaced driveways are exempt for Single-Family Residential Development. However, the exemption is only for driveways (or portions of driveways) “12 feet wide or less where runoff is directed via sheet flow toward vegetated areas at least twice as wide as the paved area.” The exemption does not apply to parking pads or similar areas. See Section 504(d)(14)



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18	Virtual Public Meeting Q&A	For new sidewalks that are required by zoning, BMPs may have to be located in public Right of ways. Will these BMPs be allowed? Will COA DOT require that an encroachment agreement be entered into that indemnifies the City and requires annual rent?	Currently, there are green infrastructure BMPs such as stormwater planters and bulb outs in the City's standard details for work in the right of way. Generally speaking, using these types of standard practices does not require an encroachment agreement.
19	Virtual Public Meeting Q&A	If a site uses multiple GI practices such as bioswales where roadway slopes are <4%, permeable pavers where walk slopes are 2% or less and infiltration trenches for steeper areas, what design storm applies?	Sites must design a system that captures and retains the first 1.0" of rainfall on site using green infrastructure BMPs. A treatment train or series of BMPs is welcome. See the <u>Georgia Stormwater Management Manual's Site Development</u> Tool for additional guidance.
20	Virtual Public Meeting Q&A	Who determines the percentage of a site that is reasonable to be used for GI measures? What percentage of a site zoned C-1? What percentage of a site zoned R-4? Are they different?	Neither the Zoning Code nor the Stormwater Management Ordinance sets standards for this. Both the existing and proposed Stormwater Management ordinances require green infrastructure (and any other BMP) to be sized based on the amount of impervious surface and located according to the site's conditions (e.g. topography, existing surface water, geology, soil characteristics, and other aspects).
21	Virtual Public Meeting Q&A	We did not receive GI credit for a rainwater harvesting system for a redevelopment project. The reviewer said that because of reduced irrigation demand in winter, there was no assurance that there would be storage capacity available and so we had to add an additional infiltration practice. Is that still the policy?	There currently is no policy for when additional infiltration practices will be required. Each rainwater harvesting and reuse system needs to be designed to store the amount needed to meet the demand it serves. If the system will not capture 100% of the annual precipitation, that uncaptured volume will need to be managed according to the Stormwater Management Ordinance. The system must have a plan to draw down the collected water so that there is capacity for the next storm. If the collected rainwater is to be used solely for irrigation, the operations and maintenance plan must indicate draw down between rain events throughout the year. Please contact Spencer Peck (speck@atlantaga.gov) to discuss this particular project.
22	Virtual Public Meeting Q&A	Will you make sure that in the future they will be available on-line?	We understand this question to be asking about posting the public meeting materials on our website. We apologize for any



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			inconvenience while we transitioned to a telework posture. The ordinance webpage is now fully updated. Please send an email to Spencer Peck (speck@atlantaga.gov) if this answer is not responsive.
23	Virtual Public Meeting Q&A	Are you claiming that the State Guidelines and Laws do not allow for underground infiltration? I do not believe that is correct. Please confirm.	The Georgia Stormwater Management Manual does not provide runoff reduction or water quality credit for typical underground detention facilities. However, if these practices are designed to infiltrate, the City may provide credit toward the Runoff Reduction standard. Due to the many challenges with designing, installing, and maintaining such systems, if these practices are proposed, then Extended Detention is required.
24	Virtual Public Meeting Q&A	RE single family homes and inspecting dry wells and stormwater management systems to ensure continues capacity and function, I would recommend the Ordinance require sampling a set of SF sites so we have an idea of how well the devices are working.	Single-family residential development that creates less than 5,000 square feet of impervious cover is subject to Section 513(j)(5) which does not allow stormwater management measures to be removed without written permission from the City. Such sites are also subject to enforcement action under Section 521 which includes the ability to inspect sites
25	Virtual Public Meeting Q&A	what measures are being considered for giving credit to existing mature trees?	The credits proposed in Section 513(g) have been replaced with a provision that prohibits approval of Stormwater Management Plans that propose removing trees for sole purpose of installing Stormwater Management Measures. See Section 513(i)(6).
26	Via Telephone	I'm concerned that my feedback is not taken seriously and does not have an impact on the content or format of the ordinance.	We are sorry to hear this. DWM takes all public feedback seriously. All comments or suggestions will be reviewed and considered. Thank you for taking the time to share your opinion.
27	Via Telephone	I noticed that "vegetated green infrastructure" is not defined in the ordinance. What is the definition? It looks like the current GDNR MS4 which expires June 10, 2024 only requires the 1 year storm for channel protection. What is the City's justification for requiring additional channel protection beyond that required by the state?	"Vegetated Green Infrastructure" are green infrastructure practices that use vegetation. A few examples include bioretention, bioswales, stormwater planters, green roofs, and other similar practices. The vegetation provides improved stormwater management, and various co-benefits like erosion/sedimentation prevention, air quality benefits, and aesthetic and biophilia benefits. A definition of this term has been added to Section 503.



