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February 10, 2022

Concerned Citizens for Proper Land Use, Inc.
Attn: Mr. Gerald Winegrad, President

Re: The Village at Providence Point (TVPP)
2625 Mas Que Road, Annapolis MD
Stormwater Management Review
ESDA Project No. 19004.01

Dear Concerned Citizens for Proper Land Use:

On your behalf I have reviewed The Village at Providence Point 216-page Stormwater Management Concept Report and the plans, prepared by the developer's engineer JBA, which were filed on June 30, 2021, with the City of Annapolis Office of Planning and Zoning. I have scrutinized the work by JBA to ensure the plans meet state and City of Annapolis stormwater treatment regulatory requirements.

In my opinion, the stormwater management plans filed exceed current requirements. The plans provide more than 125% of the state's Environmental Site Design Volume (ESD_v) as required by the City of Annapolis. Additionally, the filing demonstrates that by employing MDE's RCN Reduction Method to the 25-year storm, by virtue of the excess ESD_v provided, proposed conditions runoff will be lower than for existing conditions and on-site management of the 25-year storm will be achieved. It is my opinion that this means there would be no increase in volume, rate, or pollutant load from current conditions and the goal of post-development stormwater runoff volume being that of a mature forest in good condition is met.

I have examined several of JBA's computations for the current design and the computations reviewed check-out correctly. It is my professional judgment that the applicants have provided stormwater management plans that far exceed state requirements and with 79 micro-bioretenion cells treating 15.25 acres of impervious, green roofs treating 1.42 acres, roof top disconnects treating 0.11 acre, porous pavers for 28 cottage driveways reducing impervious by 0.36 acre, and 502 linear feet of stream channel restoration treating 5.02 acres - not included in accounting for in achieving the 125% ESD_v requirement - the development plans more than fulfill stormwater management regulatory requirements. I can state that once the site is developed with these extensive stormwater plans, there will be no increase in stormwater peak flow to Crab Creek from a 25-year storm resulting from this development.

Because the development plans limits clearing of trees to 27.3 acres and the development footprint to 36.2 acres of a 175.6 acre parcel, it also preserves wetlands and forests on site. Provisions for replanting of all forest removed are included in the project. A proposed stream restoration is included in the project that is above and beyond requirements and will stabilize stream bank erosion that is currently occurring because of existing, off-site development. Preserving existing forest and wetlands, providing reforestation, and constructing a stream restoration are all collateral benefits to the stormwater management plan that will serve to eliminate development impacts from a 25-year storm event and potentially enhance existing water quality in Crab Creek and the Chesapeake Bay.

This means that, given the current stormwater management plan and the collateral benefits of forest preservation, wetland preservation, reforestation and stream restoration, there will be no increase in loads of pesticides, fertilizers, grease and oil, sediment or other pollutants reaching Crab Creek from the development footprint of 36.2 acres, with 15.25 acres of impervious surfaces. I can unequivocally state that, compared with other potential development scenarios for 36 or more acres of this parcel, anyone concerned

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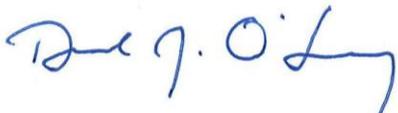
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with the water quality of Crab Creek should be elated with the current Environmental Site Design plan for development of The Village at Providence Point.

As to any contention that the applicant's Stormwater Management Plan is based on 1990's data from NOAA and does not consider worsening storm events from climate change, I can state that the rainfall amounts used in the JBA analyses are current and accurate because they are as published by the federal government (NOAA) and allowed by MDE. Anyone having a problem with the rainfall data used on this project should take it up with policy makers at MDE. Additionally, and not necessarily by choice but by City of Annapolis directive and community commitments, the developer has significantly over-designed stormwater management systems as compared to the minimum State requirements - and this includes a 502 linear foot stream restoration beyond any such requirements. The purpose of the City's directive in requiring developers to store more than the statewide minimum stormwater volume is to build-in resilience. Therefore, climate change resilience is built into the design more so than any private development project of which I am aware. JBA has proven that, based on accepted methods of analysis, the on-site stormwater design provides enough storage volume to abate increases in flow for storms up to and including the 25-year return period and mitigated stream channel erosion caused by off-site development. Current MDE regulations require 10-year return period stormwater management and would not have required stream restoration.

I have been a licensed Professional Engineer in Maryland (#17254) since 1989 and for over 30 years I have specialized in the design, review and implementation of erosion and sediment control and stormwater management plans for projects in Maryland. My analyses and evaluations have been performed on more than 100 projects on behalf of the Maryland Department of the Environment, Baltimore City, Maryland State Highway Administration, private developers, and community organizations. I specialize in environmental site design (ESD) and project management to assure compliance with regulatory surface water protection requirements. I am glad to present my resume upon request.

Sincerely,



Daniel J. O'Leary, P.E.
Senior Engineer