



October 24, 2019

Mr. Peter Friedrichs
City Planner
43 Broadway
Newport, RI 02840

RE: Schoolyard Properties
Residential Subdivision
Response to DPU Comments

Dear Mr. Friedrichs:

The following responses are in reference to the memorandum issued by the Newport DPU dated August 10, 2019.

GENERAL

1. *The project has not been issued any permits for Sewer Service, Stormwater Service, Domestic Water and/or Fire Service Application. The applicant will be required to submit for review and approval an application(s) with all applicable fees for the referenced utility permits. Some modifications to the proposed plans may be required during this process.*

Permit applications for individual residences will be submitted at time of individual lot development.

2. *A separate Soil Erosion and Sediment Control Plan with fee is required to be submitted in accordance with Chapter 15.26 of the City Ordinances*

Overall SESC features are reflected on the submitted set. SESC permit applications for individual residences will be submitted at time of individual lot development.

SEWER

1. *Please provide average, max day, and peak hourly sanitary flow projections. Please provide calculations that demonstrate the sanitary sewers hydraulic capacity is flowing at no more than 75% of full pipe depth with the proposed development at the Max Day flow projection.*

The requested calculations are attached.

2. *Connections of sewer laterals to the City's sanitary sewer shall be made at an existing wye branch on the sewer if available or be made using an approved coring bit and mechanical device. As shown the proposed new connection directly to a proposed sewer manhole in Harrison Avenue shall not be allowed.*

The private sewer main connection to the manhole will be revised. The connection will now be proposed as a wye connection.

3. *A legal agreement addressing the shared ownership of the proposed private sewer from the connection to the City's sewer main to the properties shall be provided for review and approval.*

A draft legal agreement was provided with the application. Another copy is attached.

4. *An operations and maintenance plan addressing the roles, responsibilities and emergency response associated with the private sewer shall be provided for review and approval.*

An operation and maintenance plan will be provided.

STORMWATER

1. *The existing onsite catch basins are the remains of the private drainage system used for the former Underwood Elementary School and not part of or connected to the City's storm drain system. This private system is believed to be connected to a private drainage system on the PenCraig condominiums property on the north side of Harrison Avenue with an outfall to Brenton Cove. The proposed development's Stormwater Management Plan appears to rely on the continued use of at least a portion of private stormwater system. The following information is required relative to the continued use of the private stormwater system:*

- a. *Access Agreement and/or Easement documenting right for continued use.*
- b. *Condition Assessment of Existing Private Stormwater System*
- c. *Capacity Assessment of Existing Private Stormwater System*

If the ex. private system is not being used then the details of the abandonment shall be provided.

The use of the existing private drainage system is a historic condition. The project attorney has advised that no legal documents are necessary for their continued use.

Based on the information provided by the Client, the system is maintained in good working order.

The project proposes a reduction in stormwater flow. This is reflected in the drainage design and calculations approved by RIDEM. A capacity assessment is not necessary due to the reduced load on the existing infrastructure.

2. *No Soil Evaluation(s) were provided and therefor based on the RI Soil Survey the site is PmA Pittstown Silt Loam, the soil description states:*
 - a. *Seasonal high-water table at a depth of about 20 inches;*
 - b. *Permeability of this soil is slow in the substratum;*
 - c. *Soil is suitable for community development but is limited by the high-water table and the slow permeability of the substratum. Onsite sewage disposal systems need special design and installation. If suitable outlets are available, subsurface drains can be used to help prevent wet basements. Roads and streets need careful design to prevent frost heaving.*

Taking into account the information above, please address the following:



- *How groundwater will be addressed for any proposed basements and in-ground pools. If sump pumps are assumed to be used, please identify the discharge and confirm that the flows are considered with the Storm Water Management Plan.*
- *The design and capacity of the rain gardens proposed for each lot.*

It is assumed that any residences with basements, if any, will require sump pumps, as is typical. Including sump pump discharges in a stormwater analysis is not typical. Once residence designs are submitted for building permit, specific review of applicability would be conducted. Sizing of the rain gardens is provided on sheet 7 of the design plans. The method for sizing rain gardens provided by the state design materials does not account for the elevation of the water table, only the type of soils present.

3. *Confirm that the Stormwater Runoff Analysis for existing conditions reflect conditions as they exist now (e.g. no building areas)*

The existing conditions analysis reflects the school development. This is standard for any redevelopment project. The school was present for over 50 years and was only recently demolished in anticipation of this subdivision. This existing conditions analysis was accepted by RIDEM during the RIDPES permitting process.

4. *The applicant provided a RIDEM Permit Authorization Number RIPDES No. RIR101627 for Wetlands Application No. 17-0163. The RIPDES Permit states that freshwater wetlands regulated by the RIDEM were present however review of the proposed project, reveals that the project does not represent an alteration to these freshwater wetlands. Therefore a permit for the project pursuant to the Freshwater Wetland Act (Rhode Island General Law Section 2- 1-18 et seq. or the Rules and Regulations Governing the Administration and Enforcement of the Freshwater Wetlands Act is not required. The determination by RIDEM is specific to the **proposed** site alterations illustrated and detailed on site plans on file with the RIDEM. The determination further indicates that there can be no modifications that would result in the following:*
 - a. An increase in the rate and/or volume of surface water runoff flowing into, or draining or diverting from these wetlands; or*
 - b. A diversion of groundwater into or away from these wetlands; or*
 - c. A modification to the quality of water reaching these wetlands, which could change their natural character."*

The submitted documentation received by this Department does not fully address a, b or c from the RIPDES No. RIR101627. Specifically, the plans and analysis does not address permanent ground water control for full basement foundations and in-ground pools.

In-ground pools do not typically require groundwater control as they are not intended to be fully drained. It is not typical to include potential flow from sump pumps in a stormwater analysis. Maximum flow from a typical sump pump equates to only 0.1 cfs.



WATER

1. *Water service is available for the proposed subdivision. Individual water service applications will be required to be submitted for each lot for review and approval.*

Permit applications for individual residences will be submitted at time of individual lot development.

Should you have any questions or concerns regarding any of these responses, please contact our offices at 401-849-0810. Thank you.

Best regards,

NORTHEAST ENGINEERS & CONSULTANTS, INC.



Geralyn Small, PE

Senior Project Manager

