

From: [Darcy Jones](#)
To: [SW Permit Comments](#)
Subject: Draft Municipal Stormwater Permit Comments
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The actual “existing conditions” in many areas of western Washington shed more water than they would under the “pre-existing conditions” set forth in the NPDES phase II criteria, and the current Western Washington Hydrology Model. If we retain rainwater for a proposed development onsite based on “pre-existing conditions” it seems that the amount of water being released downstream would be less than what the downstream users are accustomed to getting prior to development.

How is this effect evaluated in terms of riparian water rights ?

Thanks,

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