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			There are multiple justifications for the enhanced stream channel protection requirement: 1. Please remember that the MS4 Permit is a regulatory “floor” and not a “ceiling”: It is the minimum the City must do to comply with the MS4 Permit. As such, the City can establish regulations that exceed the minimum requirements set by this permit. 2. DWM believes this minimum standard is not sufficient to address the significant impairments to our creeks and rivers, the localized street and property flooding experienced all across the city, or the immense demand on the City’s infrastructure during large rain events. 3. This extended detention requirement will reduce peak demand on the system by requiring slower discharge rates. 4. One of DWM’s goals regarding stormwater management is to encourage the use of as much green infrastructure as possible, especially vegetated green infrastructure. As noted above, vegetated green infrastructure provides multiple benefits. Further, this enhanced detention requirement is an incentive to use vegetated green infrastructure to meet the Runoff Reduction standard of Section 513(a).
28	Via Survey	I just reviewed the proposed changes to the GI/Stormwater Ordinance. I am a landscape architect and generally deal with high-end SFR projects intown. I generally support any changes that will make the city cleaner and safer, but I do find that lack of [funding] enforcement, inspections, and compliance among the public - including well-known contractors - to be an ongoing challenge.	Thank you for your support. As you note, both human and financial resources are a consistent constraint for all enforcement activities. Despite this constraint, the City works very hard to ensure all development complies with environmental and other regulations. We also try and provide education and promote the efforts of partner organizations who are providing education to contractors who are implementing these projects. We will consider your input as we work to review and improve DWM’s inspections, enforcement, and educational activities.



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29	Via Survey	Will the operations, maintenance, performance bond, or inspections be applied to SFR projects with 5k or more s.f.?	Yes. Single-Family Residential Development that installs more than 5,000 ft ² of impervious surfaces must complete and record an Operations & Maintenance Agreement pursuant to Section 517. These Developments must also comply with Construction Inspections (Section 519), and Ongoing Inspections and Maintenance (Section 520) requirements.
30	Via Survey	Does the pre-permit consultation meeting apply to all projects including large (5k+) and small (500sf) SFR projects?	The Stormwater Consultation Meeting (Section 510) is a mandatory meeting for all commercial development and all Single-Family Residential development that install 5,000 ft² or more impervious surface. Small Single-Family Residential development is welcome to request a Stormwater Consultation Meeting, but are not required to.
31	Via Survey	Will the credits (saving trees + site design) apply to SFR projects? or the larger ones 5k+?	As currently drafted, the proposed credits for using or saving trees apply to all development.
32	Via Survey	Are there any other items I need to know about the larger 5k sf SFR projects? Like infiltration rates reported, engineering drawings, etc. I believe the old ordinance contained a provision for these larger SFR projects to comply with GSMM but it seems they were not well enforced.	Large Single-Family Residential development must comply with all Stormwater Management Standards (Section 513). The Stormwater Management Systems installed to meet these standards must be designed according to the requirements of the Georgia Stormwater Management Manual. We will evaluate our review and enforcement processes to ensure these standards have been and will continue to be consistently applied to all development.
33	Via Survey	I am a landscape architect with 25 years experience. I am an avid hiker and lover of streams and wetlands. I love the updates and am especially excited if we can adopt the credits for preserving trees. I know that currently many SFR projects are skirting the law by not adhering to the permit plan/creating 1 plan to permit and 1 plan to actually build, or just not obtaining permits in the first place. I hope the City can provide more oversight and inspections. Keep up the good work.	We are glad that you are excited by these proposed credits. As stated in the answer to Question 28, human and financial resources are a consistent constraint to enforcement and inspection activities. If you see violations of the City Code or permits, do not hesitate to report any violations to ATL311.



