June 29, 2021

City of New Bedford
Conservation Commission
New Bedford City Hall
133 William Street
New Bedford, MA 02744

RE: Panagakos Development
Development Review
CEC Project: 304-118

Dear Commissioners:

Please see the attached revised plan sets and drainage reports for the Panagakos Development project on Phillips Road. In response to the plan and design reviews, SITEC has revised the plan set and drainage report and prepared the following responses to each comment:

Nitsch Engineering comments, May 27, 2021

1) The contours have been labeled just beyond the subject property line for clarification.
2) All proposed impervious areas will drain towards the two catch basins.
3) The requested inverts have been added to the Site Utilities sheet (SU-1, 5 of 9).
4) The catch basins have been renamed as requested.
5) Drainage pipes have been labeled on the Site Utilities sheet (SU-1, 5 of 9).
6) Deep sump catch basins have been removed from the report and worksheet.
7) Catch Basin#2 has been revised to a 10' length with a 2% slope
8) The hydrocad model has been revised, along with the plan set and detail to address the concern. The invert has been revised to 91.00 with 4" pvc pipe connected to the 8" HDPE header. This will provide more than 2 feet of cover over the outlet pipe.
9) All work has been moved outside of the 25 foot buffer zone. The detail has been revised and the rip rap length from the outlet of Catch Basin #2 has been increased to 9 feet. The 10 year flow rate to this catch basin is 0.3 cfs, resulting in a velocity through the proposed 10" HDPE discharge pipe of 4.5fps.
10) With the unique shape of the lot, impervious areas and the limit of work have been minimized to provide the greatest open space possible while maintaining a 25 buffer zone to the bordering vegetated wetland. In order to avoid a one way traffic circulation the minimum required drive aisle width of 22 feet is proposed. The parking layout has been approved by the Planning Board.

11) A stamped and signed copy of the Stormwater Report certification and checklist is attached as requested.
12) An Illicit Discharge Compliance Statement has been included with the revised report.
13) The Stormwater Report has been revised to reflect the storms analysis.
14) The required recharge volume is 0.018 Acre-feet. 0.084 Acre-feet of recharge is provided for the 2 year storm. The calculation for the complete drain down within 72 hours has been added to the end of the hydrocad report.
15) Test pit information used for this design, conducted by Field Engineering during a previous submittal for the subject property, has been added to sheets 3, 5 and 6 to confirm the soil conditions, water table and percolation rates. This information is also consistent with the soils encountered during construction of the recently constructed gas station, directly across the street on Theodore Rice Boulevard.
16) Water Quality calculations have been revised to use one inch of runoff.
17) Test Pit 102 on the plan set, performed by Field Engineering, confirms the 2 foot separation to groundwater.

If you should have any further questions or comments, please feel free to contact me.

Sincerely,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.

Daniel S. Gioiosa
Project Manager II

Steven D. Gioiosa, P.E.
Vice President

Nitsch Engineering

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May 27, 2021

Mr. Dennis Audette
Chairman
New Bedford Conservation Commission
New Bedford City Hall
133 William Street
New Bedford, MA 02744

RE: Nitsch Project #9972
Panagakos Development
Phillips Road
Stormwater Review
New Bedford, MA

Dear Mr. Audette:

This letter is regarding the stormwater review associated with the Notice of Intent (NOI) submitted for the proposed commercial building development located at the corner of Theodore Rice Boulevard and Phillips Road. Nitsch Engineering received and reviewed the following documents:

- Plans entitled "Assessor's Map 136 – Lot 468, Phillips Road, New Bedford, Massachusetts," prepared by SITEC, dated March 26, 2021; and
- Stormwater Report entitled "Drainage Report – Proposed Commercial Building, Phillips Road, New Bedford, MA," prepared by SITEC, dated March 2021.

The project involves the construction of a new 3,500-square foot commercial building located on a corner lot abutting Theodore Rice Boulevard and Phillips Road, identified as Assessor's Map 136 – Lot 468. The site is currently a vacant wooded lot. A bordering vegetated wetland is located on the western edge of the parcel with most of the site located within the 100-foot buffer zone. The project includes the construction of a new commercial building, 31-space parking lot, site retaining walls, loading area, site utilities, and stormwater management system.

As requested, Nitsch Engineering is providing comments based on our review of the project against the Massachusetts Department of Environmental Protection (MassDEP) Stormwater Management Standards. We also reviewed the intended limit of work and the impacts within the 25-foot wetland resource area buffer zone.

