

Response to Feedback Received following May 18, 2026 Webinar

Comment 1:

There should be a separate spreadsheet for NCC redevelopment projects of less than 3 acres from NCC redevelopment project of more than 3 acres which are required by County Code to achieve 50% reduction in effective impervious.

Comment 1 Response:

The New Castle County redevelopment projects were covered in the 5/18/26 webinar. DURMMv2.51 previously had two separate spreadsheet versions, one for NCC projects requiring a 50% R_{Pv} reduction, and a separate spreadsheet version for all other projects. DURMMv2.6 combines all in one spreadsheet. Direct questions regarding the applicability of the 50% R_{Pv} reduction requirement to New Castle County.

Comment 2:

Clarify what changed in the calculation of “subarea weighted target runoff”, line 2.8 in the LOD tab. Comparing results of DURMMv2.5 to DURMMv2.6, this calculation results in a large jump in shortfall for ALL counties/municipalities, not just for NCC or NCC redevelopment.

Comment 2 Response:

In DURMMv2.5, the methodology utilized to compute the LOD tab Step 2.8 induced errors when the ratio of added impervious to pervious is low. For example, adding a small amount of impervious to highly pervious sites resulted in R_{Pv} credit. Where in actuality, the DSSR requires management of the R_{Pv} shortfall due to the added impervious.

The methodology used for DURMMv2.6 was implemented to correct this issue. The change affects all locations statewide; however, the most impact is to sites having HSG A soil. DURMMv2.6 more closely aligns with expected results for R_{Pv} shortfall, based on the DSSR §5.2.3.1.2.

A summary of the calculation changes follows:

DURMMv2.5

- LOD tab, step 2.7 uses weighted CN calculated in step 2.6 to compute runoff depth for proposed condition

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- LOD tab, step 2.8 uses a weighted average of steps 2.4, the target runoff depth for each HSG, to compute the subarea weighted target runoff

DURMMv2.6

- LOD tab, step 2.7 uses weighted CN calculated in step 2.6 to compute runoff depth for proposed condition. This has not changed from DURMMv2.5
 - LOD tab, step 2.8 uses the weighted average of the target RCN per HSG, from LOD tab, step 2.3
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Comment 3:

It appears there is an error with the Adjusted CN computation on the R Pv tab for ED ponds in a treatment train.

Comment 3 Response:

The adjusted CN computation on the R Pv tab Step 4.6 has been changed from a minimum function to an IF statement to allow a text result and not result in CN=0. An updated version of DURMMv2.6, dated 08/01/2026, addresses this comment.

Comment 4:

DURMMv2.51 DURMM Report tab included the R Pv extra credit rate. DURMMv2.6 lists the R Pv design average and maximum discharge rates based on entries in the R Pv tab. Include the R Pv compliance rate and R Pv extra credit rate on the DURMMv2.6 Report tab.

Comment 4 Response:

Lines 42 and 43 on the DURMM Report tab have been changed in DURMMv2.6 to include the R Pv compliance rate and the R Pv extra credit rate. An updated version of DURMMv2.6, dated 08/01/2026, addresses this comment.

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Comment 5:

Modeling an extended detention basin in HydroCAD using the compliance and extra credit rates computed in DURMM results in the HydroCAD hydrograph reaching only 37 hours before the discharge became 0 cfs.

Comment 5 Response:

The hydrologic modeling must demonstrate 48 hours from time of initial inflow to time of final outflow (DSSR § 11.10.6.2.2) for the ED BMP to be compliant. This must be verified even if the compliance rate or extra credit rate computed in DURMMv2.6 is met. In addition, in accordance with DSSR § 5.2.3.2, additional BMPs, or additional storage volume in an ED BMP, may be needed to achieve the pre-development runoff rate for the R_{Pv}.

Comment 6:

What drainage area should be entered into the CA RCN tab?

Comment 6 Response:

The total drainage area to the BMP, including area within the limit of disturbance and outside of the LOD draining to the BMP is entered in the CA RCN tab. If “No BMP” is selected in the R_{Pv} tab, only the LOD will be used to generate results.

Comment 7:

Explain how to set up DURMM for two separate ED ponds that drain to one analysis point not in series.

Comment 7 Response:

Two separate DURMM runs are necessary – one for each ED basin based on the drainage area to that basin. Each drainage area would need to demonstrate compliance with 48-hour extended detention on its own. Hydrologic modeling would be included to demonstrate C_v and F_v compliance at the analysis point.

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Comments 8, 9, 10, and 11:

DURMMv2.6 gives credit only to area within the LOD, ignoring treatment of OLOD in an ED practice. It would be beneficial to provide some credit for treatment of OLOD runoff.

DURMMv2.6 gives credit only to area within the LOD, ignoring treatment of OLOD in an ED practice. R Pv credit should be available for treating OLOD areas. The R Pv compliance rate for an ED facility should be based on the total runoff directed to it, including OLOD. The R Pv extra credit rate for an ED facility should also be based on the total runoff directed to it, including from OLOD areas. The total runoff directed to the facility should be used in measuring the required rate of discharge for offset credits.

