



Raycine Hodo <rmhodo@annapolis.gov>

Fwd: Stormwater Management Inventory and Watershed Implementation Plan

Maria Brown <dnep@annapolis.gov>
To: Raycine Hodo <rmhodo@annapolis.gov>

Fri, Nov 6, 2015 at 4:49 PM

----- Forwarded message -----

From: **Karen Jennings** <kljennings.geo@gmail.com>

Date: Friday, November 6, 2015

Subject: Stormwater Management Inventory and Watershed Implementation Plan

To: dnep@annapolis.gov

Cc: Meg Hosmer <meg.hosmer@gmail.com>, Trudy McFall <trudymcfall@hotmail.com>, Thomas Lippert <Thomas.Lippert@med.navy.mil>, joanna.bounds@gmail.com, mfynes1@jhmi.edu

November 6, 2015

Dear Ms. Broadbent,

The Annapolis Conservancy Board would like to extend our support for the CtyRqst_01 and BMP_14 stormwater management projects identified in the 2015 Stormwater Management Inventory and Watershed Implementation Plan.

The Board has been actively involved in facilitating the transfer of the property at CtyRqst_01 to the City of Annapolis, specifically for the purpose of improving water quality. This site is the headwaters of College Creek, and was also identified in 2007 by Maryland DNR and the Friends of College Creek as an important location for water quality improvements. Discussions with the adjacent homeowners regarding a tree fall in 2009 indicated that they would be supportive of a project at the site. Since 48 acres of watershed drains to this point, a stream restoration or step pool project would have the potential to provide significant water quality improvements to College Creek.

Project BMP_14 involves the retrofit of an existing wet pond located at Harness Creek View Court. This wet pond is located within the Harness Creek Conservation Easement, and drains directly into the forested areas of the easement. An upgrade to the wet pond could improve the water quality entering the conservation forest, and reduce the velocity of water exiting the pond to minimize erosion downstream.

Sincerely,

Karen Jennings

Chair, Annapolis Conservancy Board



Raycine Hodo <rmhodo@annapolis.gov>

Fwd: SCC Site selection - AECOM WIP Stormwater Plan

Maria Broadbent <mbroadbent@annapolis.gov>
 To: Raycine Hodo <rmhodo@annapolis.gov>

Tue, Nov 10, 2015 at 3:27 PM

Maria T. Broadbent
 Director
 City of Annapolis
 Dept. of Neighborhood & Environmental Programs
 145 Gorman St.
 Annapolis, MD 21401
 410-260-2200 ext 7788

----- Forwarded message -----

From: **Mel Wilkins** <mel82nd@comcast.net>

Date: Fri, Nov 6, 2015 at 4:07 PM

Subject: SCC Site selection - AECOM WIP Stormwater Plan

To: Maria Broadbent <mbroadbent@annapolis.gov>, fjb@annapolis.gov, Tom Andrews <tcandrews@annapolis.gov>

Cc: amyers.SRK@gmail.com, "Budniewski, Mark" <mbudniew@cgsi.ciena.com>, clementsae@aol.com, David Barker <david@gyatso.net>, flineskelly@gmail.com, frkissel@verizon.net, Jesse Iliff <jesse@southernriverfederation.net>, Kate Fritz <kate@southernriverfederation.net>, Lynne Rockenbauch <lyndyrock@verizon.net>, mmschlade <mmschlade@gmail.com>, president@severnriver.org, "(Suzanne womanship@outlook.com)" <sailwomanship@outlook.com>, Deirdre Shafea <dshafea@hotmail.com>, Elvia Thompson at Annapolis Green <starboard@annapolisgreen.com>, email4llpowell@gmail.com, leslie@lesliewoodward.com, Marianna Rizzo <m_rizzo@yahoo.com>, Mark Veysey <veysey.mark@gmail.com>, RROCHEZ2@aol.com, twright76@comcast.net

Maria,

SCC would like to provide following input.

General Comments:

- SCC top priority is; whenever possible we will undertake headwaters watershed SWBMP. Thus our selection of 3 sites in the plan are in the headwaters areas.
- The selection is quite difficult since the AECOM evaluation criteria and point system is somewhat arbitrary on goes against more important and realistic selection processes and factors, e.g., estimates of TMDL reductions.
- The study and report could have benefitted from the involvement of the watershed conservation organizations who know their watersheds the best and have in some cases had major assessments done by the Center for Watershed Protection. Who did far more comprehensive efforts than AECOM.

- **SCC is not** going to consider raising funds and implementing future projects on City property in the future – it's just too hard, too costly, the process doesn't work, a lack of City resources, and the ground rules keep changing. Thus those City property sites in our watershed were not considered in our evaluation of priority projects.
- There are many unanswered questions that might affect our decision making. For Example:
 - Who will make the final decisions?
 - How will the final selection be done?
 - Will the City consider implementing projects on private property?
 - Who will take responsibility for the new Severn River City Sub-Watershed? College Creek and Weems Creek organizations seem to be defunct.
 - Will the City be seeking funds for any projects, private or public, in future budgets?
 - Will any funding be available to conservation organizations for SWBMP and related programs?
 - Will the City use the Stormwater Utility fee to pay for maintenance of City property projects?
 - Who, specifically, will be responsible for implementing the plan, e.g., projects beyond the initial 20 selected for 30% design?
 - How will the efforts be coordinated between conservation organizations and City.
- SCC commends DNEP for taking this step in further evaluating the City watershed.
- The South River Federation's – South Riverkeeper discussion of the evaluation criteria process has many good points and we support their comments fully.

Site Selections:

Question 1: Please Identify your priority project 1 and factors that influenced your selection. OUT-6 --- West of Spa Road

and Silopanna Road. Headwaters pollution source part of master plans and with other two projects represents a grouping on dealing with Spa Road sources.

Question 2: Please Identify your priority project 2 and factors that influenced your selection. OPEN-06A -- - East of Hilltop Lane

and Spa Road. Headwaters pollution source part of master plans and with other two projects represents a grouping on dealing with Spa Road sources.

Question 3: Please Identify your priority project 3 and factors that influenced your selection. BMP-1 --- 1120 Spa Road (St.

Martins Lutheran Church). Headwaters pollution source part of master plans and with other two projects represents a grouping on dealing with Spa Road sources.

This site is well known to SCC and was considered for the original SWBMP work 2 years ago, but there was insufficient funding. This site has 19 SWBMP already installed plus 25 trees planted.

Question 4: Add any comments that you would like to share with the City of Annapolis.

