



39 Cascade Drive / Rochester, NY 14614 / Phone (585) 458-7770

December 18, 2015

Town of Horseheads
Planning Board
150 Wygant Road
Horseheads, NY 14845
Attn: Thomas Skebey

Re: Proposed UHaul Storage Facilities – 2494 Corning Road (NYS Route 14)
Town of Horseheads, NY

Mr. Skebey,

On behalf of our client, AMERCO Real Estate Co./UHaul, we are submitting this letter, and revised plans, to address written comments provided by Chemung County Stormwater Coalition (Coalition) dated November 20, 2015.

Chemung County Stormwater Coalition's comments dated November 20, 2015:

Stormwater Modeling

1. As per the SWPPP, the existing soils are taken to be Hydrologic Soil Group (HSG) D soils. Also, as per the SWPPP, the site has been filled with sandy soil to a depth of 3.5 to 14 feet above the original grade. As per a review of the boring logs and a site visit after a period of rain, the assumed HSG D designation does not seem to apply to these soils and a HSG A (or possibly HSG B) seems more appropriate, given the sandy nature of this fill material. The hydrologic calculations for the pre-development conditions should be based on HSG A (or possibly HSG B).

As per Chapter 7 (Hydrologic Soil Groups) of Part 630 of the National Engineering Handbook, HSG A soils typically have less than 10 percent clay and more than 90 percent sand or gravel and have gravel or sand textures. HSG A soils have low runoff potential when thoroughly wet. On the other hand, HSG D soils have high runoff potential when thoroughly wet. HSG D soils typically have greater than 40 percent clay, less than 50 percent sand, and have clayey textures. On November 13, 2015, after a period of rainfall, there was no ponding/puddling observed on the grassed portion of the site (to the east of the existing building), suggesting a well-drained soil.

Response: Based on the additional subsurface geotechnical investigation and infiltration testing, the HSG of the existing onsite "fill" material has been adjusted to reflect an HSG A classification. As noted in the SWPPP, the HSG for existing soils located outside the limits of the existing fill are

assigned an HSG D classification. Updated hydrologic analysis is provided in Appendix E of the enclosed SWPPP.

2. From the existing topographic mapping, existing shallow topographic depressions are located on the project site. These topographic depressions would act to store runoff and, in turn, allow this runoff to infiltrate. The submitted calculations do not appear to consider the effects of these topographic depressions, when estimating flow rates or volumes. These depressions would also act to increase the time of concentrations.

Response: It should be noted that the mapping of the existing topography was taken after the existing vegetation located along portions of the “pad” area of the fill site was cleared around February 2015. The plans and SWPPP prepared for the clearing activities were approved by The Coalition and The Town of Horseheads. The plans prepared for the clearing activities indicated that the ground surface was to undergo minor grading to provide positive drainage via surface slopes ranging from 0.5% minimum and 1.0% maximum. The presence of shallow topographic depressions is evidence that the grading activities proposed as part of the previous clearing phase of this project did not provide positive drainage as required. As such, these potential shallow depressions were not included in the Time of Concentration (Tc) calculations for existing conditions. The Tc calculations for existing conditions included surface slopes across the fill “pad” area at the minimum surface slope specified in the clearing plans, 0.5%.

3. Details regarding the proposed Soil Restoration should be clearly outlined in the SWPPP and Plans. In regards to the calculation of CNs for post-development conditions, consideration should be given that (from a practical standpoint) soil restoration can't be completed for all disturbed areas that shall remain vegetated. In accordance, for compacted soils that will not undergo Soil Restoration, the Hydrologic Soil Group for this soil has to be changed (by one level) to a less permeable HSG from the current HSG.

Response: Soil Restoration areas have been delineated on the Landscaping and Lighting Plan. In addition, soil restoration is a specific activity that is required to be provided as outlined in Erosion Control Sequence notes provided on the Note Sheet as well as in the SWPPP. The Soil Restoration language in the SWPPP has been updated to further clarify/detail the required soil restoration efforts as stated and required in the NYSDEC Stormwater Management Design Manual.

4. A portion of the existing pavement is proposed to be replaced. This work could constitute redevelopment, per the NYS Stormwater Design Manual, and applicable requirements regarding stormwater management be addressed.

Response: The SWPPP has been updated to include a discussion relative to the proposed replacement of existing pavement areas and the redevelopment criteria.

5. How is runoff from proposed Building B and adjacent pavement proposed to be managed?

Response: Runoff from Building B and adjacent pavement are proposed to be routed to the Detention Pond proposed due east of the Building B so to provide peak flow attenuation for that contributing area. The additional impervious cover (building and new asphalt) associated with Building B is included in the Existing/Proposed Impervious Cover Summary included in Appendix E of the SWPPP. It should be noted that due to grade limitations, direct water quality mitigation for Building B and the new impervious area, via a bioretention area cannot be provided. However, Bioretention Area #1 was sized based to include this contributing impervious cover thereby providing mitigation in excess of what is actually flowing to the practice.

So the Town may continue their review, we are providing the following:

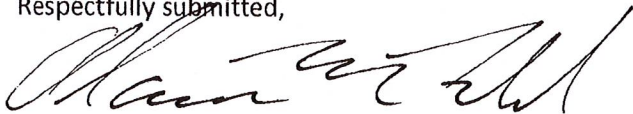
- Site Development Plans (full size) – 2 sets
- Site Development Plans (11x17) – 10 sets
- SWPPP – 1 Copy

So the Chemung County Stormwater Coalition may continue their review, we are sending the following information in a separate submission:

- This Letter – 1 copy
- Site Development Plans (full size) – 1 set
- SWPPP – 1 copy

We respectfully request that this project be placed on the agenda for the January 6, 2015 regularly scheduled Planning Board meeting. We are hopeful that the Planning Board will consider passing conditional resolutions with regards to SEQR and Site Plan Approval at this meeting. If you have any questions, or require additional information, please do not hesitate to contact our office.

Respectfully submitted,



Adam M. Fishel, PE, CPESC

cc: David Pollock – AMERCO Real Estate Co. / UHaul (via email)
Jimmie Joe Carl – Chemung County Stormwater Coalition