

February 28, 2017

Ms. Sarah Porter, Conservation Agent
Department of Environmental Stewardship
New Bedford City Hall
133 William Street
New Bedford, MA 02744

RE: SE 049-0750, VVK Realty, LLC & GVK Realty, LLC
1494 E. Rodney French Blvd

Dear Ms. Porter:

This letter is provided in response to the review comments provided to the Commission by Nitsch Engineering dated February 17, 2017. Accompanying this letter are the following plans/documents:

1. Revised plan set titled "Proposed Site Improvements, Building Razing, and Pile Installation", prepared by CLE Engineering, Inc., 2 sheets, revised thru 2/28/2017, stamped by Jeramy M Packard, P.E., dated 1/25/2017
2. Revised Operation and Maintenance and Long Term Pollution Prevention Plan, dated December 15, 2015, Revised February 28, 2017
3. Sediment Forebay sizing calculations, dated February 2017

CLE responses from Nitsch comment letter dated February 17, 2017:

4. **The project discharges to a shellfish suitability area, which is defined as a critical area per Standard 6 of the Guidelines. Under the Guidelines, projects that discharge to a critical area must provide 80% Total Suspended Solids (TSS) removal. The proposed project includes a sediment forebay and vegetated filter strip that provide 59% TSS removal. The proposed project is an improvement over the existing condition, which does not have any water quality treatment. However, the proposed use includes a higher intensity of parking that will generate a higher sediment load than the current use and previously approved project. Therefore, we encourage the Applicant to provide 80% TSS removal on the project.**

The Massachusetts Stormwater Handbook describes an alternative as practicable if it can be implemented within the site being redeveloped, taking into consideration cost, land area requirements, soils and other site constraints. The existing pavement of the parking area is proposed to be resurfaced with no increase in paved area. The inclusion of a conventional closed drainage system or additional stormwater BMP installations would significantly increase the scope and cost of the project both from a design and a construction perspective. Total TSS removal remains at 59%.

5. **The Applicant should provide sizing calculations consistent with the Stormwater Management Standards for the proposed sediment forebay to ensure that it meets the 25% TSS removal threshold. Due to the fact that the forebay will be filled with stone, there will only be 40% void space available to accept stormwater.**

Sediment forebay sizing calculations are included as an attachment to this memorandum.

6. We recommend that some spot grades be added to the plans to ensure that any stormwater generated by the new parking area is directed towards the sediment forebay.

A revised site plan including spot grades for the proposed parking lot resurfacing is included as an attachment to this memorandum.

7. The stormwater narrative states that sand and salt will not be used in the proposed pavement area. We recommend this be added to the Operations and Maintenance Plan.

A revised operation and maintenance plan which includes provisions prohibiting the use of salt and/or sand within the paved areas is included as an attachment to this memorandum.

We trust that these responses and revisions will allow the project review to be completed by the Commission. If you have any questions, please feel free to contact me.

Respectfully submitted,
CLE Engineering, Inc.



Jeramy M. Packard, P.E.

Cc: VVK Realty, LLC & GGK Realty, LLC