- SCC would consider developing a partnership with St. John's College the five (12A – 12E) AECOM identified projects on their campus.
- SCC has three important sites in the upper headwaters that can be added for consideration. See attachment.
- SCC will also put the three remaining sites in our "to do" list. **BMP-3, BMP-5, and BMP-10**

We believe a follow-up meeting to discuss the various areas of concern and the implementation process should take place in the near future.

Cheers

Mel Wilkins

Spa Creek Conservancy

EcoGardens LLC

EnviroSite Design Services

410 271 5546 Cell

410 721 7991 Home

410 721 4577 Fax



WIP Top Three SCC Projects.docx

19K

Top Three SCC Projects

Out_06

West of Spa Road and Silopanna Road

The site is at the Bayshore Landing Apartments at the existing grass swale downstream of a 27-inch storm drain pipe. The grass swale intercepts runoff from the Bayshore Landing Apartments and adjacent roadways. An existing scour pool is downstream of the outfall pipe, as well as a pilot channel that appears to have been created by erosive velocities. The existing swale crosses a sewer line, and electric lines are nearby.

Dry Swale

Retrofit

Retrofit alternatives at this site include upgrading the existing swale to meet current MDE standards. An armored sedimentation basin with a level spreader would provide pretreatment. Upgrading the swale from the pipe outfall to the existing bridge would treat approximately 10% of the drainage area. The bottom of the swale may need to be excavated and replaced with permeable soils.

Private (LLC)

1.1 ac drainage

0.6 Impervious

Open_06A

East of Hilltop Lane and Spa Road

This site is northeast of the intersection of Hilltop Lane and Spa Road. An existing inlet on Hilltop Lane intercepts runoff from the road. No utilities were observed in the grass area, and this area has high visibility from Hilltop Lane and Spa Road.

Micro-Bioretenion

Potential improvements at this site include installing a micro-bioretenion facility in the grass open space. This would require curb cuts upstream and downstream of the existing inlet and partially blocking the existing inlet using a weir. The soils in the area are hydrologic group C so an underdrain would most likely be required. Aesthetically pleasing plantings are recommended due to the visibility of this site, although trees should be avoided to prevent impacting visibility. Community (Church, Mosque, etc.)

0.3 ac drainage

0.3 ac Impervious

BMP_01

1120 Spa Road (St. Martins Lutheran Church)

This site is at an existing dry pond northwest of St. Martins Lutheran Church. The pond collects runoff from the roof of nearby church buildings and has a single inlet. The outlet structure includes a low flow pipe and a concrete riser with a grate inlet that drains to a storm drain pipe under Forest Drive. No utilities were observed in the pond, and there are two small ornamental trees.

Bioretention

Retrofit alternatives at this site include implementing a bioretention facility in the existing pond footprint. A berm is proposed near the inlet to create a sediment forebay. The low flow pipe of the existing riser would need to be blocked, but the grate inlet could remain to provide overflow

control for the bioretention. The soils in the area are hydrologic group C, so an underdrain would most likely be required.

Community (Church, Mosque, etc.)

1.1 ac drainage

0.3 ac Impervious

Other Priority Project Recommended

<p>R-14 This site has been previously identified by SCC/CWP and is a major pollutant contributor to the Lincoln Dr. Biocell and headwaters.</p>	<p>Perimeter Sand Filter or Bioretention Stormwater planters</p>	<p>Fastenal/Eastern Petroleum Corporation Office Complex</p>	<p>1.50 ac drainage</p>	<p>Unmanaged parking lot. May install perimeter sand filter or bioretention. Building owned by Board member of South River Federation.</p>
<p>R-22 This site has been previously identified by SCC/CWP and is a major pollutant contributor to the CCM ravine now undergoing restoration and headwaters.</p>	<p>Bioretention</p>	<p>Apartments on Silopanna Rd across from Children's Museum</p>	<p>1.70 ac drainage</p>	<p>Untreated stormwater and existing drainage issues. Possible bioretention of garden area and curb cuts to bioretention.</p>
<p>R-23 This site has been previously identified by SCC/CWP and is a major pollutant contributor to the headwaters gabion basket swale area now undergoing restoration and headwaters. There is also preliminary community contact on the community SW issues in general.</p>	<p>Bioretention Streetscaping</p>	<p>End of street at Southwood and Virginia</p>	<p>3.22 ac drainage</p>	<p>Existing plantings along the stream, residents have existing drainage problems.</p>

November 6, 2015

Maria Broadbent
Director
Department of Neighborhood
and Environmental Programs
City of Annapolis
160 Duke of Gloucester St.
Annapolis, MD 21401-2517

**South River Federation Inc. Comments on City of Annapolis Stormwater
Management Inventory and Watershed Implementation Plan**

Dear Ms. Broadbent:

By this letter, the South River Federation, Inc. (SRF) provides comment on the City of Annapolis' Stormwater Management Inventory and Watershed Implementation Plan (WIP) Interim Submittal that SRF hopes the City finds useful in crafting its Final WIP. The following comments are grouped into three categories: First, SRF offers several programmatic comments on the process undergone by the City in conjunction with its environmental consultants in developing the WIP in order to facilitate the City's achievement of its stated goal to "meet the water quality and load reduction requirements of the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) permit and the Chesapeake Bay Total Maximum Daily Load (TMDL)." Second, SRF addresses each of the Best Management Practices (BMP) proposed in (or near) the South River watershed, offers constructive criticism of certain proposed BMPs which it feels will fall short of achieving these goals and proposes alternative solutions. Finally, SRF offers comments on how to maintain constructive continuing dialogue between the City and the various watershed groups and individual citizens interested in assisting the City with implementation of the WIP.

I. PROGRAMMATIC CONSIDERATIONS

A. The Number of BMPs Identified Cannot Achieve MS4 and TMDL Requirements

At the outset, SRF notes that the interim WIP identifies only 65 sites within City limits for consideration of BMPs. Mindful of resource constraints on the development and implementation of the WIP, SRF contends that identification and implementation of far more BMP sites in the City is necessary to comply with MS4 and TMDL requirements. SRF therefore requests that additional time be allotted to identify these sites, and SRF volunteers to assist the City with identification of such sites within the South River watershed. Understanding that identification of such BMP sites will require financial analysis, SRF further volunteers to assist the City with developing cost estimates of sites within our watershed, and to work actively to create useful

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partnerships to fund, install and maintain such BMPs, which will include SRF attempts to raise external funding for priority City projects.

The target reductions of criteria pollutants identified in the WIP is unrealistic in light of the relatively few BMP sites identified. Based upon current scientific literature, SRF considers the currently proposed BMPs capable of obtaining approximately as high as 1/10 or as low as 1/100 of the target reductions stated in the WIP. SRF acknowledges and appreciates the effort put forth in generating the WIP as currently drafted, but feels strongly that without significantly greater numbers of BMPs coupled with more strategically-oriented designs (discussed in greater detail *infra*) achievement of MS4 and TMDL goals is unobtainable.

