

**Additional Stakeholder Comments
Norman EDC Update**

	Section	COMMENT	RESPONSE
1	Intro	"regulate both public improvements and private work, which will either be dedicated to or accepted by the City"..."In addition all work within the public right of way is governed by these regulations." - Not bad! Good summary of the document	n/a
2		"These documents are meant to provide minimum criteria and to apply rigidly to new developments which are not constrained by already existing improvements."	n/a
3	Definitions	NOT- "that the project permitted has 70% revegetation of all bare areas and all soil disturbing activities are concluded"	Final stabilization must provide 70% or more of the cover that was provided by native vegetation prior to earth disturbance. In addition, cover must also be uniform with no large bare areas (10 square feet or greater).
		right now interpreted as restoring a site to 70% of its existing condition PRIOR to soil disturbing activities	
4		Pollutant- " Shall mean any.... Garbage, sewage sludge, chemical wastes, biological materials, radioactive materials,....rocks, sand.... Soil, sediment, building materials... Are we really considering chemical waste, biological, and radioactive materials in the same category/ definition of rocks, sand, soil, and sediment?	We are simply identifying a 'pollutant' as a substance that may have harmful effects on the environment.
5		Pollution Prevention Plan- "Shall mean a written site specific plan to eliminate or reduce, and control the pollution of stormwater through designed facilities, sedimentation ponds, natural or constructed wetlands, and Best management practices. This is good also! Gives flexibility for site specific determinations	n/a
6		Solid Waste-"carpet fibers, wood chips, sawdust, grass clippings, and leaves	The definition states that that solid waste is discarded material. If the wood chips are being used as a best management practice (i.e. temporary stabilization) they are not considered a discarded waste material.
7		How are wood chips considered solid waste, when mulch is considered an acceptable form of site stabilization? Ssam question for sawdust.... It's all the same material	
8		Grass clippings?	Per the city's fertilizer ordinance, grass clippings cannot be blown, swept, or otherwise disposed of in the street or stormwater drainage systems; therefore, they should be disposed of as solid waste. Grass clippings that are blown back onto the yard are serving a function as mulch and are not considered a discarded waste material.
9		Leaves? Really? Is there a plan in place to prevent the leaves from falling off the trees along creek beds each year to keep them from polluting the watersheds? Is this really a "Solid Waste"?	Per the city's fertilizer ordinance, leaves cannot be blown, swept, or disposed of in the street or stormwater drainage systems; therefore, they should be disposed of as solid waste. During FY 2022, stormwater maintenance crews removed 2,279 tons of debris from stormwater channels which included trash and debris as well as leaves, branches, and other vegetation. Debris can impede drainage causing the flow of water to back up and cause flooding.
10	Section 100- General	1001.5 - Keeping "a set of approved construction plans on the job site at all times" typically these are kept at the office of the contractor and on file with the City, readily available to view upon request	An approved set of construction plans needs to be on site at all times. This is necessary for the contractors to have immediate responses to field issues using the approved plan set. This is already included in Section 1001.4 of the current EDC.
11	1002.2	"Standard sheets shall be 22" x34" this would require hand trimming of 2" off of each side of an industry standard 24"x36" plan sheet. Why?	The City will use the industry standard sheet size of 24" x 36"
12	1002.19	As Built Site Grading Plan, Item B Driveway grades... requiring as built survey shots on drive way grades seems odd... no drives are poured within the right of way without prior inspection and approval by the City of Norman. Never a requirement previously.	
		Any other additional as built shots that will be a new requirement / cost for a homebuilder while constructing residences in Norman?	When driveways and/or curb returns are constructed with the development, they are required to be shown on the as-builts.
13	1004.2 Proposed Site conditions	c.4.- showing retaining walls that are 3 feet higher would be better worded as "showing retaining walls that are required to be permitted"	When driveways and/or curb returns are constructed with the development, they are required to be shown on the as-builts. This will most commonly occur with non-residential development. We propose to update this statement to read "those supporting 2-foot of soil or more, measured from top of footing to top of wall."
14		c.7. "All proposed site features" this is incredibly ambiguous and open to interpretation. How can we determine "All proposed site features"?	Change 1004.2 C.7 to "Revise other significant proposed features" which is the current EDC language that represents the need to show any other significant improvements/features that are not otherwise listed above.
