

March 13, 2018

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

RE: Nitsch Project #9972
1471-1475 Braley Road
Braley Road Condominiums
New Bedford, MA

Dear Mr. Dixon:

This letter is regarding the request for an Order of Conditions at the Braley Road Condominiums located at 1471-1475 Braley Road in New Bedford, Massachusetts. Nitsch Engineering has reviewed the following documents for compliance with the Massachusetts Department of Environmental Protection Stormwater Management Standards:

- Notice of Intent Application, 1471-1475 Braley Road, prepared by InSite Engineering Services, LLC, dated November 9, 2018;
- Plan entitled "Braley Woods Condominium, 1471-1475 Braley Road, New Bedford, Assessor's Map 137, Lots 108 and 109." Prepared by InSite Engineering Services, LLC, dated September 11, 2018; and
- Report entitled "Stormwater Management Report, 1471-1475 Braley Road Condominiums, 1471-1475 Braley Road, New Bedford, Massachusetts," prepared by InSite Engineering Services, LLC, dated January 10, 2019.

Below are our comments regarding stormwater management only:

1. The project is a redevelopment project. Therefore, it is required to meet the Standards to the maximum extent practicable.
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.
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.
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.
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.
6. A Stormwater Management Form was not submitted for review.
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.

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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.
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.
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.

If you have any questions, please call us at 617-338-0063.

Very truly yours,

Nitsch Engineering, Inc.



Scott D. Turner, PE, AICP, LEED AP ND
Vice President, Director of Planning

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