B. Proposed Revisions to the Criteria Utilized in the WIP for Prioritization of BMPs

Apart from the number and type of BMPs proposed, SRF proposes revisions to certain of the criteria by which the City and its consultant evaluated the BMPs identified. In an overall sense, SRF is concerned that too much priority is afforded to projects on the basis of the ease with which they may be constructed, at the expense of meaningful progress toward compliance with MS4 and TMDL requirements. In Table K of the WIP, the City sets forth a series of criteria and attendant weighting scheme in support of its stated priority projects. Of the criteria in Table K, SRF agrees that Impervious Drainage Area, Site Ownership, Anticipated Project Cost per Impervious Acre Regulatory Approvals and Maintenance Burden are useful metrics for prioritizing BMPs in the context of limited resources. Several of the other criteria in Table K are also useful considerations, but as explained more fully in the following paragraphs, are more efficiently considered as part of another criterion. Finally, SRF suggests revision of some of the weights assigned to certain of Table K's criteria.

- Site Access

The ease or difficulty of access to a site is readily accounted for as part of the cost per impervious acre analysis. While SRF is mindful of a point of diminishing return on investment in a particular stormwater BMP, considering "site access" as an independent criterion is logically unnecessary and risks undervaluing BMPs that may achieve substantial long-term nutrient reduction on the basis of temporary access difficulty.

- Utility conflicts

As with site access, utility conflicts are simply a component of total cost, and thus more simply analyzed as part of the cost per impervious acre analysis. In light of Annapolis' historical development and dense existing overlay of roads and utilities, conflicts are likely at nearly every adequately sized BMP. It is thus possible that resolution of utility conflicts for effective stormwater BMPs can benefit from efficiencies of scale if BMPs are appropriately sized for achievement of MS4 and TMDL objectives.

- Environmental impacts

SRF agrees in a broad sense that "trees, natural streams, and natural wetlands provide environmental benefits that are difficult to reproduce once impacted." However, assuming that a particular site contains high-functioning "natural" streams and wetlands puts the cart before the horse, as clearly such an area would not be a potential BMP site. Significant research and local

data demonstrates that nearly all existing Annapolis area streams and wetlands are not "natural" at all, but in fact are quite unstable and are sources - not processors - of pollution. SRF's concern is that the City may refer to this criterion to de-prioritize ambitious projects with significant pollution reduction potential because such projects are likely to "impact" trees, natural streams and natural wetlands. Moreover, impacts to these natural resources are already subject to a variety of State and Federal standards. Thus SRF recommends analyzing this criterion as a subset of its regulatory approvals analysis.

- Regulatory approvals

The City's current analysis of regulatory approval issues allows for only two possible scores, without regard for the various permitting requirements of the City itself, the State of Maryland, and/or the federal government. SRF (and other NGOs) have worked with Anne Arundel County DPW and other regulatory leaders for nearly two decades to simplify permitting procedures and ensure compliance on complex stormwater and habitat projects. SRF encourages consideration of large, successful BMPs such as SRF has previously installed in Anne Arundel County. However, mindful of the need to obtain regulatory approval, SRF suggests revising this metric as follows: identify all permits typically required for BMPs in the City (i.e. Critical Area, MDE Waterways (tidal and/or nontidal), MDE wetlands (tidal and/or nontidal), US Army Corps / EPA, MD Forest Conservation Act) to determine a total. Next, identify all permits required for a particular BMP, and subtract this figure from the total to arrive at the subject BMP's weighted score. For example, assume each permit equals five points. If the five permits identified above represent the total possible permits which may be required for any BMP in the City, and a given BMP requires three permits, it would receive a weighted score of 10 points.

- Erosion or flooding concern

Although formerly stormwater utility fee funds have been used to implement practices which conveyed stormwater away from infrastructure and into the nearest waterway as quickly as possible, this practice is in fact antithetical to the intent of the WIP and the TMDL in general. Simply put, the City must design BMPs that can simultaneously eliminate flood risk to structures and diminish stormwater runoff into local waterways. However, SRF agrees that sites where erosion is ongoing or poses a significant risk should be carefully considered when prioritizing projects. Therefore SRF recommends renaming this metric "Erosion activity/potential" and provide a score of up to 25 points (from the current 0-10). SRF recommends deleting all reference to "flooding concerns" unless the selected BMP addresses flood flow volumes and provides significant water quality treatment before delivering stormwater to the storm drain system. The City cannot possibly hope to reduce sediment loading by 20% in 10 years by de-prioritizing sites where erosion is actively occurring. Yet, this criterion as currently proposed de-prioritizes certain sites specifically for this reason. From a "volume of sediment" standpoint, this criterion is antithetical to achieving MS4 and TMDL standards.

- Public visibility

Although SRF recognizes that high visibility projects are sometimes more likely to receive grant funding, it is alarming that this metric is allotted half the weight of a site's erosion activity/potential. High profile / high visibility projects are important, but do not impact the percentage reduction of sediment achieved by an individual project. Thus, SRF recommends changing the current 5-point score to "0 - 2."

II. SPECIFIC BMPs

a. SRF Concur With the Following Proposed BMPs

Describing the BMP labeled “City_06” the WIP states that “[a] step pool conveyance is another potential retrofit at this location.” SRF agrees that a step pool conveyance is an appropriate retrofit for the 42-inch outfall into Aberdeen Creek off of Hunt Meadows Drive.

The WIP describes as “Open_16” the storm drain system along Hunt Meadows Drive, and proposes rerouting the runoff currently channeled in the storm drain into a bioretention filter before tying back into the existing storm drain system. SRF agrees that such a BMP would provide a meaningful retrofit to the existing storm drain channel.

