



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

February 4, 2013

RE: GEAUGA COUNTY
CITY OF CHARDON
CONSTRUCTION STORM WATER
PERMIT NO: 3GC06235*AG.
THE MAPLE HIGHLANDS TRAIL

Aaron Young
Geauga Park District
9160 Robinson Rd
Chardon, OH 44024

Dear Mr. Young:

On November 23, 2012, the Geauga Park District obtained coverage under the Ohio EPA General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Construction Activities #3GC06235*AG. This permit requires the implementation of post-construction water quality practices in accordance with Part III.G.2.e of the permit. As a large construction activity, post-construction practices must be capable of treating the Water Quality Volume (WQv). On January 4, 2013, Ohio EPA received a request from GPD Associates to address post-construction requirements of the NPDES permit through alternative practices. The NPDES permit allows the use of alternative post-construction BMPs with the approval of Ohio EPA.

A review of the proposal indicates that the WQv associated with the project has been calculated in accordance with NPDES permit requirements. Some of the WQv will be treated through non-structural means, i.e., interception by tree canopy and maintenance of sheet flow through mature forested areas. A credit of 226 ft³ of WQv was subtracted from the total WQv required by the project to account for the runoff reduction benefit of tree canopy. The assumptions made are in line with runoff reduction methodology as developed by the Center for Watershed Protection. The remainder of the WQv will be treated through standard practices contained in the NPDES permit. Bioretention cells will be used for Critical Areas 1-4 and infiltration trenches will be placed along the trail for Critical Areas 5 & 6. Critical areas are sections of the trail where tree canopy and sheet flow runoff cannot be maintained or where drainage systems are being installed to collect and concentrate runoff from the trail.

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Ohio EPA has reviewed the proposal and concurs that it is an acceptable means to meet the post-construction requirements of the NPDES permit for this project. However, please be aware that the Geauga Soil & Water Conservation District may still require you to obtain approval of the storm water pollution prevention plan (SWP3) before you can commence construction.

If you have any questions, please contact me at (330) 963-1145.

Sincerely,



Dan Bogoevski
District Engineer
Division of Surface Water

DB/cs

cc: Carmella Shale, Geauga SWCD
Nick Mostos, GPD Group