September 3, 2026

Good afternoon Mr. Williams,

Thank you for providing the calculations for our property and for clarifying that the four parcels were evaluated collectively as a single General Property.

After reviewing the Stormwater Initial Assessment Resolution, I would appreciate additional clarification regarding the basis for limiting retention credits to areas that are "exclusively reserved for stormwater management."

Definitions according to Stormwater Initial Assessment Resolution (2026-433) (B).
"**Stormwater Detention Basin** means a facility, either natural or manmade, that collects and contains stormwater runoff and allows the release of the stormwater through a structure that is designed to control the rate of the release of the stormwater, as acknowledged by the City Manager."
"**Stormwater Detention/Retention Basin** means a facility, either natural or manmade, that performs a combination of both a stormwater detention basin and a retention basin, as acknowledged by the City Manager."
"**Stormwater Retention Basin** means a facility, either natural or manmade, that collects and contains stormwater runoff and only allows the release of the stormwater runoff by one or more of the following: evaporation, percolation into the natural ground and/or percolation into a 3 manmade filtration system that may convey the stormwater runoff to a stormwater management system, as acknowledged by the City Manager."

In reviewing Resolution 2026-433, I note that the definitions of Stormwater Detention Basin and Stormwater Detention/Retention Basin do not appear to expressly require that such facilities serve no other purpose or be exclusively dedicated to stormwater management.

Likewise, the Resolution defines the **"Retention Credit Factor" as the value generated by dividing the Stormwater Retention Volume by the Standard Retention Volume**. The Resolution does not appear to specify that retention volume may only be attributed to facilities that are exclusively reserved for stormwater management. The retention credit also fails to incorporate the detention systems our property has put in place to help with stormwater. It appears that in this regard the city's calculations and definitions are not aligned.

Accordingly, I would appreciate clarification regarding the specific provision, engineering standard, or regulatory requirement that supports the exclusion of certain site features from the retention credit analysis.

Our historic property contains a number of interconnected stormwater management features that function together as an integrated system. These include retention basins, French drains, drainfields, grading patterns, drainage channels, sloped driveways and barriers that direct stormwater away from structures and toward areas designed for infiltration and percolation. Collectively, these features were intentionally designed to concentrate stormwater in controlled locations and control the rate of the release of the stormwater.

Based on our review of the site and the integrated nature of its stormwater management system, I believe the property's effective retention capability far exceeds the 15% retention credit currently assigned. Our attached calculations attempt to account for the broader system of detention and retention areas that work together to control runoff and promote on-site infiltration.

I am therefore requesting that the City review the attached calculations and reconsider whether additional retention credit may be appropriate, or alternatively provide a detailed explanation of why the additional stormwater management features do not qualify under the City's methodology.

Thank you again for your time and assistance. I appreciate your willingness to discuss the calculations and look forward to better understanding how the City's retention credit methodology was applied to our property.

JIM KONISH

Phone: (352)-871-4747

E-mail: whypaygrumorethanyouowe@gmail.com

Website: www.whypaygrumore.com