Finally, the WIP describes as “Park_08” a BMP of retrofitting existing swales at an open area in Annapolis Walk Park to bioswales. SRF agrees that such a retrofit is a good concept, and moreover is easy to implement and thus provides low-hanging fruit for the City to act upon.

b. SRF Submits the Following Comments on Proposed BMPs in the WIP

- **BMP-06:** This BMP was a permit requirement from work previously performed at the site, but was never constructed. This is a compliance issue, and SRF contends that it should not be a City-funded TMDL project, as it serves pre-2000 stormwater manual needs, not current needs. Moreover, the permittee is the party responsible for construction of this BMP, and its failure to do so should be investigated and addressed according to law. The rain garden proposed by the City in a grassy area would neither contribute to impervious reduction or significant pollution reduction, given the huge roof and parking lot area.
- **BMP-17:** This is a small retrofit BMP. No impervious reduction or significant pollution reduction is proposed with this BMP, which basically converts a rip rap basin to a 1990s-style sand basin.
- **BMP-04:** Unfortunately, this proposed BMP focuses only on retrofits in existing BMPs, which have been consistently insufficient as a matter of scale and thus retrofitting of these BMPs is unlikely to succeed. SRF recommends that the City fund full retrofit, including outfall restoration, as part of Newtowne-20 redevelopment.
- **BMP-07:** The WIP recommends a wet pond upgrade at this site. SRF recommends conversion of the wet pond to a functioning stormwater wetland for significantly enhanced nutrient and sediment reduction.
- **BMP-11:** The WIP recommends a wet pond upgrade. SRF recommends conversion of the wet pond to a functioning stormwater wetland for significantly enhanced nutrient and sediment reduction.
- **BMP-14:** The WIP recommends a wet pond enhancement with swale work. Potential pollution reductions at this site are very large and therefore SRF recommends an expansive suite of BMPs such as extensive roadside swales, outfall restoration, etc., to capitalize on the potential of this large facility.
- **BMP-15:** This is a large regional pond and a suite of BMPs upslope and downstream should be considered along with the pond's upgrade.
- **BMP-18:** The WIP currently recommends “upgrading the existing wet pond to meet current MDE standards.” It is unclear whether the City is referring to standards related to soil substrate, slopes on berm, etc., and it would be helpful for evaluation of this BMP's potential for success to know

what metrics the City intends to work toward. SRF suggests that this facility is currently undersized for its stormwater load, and could benefit from expansion. SRF also notes the City's apparent concern in the WIP with removing individual urban trees elsewhere in the WIP, and suggests that the WIP's description of this site as "overgrown" is misleading, as the site currently supports several 25-30 foot tall Bald cypress trees (10-15 trees total), which should remain in place as they perform significant water quality improvement and habitat functions.

- **CityRqst-03:** The WIP concludes that since stormwater management work is proposed above the badly eroding stream (BMP-14) that stream restoration is not necessary or appropriate. Apart from making the questionable assumption that upslope BMPs will function perfectly, this conclusion fails to account for significant rain events wherein upslope BMPs are designed to release stormwater above a certain threshold, which will then flow into the eroding stream feeding Aberdeen creek. When upslope BMPs are overwhelmed, as they are designed to be, the erosion problem currently suffered at this site will continue to be exacerbated, and the sediment and nutrient loading problem at the site will go un-mitigated.
- **Open-1:** The WIP summarily concludes that since overhead utilities and a sewer line exist in this gully, that only a micro-bioretenion project is feasible. SRF suggests that to the extent the City analyzed this site as a potential location for a stormwater BMP, it is reasonable to simply consider the cost of resolving utility conflicts as part of total cost per impervious acre, and consider additional BMP alternatives.
- **Open-2:** The WIP notes that this site could not be accessed during field investigation, and thus that no potential improvements are provided at this site. SRF suggests that greater effort should be made to communicate with the property owner to obtain access to this site, as the stream on Crab Creek is severely impaired, and the potential increase of runoff from proposed development is likely to increase this impairment.
- **Park-09:** SRF appreciates the City's acknowledgement that our planned project at this site will significantly reduce sediment and nutrient loading into Church Creek, and we welcome continuing dialogue as to ongoing maintenance at the site.

III. Additional Considerations

SRF has the following additional suggestions for the City as it moves forward with implementing the WIP. First, SRF is grateful to the City for making available the WIP, watershed map and explanatory power point online. However, SRF suggests that these documents could benefit from a bit of contexts as to why they are on the city's website, i.e., a brief overview of the MS4 and TMDL requirements and explanation of how the WIP is intended to meet these requirements, accompanied by designation of a point of contact at the City for organizations and individuals seeking additional information.

SRF also notes that at the public meeting on October 19, 2015, several individuals suggested incorporation of elements from the 2009 City of Annapolis Watershed Study and Action Plan (McCrone Study) into this 2015 WIP package. There are many "Specific Project Recommendations" (McCrone Study, 50), a list of "City-Wide Projects and Initiatives" (*id.* 52), and "Programmatic Change Recommendations" (*id.* 54) that should be included in the final WIP document.

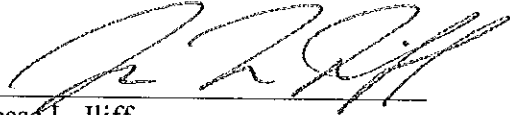
Finally, SRF strongly recommends that the City model the format of its final WIP after that of the Anne Arundel County WIP, available at:

http://www.mde.state.md.us/programs/Water/TMDL/TMDLImplementation/Documents/FINAL_PhaseII_Report_Docs/Final_County_WIP_Narratives/Anne_Arundel_WIPII_2012.pdf.

IV. Conclusion

SRF commends the City for beginning the work of addressing stormwater management. The draft WIP and watershed map are important first steps in this process, but much work remains to be done notwithstanding fiscal constraints. To that end, SRF hopes to be an effective and perennial partner with the City in its effort to achieve our collective goal of improved water quality. SRF welcomes the opportunity to answer any questions about these comments and engage in further discussion of them and the WIP in general with the City and suggests scheduling another meeting to discuss these and comments submitted by other interested persons and organizations sometime in early December, 2015.

Respectfully Submitted,



Jesse L. Iliff
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Raycine Hodo <rmhodo@annapolis.gov>

City of Annapolis - Community Input for Selecting Projects for Concept Design

Lynne Rockenbauch <lyndyrock@verizon.net>

Thu, Nov 5, 2015 at 5:10 PM

To: Raycine Hodo <rmhodo@annapolis.gov>, dneep@annapolis.gov

Cc: Zora Lathan <zoralathan@earthlink.net>, David Barker <david@gyatso.net>, Amy Clements

<ClementsAE@aol.com>, Anne Myers <amyers.SRK@gmail.com>

I am not personally a resident of Annapolis, but as President of the Severn River Association, I am speaking for the Annapolis City resident members and particularly for the areas in your WIP marked Severn Watershed. The other watershed areas have active groups who will respond separately.

Question 1: Please Identify your priority project 1 and factors that influenced your selection.

BMP-19. This is a prime educational site since the Chesapeake Ecology Center gardens are there. Unfortunately, the private property owners may be tough to deal with because they have expanded their backyards into the swale. This is why the Ecology Center will not tackle this one. The city needs to "take back the swale" and make it obvious to these homeowners what the swale is for and why their chicken coops and play equipment do not belong there.

