May 15, 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 May 7, 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 meet 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. 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.

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

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.

The drywell has been modified to include Cultec underground infiltration units to handle the increase in flows to the wetland. The infiltration rate was modified to reflect the Rawles rate in inches / hour. The infiltration rate is an insignificant discharge. The rate is controlled in the volume of the units. The rate is conservative for this area. A test hole is not necessary for this system.

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.

   The First Defense unit will be utilized on the site.

5. An Illicit Discharge Statement has not been submitted. The Stormwater Report states this form will be submitted prior to construction.

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

Paul D. Carlson, PE
Project Manager / Principal