15		d. Requires stormwater to be drained in underground pipes if crossing more than 3 lots, above ground flumes are current standard, and are a better, less maintenance solution for both the City and contractor / property owners	This statement clarifies that overland drainage is appropriate for no more than 3 lots or 1/2 acre (whichever is less). This approach ensures consistency even with varying lot sizes. (also see 5003.6)

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16	1004.3 Erosion Control	" A sediment and erosion control plan shall include plans for both pre and post construction. These plans shall be prepared and submitted for review and approval by the Stormwater Program Manager or City designee"	This is not changed from the current EDC.
17		Why "PRE" construction? Are we going to shoot existing survey shots to produce these plans? Will our as builts be held to the same 70% vegetation rule when the permittee wishes to cease activity on these sites?	
18		If we are going to submit plans for "pre-construction" will a standard topo survey suffice?	Yes, a standard topographic map will suffice. The intent here is to ensure pre-construction conditions are considered when selecting, designing, and placing BMPs as significant changes in elevation may require phased sediment and erosion control plans. All construction projects wishing to terminate their permit must meet the same final stabilization requirements (70% of pre-existing vegetation).
19	1007- Retaining Wall Design	"All retaining walls 3 feet and more in height or those supporting 1 foot of soil or more shall be required to obtain a retaining wall permit prior to construction"	We propose to update this statement to read "those supporting 2-foot of soil or more, measured from top of footing to top of wall."
20		This is contradictory. Every retaining wall is in place to support soil. It would be simpler to judge a retaining wall height by elevation from footing to top of wall, which is standard on as built grading plans. The amount of fill supported by the wall is almost always directly correlated to the wall height. Removing the amount of fill language would improve this.	
21	1007.3	Retaining wall penalties - See A. and B.	This is not changed from the current EDC.
22		Is this the best way to handle this?	
23	Section 2000- Water lines	2002.4 Highlighted language "and may participate in a cost sharing of the construction"	
24		Again, ambiguous. Would be better to define what the standards are to induce City participation in cost sharing	This statement clarifies the existing process for upsizing mains. The City is responsible for making any determination related to cost sharing arrangements. Because each situation is unique, the term "may" is appropriate.
25	2002.10 Fire Hydrants	c. Seems to be missing some language - re: "if all following conditions are met: _____, " no conditions are listed	Add back missing language as follows: C. Fire hydrants may be located more than 6 ft. from the back of curb (or edge of pavement) only if the following conditions are met: 1. In no case shall the fire hydrant be located greater than 15 ft. from the back of curb (or edge of pavement). 2. A blue reflective indicator shall be placed in the center of the street at the fire hydrant.
26		h. Tamper resistant operating mechanisms only for hydrants "east of 48th Ave Ne" or as directed?	This is not changed from the current EDC. It is a safety issue to have open holes within the public right of way.
27		Should we standardize City wide?	
28	Section 4000 Streets	4001.2 - Pot Holing - Locating existing utilities	
29		e. Requiring necessary pot holing to be repaired within 24 hours doesn't seem practical, many times it will be days or weeks before the proper utility company will be able to determine what is necessary after potholing a line.	
30	4002 Traffic Impact of developments	References the need for TIA in the event a development will increase the VPH by more than 100, but also notes "each development will be evaluated based on traffic load out of the development, load on the arterial... and current planned configuration of the arterial, as shown in the City's Comprehensive Transportation Plan"	n/a
31		This document continually references the Norman 2025 Comp Plan which is in the works of being updated. Is that smart?	References to the Norman 2025 plan can be adjusted to state "the City's adopted Comprehensive Plan."
32		i.e., if we update 2025, do we need to also update the EDC so they are in line with each other?	
33	4003.2	Uses language "in the most recently adopted land use plan", in this seems to fit better and address the issue above. Would make sense to keep that language (whatever the final language is) consistent throughout the document.	
34	4007.2- Sight distance triangle	leaves the distance totally at the discretion of the director of public works. While beneficial for flexibility, leaves a lot of room for interpretation when trying to plan a project.	n/a
35	4010.4 Sidewalks	section error reference source not found!	Cross references will be checked and updated as needed

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36	4010.6- Curing?	list methods for concrete curing that are not typical in a day to day construction	n/a
37	4011.3	"Payment for public street signs shall be made to the City before the final plat is filed"	This will be changed to AFTER the final plat is filed
38		Typical to do this after the plat is filed.	
39	4013.1A	Lighting, General - Streetlights are not shown the preliminary plat. Streetlights are determined by the City's traffic engineer at final plat stage, and installed by franchise utility prover after plat filing	This statement will be amended. Streetlights are not required to be shown on Preliminary Plats.