GENERAL COMMENTS

1. The southeast corner of the lot near the loading delivery area appears to have contours that are not labeled. Please label these contours.

2. All impervious areas to drain towards the proposed inlets.

3. Add inverts to roof drains exiting the building.

4. Rename the proposed inlets so that there is a CB#1 and a CB#2.

5. Label all drainage pipe sizes.

6. The TSS removal summary table located under Stormwater Standard No.4 – Water Quality Volume and the TSS Removal Calculation Worksheet in the Drainage Report includes deep sump catch basins. Deep sump catch basins are not proposed for the project. The Applicant shall update the report to remove reference to the deep sump catch basins.

7. The southernmost CB outlet pipe has a pipe slope of 27%. Nitsch Engineering recommends lowering the invert out of the Stormceptor structure to reduce the pipe slope and discharge velocity to prevent downstream erosion.

8. The HydroCAD model shows the stormwater infiltration system has an 8-inch outlet pipe with an invert of 91.20 feet, which is consistent with the plans. Per the "Cultec Contactor 330xLHD Typical Cross Section Detail" the top of chamber is 91.54 feet. The invert for the outlet pipe appears to be too high to work with the proposed system and header configuration. Nitsch Engineering recommends lowering the invert out of the system as necessary and maintaining a minimum 1% pipe slope to the discharge point or provide a manhole structure to allow for the crown of the outlet pipe to be higher than the top of chamber elevation. The infiltration system outlet pipe elevation shall also be checked to confirm a minimum of 2 feet of cover is provided.

9. All work shall be outside the 25-foot wetland buffer zone, including the retaining wall and discharge points. Per the "Flared End W/ Riprap Detail" the riprap shall have a minimum length of approximately 12 feet. The riprap on the plans is shown to be approximately 4.5 feet to avoid the 25-foot wetland buffer zone, which contrasts from the detail. Nitsch Engineering recommends updating the detail to reflect the plan or relocating the discharge points to meet the 12-foot requirement per the detail. If the former option is chosen, please explain how slope stabilization in this area is adequate to prevent erosion.

MASSDEP STORMWATER MANAGEMENT STANDARDS

10. The MassDEP Stormwater Management Standards require that Applicants consider environmentally sensitive site design and low impact development (LID) techniques to manage stormwater. These should include reducing impervious surfaces, disconnecting flow paths, treating stormwater at its source, using decentralized systems, maximizing open space, minimizing disturbance, protecting natural features and processes, and enhancing wildlife habitat. There appears to be opportunities to consider additional LID techniques within the proposed project site. These may include considering making the parking lot one-way to reduce pavement widths and use of vegetated areas and natural processes to provide stormwater treatment (i.e., rain gardens, bioretention, bioswales, or tree filters). These types of systems may offset the need for catch basins and proprietary water quality structures and will reduce the size of the subsurface infiltration system.

11. The Applicant shall provide a stamped and signed Stormwater Report Certification and Checklist per the Stormwater Management Standards.

12. The Applicant should provide an Illicit Discharge Compliance Statement as required per Standard 10 in the Checklist for Stormwater Report.

13. Page 2 of the drainage report states that the 25-year storm was analyzed, but it does not appear that it was accounted for in the HydroCAD calculations. Nitsch Engineering recommends including the 25-year storm in the HydroCAD calculations or updating the text so that it is consistent with the calculations.

14. The Applicant shall provide calculations for the required recharge volume and the recharge volume provided. Additionally, the Applicant shall provide drawdown calculations confirming that the infiltration system will drain completely within 72 hours.

15. The Drainage Report appears to use the Natural Resources Conservation Service (NRCS) Web Soil survey to obtain soil information for the HydroCAD model. The stormwater infiltration system appears to be within soil type 260A – Sudbury Fine Sandy Loam per the Proposed Conditions Drainage Plan which is a Hydrologic Soil Group B. Per the Massachusetts Stormwater Handbook, the infiltration rate for this type of soil is 1.02 inches per hour. The HydroCAD model appears to use an infiltration rate of 8.27 inches per hour which is indicative of a Hydrologic Soil Group A – sand soil. Nitsch Engineering recommends updating the infiltration rate to reflect Sandy Loam, or conduct test pits by a licensed soil evaluator showing that sand is present in the proposed stormwater infiltration area or perform field infiltration testing.

