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July 20, 2025

VIA ELECTRONIC MAIL

Bernard "Bo" Cox
Development Services Director
375 Garner Street, Suite B
Bronson, FL 32621

Re: Subdivision Preliminary Plat Application/PID 05153-000-00 – Headwater Commercial Park
Review Comment Letter #2

Dear Mr. Cox,

Per your request, below are NFPS's review comments for Headwater Commercial Park Preliminary Plat and Stormwater Plans.

1) The applicant proposes Stormwater Management Systems (SMS) outside the designated areas. SMS cannot be located within platted lots and must be completely contained within the common areas or SMS areas. The applicant must revise the Stormwater Management Plan (SMP) and Preliminary Plat to remove all SMS from within the proposed lots.
2) The applicant has not provided soil borings for all proposed Stormwater Management System (SMS) areas. To accurately account for stormwater and calculate SMS, soil borings must be performed and accounted for, including Mean High Water Table.
3) The applicant has not provided the Mean High Water Table or factored it into the stormwater calculations. Please provide accordingly.
4) The project is located in a Special Flood Hazard Area (SFHA). The Base Flood Elevation (BFE) must be provided for all SFHAs. Please provide the calculations on how the BFE for each SFHA was derived. Please ensure to include volume compensation and recovery is included for SFHAs.
5) The applicant has not factored in the proposed road in the Stormwater Management Plan (SMP), grading, or calculations. The proposed road must be included (including design of the road to ensure proper drainage) in the SMP.
6) There are no cross sections for any of the SMS. The applicant must provide cross sections for all SMS.
7) Proposed drainage structures are not labeled. Are there any existing drainage structures that would be affected by the proposed site?
8) Overall site drainage patterns are unclear, recommend showing additional drainage arrows throughout the drawing.
9) Proposed contours seem to terminate unexpectedly, please review for tie in locations.
10) Drainage structure pipe sizes are not shown, please label.

11) Is there a reason for the separation of the "DRA-DRAW", "DRA #9", and "DRA #10" storm water facilities. If not, please consolidate.

12) Storm water facilities should show a freeboard of at least 1' from the maximum staging anticipated from the critical storm, please review pond tops.

13) Stormwater facilities should have details for an emergency overflow weir on the berm to avoid blow outs in possible failures.

14) Is the proposed design intended to treat all proposed site areas. If not a Pre-existing conditions versus Post-condition analysis should be performed to demonstrate that the runoff generated from the site development does not exceed the pre conditions.

15) Was there a specific methodology used in the pond placement and design over the site. The amount of pond proposed seem to be an unnecessary maintenance complication after construction.

16) Report narrative does not provide adequate explanation of the existing conditions of the site. (Flood zones, existing drainage patterns...) The same issue arises concerning the proposed design conditions, specifically concerning pond types used in treatment.

17) Would like to see some narrative explaining the storm water design process, describe the need for multiple small ponds versus larger combined facility.

18) Was there an analysis showing that the 100 year 24 hour storm event is the critical storm event. 100 year 8 hour tends to show a shorter time of duration creating a higher intensity overwhelming pipe sizes.

19) Treatment calculation not found in the drainage documentation.

20) The applicant must demonstrate compliance with Section 50-557(19) of the LDC which requires any subdivision in excess of five acres in size and located within a six-mile radius of the cities of Chiefland and Williston will identify and preserve sinkhole locations.

Based upon the above comments, the preliminary plat, stormwater plans, and stormwater calculations are insufficient for review. Approval of the preliminary plat is accompanied by the approval of the stormwater management plans and calculations. Thus, the stormwater plans and calculations must of sufficient detail to meet the criteria established by Suwannee River Water Management District and Chapter 50-582 of the LDC.

If you have any questions, please do not hesitate to contact me.

**SINCERELY,**

Brandon M. Stubbs

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Cc: Melissa Lopez, Administrative Manager

Marc L Mason

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