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DEPARTMENT OF PERMITTING SERVICES

Douglas M. Duncan
County Executive

Robert C. Hubbard
Director

December 11, 1997

Mr. Mark A. Mezzanotte, P.E.
M/K Enterprises
2900 Linden Lane, Suite #200
Silver Spring, MD 20910

Re: Stormwater Management ***CONCEPT/Final Water Quality Plan*** for Clarksburg Town Center (Phase I)
Preliminary Plan #: 1-95042
Site Plan #: 8-98001
Tract Size/Zone: 269.13 Ac/RMX-2
Total Concept Area: 120
Tax Plate: EW
Parcel: 2
Liber/Folio: 6776/876, 8825/775
Montg. Co. Grid: 09-C, D, E-3, 4
Watershed: Little Seneca Creek (SPA)

Dear Mr. Mezzanotte:

Based on a review of your resubmission, the STORMWATER MANAGEMENT CONCEPT and the FINAL WATER QUALITY PLAN (FQWP) for the above mentioned Special Protection Area site, the following information is necessary at this time to complete our review. Most of these concerns are based on either new information or the need for further clarification of the resubmission.

MCDEP's comments on the water quality monitoring plan are attached and will have to be addressed also.

Please address all of the following:

1. The present open section/closed section waiver approved by this agency only applies to the streets within the development. The current waiver does not extend to the perimeter roadways. These include Stringtown Road, Clarksburg Road, and ~~Peidmont~~ Road (A-305). NOT BUILT

2. Due to the limited space provided for the water quality structures and the appearance of lack of space for structure expansion, **all roadway cross sections** need to be defined at this time. This will allow all water quality structures to be designed for their **maximum possible impervious drainage area.**

3. Roadway grading, stormdrain lay out, and street width (including sidewalks, bike paths, etc.) must not exceed the impervious limits described by the approved Final Water Quality Plan/Site Plan. This must be agreed to by all parties, including regulatory agencies.

4. The five foot P.U.E. along the east side of Greenway Road must be moved out of the side slopes of the water quality BMPs. The Water Resources Section prefers its deletion entirely.

5. Sand Filter #2. A seven foot high retaining wall with a ten foot (vertical) high 2:1 side slope posses a safety threat. Provide details of safety fences and how maintenance access will be provided.

6. Due to the addition of bike lanes/paths, and because much of main street drains towards SF#2, please provide design details of the Main Street including grading and cross sections that clearly reflect maximum required width and grading. These details, must **also** provide clear detailed sections of the stream valley crossing. Show how **all** impervious surfaces will be graded to the street, or how they will be otherwise conveyed to a water quality structure.

7. Please explain how water quality will be provided for Stringtown Road between street K and street C/transition areas (Clarksburg Road and Greenway Road; and Stringtown Road and Greenway Road).

8. The top of dam for SF #3 needs to be 10 feet minimum for maintenance access. The storm drain outfall needs to be extended to the tree line.

9. The outfall from Bio-filter #4 needs to extend to the tree line.

10. The redirecting of drainage areas to pond #2 from their normal flow paths will cause a greater flow (both volume and duration) in the stream channel below the outlet of pond #2. Provide TR-55 hydrology (both pre and post) which describes the possible magnitude of the situation and a clear discussion of how it will be mitigated.

11. How much imperviousness is anticipated for the future west side Town Square.

12. What type of surface is proposed for the future play areas and pathways within the park. How is water quality being provided (or otherwise mitigated) for these areas?

13. Some of structures on sheet 12 appear to bypass water quality structures. Please clarify on the plan.

14. Show **all** pre-developed drainage areas correctly, not just as a homogeneous watershed.

15. The flow splitting pipe from S.D. structure #407 to SF #8 needs to be within an easement, run along property lines, not diagonally across lots.

16. Sheet #1 shows an alley behind townhouse units 17-23. Is there an alternative to the alley? This area would be better used to "soften" the slopes into the stream valley; also, there would be less impervious area to deal with.

SEDIMENT CONTROL CONCEPT PLAN

The Review of the concept sediment control plan revealed, generally, it is acceptable; however, prior to permit plan submission a pre-design meeting will be necessary.

NOTE: Please discuss in the monitoring plan when construction of the stream repair work should occur, to minimize the damage to the stream valley.

Review of the final water quality monitoring plan has not been completed at this time. However, the following preliminary comments along with comments from MCDEP will need be addressed at this time.

Section 2.2. #2, and 3.3.2.

Although we may agree the bank full storm event may remain unchanged at the Stringtown Road culvert, it will change in each of the branches. For example: By diverting all storm runoff to SM basin #2, the drainage area to the main stem of the creek may be reduced by as much as 50%. How will the bankfull affected? The frequency and duration in the western tributary should also change. Please discuss.

Section 3.2.2.

The WQM/BMP designs may need to be modified or refined at the time of permitting.

Section 3. Pg. 3-12

The use of 32.2% imperviousness for the existing condition seems unrealistic. Please provided a clear color coded plan and calculations to justify this statement. Unless the percent of imperviousness is correct, all assumptions, calculations, and statements in the monitoring plan are suspect.

Section 4.2.

The proposal to provide sediment control inspection only following a 1" or greater storm event is unacceptable. Full sediment control inspection must be done on a daily basis with reports submitted to the MCDEP Special Protection Area Coordinator monthly.

Any divergence from the information provided to this office; or additional information received during the development process; or a change in an applicable Executive Regulation may constitute grounds to reevaluate the site for additional or amended stormwater management requirements. If there are subsequent additions or modifications to the development, a separate concept request shall be required.

If you have any questions regarding these actions, please feel free to contact Richard Gee of my staff at (301)217-6312.

Sincerely,

Richard R. Brush, Section Manager
Water Resources Section

RRB:enm:CN195042

cc: J. Davis
S. Federline
SM File #1-95042
SM Log #98-019
Wynn Witthans