16. The Applicant calculates the Water Quality Volume using 0.5 inches of runoff. Per Oliver Geographic Information System (GIS), the site appears to be within an Outstanding Resource Water. The Massachusetts Stormwater Standards require project sites within Outstanding Resource Water areas to calculate Water Quality Volume using 1-inch of runoff times the total impervious area of the post-development project site. The Applicant shall update the calculations to use 1-inch of runoff.

17. The Applicant shall confirm that there is a 2-foot separation between the bottom of the Stormwater Infiltration system and the seasonal high groundwater table, per the Massachusetts Stormwater Handbook.

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

Very truly yours,

Nitsch Engineering, Inc.

Brian Biagini, EIT
Senior Project Designer

Joshua Soares, PE
Project Manager

BJB/jms/ajc

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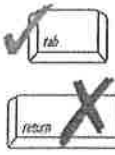
Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands Program

Checklist for Stormwater Report

A. Introduction

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



A Stormwater Report must be submitted with the Notice of Intent permit application to document compliance with the Stormwater Management Standards. The following checklist is NOT a substitute for the Stormwater Report (which should provide more substantive and detailed information) but is offered here as a tool to help the applicant organize their Stormwater Management documentation for their Report and for the reviewer to assess this information in a consistent format. As noted in the Checklist, the Stormwater Report must contain the engineering computations and supporting information set forth in Volume 3 of the Massachusetts Stormwater Handbook. The Stormwater Report must be prepared and certified by a Registered Professional Engineer (RPE) licensed in the Commonwealth.

The Stormwater Report must include:

- The Stormwater Checklist completed and stamped by a Registered Professional Engineer (see page 2) that certifies that the Stormwater Report contains all required submittals.[1] This Checklist is to be used as the cover for the completed Stormwater Report.
- Applicant/Project Name
- Project Address
- Name of Firm and Registered Professional Engineer that prepared the Report
- Long-Term Pollution Prevention Plan required by Standards 4-6
- Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan required by Standard 8[2]
- Operation and Maintenance Plan required by Standard 9

In addition to all plans and supporting information, the Stormwater Report must include a brief narrative describing stormwater management practices, including environmentally sensitive site design and LID techniques, along with a diagram depicting runoff through the proposed BMP treatment train. Plans are required to show existing and proposed conditions, identify all wetland resource areas, NRCS soil types, critical areas, Land Uses with Higher Potential Pollutant Loads (LUHPPL), and any areas on the site where infiltration rate is greater than 2.4 inches per hour. The Plans shall identify the drainage areas for both existing and proposed conditions at a scale that enables verification of supporting calculations.

As noted in the Checklist, the Stormwater Management Report shall document compliance with each of the Stormwater Management Standards as provided in the Massachusetts Stormwater Handbook. The soils evaluation and calculations shall be done using the methodologies set forth in Volume 3 of the Massachusetts Stormwater Handbook.

To ensure that the Stormwater Report is complete, applicants are required to fill in the Stormwater Report Checklist by checking the box to indicate that the specified information has been included in the Stormwater Report. If any of the information specified in the checklist has not been submitted, the applicant must provide an explanation. The completed Stormwater Report Checklist and Certification must be submitted with the Stormwater Report.

[1] The Stormwater Report may also include the Illicit Discharge Compliance Statement required by Standard 10. If not included in the Stormwater Report, the Illicit Discharge Compliance Statement must be submitted prior to the discharge of stormwater runoff to the post-construction best management practices.

[2] For some complex projects, it may not be possible to include the Construction Period Erosion and Sedimentation Control Plan in the Stormwater Report. In that event, the issuing authority has the discretion to issue an Order of Conditions that approves the project and includes a condition requiring the proponent to submit the Construction Period Erosion and Sedimentation Control Plan before commencing any land disturbance activity on the site.

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands Program

Checklist for Stormwater Report

B. Stormwater Checklist and Certification

The following checklist is intended to serve as a guide for applicants as to the elements that ordinarily need to be addressed in a complete Stormwater Report. The checklist is also intended to provide conservation commissions and other reviewing authorities with a summary of the components necessary for a comprehensive Stormwater Report that addresses the ten Stormwater Standards.

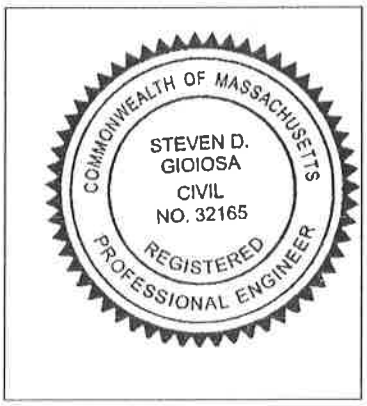
Note: Because stormwater requirements vary from project to project, it is possible that a complete Stormwater Report may not include information on some of the subjects specified in the Checklist. If it is determined that a specific item does not apply to the project under review, please note that the item is not applicable (N.A.) and provide the reasons for that determination.

