

May 7, 2019

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:

- 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, revised through April 25, 2019;
- Response to comments letter prepared by InSite Engineering Services, dated March 14, 2019;
- Report entitled, "Stormwater Management Report, 1471-1475 Braley Road Condominiums, 1471-1475 Braley Road, New Bedford, Massachusetts," prepared by InSite Engineering Services, LLC, revised through April 24, 2019; and
- Stormwater Management Checklist.

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. The plans have been revised to include a drywell and water quality unit to provide water quality treatment and infiltration, which will reduce the peak rate of stormwater being discharged to the wetlands.
3. The drywell was modelled using an infiltration rate of 1.02 cubic feet per second. The infiltration rate for Hydrologic soil group B as described in the Rawls tables that are an Appendix to the Stormwater Management Standards is 1.02 inches per hour, which is a much slower rate. The Applicant should model the dry well using the standard Rawls rate of 1.02 inches per hour rather than 1.02 cubic feet per second. We recommend performing a test hole near the proposed drywell since that would provide a more accurate infiltrate rate and also verify seasonal high groundwater elevations.
4. The drainage narrative states that a Downstream Defender will be installed to provide water quality treatment. The plans show a First Defense unit. Although we are not familiar with the First Defense unit, it is generally similar to Stormceptor units and we expect it would perform similarly. Adding the water quality unit improves the quality of stormwater being discharged from the site.
5. An Illicit Discharge Statement has not been submitted. The Stormwater Report states this form will be submitted prior to construction.

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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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