Question 2: Please Identify your priority project 2 and factors that influenced your selection.

Ridgewood and Brewer (CtyRqst_01). The end of Brewer Ave drains right off the end of the road into a deep ravine. This is College Creek headwaters and would be a great place to make sure the stormwater is treated before running into natural streams. The drainage area is fairly large here.

Question 3: Please Identify your priority project 3 and factors that influenced your selection.

The dry pond at the end of Blackwell Road, BMP_02. This pond is failing and in great need of maintenance. This bubbled to the top because it is no longer functional. Built in 1990, it probably has not been maintained at all. The city probably expected the HOA to maintain it, but the HOA either didn't know of that responsibility or didn't know how or why to maintain it.

Question 4: Add any comments that you would like to share with the City of Annapolis

Since you are picking projects to take to 30% design, I believe that the most important criteria to consider for the city is –

- Is the project at the top of the stormwater problem? This would usually be at the headwaters of a creek such as Spa, Back, College, or Weems Creek, but could be a large storm drain collecting water from streets over along distance. Generally starting at the top of the stormwater problem and working down makes the most sense.
- Is the project visible – near where people walk, where "before" pictures could be displayed and the solution explained. This creates an educational opportunity.
- Is the drainage area relatively large? This will increase value of TMDL credit.

- Is this project on city property?

Please add the swale behind Bloomsbury Square along Rowe Blvd to your list. This could be improved and would make a nice educational site. I discovered this while trying to figure out what you had in mind for the corner of Rowe and Calvert, so maybe you could consider it part of that site (Open_11).

Respectfully submitted,
Lynne Rockenbauch
President, Severn River Association



Raycine Hodo <rmhodo@annapolis.gov>

Fwd: Watershed report

Maria Brown <mrbr@annapolis.gov>
 To: Raycine Hodo <rmhodo@annapolis.gov>

Thu, Oct 22, 2015 at 5:06 PM

First response!

----- Forwarded message -----

From: <ellenmoyer@yahoo.com>
 Date: Thursday, October 22, 2015
 Subject: Fwd: Watershed report
 To: "dnep@annapolis.gov" <dnep@annapolis.gov>

Sent from my iPhone

Begin forwarded message:

From: ellenmoyer@yahoo.com
Date: October 22, 2015 at 4:12:22 PM EDT
To: "dnep@annapolis.gov" <dnep@annapolis.gov>
Cc: Jared Littmann <aldlittmann@annapolis.gov>
Subject: Watershed report

I am disappointed in the quality of this report.

The study should encompass a master plan to its fullest extent. Community groups are hindered if projects and programs they have developed are not included because it impedes their ability to secure grants from other agencies.

Every program and area should be a part of a master plan including other measures as tree planting, fragmities removal, storm water retrofits, floating island to remove toxins, all things to lead to improved water quality. Only after a watershed master plan is in place can priority areas be selected that will make the biggest difference with the public dollars available. This is much the process used with a comprehensive land use process...mega citizen participation. Followed by sector planning. That includes the potential funding sources, public, private, and foundations that can make a difference for accomplishment.

This is nothing but a rain garden plan that has little to do with excellence in making a difference in our watershed. a program that could be a model for other municipalities but it falls far short. The 2009 City watershed plan by McCrone, the only municipal watershed plan in the state, you dissed has in fact been used by community groups in there implementation strategies. Where has the vision for excellence gone?

Choose a priority...mine are not even listed.

Back creek nature park...you selected a stream that leads to a flooded area. The western storm drain stream has been looked at by the Smithsonian Environmental Resource Center and others and designs suggested and is not even included. The head of back creek has been under consideration, programs suggested to stop the silting and outreach programs coordinated with community associations for backyard habitats recommended. Invisible. And so on and on.

The lack of community participation, coordination with rec and parks and public works and consideration from other city commissions is the mark of amateurs with little respect for genuine community outreach in the planning process.

I am sorry this plan that is not a plan is so limited certainly not visionary and will be a waste of public money. It is interesting that community groups frustrated with city neglect have managed to

11/10/2015

Annapolis.gov Mail - Fwd: Watershed report

plan, strategize and find resources for projects that will make a difference in water and habitat quality that are far more vigorous than anything identified in this half baked plan that is not a plan.

Ellen Moyer

Adding to the frustration your email says select a priority site and there is no access to the survey you want answered.

Another mark for excellence or lack thereof.

EM

Sent from my iPhone

--
Maria R. Brown
Assistant to the Director
Department of Neighborhood & Environmental Programs
145 Gorman Street
Annapolis, MD 21401
410-260-2200 x7751



Raycine Hodo <rmhodo@annapolis.gov>

Fwd: City Stormwater Management Projects

Maria Brown <mrb@annapolis.gov>
To: Raycine Hodo <rmhodo@annapolis.gov>

Sat, Oct 24, 2015 at 11:59 AM

----- Forwarded message -----

From: **Robert Worden** <njworden@aol.com>
Date: Saturday, October 24, 2015
Subject: City Stormwater Management Projects
To: dnepe@annapolis.gov

Dear DNEP Staff:

These are my top three proposed projects:

- (1) Park_07 Amos Garrett Park - *new!*
- (2) Open_11 Calvert & Rowe Firefighters Memorial
- (3) Open_6B Hilltop & Spa

Thanks for asking for public input.

Robert Worden
30 Murray Avenue
Annapolis 21401

--
Maria R. Brown
Assistant to the Director
Department of Neighborhood & Environmental Programs
145 Gorman Street
Annapolis, MD 21401
410-260-2200 x7751



Raycine Hodo <rmhodo@annapolis.gov>

Fwd: College creek head waters

Maria Brown <dnep@annapolis.gov>
To: Raycine Hodo <rmhodo@annapolis.gov>

Sun, Oct 25, 2015 at 2:59 PM

----- Forwarded message -----

From: **Adam Petty** <adam.petty@gmail.com>
Date: Sunday, October 25, 2015
Subject: College creek head waters
To: dnep@annapolis.gov

The area near Adams school and the old folks home needs bioretention badly to clean the storm water and runoff before it gets to college creek. I will send you some pictures.

Thanks
Adam Petty
704 Genessee St
Annapolis MD

Sent from my iPhone



Raycine Hodo <rmhodo@annapolis.gov>

Fwd: Community Input on Stormwater and Watershed

Maria Brown <dnep@annapolis.gov>
To: Raycine Hodo <rmhodo@annapolis.gov>

Tue, Oct 27, 2015 at 1:51 PM

----- Forwarded message -----

From: **Ann Trott** <afranster68@gmail.com>
Date: Tuesday, October 27, 2015
Subject: Community Input on Stormwater and Watershed
To: Maria Brown <dnep@annapolis.gov>
Cc: Ann Trott <afranster68@gmail.com>

I attended the recent meeting held at the Moyer Center regarding stormwater management. I am a resident of the Fairwinds Community, which is off of Bay Ridge Road. I have lived here for more than 26 years and have seen the area change in many ways.