A complete checklist must include the Certification set forth below signed by the Registered Professional Engineer who prepared the Stormwater Report.

Registered Professional Engineer's Certification

I have reviewed the Stormwater Report, including the soil evaluation, computations, Long-term Pollution Prevention Plan, the Construction Period Erosion and Sedimentation Control Plan (if included), the Long-term Post-Construction Operation and Maintenance Plan, the Illicit Discharge Compliance Statement (if included) and the plans showing the stormwater management system, and have determined that they have been prepared in accordance with the requirements of the Stormwater Management Standards as further elaborated by the Massachusetts Stormwater Handbook. I have also determined that the information presented in the Stormwater Checklist is accurate and that the information presented in the Stormwater Report accurately reflects conditions at the site as of the date of this permit application.

Registered Professional Engineer Block and Signature



Signature and Date April 20 2021

Checklist

Project Type: Is the application for new development, redevelopment, or a mix of new and redevelopment?

☒ New development

☐ Redevelopment

☐ Mix of New Development and Redevelopment

Checklist for Stormwater Report

Checklist (continued)

LID Measures: Stormwater Standards require LID measures to be considered. Document what environmentally sensitive design and LID Techniques were considered during the planning and design of the project:

- ☒ No disturbance to any Wetland Resource Areas
- ☐ Site Design Practices (e.g. clustered development, reduced frontage setbacks)
- ☐ Reduced Impervious Area (Redevelopment Only)
- ☒ Minimizing disturbance to existing trees and shrubs
- ☐ LID Site Design Credit Requested:
  - ☐ Credit 1
  - ☐ Credit 2
  - ☐ Credit 3
- ☐ Use of "country drainage" versus curb and gutter conveyance and pipe
- ☐ Bioretention Cells (includes Rain Gardens)
- ☐ Constructed Stormwater Wetlands (includes Gravel Wetlands designs)
- ☐ Treebox Filter
- ☐ Water Quality Swale
- ☐ Grass Channel
- ☐ Green Roof
- ☐ Other (describe): _____

Standard 1: No New Untreated Discharges

- ☒ No new untreated discharges
- ☐ Outlets have been designed so there is no erosion or scour to wetlands and waters of the Commonwealth
- ☐ Supporting calculations specified in Volume 3 of the Massachusetts Stormwater Handbook included.

Checklist for Stormwater Report

Checklist (continued)

Standard 2: Peak Rate Attenuation

☐ Standard 2 waiver requested because the project is located in land subject to coastal storm flowage and stormwater discharge is to a wetland subject to coastal flooding.

☒ Evaluation provided to determine whether off-site flooding increases during the 100-year 24-hour storm.

☒ Calculations provided to show that post-development peak discharge rates do not exceed pre-development rates for the 2-year and 10-year 24-hour storms. If evaluation shows that off-site flooding increases during the 100-year 24-hour storm, calculations are also provided to show that post-development peak discharge rates do not exceed pre-development rates for the 100-year 24-hour storm.

Standard 3: Recharge

☒ Soil Analysis provided.

☒ Required Recharge Volume calculation provided.

☐ Required Recharge volume reduced through use of the LID site Design Credits.

☒ Sizing the infiltration, BMPs is based on the following method: Check the method used.

☒ Static ☐ Simple Dynamic ☐ Dynamic Field[1]

☒ Runoff from all impervious areas at the site discharging to the infiltration BMP.

☐ Runoff from all impervious areas at the site is *not* discharging to the infiltration BMP and calculations are provided showing that the drainage area contributing runoff to the infiltration BMPs is sufficient to generate the required recharge volume.

☒ Recharge BMPs have been sized to infiltrate the Required Recharge Volume.

☐ Recharge BMPs have been sized to infiltrate the Required Recharge Volume *only* to the maximum extent practicable for the following reason:

- ☐ Site is comprised solely of C and D soils and/or bedrock at the land surface
- ☐ M.G.L. c. 21E sites pursuant to 310 CMR 40.0000
- ☐ Solid Waste Landfill pursuant to 310 CMR 19.000
- ☐ Project is otherwise subject to Stormwater Management Standards only to the maximum extent practicable.

☐ Calculations showing that the infiltration BMPs will drain in 72 hours are provided.

