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**To:** [ECY RE WW SW Manual Comments](#)  
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Volume 1 Section 2.4.1 New Development and 2.4.2 Redevelopment pages 2-11 to 2-14.

Both of these sections appear to contradict each other regarding converted pervious surfaces. The text sets thresholds regarding the conversion of any vegetation to pasture, landscaping or lawn. If these thresholds are met then certain minimum requirements apply to new and replaced hard surface and to converted pervious surfaces. The definition of converted pervious surfaces is:

**“The surfaces on a project site where native vegetation is converted to lawn or landscaped areas, or where native vegetation is converted to pasture.”**

If there is a 1-acre project that is currently a pasture and it is being converted to a park with only lawn and landscaping the current draft language would require minimum requirements 1-9 apply to the project for new and replaced hard surfaces and converted pervious surfaces. Since there are no hard surfaces and, based on the above definition, no converted pervious surfaces in the project it would appear that there is nothing to apply minimum requirements 1-9 to. Was this the intent by removing the word native from the text? If the intent is to capture projects that convert non-native vegetation to a land cover that generates more runoff than I believe this section needs to be modified.

I would also like to point out that the current language also affects projects that are converting a lawn to a pasture since the threshold is determined by the conversion of vegetation, not native vegetation. This seems counterintuitive.

Thank You,  
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