Having seen the damage, this spring/summer alone, that stormwater runoff from Georgetown Plaza has caused to our property and the properties along Cypress Road, I feel working on BMP 17 is an absolute must. What would be achieved if work was done at OUT 07, the drain located at Windwhisper Lane and Georgetown Road, if work is not done where the drainage and overflow of rainwater originates.

I have taken videos showing the stormwater coming from Georgetown Plaza. In the videos, the water is flowing so fast, you think you're looking at an area where one does white water rafting. The flow of water completely engulfs the swale that is located on our property. When I say engulf, I mean one cannot see the rocks of the swale, the drain becomes completely clogged with debris and the entire area is flooded. On two occasions, the water was only 2" from the top of the pad of a BGE transformer. The area of flooding extends onto the properties on Cypress Road, as well. This has happened on three occasions while I was home and one additional occasion while I was away.

The amount of soil from our property that has washed away is probably contributing greatly to the sediment build up at the drainage pipe located at Windwhisper Lane and Georgetown Road. I do believe that much of the sediment is carried along to empty into Back Creek.

I understand that Georgetown Plaza is privately owned, that there is a tree and a fence to contend with as well as disruption of areas of the parking lot. However, the temporary inconvenience caused by working on BMP 17 is quite small compared to the ongoing damage caused by water runoff from that shopping center.

Please put both BMP 17 as well as OUT 07 high on the list of areas to be considered for improvement of Stormwater runoff.

Thank you,

Ann Trott
204-B Victor Pkway.
Annapolis, MD. 21403

afranster68@gmail.com



Raycine Hodo <rmhodo@annapolis.gov>

Back Creek Sub Watershed

frkissel@verizon.net <frkissel@verizon.net>

Tue, Oct 27, 2015 at 10:46 PM

To: rmhodo@annapolis.gov

Cc: Maria Broadbent <MBroadbent@annapolis.gov>

Dear Ms. Hodo

I note that Project ID Out-04 in Table B-1 shows that the site "was inaccessible; no potential improvements are planned at this site.", and that the acreage for drainage area and impervious area are not provided – the reason being that it is "Not Applicable".

I think that the acreages Are applicable, even if the projects are not scheduled to go ahead, and ask that you include them in this document, since it will be a great help in deciding if these projects should be considered in the future – especially considering that the property contains "steep slopes". The fact that the property is "private" does not necessarily, mean that the project is forever off the table.

I think the same argument also holds for other places in the document where the acreages are considered "non applicable".

Thank you

Rick Kissel

Ms. Frances Ulmer
938 King James Landing Rd.
Annapolis, MD 21403

November 2, 2015

The City of Annapolis, Maryland
Department of Neighborhood & Environmental Programs

Subject: City of Annapolis' Watershed Implementation Plan

Dear DNEP:

As a resident of the City of Annapolis living on Back Creek, and as an active mariner, I am greatly concerned about the state of Back Creek and its future, including:

1. The health of the watershed for support of local wildlife and for recreational use such as fishing, crabbing, swimming, kayaking, and paddle boarding.
2. The ongoing maintenance of the waterway so that navigable channels remain accessible.

Therefore, I am respectfully submitting the following comments on the City of Annapolis' (the City) Watershed Implementation Plan (WIP).

Public Outreach

On October 26, 2015 the DNEP responded via email as follows to a question I asked regarding the first WIP projects the City plans to implement:

"The City has not chosen the first 20 sites for implementation. The top 20 will be chosen from those listed in the report found at: <http://www.annapolis.gov/government/city-departments/neighborhood-environmental/watershed-improvement-project> and from suggestions from citizens of Annapolis. Please take a look at the interim submittal report and then feel free to suggest your top three choices and/or suggest a project(s) for consideration."

I have reviewed the WIP interim submittal report referred to by the DNEP. The WIP report states:

"The proposed ranking criteria is a tool to assist the City to select the 20 high priority projects; however, the City may select any projects it believes are most appropriate based on engineering judgement."

Of concern, is that the ranking criteria does not appear to factor in public input (see Figure 1 below). This impression is furthered because there was a single public meeting held on October 19, 2015 by the City and with a limited window given for the public to comment by (November 6, 2015).

Also of concern, is the statement: *"The City may select any projects it believes are most appropriate based on engineering judgement."* This appears subjective and potentially defeats the City's ranking criteria.

Figure 1 – Storm Water Management Prioritization Criteria*

Criterion	Max Possible Score
A. Impervious Drainage Area	25
B. Site Ownership	10
C. Site Access	5
D. Utility Conflicts	10
E. Environmental Impacts of Proposed Solution	10
F. Regulatory Approval	10
G. Flooding and Erosion Concerns	10
H. Anticipated Project Cost per Acre Treated	10
I. Public Visibility	5
J. Anticipated Annual Maintenance Cost	5

*Figure 1 Source: City of Annapolis – Stormwater Management Inventory and Watershed Improvement Plan, Appendix B: Field Investigation Summary

Inequitable Allocation of Projects Between the Four Watersheds

During the October 19, 2015 public meeting at the Pip Moyer Recreational Center, the City indicated they had been collaborating with the Spa Creek Conservancy during the WIP inventory phase. Of concern, is how much outreach has been conducted with the communities and businesses in the other areas targeted by the WIP (Back Creek, Severn River and South River)?

The Back Creek Watershed represents one of the largest Sub-Watersheds within the WIP. Back Creek houses a majority of the major marinas within Annapolis, as well as a host of maritime related businesses, and waterfront communities. However, as illustrated by Figure 2 (below):

- Only a total of six projects are under consideration for Back Creek versus fourteen projects for Spa Creek
- A total of nine rain garden projects are under consideration for Spa Creek versus one for Back Creek and zero for the Severn and South Rivers.

Figure 2: Data Pulled from City of Annapolis WIP Report*

	Rain Garden Projects	Number of Projects Examined	Number of Projects Under Consideration
Back Creek	1	7	6
Severn River	0	15	11
South River	0	19	14
Spa Creek	9	24	14
Total	10	65	45

*WIP Report: City of Annapolis – Stormwater Management Inventory and Watershed Improvement Plan, Appendix B: Field Investigation Summary

Of concern, is that Back Creek and the Severn and South Rivers are being given a back seat to Spa Creek.

