**Background:**
City Code 32A-24 requires on-site retention of stormwater for all development. The amount of retention required is determined by the Stormwater Policies and Standards Manual.

The Stormwater Policies and Standards Manual acknowledge that development may require alteration of the natural alignment of a drainage system. In Chapter 3, it establishes requirements to minimize the effect of this alteration on surrounding properties and the city’s Municipal Separate Storm Sewer System (MS4). Section 3.8 requires that all development make provisions to retain stormwater runoff in accordance with the requirements in Chapter 6 Drainage Standards of the Stormwater Policies and Standards Manual. However, stormwater retention requirements may be waived in specific cases for infill areas or redevelopment parcels. In these cases, post-development discharges must be less than pre-development discharges and post-development times of concentration must not exacerbate downstream conditions. AZPDES requirements must be met regardless of stormwater storage provisions.

**Interpretation:**
Providing adequate retention for the 100-year, 2-hour design event can be very difficult and expensive for infill and redevelopment lots. Because these lots are either located within an existing subdivision or were previously developed, the outfall from these parcels is already contributing to the city’s Municipal Separate Storm Sewer System (MS4). Consequently, it is not necessary to require these lots to provide storage for the 100-year, 2-hour event, as long as post-development discharges do not exceed pre-development discharges. First Flush volume is the absolute minimum retention requirement that can be applied to a lot. Any development on the lot shall not negatively impact the city’s Municipal Separate Storm Sewer System (MS4). AZPDES requirements must be met regardless of the provisions in this policy. To be considered an infill parcel, the lot must be located within a designated infill area or developed subdivision, but not developed during the normal build-out of that subdivision. To be considered a redevelopment parcel, the site must be located within a designated redevelopment area or have been previously developed. Reductions in retention for redevelopment will only be applied to that portion of the site which was previously developed, remaining parcel site not previously developed will be required to retain the 100-year, 2-hour event.