40	4013.2 Scheduling	This paragraph seems to be more of an idea. Would be nice to keep the EDC to standards and guidelines.	This is not changed from the current EDC and remains applicable.
41		"A good rule to follow is to order street lighting at the same time that street name signs are ordered. Close coordination with the developer is required for lights to be installed in time to avoid interference with private landscaping"	n/a
42		Is this necessary? Is it helpful? Does street lighting ever interfere with landscaping?	n/a
43	Technical Memorandum	Designed as a companion to 7000- Sustainable Developmental Practices	n/a
44	19-411	"Allows optional section of the EDC that address sustainable stormwater development to apply broadly to the development throughout the City instead of only within the designated water quality protection zone	n/a
45		Could be extremely limiting if WQPZ requirements and regulations began to appear outside of the WQPZ zones....	Broader application of WQPZ or Section 7000 design standards is not proposed. The City may choose to explore incentives to encourage more sustainable development practices.
46	19-411.B.2	"reduction in nitrogen of at least seventy five percent (75%) and a reduction in phosphorous of at least fifty eight percent (58%)	n/a
47		How is this going to be calculated? Who does it? Who checks the method and approves it?	The calculations are defined in Section 7002.4 and will be calculated by the engineer of record. City staff will review the calculations. This is the same process that is in place with the current WQPZ.
48	19-411.F	"all developments are encouraged to utilize EDC 7000 sustainable stormwater development measures"	n/a
49	19-514	"Portions of the WQPZ that are not within 30 feet of a combustible structure may be left undisturbed and natural, and in no event, shall grassy vegetation in this area be mowed or otherwise cut down"	n/a
50	Impervious Coverage	Increasing residential impervious coverage from 65% of the lot to 85% of the lot is a GOOD thing!! We need more of this to be able to utilize smaller home sites for more affordable housing	Agree; where proper measures are taken
51		I think the issue here will be the necessary steps needed to obtain that additional 20% coverage, i.e. "capturing the 1" of rainfall... grading plans and calcs showing no adverse effect per EDC 5000"	n/a
52	Conclusion	"Adopting a program of incentives that supports sustainable stormwater development will create an environment of collaboration between the City and development community... Proactively implementing these recommendations through ordinance amendments can ultimately reduce the long term burden on the City and it's taxpayers by mitigating the need to retrofit drainage infrastructure in the future."	n/a
53		But can it be done?	Stay tuned.
54	5000 Stormwater	see 5011.c regarding bridges in the floodway -SV	n/a
55		Detention facilities moving from 100 to 500 year with a 1' of freeboard? MO is making an objection.	We will update the reference to the 500-year floodplain to state "100-year with 1 foot of freeboard unless more stringent OWRB dam safety requirements control, as outlined in title 785:25-3-3."
56		Might need to add language about sizes, maybe acre feet for ponds, so you could downsize for smaller, and maybe upsize to larger?	Statement is unclear as to intent
57	6000 Stormwater Quality	6001.3.B enforcement language	n/a
58		6001.3.D ABATEMENT LANGUAGE, SHOULD BE SIMILAR TO THE CODE ENFORCMENT LANGUAGE	6001.6 should be amended to "Enforcement" (remove "and Abatement")
59		this is new language that was added after stakeholder meeting, not in the current documents we have.	Proposed abatement language will not be included in this update

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60		6001.7 New annual permit fee of \$60 and there is additional costs for renewals. Monthly?	This is an annual fee.
61		6004.1.B Permits now going to be needed on lots less than 1 acre. Currently it's only for lots over 1 acre.	This applies to single lot development only when the site has not already been addressed through permitting for a subdivision or larger project. The City currently requires any earth disturbance that does not meet the exemptions listed in 6004.1 to obtain an earth change permit. This includes lots that may or may not be part of a common plan of development.
62		might also have specifics of ODEQ and City permitting simultaneously	n/a
63	7000 Sustainable development		
64		This section is not a requirement, but options for the city to incentivize and credit for new sustainable development	n/a
65		Potentially reducing the parkland requirement? Increasing the impervious coverage? Conservation landscaping credits	n/a
66		City is encouraging up front negotiations to help utilize credits and incentives	Agree
67		Stormwater control measures -SCMS- Encouraged, but not required	Agree
68		A lot of requirements for basin liners	n/a
69	Streets	Mainly reorganization of items, see items in green to reference the new things that came after the stakeholder meetings	n/a
70	Utilities	mainly water and sewer	n/a
71		"Eliminate the 'may' language for any oversizing of the line on case by case basis - item 2002.4 sections containing new ideas, such as non vehicular curb cuts to channel stormwater	This statement clarifies the existing process for upsizing mains. The City is responsible for making any determination related to cost sharing arrangements. Because each situation is unique, the term "may" is appropriate.
