

T.G. MILLER, P.C.

ENGINEERS AND SURVEYORS

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July 22, 2019

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

Re: Mill Creek Reserve Project, Storm Water Pollution Prevention Plan Review

Dear David,

We've reviewed the Storm Water Pollution Prevention Plan (SWPPP) and drawings C100 through C300 dated June 17, 2019 and have the following comments related to the SWPPP.

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.
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.
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.
4. Disconnection of rooftop runoff Dr 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.

David A. Herrick, P.E.
Frank L. Santelli, P.E.
Andrew J. Sciarabba, RE.

Dondi M. Harmer, P.E.,
LEED A.P.

Lee Dresser, L.S.
Darrin A. Brock, L.S.

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.
6. Plans must 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>

& Oils =

1. Update Number 36 & 37 after adjusting composite CN.
2. SWPPP preparer must sign Page 6, and Owner/Operator must sign Page 14.
3. Update Number 9 to include wetlands, as well as Mill and Fall Creek. 9(a) should also have on-site stream checked.

If you have any questions please feel free to contact me.

Sincerely,



Donald Hamer, P.E., CPESC

Cc: Ray Burger, Planner
R. Young, Highway Superintendent
D. Herrick, P.E.