July 24, 2019

Mr. David Sprout  
Stormwater Management Officer  
Town of Dryden  
93 East Main Street  
Dryden, New York 13053

RE: Mill Creek Reserve Project  
Stormwater Pollution Prevention Plan Review

Dear Mr. Sprout:

The following is our response to the review letter prepared by Donald Harner, P.E., dated July 22, 2019 for the above referenced project. Our responses are in bold and follow the italicized comment.

**Stormwater Management**

1. Per Part I.F.8(c) of the SPDES General Permit, “Documentation of satisfactory compliance with Section 106 of the National Historic Preservation Act for a coterminous project area . . .” requires you to submit the project site area to the NY State Historic Preservation Office (SHPO) through the online Cultural Resource Information System (CRIS). Consultation letter from CRIS to be included with the SWPPP.

   We have submitted the project site area to SHPO through the CRIS website and will include any associated documentation in Appendix A of the revised SWPPP.

2. Per the NYSDEC Stormwater Management Design Manual, “When the predevelopment land use is agriculture, the curve number for the pre-developed condition shall be taken as meadow”. Pre-developed condition of row crops should be modeled as meadow cover. Update hydrologic calculations to reflect a meadow-based composite curve number.

   We have updated our hydrology calculations as “meadow” instead of “row crop” for both pre and post-development conditions and will revise the SWPPP accordingly. Based on the results, pre-development peak flows are equal to post-development peak flows for each modeled storm event.

3. Per the NYSDEC General Permit (Appendix B, Table 2) “. . . single family residential subdivisions that involve soil disturbances of less than five (5) acres that are part of a larger common plan of development or sale that will ultimately disturb five or more acres of land” requires the preparation of a SWPPP that includes post-construction stormwater management practices. Clarify if all lots, including those under an acre, will require a SWPPP with associated permanent stormwater practices based on the revised watershed calculations from comment 2 above.
We will modify the SWPPP to state the following: A Stormwater Pollution Prevention Plan (SWPPP) has been prepared for the Mill Creek Preserve Subdivision. Prior to any disturbance associated with the Grantee’s development of any lot within said subdivision, Grantee must prepare his/her own SWPPP modification specific to his/her particular lot and file an individual Notice of Intent (NOI). Said SWPPP must identify permanent post construction stormwater management practices.

4. Disconnection of rooftop runoff or grassed filter strips may be used as an area reduction technique when calculating the water quality volume. Clarify how each impervious area is being treated (rooftops are being disconnected and driveways drain to filter strip?). Update WQv calculations to reflect these changes.

As stated in Section 2.2 of the SWPPP, although rooftop disconnect is considered an applicable practice, all impervious surfaces associated with each home and driveway will be treated via grassed filter strips, essentially removing all new impervious areas from the water quality calculations and therefore bringing our required WQv and RRv to zero, as currently modeled.

5. Further explain how the total disturbed area of 63.4 acres was developed. Per Part II.C.3(a) of the General Permit, if greater than five acres of soil is to be disturbed at any one time, the owner or operator shall have a qualified inspector conduct at least two site inspections every seven calendar days. Include language for who is responsible for SWPPP inspections for each lot and at what frequency.

Our Limit of Disturbance (LOD) has been revised for each individual lot by offsetting distances from the driveway, home and septic systems. Our revised LOD is approximately 27.53 acres with an average lot disturbance of only 0.69 acres. Although it is not anticipated that greater than five acres of disturbance will occur at any one time, the SWPPP will be revised to require that each lot owner file an NOI and perform weekly Construction Duration Inspections therefore ensuring that multiple weekly inspections would occur if such disturbance is encountered, as required by the General Permit.

6. Plans must be stamped by a NYS licensed professional engineer.

The revised SWPPP will be stamped by a NYS licensed professional engineer.

7. It appears that the southeastern lots (off Main Street) are within the Seneca Watershed Workmap floodplain. Refer to link below and further describe in the SWPPP for informational purposes.

http://fema.maps.arcgis.com/apps/View/index.html?appid=3329f223ec2648ce80656901f5e80c10

The SWPPP will be revised to include a Seneca Watershed Map as Figure No. 13. A brief description of the workmap and associated reference will be described in Section 1.4.3 of the SWPPP.
NOI Form

1. Update Number 36 & 37 after adjusting composite CN.

   As noted above in Comment No. 3, since the SWPPP has been revised to require individual NOI’s be submitted for each lot owner, only a blank NOI will be provided in Appendix A.

2. SWPPP preparer must sign Page 6, and Owner/Operator must sign Page 14.

   See NOI Comment No. 1.

3. Update Number 9 to include wetlands, as well as Mill and Fall Creek. 9(a) should also have on-site stream checked.

   See NOI Comment No. 1.

We trust we have responded to your request and we will provide the revised SWPPP to you immediately upon completion of our revisions. If you have any questions, please contact our office.

Respectfully,

Keystone Associates
Architects, Engineers and Surveyors, LLC

Mark W. Parker, PE, CPESC
Civil Engineering Department Manager

Enclosures

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