Rain Gardens

The WIP report states:

- 1) "A site has greater potential when it drains larger impervious areas when compared to a site that drains smaller areas".
- 2) "The pollutant removal benefits are assumed to be proportional to the impervious drainage area for preliminary ranking."

Almost a quarter of the projects under consideration (22%) are rain garden projects. Yet, the rain garden projects address substantially less impervious drainage surface area than many of the existing project sites under consideration for retrofit. The retrofit projects, with far greater impervious drainage surface area, are the biggest contributors to pollution and sediment run-off.

Of concern, is that the City's ranking criteria (see Figure 1 above) have the effect of giving new rain garden projects priority over retrofit projects. This outcome is reflected in the Priority Ranking Tables of the WIP interim submittal report (see Figures 3 and 4 below).

1. How many of the retrofit sites identified in the WIP report are aging and outdated, in dire need of maintenance and re-engineering?
2. How many outfall projects and other projects in the WIP that contribute to run-off in the watersheds will take a back seat to rain gardens?
3. Is the City about to embark on implementing a host of rain gardens throughout Annapolis that will create an additional maintenance burden on the City and taxpayers at the expense of not maintaining and updating existing sites of some of the biggest polluters?

Figure 3 – Table D-1: Back Creek Sub-Watershed Priority Ranking Table*

Project ID	Location	Project Type	Impervious Drainage Area (0-25)	Ownership (0-10)	Access (0-5)	Utility Impacts (0-10)	Environmental Impact of Proposed Solutions (0-10)	Regulatory Approval (0-10)	Flooding and Erosion Concerns (0-10)	Anticipated Project Cost / Impervious Acre (0-10)	Public Visibility (0-5)	Maintenance Burden (0-5)	Total Score (0-100)	Rank
Park_02	Ellen O. Moyer Nature Park at Back Creek (Bembe Beach Road and Edgewood Road)	Dry Swale Retrofit to Bioswale	0	10	5	10	5	10	10	10	2.5	2.5	65	1
Out_01	North of Edgewood Road (Osprey Nature Center)	Step Pool Conveyance System	25	10	0	10	0	0	5	5	2.5	5	62.5	2
BMP_06	Mt. Moriah Church (2204 Bay Ridge Ave)	Rain Garden	0	5	5	10	10	10	0	10	5	5	60	3
BMP_17	914 Bay Ridge Road (Georgetown Plaza)	Infiltration Basin Retrofit	12.5	0	5	10	5	10	0	5	2.5	5	55	4
Out_07	Windwhisper Lane and Georgetown Road	Step Pool Conveyance System	25	0	0	10	0	0	5	5	2.5	5	52.5	5
Out_05B	Northeast of Tyler Avenue and Janice Drive	Micro-Bioretenion	0	5	5	10	10	10	0	5	5	2.5	52.5	5
Out_05A	Northeast of Tyler Avenue and Janice Drive	Bioretention	12.5	5	5	5	10	0	0	5	5	2.5	50	7

*Figure 3 Source: City of Annapolis – Stormwater Management Inventory and Watershed Improvement Plan, Interim Submittal (Scope Tasks 2, 3, and 6), Appendix D: Priority Ranking Tables

Figure 4 – Table D-1: Spa Creek Sub-Watershed Priority Ranking Table*

Project ID	Location	Project Type	Imper-vious Drainage Area (0-25)	Owner-sh'p (0-10)	Access (0-5)	Utility Impacts (0-10)	Environ-mental Impact of Proposed Solutions (0-10)	Regulatory Approval (0-10)	Flood'ng and Erosion Concerns (0-10)	Anticipated Project Cost / ImperVIOUS Acre (0-10)	Public VisiBility (0-5)	Mahn-tenance Burden (0-5)	Total Score (0-100)	Rank
Park_03	Truxton Park (North) near Pump House Road	Bioretention	12.5	10	5	10	10	10	10	5	5	2.5	80	1
BMP_05	Northeast of Juliana Circle East and Newtowne Drive (Rivers Glen)	Dry Pond Retrofit to Sand Filter	25	5	5	10	10	10	0	5	0	2.5	72.5	2
Open_06B	East of Hilltop Lane and Spa Road	Micro-Bioretention	12.5	10	5	10	10	10	0	5	5	2.5	70	3
Open_12E	Saint John's Campus: Harison Health Center	Rain Garden	12.5	5	5	10	10	10	0	5	5	2.5	65	4
Park_04A	Rec Center (Compromise Street and Newman Street)	Rain Garden	0	10	5	10	10	10	0	10	5	5	65	4
Open_12A	Saint John's Campus: Pinkey Hall	Rain Garden	0	5	5	10	10	10	5	10	5	2.5	62.5	6
Park_04B	Rec Center (Compromise Street and Stain Mary's Street)	Rain Garden	0	10	5	10	5	10	0	10	5	5	60	7
BMP_10	Meridian Nursing Center (Milkshake Ln and Hilltop Ln)	Wet Pond Retrofit	25	0	0	10	0	10	0	5	2.5	5	57.5	8
Open_12B	Saint John's Campus: Pinkey Hall	Rain Garden	0	5	5	10	10	10	0	10	5	2.5	57.5	8
Open_12C	Saint John's Campus: Pinkey Hall	Rain Garden	0	5	5	10	10	10	0	10	5	2.5	57.5	8
Open_12D	Saint John's Campus: Chase-Stone House	Rain Garden	0	5	5	10	10	10	0	10	5	2.5	57.5	8
Out_05	West of Spa Road and Slopanna Road	Dry Pond Retrofit	12.5	0	5	5	10	10	5	5	0	5	57.5	8
Open_06A	East of Hilltop Lane and Spa Road	Micro-Bioretention	0	5	5	10	10	10	0	5	5	2.5	52.5	13
Open_08	Northwest of Forest Drive and South Cherry Grove Avenue	Infiltration Trench Retrofit	0	10	5	5	10	10	0	5	2.5	5	52.5	13
Open_09	Center of State Circle	Rain Garden	0	0	5	10	10	10	0	10	5	2.5	52.5	13
Park_07	Amos Garrett Park (Amos Garrett Boulevard)	Rain Garden	0	10	2.5	10	10	0	0	10	5	5	52.5	13
BMP_01	1120 Spa Road (St. Martins Luthern Church)	Bioretention	0	5	5	10	5	10	0	5	5	2.5	47.5	17
BMP_12	Tuckahoe Creek Court (Oxford_Landing_Sec tion_III)	Infiltration Basin Retrofit	25	0	0	10	0	0	0	5	2.5	5	47.5	17
Trans_02	Maryland Avenue from King George Street to State Circle	Permeable Pavement	0	10	5	0	0	10	0	0	2.5	0	27.5	19
BMP_03	Milkshake Lane	Infiltration Basin Retrofit	0	0	2.5	5	0	10	0	0	2.5	5	25	20

*Figure 4 Source: City of Annapolis – Stormwater Management Inventory and Watershed Improvement Plan, Interim Submittal (Scope Tasks 2, 3, and 6), Appendix D: Priority Ranking Tables

Conclusion

A substantial amount of time and money has been invested by the City into the WIP over the past several years. When the City chooses the top 20 projects for implementation, I am respectfully requesting that:

1. Broader public outreach is made, especially with the Back Creek community, before the 20 projects are selected and committed to.
2. Back Creek and other areas targeted in the WIP (Severn River and South River) receive an equitable amount of the top 20 projects.
3. Retrofit projects are not given a lower priority over new projects such as rain gardens that address substantially less impervious drainage area and associated levels of pollution.