☐ Property includes a M.G.L. c. 21E site or a solid waste landfill and a mounding analysis is included.

[1] 80% TSS removal is required prior to discharge to infiltration BMP if Dynamic Field method is used.

Checklist for Stormwater Report

Checklist (continued)

Standard 3: Recharge (continued)

☐ The infiltration BMP is used to attenuate peak flows during storms greater than or equal to the 10-year 24-hour storm and separation to seasonal high groundwater is less than 4 feet and a mounding analysis is provided.

☐ Documentation is provided showing that infiltration BMPs do not adversely impact nearby wetland resource areas.

Standard 4: Water Quality

The Long-Term Pollution Prevention Plan typically includes the following:

- Good housekeeping practices;
- Provisions for storing materials and waste products inside or under cover;
- Vehicle washing controls;
- Requirements for routine inspections and maintenance of stormwater BMPs;
- Spill prevention and response plans;
- Provisions for maintenance of lawns, gardens, and other landscaped areas;
- Requirements for storage and use of fertilizers, herbicides, and pesticides;
- Pet waste management provisions;
- Provisions for operation and management of septic systems;
- Provisions for solid waste management;
- Snow disposal and plowing plans relative to Wetland Resource Areas;
- Winter Road Salt and/or Sand Use and Storage restrictions;
- Street sweeping schedules;
- Provisions for prevention of illicit discharges to the stormwater management system;
- Documentation that Stormwater BMPs are designed to provide for shutdown and containment in the event of a spill or discharges to or near critical areas or from LUHPPL;
- Training for staff or personnel involved with implementing Long-Term Pollution Prevention Plan;
- List of Emergency contacts for implementing Long-Term Pollution Prevention Plan.

☒ A Long-Term Pollution Prevention Plan is attached to Stormwater Report and is included as an attachment to the Wetlands Notice of Intent.

☐ Treatment BMPs subject to the 44% TSS removal pretreatment requirement and the one inch rule for calculating the water quality volume are included, and discharge:

- ☐ is within the Zone II or Interim Wellhead Protection Area
- ☐ is near or to other critical areas
- ☐ is within soils with a rapid infiltration rate (greater than 2.4 inches per hour)
- ☐ involves runoff from land uses with higher potential pollutant loads.

☐ The Required Water Quality Volume is reduced through use of the LID site Design Credits.

☒ Calculations documenting that the treatment train meets the 80% TSS removal requirement and, if applicable, the 44% TSS removal pretreatment requirement, are provided.

Checklist for Stormwater Report

Checklist (continued)

Standard 4: Water Quality (continued)

☒ The BMP is sized (and calculations provided) based on:

- ☒ The ½" or 1" Water Quality Volume or
- ☐ The equivalent flow rate associated with the Water Quality Volume and documentation is provided showing that the BMP treats the required water quality volume.

☒ The applicant proposes to use proprietary BMPs, and documentation supporting use of proprietary BMP and proposed TSS removal rate is provided. This documentation may be in the form of the propriety BMP checklist found in Volume 2, Chapter 4 of the Massachusetts Stormwater Handbook and submitting copies of the TARP Report, STEP Report, and/or other third party studies verifying performance of the proprietary BMPs.

☐ A TMDL exists that indicates a need to reduce pollutants other than TSS and documentation showing that the BMPs selected are consistent with the TMDL is provided.

Standard 5: Land Uses With Higher Potential Pollutant Loads (LUHPPLs)

☐ The NPDES Multi-Sector General Permit covers the land use and the Stormwater Pollution Prevention Plan (SWPPP) has been included with the Stormwater Report.

☐ The NPDES Multi-Sector General Permit covers the land use and the SWPPP will be submitted ***prior to*** the discharge of stormwater to the post-construction stormwater BMPs.

☐ The NPDES Multi-Sector General Permit does ***not*** cover the land use.

☐ LUHPPLs are located at the site and industry specific source control and pollution prevention measures have been proposed to reduce or eliminate the exposure of LUHPPLs to rain, snow, snow melt and runoff, and been included in the long term Pollution Prevention Plan.

☐ All exposure has been eliminated.

☐ All exposure has ***not*** been eliminated and all BMPs selected are on MassDEP LUHPPL list.

☐ The LUHPPL has the potential to generate runoff with moderate to higher concentrations of oil and grease (e.g. all parking lots with >1000 vehicle trips per day) and the treatment train includes an oil grit separator, a filtering bioretention area, a sand filter or equivalent.