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34	Via Survey	USGS is available as a resource for scientific material and interpretation for management and others to make informed decisions. Please let us know how we can be of service and partner.	Thank you for your offer of support. A DWM staff member will reach out to you to discuss the assistance you can offer.
35	Via Survey	I have designed stormwater management detention and treatment systems for site development projects in Atlanta and Douglas County. I believe the proposed requirements are very stringent, but can will benefit the city as a whole.	Thank you for your comment and support for these updates.
36	Via Survey	I believe providing incentives for runoff reduction and vegetative GI practices would be beneficial, as opposed to establishing harsh alternative design requirements (such as 48-hr detention of the 25 year storm) that try to deter alternative designs.	Thank you for this suggestion. We will consider using incentives to encourage the use of green infrastructure.
37	Via Survey	I have worked to get the airport to adopt the policy. It has not been incorporated into the airport design and construction process on a consistent basis.	Please let us know if there is anything DWM can do to help the Airport's design staff consider and integrate green infrastructure in future construction activities.
38	Via Survey	I don't have a full understanding of it and I'd like to better understand why there are seemingly expansive exclusions for the linear transportation projects.	The vast majority of rights-of-way in Atlanta have serious constraints, including available space, underground utilities, contaminated and impermeable soils, and other issues that may prevent using green infrastructure. Please contact Spencer Peck (speck@atlantaga.gov) if you'd like to discuss this in more detail.
39	Via Survey	I am so proud of the City of Atlanta's Watershed Dept. for taking such a leadership stance on green infrastructure.	Thank you for your support.
40	Via Survey	I have worked on site engineering construction documents and permitted them with the City using the Ordinance as the basis of design. I'd like to see green infrastructure especially be held to ongoing inspections and maintenance better. I have seen poor GI installation and maintenance bring down the entire project and reflect poorly on the practice. Increased scrutiny on ongoing maintenance and inspections via the recorded SWMA of GI to encourage best practices. Periodic infiltration testing of infiltration-based GI designs could be valuable.	As stated in the answer to Question 9, there are several provisions that require all development to routinely inspect and maintain Stormwater Management Systems. If you see violations of the City Code or permits, do not hesitate to report any violations to ATL311.



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41	Via Survey	I design and permit onsite stormwater management system for existing and proposed facilities. The proposed updates look great to me. Continue to allow designers flexibility to apply ordinance requirements creatively.	Thank you for your support for these updates. The ordinance and our review processes are intended to encourage as much creativity as possible. DWM will consider methods to expand this intention.
42	Dept. Of City Planning	Please consider integrating the City Arborist into the Stormwater Consultation Meetings. This is an excellent opportunity to more fully integrate trees into stormwater management and to ensure trees are protected early in the development process.	DWM will consider including the City Arborist in Stormwater Consultation Meetings. DWM believes this is an excellent opportunity to encourage preserving and using trees for multiple co-benefits including stormwater management.
43	Dept. Of City Planning	Please consider modifying the prohibition on locating dry wells within ten feet (10') of building foundations. This prohibition frequently results in trees being removed to install the practice. This prohibition could be modified to maintain the 10' distance from structures with basements, but be reduced for structures built on crawlspaces or slabs.	DWM will review this requirement and consider how to integrate methods to prevent this requirement from causing the removal of trees. The Single-Family Residential Guideline document is in the process of being updated. This concern will be addressed in these updates.
44	Dept. Of City Planning	Please also consider modifying the prohibition on installing Dry Wells under impervious surfaces. Permeable pavers and modified french drains are designed with the same intention but are not subject to the same prohibition.	Thank you for your comment. We will consider this revision.
45	Via Email	We and our colleagues in our organization's Clean Water Supply program have been involved in various aspects of stormwater policy at the national, state and city scales for many years. Our Atlanta staff have been directly involved in various aspects of green stormwater infrastructure policy and management in Atlanta, the metro Atlanta area and Georgia for several years. Examples include: Jenny Hoffner served on the core team of the City of Atlanta Green Infrastructure Task Force, leading the Planning Team along with Julie Owens of the Department of Watershed Management. Our staff (B.Emanuel) participated as stakeholders in Georgia EPD's process to revise MS4 permits statewide, resulting in the new permits issued over the past 1-2 years. Our staff (J. Hoffner) in partnership with DWM, ECO-Action and Carter convened the	Thank you for your years of support and advocacy.



