

Our ref: 12611057

**August 14, 2025**

**Mr. Peter R. Virkler, Coordinator of Public Works**  
**City of Canandaigua**  
**2 North Main Street**  
**Canandaigua, NY 14424**

**Waterchase Residential Subdivision – Canandaigua, NY**

Dear Mr. Verkler:

**Review Stormwater Pollution Prevention Plan and Related Drawings**

Per your request, GHD has performed a review of the Stormwater Pollution Prevention Plan (SWPPP) dated June 23, 2025, and related Drawings for the Waterchase Residential Subdivision located off North Road, Stewart Place, and Kennedy Street in the City of Canandaigua, NY. The project proposes the development of 79-lot, single-family lots on 27.4 acres of vacant land and includes construction of all related roadways, utilities, grading, and stormwater management. The project must comply with the General Permit for Stormwater Discharges from Construction Activities, GP-0-25-001 (General Permit).

GHD's comments on the SWPPP and related Drawings are as follows:

**SWPPP**

1. Appendices – I recommend the NYSDEC Letter of Authorization (LOA) be made an Appendix (to be added once received) for ease of keeping the records together.
2. Section 2.1 – The first sentence has “WQV” that does not belong. Also, states that there are three bioretention areas, but there are five in the plans.
3. Section 2.2 states that off-site runoff is excluded from the modeling, but PR#1 includes off-site runoff from the properties to the north, which will flow to the stormwater facilities. Clarify that statement applies outside of the exception discussed in the SWPPP, which includes in sizing the wet pond #1 and sedimentation basin #1.
4. Post-construction Drainage Areas use SWMF (stormwater management facilities) numbering #1-6. It is difficult to follow the numbering without a table or figure to identify each area and the related bioretention areas #1-5, wet ponds #1-3, and sedimentation basins #1-2. For example, PR#6 flows to SWMF #5, which is bioretention area #3.
5. Archaeological section states that through consultation with OPRHP no impact was determined. Is there any documentation of this that can be included in the SWPPP?
6. Section 2.8 – The entity responsible for long-term maintenance is not identified. Will individual owners be responsible for their portion of each SWMF or will there be a homeowner's association? Also, I recommend a note in this section that copies of long-term maintenance inspections must be provided to the City or upon request. Finally, some MS4s require a maintenance agreement, and if the City has that requirement, it should be noted here and made part of the SWPPP as an Appendix.

7. Section 3.1 states that while under 5 acres disturbance, once a week inspections will be conducted. The General Permit language is every 7 calendar days, and that should be reflected in the SWPPP. Inspection schedule and reports must reflect that to be compliant (i.e., inspection on Monday week 1 and Tuesday week 2 is 8 days apart and a violation of the permit).
8. Section 3.1, Temporary ES measures, inlet protection fabric is listed to be installed around CBs. This is incorrect use of the protection and must be inside and under the frame. Also, fabric must be appropriate for the use in CBs or sediment bags/inserts intended for CBs protection should be specified. The Erosion and Sediment Control (ESC) Plan shows the use of silt sock wrapper around inlets, which is not in the SWPPP.
9. Section 3.1 – Next, construction entrance is marked to be only off North St. Construction entrance will need to be relocated per phase. Finally, the sediment basins reference a parking lot, which is not part of the project.
10. Section 3.6 – In regard to sequence, I recommend (if the City agrees) to limit clearing during road/utility work to the areas required. This allows for the future building lot areas to remain in an undisturbed state, limiting potential erosion and sediment until such time as the homes are constructed on each lot. However, this should follow City's standard procedure.
11. Section 3.6 – Winter shutdown is mentioned (and likely for this size multi-phase project). I recommend adding the General Permit language related to winter shutdown and partially shutdown, which allows for stop in inspections or inspections every 30 days if the site meets these requirements.
12. Per General Permit, Part III.B.1.c.iv. the phasing plan must include "n. a table identifying the order and intended schedule of when each phase will begin and end...". This section must be updated.
13. Section 5.9 – Does the City require as-builts to be submitted at the end of the project? The SWPPP indicates as-builts will be prepared, and if required, should note that they are to be submitted to the City.
14. The SWPPP must note that a field copy of the SWPPP and related documents must be kept onsite during construction, as well as copies of all inspection reports. In addition, all records must be kept for a period of 5 years following Notice of Termination (NOT).
15. Typically, I recommend on behalf of the MS4, that the following language be added to the SWPPP (if the City agrees):
  - a. MS4 shall be provided a copy of the LOA once received.
  - b. MS4 shall conduct inspections of the site during construction and shall be granted access as needed.
  - c. MS4 shall be sent electronic copies of all inspection reports.
  - d. MS4 must sign the NOT prior to submittal to close the permit and may require a final inspection.
  - e. Authorization to disturb greater than 5 acres must be requested in writing to the MS4, and a copy of that authorization must be kept in SWPPP.
  - f. MS4 may require inspection prior to shutdown of construction and decrease in inspection frequency (such as winter shutdown or end of phase).

## Drawings

1. C5-C8 – Both the northern and center wet ponds are labeled Wet Pond #1 and the southern bioretention areas are both labeled #2.
2. C15 Grading Plan – The northern property line (per drawing and SWPPP) proposes a wide drainage swale that takes up most of the rear yards. Functionally I have no concerns as the runoff will move in this direction to the roadway storm system. However, the City may want to consider if these single-family homes decide to build sheds, decks, or pools. The open drainage will need to be maintained, and I could see issue with lots 2.5-2.9.

3. C15 – The grading and swale behind lots 2.20-2.23 will need to be properly installed. The limited contours and grades do not allow for much room for error, and the rear yard drainage of these lots is dependent on that swale.
4. C19 ESC Plan – First, any areas to remain undisturbed must be identified on the plan (per General Permit, Part III.C). Second, I am concerned about the ESC plan being shown for the entire site when the development will occur in three phases. I would prefer to see three drawings, so that all ESC practices for each phase are clear in their location and use (such as staging, stockpiles, and concrete washouts), as well as the protection at the transition points between phases. The City may also require in phasing the project the applicant show any turnarounds or transitions at those points. In some projects, this is done by submittal of the detailed plans per phase for permitting following overall approval. If that is the extent, my comment is that permit application for each phase shall include limits and transitions between phases as applicable.
5. C25 Construction Details-2 – The sheet includes details for Jute mesh matting and Check dams. These measures were not found on the ESC Plan for location to be used and were not discussed in the SWPPP as proposed ESC measures.

If you have any questions regarding these comments, feel free to contact me.

Regards,



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**Project Engineer**

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