The Annapolis waterways are one of the primary attractions of residents who relocate from surrounding cities and states to the Annapolis area. This was the compelling reason for my move to Annapolis.

The Annapolis waterways are a major draw of visitors and the thousands of boaters who keep their boats in area marinas and who support the livelihood of our local maritime businesses.

It is imperative that the City through programs such as the WIP ensure that the money invested into these programs is being put to its best use to maintain, improve, and preserve our waterways now and in the future.

Sincerely,

Frances Ulmer



Raycine Hodo <rmhodo@annapolis.gov>

Fwd: ranking of stormwater projects

Maria Brown <dnep@annapolis.gov>
To: Raycine Hodo <rmhodo@annapolis.gov>

Tue, Nov 3, 2015 at 2:39 PM

----- Forwarded message -----

From: **Ben & Carrie Capuco** <capuco@comcast.net>
Date: Tue, Nov 3, 2015 at 8:50 AM
Subject: ranking of stormwater projects
To: dnep@annapolis.gov

Below are my rankings from most desirable to less desirable. I intentionally omitted sites where I know the city has already made substantial stormwater investment (i.e., Back Creek Nature Park, Truxton, and the Rec. Center). I also did not prioritize any of the suggestions on private lands where it seems the landowner has a moral responsibility for stewardship of their land and has demonstrated that stewardship before (i.e., St. John's College). I did include the Baldwin property because the Baldwin family has worked cooperatively with the county in the past and might do so again if approached. Finally, I prioritized property where the land rights are clear, which should expedite action.

1. Open_14 Southeast of Farragut Road and Roscoe Row Boulevard
2. Open_10 East of Lowes Access Road and Taylor Avenue
3. Open_11 North of Calvert Street and Roscoe Rowe Boulevard
4. City_01 Forest Drive (Municipal Housing Authority)
5. BMP_01 1120 Spa Road (St. Martins Lutheran Church)
6. Open_09 Center of State Circle
7. Trans_02 Maryland Avenue from King George Street to State Circle
8. Out_05A Northeast of Tyler Avenue and Janice Drive
9. Out_05B Northeast of Tyler Avenue and Janice Drive

10. City_05 Southeast of Claude Street and Giddings Avenue (Municipal Public Work Property)
11. City_01 Forest Drive (Municipal Housing Authority)
12. City_02 Belle Court (Parks and Recreation)
13. City_03 Betsy Court (Municipal Housing Authority)
14. Open_06B East of Hilltop Lane and Spa Road
15. CtyRqst_01 Ridgewood Street and Brewer Avenue
16. BMP_18 South of Aris T Allen Boulevard and Vineyard Road
17. Open_08 Northwest of Forest Drive and South Cherry Grove Avenue
18. City_06 Hunt Meadows Drive (Municipal Other)
19. CtyRqst_02 North of Lincoln Drive

Carrie W. Capuco



Raycine Hodo <rmhodo@annapolis.gov>

Fwd: Stormwater Management Inventory and Watershed Improvement Plan

Maria Brown <dnep@annapolis.gov>
To: Raycine Hodo <rmhodo@annapolis.gov>

Fri, Nov 6, 2015 at 4:50 PM

----- Forwarded message -----

From: Cara <caravisconti@hotmail.com>
Date: Friday, November 6, 2015
Subject: Stormwater Management Inventory and Watershed Improvement Plan
To: "dnep@annapolis.gov" <dnep@annapolis.gov>
Cc: "mbroadbent@annapolis.gov" <mbroadbent@annapolis.gov>

To: Department of Neighborhood & Environmental Programs

Subject: Stormwater Management Inventory and Watershed Improvement Plan

Dear Ms. Broadbent:

I'm following up regarding the meeting on October 19 concerning the City of Annapolis Stormwater Management Inventory. As a resident of the Fairwinds Condominium Association community, which is located in the Back Creek Watershed area of the study, I am VERY much in favor of two (2) projects for further concept design work. BMP_17 and Out_07. Although these projects are located on private property, I feel it is extremely important to include these for consideration as they both directly affect the property of private citizens and are causing considerable damage to private land.

Especially BMP_17. The runoff from this deteriorating infiltration area is so overwhelming– it literally runs off the Georgetown Plaza property directly on to the Fairwinds property causing a huge amount of land erosion. The erosion is effecting our ability to maintain proper landscape practices, including a rain garden installed two years ago that is already operating inefficiently. It is filled with sludge to the point where the runoff flows so fast it doesn't have a chance to pool or seep into the ground. The rush of storm water across our land, by way of a rip-rap swale, also flows very fast, causing more erosion. The soil is literally washing away and taking with it any and all plant life. In addition, large, mature tree roots are becoming more and more exposed to the point where residents of our community is afraid the trees with shallow roots may give way and topple over in a high wind that would come as part of a tropical storm, a Nor'easter or a hurricane.

As I stated during the October 19th meeting – I am in support of the work to be done on any and all of these projects however, I strongly believe the City should pay particular attention to the problems at the source – upstream. If the problems upstream are not fixed, any work performed downstream is just a "band aide solution". BMP_17 fits the source upstream description.

Both projects, Georgetown Plaza (BMP_17), and Mariner's Point (Out_07) have received a lot of attention from the surrounding communities – Fairwinds, Georgetown East, Georgetown Grove, Mariners Point and King James Landing. I can't speak for these communities, however, as a resident of Fairwinds I am requesting

your department consider my request for these two projects to be on the list for further design work. I will work tirelessly with the City to garner support from these surrounding communities. Addressing these two areas of concern will have a lasting, positive effect on a lot of citizens!

Respectfully,
Cara Visconti
Resident, Fairwinds Condominium Association