



March 14, 2019

Mr. Craig Dixon Chairman
New Bedford Conservation Commission
New Bedford City Hall 133 William Street
New Bedford, MA 02744

Subject: 1471-1475 Braley Road
Braley Road Condominiums
New Bedford, MA

Dear Mr. Dixon:

InSite Engineering (IES) has prepared the following response in conjunction with the Nitsch Engineering letter dated March 13, 2019. The review comments are numbered in sequence to the Nitsch letter followed by our response:

Review Comments:

1. The project is a redevelopment project. Therefore, it is required to meet the Standards to the maximum extent practicable.

The project is a redevelopment and all standards are met or are met to the maximum extent possible.

2. The project includes repaving an existing parking lot and installing a trench drain at the entrance to the parking lot. Currently, a small portion of the existing driveway discharges directly to Braley Road. The installation of the trench drain results in less stormwater discharging to Braley Road and additional stormwater being collected and conveyed to the adjacent wetlands. This results in an increase in discharge of peak flows to the adjacent wetlands. Standard 2 requires a reduction in peak flows from the site when comparing the proposed peak flows with the existing peak flows.

Standard 2 has been met with the addition of a new stormwater measures including trench drain, First Defense stormwater separator and a drywell to assist in controlling the increased volume from the trench drain.

3. The proposed project was built in the late 1980's, which is the time that Stormwater Management Standards had been developed. The existing site contains two catch basins that collect stormwater from the existing parking lot. It is unclear whether these catch basins provide any stormwater treatment or whether they have been maintained. It is unclear whether they have sumps and if so, what is the depth of the sumps. They appear to be the only stormwater management facilities on the property. The existing site design is not consistent with the Stormwater Management

Standards.

The client has agreed to install a First Defense stormwater separator at each catch basin location. The First Defense units manage runoff and capture stormwater pollutants to comply with regulations and reduce damage to the environment. Detail has been added to the drawing set.

4. The proposed trench drain is a collection and conveyance strategy. It does not provide any stormwater treatment or stormwater detention. A construction detail for the trench drain was not included and should be added to the plans.

A detail has been added to the drawing set.

5. The Stormwater Report describes compliance with Standard 8 (Erosion and Sedimentation Control) and Standard 9 (Operations and Maintenance). It does not address the other Standards.

Standards 1 through 10 have been addressed in the stormwater report.

6. A Stormwater Management Form was not submitted for review.

A Stormwater Management Form is attached to the package.

7. The Notice of Intent plan shows a silt sock erosion control line. A detail was not provided for this strategy. We recommend an erosion control detail be provided.

A detail has been added to the drawing set.

8. The Erosion and Sedimentation Plan describes a stone construction entrance. However, there is no construction entrance shown on the plans. Construction details of the construction entrance were not provided.

A detail has been added to the drawing set.

9. The Operations and Maintenance Plan does not describe cleaning any of the stormwater management facilities such as the trench drain, catch basins, etc. We recommend the Operation and Maintenance Plan describe the maintenance of the stormwater management facilities including inspections, cleaning schedule, etc.

An operations and maintenance plan is attached within the appendix of the stormwater report.

10. In general, the existing site is not in compliance with the Stormwater Management Standards. The proposed project does not provide any additional water quality benefits or infiltration. The addition of the trench drain collects and redirects water that currently discharges to Braley Road to wetlands resources that are located north of the development, resulting in an increase in peak flows to the wetlands.

All of the standards are now met with the installation of First Defense stormwater separator and drywell.

We hope your comments and concerns have been properly addressed. If you have any further questions please contact me at 508-336-4500.

Sincerely,

InSite Engineering Services, LLC

A handwritten signature in black ink, appearing to read "P.D. Carlson", enclosed within a thin black rectangular border.

Paul D. Carlson, PE
Project Manager / Principal