



March 8, 2011

Mr. Lou Parnes  
Non-Tidal Wetlands Division  
Maryland Department of the Environment  
1800 Washington Boulevard  
Baltimore, MD 21230

Dear Mr. Parnes:

The North College Park Citizens Association opposes Permit Application 200863391/08-NT-0239 submitted by Metroland Developers, LLC for the Relocation and Restoration of Narragansett Run.

Narragansett Run is the primary drainage for North College Park. Failure during heavy rain could have catastrophic effects on homeowners throughout the area, and we therefore second the opposition of the City of College Park in its letter to you of February 22nd.

We understand from the materials submitted in support of the permit by the Dewberry firm that the essence of this permit is to fill in 1100 feet of streambed and replace it with 1733 feet of streambed in order to mitigate the following impacts:

1. Permanent wetland impact of 1,809 square feet in "Area B," no depth indicated
2. Permanent stream impact of 752 square feet in "Area C," 10 feet depth
3. Permanent wetland impact of 41,358 square feet, permanent wetland buffer impact of 22,296 square feet and permanent stream impact of 8,344 square feet in "Area E," no depth indicated
4. Permanent floodplain impact of 2,711 square feet in "Area H," no depth indicated
5. Permanent floodplain impact of 177,167 square feet in "Area J," no depth indicated, according to Sheet 19, but additionally permanent floodplain impact of 119,285 square feet in the same area, no depth indicated, according to Sheets 20 through 31.

It would be an act of faith on the part of the Maryland Department of the Environment (MDE) to accept that all the dredging will cancel out all the filling. Arithmetically, it does not appear possible for a 10-foot stream that is just 633 feet longer than the current stream to absorb the additional displacement of water. Perhaps the MDE staff will understand the Dewberry submission, a set of drawings that do not appear to have any narrative, but MDE cannot expect the general public to comprehend them. I have never seen a public proceeding that demonstrated so little concern for public understanding.

NCPCA lacks faith in the foresight of the original developers, who have lost this property to foreclosure. We also lack faith that their experts really know what to do with the huge amount of water that these impacts will displace on rainy days.

We would deeply appreciate MDE's assistance in ensuring that development of this property will not have devastating consequence for the upstream property owners.

Sincerely,

Mark Shroder

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