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		Intrenchment-Custer One Water Task Force to address persistent flooding and combined sewer problems in the Intrenchment Creek headwaters and Custer Avenue CSO sewershed area of Southeast Atlanta; this Task Force has now developed detailed recommendations to improve all aspects of water management, including and especially stormwater management, in this heavily impacted watershed of central Atlanta. For approximately 6 years, we have collaborated with Hartsfield-Jackson Airport staff (and with support from DWM staff) to apply the City's post-construction stormwater ordinance where feasible at the airport. In 2019-2020, our staff (B. Emanuel) participated in the Metro North Georgia Water Planning District's work group on Runoff Reduction practicability guidance for member jurisdictions and utilities adopting the District's new (2019) Model Ordinance and operating under renewed MS4 permits emphasizing runoff reduction.	
46	Via Email	Thank you for sharing information about the post-construction stormwater ordinance updates and for the opportunity to provide feedback and input on the updates. We have been supporters of the city's current stormwater ordinance ever since its passage in 2013, and we have appreciated the opportunity to be a partner in assessing the success of the implementation of the ordinance over the past several years. The ordinance has made the City of Atlanta a leader both regionally and nationally on urban green infrastructure policies, but it has become clear to us as well that there are various areas of improvement available to the City and its stakeholders in the ordinance and the policies and programs that support its implementation. This is especially true given the still-increasing challenges brought by climate change and continued urban development and re-development to the city's streams and watersheds, which compound the historical damage done to these resources. In short, we too had identified room for improvement both in the ordinance and in its implementation, and	Thank you for your support of these revisions.



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		we appreciate the Department of Watershed Management taking action to make improvements to the ordinance. Overall, we support the ordinance updates and revisions. We are particularly pleased to see the revisions to the Stormwater Management Standards, as well as the infeasibility determination process and the alternative compliance process. These are important revisions that will aid in effective implementation of the ordinance; in particular, they will help ensure that more development projects proceed with the runoff reduction standard at the core of their stormwater management efforts rather than seeking ways to avoid complying with the runoff reduction standard. The infeasibility determination process appears to place clearer and more rigorous criteria around the Department's ability to waive the runoff reduction standard. This is a needed and important change which we support. In turn, the Alternative Compliance Policy is a strong effort to keep the focus on runoff reduction efforts as much as possible at any given site, and we support this approach.	
47	Via Email	We have two suggestions for improvement to the draft ordinance: First, we are pleased to see the new Extended Detention provisions, as they should encourage greater adoption of practices to meet the Runoff Reduction standard. However, there are instances in the draft ordinance in which the term "vegetated green infrastructure" is used in this context in a way that omits mention of volume reduction techniques such as rainwater harvest and reuse as methods to aid in meeting the Runoff Reduction standard. This is an unfortunate omission and should be corrected. Especially in densely developed urban areas, rainwater harvest and reuse can be an important component of a systems-based approach (hopefully also including vegetated green infrastructure) to meet the Runoff Reduction standard. An example is in Sec. 74-513 (c). It would be a shame if, based on this phrasing, a developer or designer saw strictly vegetated green	DWM will review the instances of this language and consider including rainwater harvesting and reuse where relevant.



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		infrastructure as the only tool for avoiding the extended detention requirement, to the exclusion of other volume reduction practices such as rainwater capture. (Please note: In this regard we agree with the Department's desire to limit the use of underground infiltration practices, as these are often neglected and left un-monitored; we support ordinance language to that end.) More broadly, we are happy to learn that DWM is researching methods to incentivize rainwater capture and reuse, as this is an under-utilized tool in development in Atlanta, especially in densely developed urban core areas and in combined sewer system areas.	
48	Via Email	Secondly, we would like to offer a suggestion that might be appropriate to incorporate into the ordinance and/or might be a matter of Department policy in implementing and enforcing the ordinance. This pertains to the topic of low-permeability soils and the challenge they may present to the use of infiltration-based BMPs to meet the Runoff Reduction standard. Although the proposed changes to the infeasibility determination process and the proposed Alternative Compliance process will, as noted above, encourage greater efforts to meet the Runoff Reduction standard, our experience with development sites in the city has shown that many site developers and designers feel very challenged by the presence of low-permeability soils on-site. Thus, many abandon efforts to meet the Runoff Reduction standard based largely on this challenge related to soil type and condition. Although the infiltration rates analysis is required prior to or at the time of the stormwater consultation meeting, we suggest the Department consider requiring a certain total number (or density) of infiltration tests, especially for large development sites, and we would hope the Department could help educate developers and designers on the value of performing these tests as early as possible in the site assessment and design process to aid in the pursuit of Better Site Design principles. For example, especially	DWM will review this issue and consider how to integrate methods to ensure soil testing is conducted early in the design process.