72	Development Regulations	potential 85% coverage with proper stormwater controls and green development practices in place	n/a
73	General	definitions, references to adopted codes, formatting	
74		website based now. No longer individual stakeholder meetings, everything will be run through the website for comments, feedback, addressing issues, ect.	
75		Dawn will send a follow up email today with a link to the website	
76		freese.mysocialpinpoint.com/normanedcupdate/home	n/a
77		click the get involved tab to get to the screen for feedback	
78		use the ideas wall for anything edc specific	
79		use the contact us for items that are not EDC specific	
80	Discussion	Is fee in lieu of detention still available?	Yes, in approved situations; no change is proposed to the City's current fee in lieu consideration/process.
81		still allowable on a case by case basis, but will require Council approval	Agree
82		Maybe add a map of areas that would be reasonable to utilize fee in lieu of detention within the EDC update? EDC has to be approved by council	A map could exclude consideration of an area. Recommend having open discussions with staff during development of project.
83		Mo- definition- depth of cover over the pipe should be to the top of the pipe, Terry confirmed and all agreed	Yes, that is correct. This definition will be updated to state "Pipe depth or depth of cover shall mean the difference between the finished grade elevation and the top of the pipe."
84		1002.2- Why are we going to 34x22?	This reference will be updated to reflect 24"x36" standard sheets.
85		Significant amount of time required to review this. How much time do you we have to ask questions?	
86		Council wants this in front of them for action by the end of 2022 - Second or third week of December is what Council requested -Dawns answer	
87		When is the odd seat election? January? Why are we rushing?	At the 11/29/22 study session, the City Council extended the project timeline providing additional review time. The EDC is scheduled for consideration by the City Council on 2/14/23.
88		Last week of October is the open house with the public, so essentially we need to get comfy with everything before the end of October when it released to the public.	
89		Roach- feels like the timeline is rushed, and we should make sure we take the time necessary to make sure the final product is a good solution for all parties.	

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90		Presentation from today will be uploaded to the website.	n/a
91	General	1002.2- requires standard sheet size to be 22"x34xx. Currently the standard sheet size is 24"x36" and this is the size required in all other municipalities in this area. While we realize that this new size is to facilitate the printing of half size sheet sets on 11" x 17" paper, we are concerned that this will cause issues in the printing of full size plans. Most plotters are designed to handle a 36" wide roll of paper. Plotting out a 34" sheet on a 36" wide roll of paper will require that each sheet that is plotted will then have to be trimmed by hand down to 34". This will cause an egregious amount of extra work on large sets of plans causing a major waste of time and money.	This reference will be updated to reflect 24"x36" standard sheets.
92		1002.19B - requires that driveway grades be placed As-Built Grading Plans. But when this plan is prepared, not only has the driveway now been constructed, but neither has the finished floor of the home. Any grade placed on the plan would be a complete fabrication. This is just extra work that would have no real meaning.	When driveways and/or curb returns are constructed with the development, they are required to be shown on the as-builts.
93		1004.2D - requires for an underground storm sewer if stormwater runoff from more than 3 lots of 1/2 acre drains onto another lot or between 2 lots. In the past, we have been allowed to accommodate this with a flume and we would like to maintain this as an option.	This statement clarifies that overland drainage is appropriate for no more than 3 lots or 1/2 acre (whichever is less). This approach ensures consistency even with varying lot sizes. (also see 5003.6)
94		1007.1- requires a permit for retaining walls that are "3 feet and more in height or those supporting 1 foot of soil or more". We are not sure how to interpret this.	We propose to update this statement to read "those supporting 2-foot of soil or more, measured from top of footing to top of wall. "
95	Water Lines	2002.4- states that "The additional cost for the upsize shall be determined by the Utilities Engineer and may participate in a cost sharing of the construction." This statement is not clear. We believe if upsizing of the waterline is required by the City then they should absolutely participate in cost sharing.	This statement clarifies the existing process for upsizing mains. The City is responsible for making any determination related to cost sharing arrangements. Because each situation is unique, the term "may" is appropriate.