Comments 8, 9, 10, and 11 Response:

The R Pv compliance rate for an ED facility is based on the total runoff from the drainage area to the ED facility, including OLOD. Only R Pv extra credit release rates and extra credit volume calculations exclude OLOD. Basing the R Pv extra credit release rate strictly on the LOD does not preclude the capturing of OLOD in an ED practice.

Any OLOD that is captured is a benefit to the environment. However, the inclusion of OLOD in the release rate calculation for extra credit limits the treatment time proportional to the total volume as a higher release rate will result. Conversely a release rate based on the LOD will extend the treatment time in basin as more OLOD is captured, which offers a greater environmental benefit.

In DURMMv2.6 OLOD areas are included in the computations to quantify extra credit for recharge BMPs. BMPs that recharge may take in OLOD runoff and recharge it for extra credit.

RGM-6 has been updated to include this explanation for the rationale of not including OLOD in the credit computations for ED practices as follows:

OLOD Exclusion for ED Practices

OLOD is excluded from computing the R Pv Extra Credit Rate. Inclusion of OLOD in the R Pv Extra Credit Rate calculation limits the treatment time proportional to the total volume as a higher release rate will result. Conversely, a release rate based on LOD extends the treatment time in the ED practice as more OLOD is accepted.

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Comments 12 and 13:

Consider adjusting the standard to obtain offset credit equal to the runoff volume treated to require all outflow from an ED practice in the R_{Pv} event to pass through the low flow orifice at a rate not to exceed 2 times the average discharge rate. Alternately, consider changing the required detention time.

Comments 12 and 13 Response:

DSSR §11.10.6.2.1 and §11.13.6.1 require ED practices to provide 48 hours extended detention of the R_{Pv} runoff volume. DSSR §11.10.6.2.2 and §11.13.6.1 establish that the peak outflow for an ED practice discharge hydrograph shall not exceed 5 times the average discharge rate needed to achieve 48-hour extended detention. The intent of these regulatory standards is to extend detention of the runoff volume and replicate a baseflow discharge condition rather than having a high peak and a very low tail end discharge rate to achieve 48-hour extended detention. A design that extends the discharge greater than 48 hours, within reason, and/or establishes a discharge rate that is 2 times the average discharge rate is currently acceptable but does not automatically provide for R_{Pv} extra credit.

DSSR §5.2.3.1.5 allows for additional runoff volume treated more than necessary to achieve site compliance to be used as offset credits. ED practices rely on discharge rate rather than runoff volume reduced to demonstrate compliance. The DSSR does not provide measures to quantify how to achieve R_{Pv} extra credit for extended detention BMPs, which is the purpose of RGM-6. The weighted target runoff for the LOD, a runoff volume, is used to establish the extra credit discharge rate for ED practices to allow a mechanism to quantify extra R_{Pv} credit. This method more accurately reflects the treatment trends expected based upon HSG, land cover, and land use as presented during the May 18, 2026 webinar. Please refer to the below image presented during the webinar.

RGM-6 Impacts to ED Extra Credit Rates	
DURMMv2.51 Shortfall/48 hr	DURMMv2.6 Target/48 hr
• Impervious Increase → Rate increases • Impervious Decrease → Rate Decreases • Redev. Increase → Rate Decreases • Clearing Increase → Rate Increases • Rates unaffected by changes due to being capped at 1", No incentive to limit imperviousness. • Highest rates in HSG A	• Impervious Increase → No Change, Harder • Impervious Decrease → No Change, Easier • Redevelopment → Rates Higher, Possible • Woods Clearing → Rate Decreases • Extra Credit Rates no longer tied to a 1" capped value • Highest rates in HSG D

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If the R_{Pv} extra credit discharge rate cannot be met for an ED practice to generate credit to offset unmanaged areas of the site, alternate BMPs may be designed for the site that provide volume reduction in order to provide R_{Pv} extra credit to offset unmanaged areas. The Department will move forward with the procedures established by RGM-6 to quantify R_{Pv} extra credit for ED practices and maintain these comments for consideration when embarking upon revisions to the DSSR.

Comment 14:

Are projects that were submitted but not approved before July 1 required to use DURMMv2.6, or can they proceed under the regulatory guidance (DURMMv2.51) in effect at the time of submission?

Comment 14 response:

Excluding any requests for public hearing, DURMMv2.6 as published in the July 1, 2026 Delaware Register of Regulations, will be effective August 1, 2026. Any project submitting Sediment and Stormwater Management plans for review in accordance with the Step 2 or combined Step 2/3 checklists to the Department or Delegated Agency on or after August 1, 2026 are expected to use DURMMv2.6. This will ensure compliance with the checklist item: *“Drainage calculations for the R_{Pv}, C_v, and F_v events using the latest DURMM model and other approved H&H software as appropriate.”* Projects submitted for Step 2 or Step 2/3 review prior to August 1, 2026 will not be required to submit revised DURMM computations; however, revised computations using DURMMv2.6 will be accepted for those projects.