Standard 6: Critical Areas

☐ The discharge is near or to a critical area and the treatment train includes only BMPs that MassDEP has approved for stormwater discharges to or near that particular class of critical area.

☐ Critical areas and BMPs are identified in the Stormwater Report.

Checklist for Stormwater Report

Checklist (continued)

Standard 7: Redevelopments and Other Projects Subject to the Standards only to the maximum extent practicable

☐ The project is subject to the Stormwater Management Standards only to the maximum Extent Practicable as a:

- ☐ Limited Project
- ☐ Small Residential Projects: 5-9 single family houses or 5-9 units in a multi-family development provided there is no discharge that may potentially affect a critical area.
- ☐ Small Residential Projects: 2-4 single family houses or 2-4 units in a multi-family development with a discharge to a critical area
- ☐ Marina and/or boatyard provided the hull painting, service and maintenance areas are protected from exposure to rain, snow, snow melt and runoff
- ☐ Bike Path and/or Foot Path
- ☐ Redevelopment Project
- ☐ Redevelopment portion of mix of new and redevelopment.

☐ Certain standards are not fully met (Standard No. 1, 8, 9, and 10 must always be fully met) and an explanation of why these standards are not met is contained in the Stormwater Report.

☐ The project involves redevelopment and a description of all measures that have been taken to improve existing conditions is provided in the Stormwater Report. The redevelopment checklist found in Volume 2 Chapter 3 of the Massachusetts Stormwater Handbook may be used to document that the proposed stormwater management system (a) complies with Standards 2, 3 and the pretreatment and structural BMP requirements of Standards 4-6 to the maximum extent practicable and (b) improves existing conditions.

Standard 8: Construction Period Pollution Prevention and Erosion and Sedimentation Control

A Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan must include the following information:

- Narrative;
- Construction Period Operation and Maintenance Plan;
- Names of Persons or Entity Responsible for Plan Compliance;
- Construction Period Pollution Prevention Measures;
- Erosion and Sedimentation Control Plan Drawings;
- Detail drawings and specifications for erosion control BMPs, including sizing calculations;
- Vegetation Planning;
- Site Development Plan;
- Construction Sequencing Plan;
- Sequencing of Erosion and Sedimentation Controls;
- Operation and Maintenance of Erosion and Sedimentation Controls;
- Inspection Schedule;
- Maintenance Schedule;
- Inspection and Maintenance Log Form.

☒ A Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan containing the information set forth above has been included in the Stormwater Report.

Checklist for Stormwater Report

Checklist (continued)

Standard 8: Construction Period Pollution Prevention and Erosion and Sedimentation Control (continued)

☐ The project is highly complex and information is included in the Stormwater Report that explains why it is not possible to submit the Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan with the application. A Construction Period Pollution Prevention and Erosion and Sedimentation Control has ***not*** been included in the Stormwater Report but will be submitted ***before*** land disturbance begins.

☐ The project is ***not*** covered by a NPDES Construction General Permit.

☐ The project is covered by a NPDES Construction General Permit and a copy of the SWPPP is in the Stormwater Report.

☒ The project is covered by a NPDES Construction General Permit but no SWPPP been submitted. The SWPPP will be submitted BEFORE land disturbance begins.

Standard 9: Operation and Maintenance Plan

☒ The Post Construction Operation and Maintenance Plan is included in the Stormwater Report and includes the following information:

- ☒ Name of the stormwater management system owners;
- ☒ Party responsible for operation and maintenance;
- ☒ Schedule for implementation of routine and non-routine maintenance tasks;
- ☒ Plan showing the location of all stormwater BMPs maintenance access areas;
- ☒ Description and delineation of public safety features;
- ☒ Estimated operation and maintenance budget; and
- ☒ Operation and Maintenance Log Form.

☐ The responsible party is ***not*** the owner of the parcel where the BMP is located and the Stormwater Report includes the following submissions:

- ☐ A copy of the legal instrument (deed, homeowner's association, utility trust or other legal entity) that establishes the terms of and legal responsibility for the operation and maintenance of the project site stormwater BMPs;
- ☐ A plan and easement deed that allows site access for the legal entity to operate and maintain BMP functions.

Standard 10: Prohibition of Illicit Discharges

☒ The Long-Term Pollution Prevention Plan includes measures to prevent illicit discharges;

☒ An Illicit Discharge Compliance Statement is attached;

☐ NO Illicit Discharge Compliance Statement is attached but will be submitted ***prior to*** the discharge of any stormwater to post-construction BMPs.