96	Sanitary Sewer	3002.7 - set a maximum depth of sanitary sewer lines at 12 feet unless approved by te Utilities Engineer. In the past, the maximum depth was 20 feet. And in Oklahoma City it is 18 feet. While we usually design the lines to be as shallow as possible, there are times when a 12 feet maximum depth could be severely restrictive.	This is not changed from the ccurrent EDC and staff feels that approval of the Utility Engineer is appropriate.
97	Streets	4004.4 A&B - have to do with profile requirements on plans sheets. But the staements are really confusing and not clear as to what is required. Needs to be explained better and examples given.	This is not changed from the ccurrent EDC.
98		4010.4- contains a statement that says "Section Error! Reference source not found." This needs to be cleaned up	Cross references will be checked and updated as needed
99		4013.1A - requires that streetlights be shown on the preliminary plat. But this information is provided by the franchised vendor providing electrical service, and they do not get involved untl the project is almost under construction.	This statement will be amended. Streetlights are not required to be shown on Preliminary Plats.
100	Stormwater	5003.6- has the same issue as 1004.2 D above	This statement clarifies that overland drainage is appropriate for no more than 3 lots or 1/2 acre (whichever is less). This approach ensures consistency even with varying lot sizes.
101		5005.4- has to do with the required use of the soil conservation services (SCS) method to size detention ponds. This will cause the ponds to be much larger in size, even for smaller developments. This will take up more land. This method is good for 200 acres or later size parcels, but is not suitable for small parcels.	This langauge will be clarified regarding stabilization zones for wet ponds.
102		5006.1 B & C are more restrictive than the past and will result in additional inlets needed to meet these requirements.	
103		5007.2 3 - Does not agree with 5006.1 C on the depth of flow allowed in residential streets	Remove "(typically 0.38)" from 5007.2.3; criteria in 5006.1.C addresses depth of street flow for all street types.
104		5007.2 B 3- requires that at least 70 percent of the street flow must be captured by the curb inlets. This means that either the slope of the street will have to be flatter, the inlets will have to be larger, or the inlets will have to be spaced more frequently (more inlets)	The current EDC state 70 to 80% capture in Section 5007.1.D.2. This recommendation is on the lower end of the current EDC requirements.

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105		5012.2.O- requiring OWRB guidelines for hazard dams to regulate small detention ponds will also result in larger detention ponds which take up more land	This statement is in the current EDC in Section 5011.2.S and it has been applied in the past. This section only states that OWRB dam safety criteria shall be used. It does state that all dams must meet high design hazard criteria.
106		5012.2.Q- Including the 500 year storm event analysis into sizing the outlet of the detention pond will also increase the size of the pond and use more land	We will update the reference to the 500-year floodplain to state "100-year with 1 foot of freeboard unless more stringent OWRB dam safety requirements control, as outlined in title 785:25-3-3."
107		5012.4A - says the fee-in-lieu of detention is allowed at the discretion of the City Engineer. But in a meeting held with City staff after the release of this draft version of the EDC, we were told that fee-in-lieu of detention was going to be discouraged and would have to be approved by the City Council. We believe that fee-in-lieu of detention is a good tool if applied correctly.	Agree; no changes to this program are proposed. Fee-in-lieu may be considered when appropriate; a recommendation from the City Engineer and city council approval are required.
108	Stormwater Quality	6004.2 G - Need to define stabilization as above water level. Bottoms of sedimentation basins that are also ponds cannot be stabilized if they are wet.	This language will be clarified regarding stabilization zones for wet ponds.
109	Sustainable Stormwater Development	We generally believe that many of the items in this section, if they become a requirement and not an option, will create increased costs to the developers due to higher reporting requirements and lots of mandatory certification by professionals.	Section 7000 is proposed as an optional part of the EDC which can support development within the WQPZ and may otherwise be utilized at the discretion of the applicant/developer. The City Council may choose to broaden application of Section 7000 at a later time.
110		7004.3C - Integrated pest management for ponds will increase maintenance costs.	This is a possible outcome; however pest management is necessary to address best practices for health and safety.
111		7004.3 C 2 c - only one species of fish is allowed to be introduced into the wet pond to control mosquitoes	The required fish species criteria are stated in section 7004.3; additionally, the City will accept the introduction of species as recommended by the OK Department of Wildlife Conservation.
<i>All comments were reviewed by staff and the consultant team</i>			
n/a	<i>Indicates the comment is a statement, not a question</i>		