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		on large development sites, if conducted early enough in the development process, the locations of buildings and infrastructure in a site plan can be informed by knowing what areas have favorable soils and infiltration capacity and where the site does not.	
49	Via Survey	ECO-Action is in support of the proposed ordinance updates. Specifically: • Linear Transportation (roadways, transit, etc) projects will now be required to comply with the stormwater ordinance including the green infrastructure requirement. • New alternative compliance process is designed to encourage green infrastructure and discourage underground infiltration and mechanical and proprietary devices. • Waivers are required to go through a standardized process that ends with the approval of the Commissioner. • Combined sewer areas must meet increased stormwater management requirements	Thank you for your support of these revisions.
50	Via Survey	Please see Intr trenchment Creek Task Force recommendations that are appropriate to the Post-Development Stormwater Management Ordinance.	DWM will review these recommendations.
51	Via Survey	Spent over two years working for American Rivers full-time in Decatur working on green infrastructure projects alongside the City's GI Task Force and I am intermittently employed for AR as a contractor helping advance the goals of the Intr trenchment Creek One Water Management Task Force. I think these improvements are a great step in the right direction, especially the change regarding linear projects. Congratulations on this progress.	Thank you for your support of these revisions.
52	Via Survey	I think the Determination of Infeasibility needs to be more difficult to achieve. E.g. if a developer has soil that won't percolate, they should be required to consider other options such as rainwater harvesting before reaching a conclusion of infeasibility. (maybe this is addressed in the Alternative	The Alternative Compliance Process requires applicants to explore ways to achieve the runoff reduction standard to the maximum extent feasible with other Green Infrastructure options, including rainwater harvesting and reuse.



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		Compliance Process, I didnt get to dig into that part as deeply as I'd like)	
53	Via Survey	We need design guidelines for all road projects including requiring modifications to existing roads when resurfacing occurs. Small scale projects such as linear bioswales have profound impacts on communities. Green infrastructure needs to be a part of mandated streetscaping options for local and arterial streets throughout Atlanta, working in conjunction with ATLDOT to provide both green infrastructure and multi-modal transportation options.	Thank you for your recommendations. Linear Transportation Project must now comply with the Stormwater Management Standards or seek a Determination of Infeasibility and then comply with the standards to the maximum extent feasible. Standard details of Green Infrastructure practices that can be integrated into right-of-way design are available on the Stormwater Ordinance webpage.
54	Via Survey	Based off of my experience these update are necessary to address the scale of downstream problems in infrastructure, cso compliance, and ecological degradation. Due to rapid growth over the last few years, there are limited redevelopment infill opportunities in the City triggering modern stormwater infrastructure, especially the combined sewer district; the past ordinance can no longer fill the gap of volumes reaching downstream infrastructure. Without stiffening the requirements, once these sites and projects have been redeveloped, the burden of mitigating current and future capacity and pollutant issues falls squarely on the city. The past couple of years I have gained experience in municipalities throughout the nation including NYC. Combined Sewer Infrastructure in NYC is very similar in age and design to Atlanta CS infrastructure. They have reached a tipping point in capacities downstream from development that requires multi-billion dollar investments for district redevelopment. Unless a strong shift occurs to implement incentives to change development patterns, I see this issue arising more and more often in Atlanta.	Thank you for your support of these revisions.



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55	Via Survey	The city is entering a scale of excess drainage in the CS system that requires tunnels (ie the West Side Tunnel). This is the largest scale solution available and requires Billions in funding. If current requirements are not stiffened for upstream contributors, my opinion is that it is inevitable that another tunnel project will have to address eastern combined sewer drainage leading to Intrenchment Creek WWTP. This draft is currently focused on stormwater requirements, but the future of the downtown district will continue densifying and sewer loading will increase. Once a site begins contributing more sewer volumes than stormwater falling on the site, the impact of stormwater offsets for additional sewer loads becomes negligible. I recommend future study in water reuse strategies and legislation for dense redevelopment that balances future sewer demands with downstream treatment capacity.	Thank you for your recommendations. DWM will review these options for future studies, including downtown.