

LLEWELLYN - HOWLEY
I N C O R P O R A T E D

May 16, 2011

Kevin Burke
Environmental Analyst
Vermont Department of Environmental Conservation
Water Quality Division
103 South Main Street
Building 10 North
Waterbury, Vermont 05671-0408



Re: 20 Kimball Avenue, South Burlington, Stormwater Discharge Permit 6275-9030
File: 2010024

Dear Kevin,

To complete the referenced application, attached please find the following:

- The General Permit 3-9030 EFA Submittal Form for the referenced property.
- The previously submitted letter to Jennifer Callahan dated March 31, 2011.
- A hard copy of the VCGI map for the referenced property with approximate property line.

Please let me know if you have any questions or concerns regarding this or if there is anything else required for the permit. Thank you as always for your assistance.

Sincerely,
Llewellyn-Howley Incorporated

Mitchel Cypes P.E.

cc: Mr. Alan Palmer (via email)
Jennifer Callahan (via email)

General Permit 3-9030 EFA Submittal Form

TO ACCOMPANY NOTICE OF INTENT TO DISCHARGE STORMWATER
PURSUANT TO GENERAL PERMIT 3-9030

1. Applicant: Alan Palmer
2. Permit number: 6275- 9030
3. Name of project: 20 Kimball Avenue
4. Location of project: South Burlington, VT
5. Provide latitude and longitude of project (DD°MM'SS'')
Latitude: N44°27'37"
Longitude: W73°09'12"
6. Provide as an attachment all pertinent information from the analysis; including maps (e.g. site map, post development subwatershed map, BMP drainage map, etc.) and BMP information (e.g. storage information, orifice sizing, infiltration rate, etc.).
7. Designer's Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my diligent inquiry of the person or persons who manage the system or actions required by this permit, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I also certify that the Engineering Feasibility Analysis was followed in accordance with General Permit 3-9030.



Original Signature of Stormwater Designer

Senior Civil Engineer

Title

Mitchel Cypes P.E.

Print or Type Name

LLEWELLYN - HOWLEY
INCORPORATED

March 31, 2011

Jennifer Callahan
Environmental Analyst
Vermont Department of Environmental Conservation
Water Quality Division
103 South Main Street
Building 10 North
Waterbury, Vermont 05671-0408



Re: 20 Kimball Avenue, South Burlington, Stormwater Discharge Permit 6275-9030
File: 2010024

Dear Ms. Callahan,

The 1.86-acre property located at 20 Kimball Avenue in South Burlington, which is located on the north side of Kimball Avenue east of Kennedy Drive, contains an office building and a paved parking lot. The development of this property was in compliance with stormwater discharge permits required during its construction. The pervious areas of the property include an area adjacent to the building and areas along the perimeter of the property. Placing stormwater mitigation in these areas could lead to basement flooding, undermine existing structures, require work on adjacent lands and/or require pumping of stormwater runoff. Such potential stormwater mitigation would not be in compliance with the limitations found on Table 2 in Appendix 'A' of the Residual Designation Engineering Feasibility Analysis. Based on this review, for the required Engineering Feasibility Analysis that must be submitted by June 30, 2011 for compliance with General Permit 3-9030, no new stormwater treatment should be required for this property.

The property was developed in two phases. The first phase for a 25,000sf 3-story office building included the following approvals:

- Temporary Pollution Permit #2-0939 issued by the Agency of Environmental Conservation dated April 15, 1981.
- A Certification of Compliance issued by Agency of Environmental Conservation dated July 13, 1981.
- Act 250 Land Use Permit #4C0310-3 for the construction of a 25,000sf 3-story office building dated July 13, 1981.

The second phase for a 9,600sf addition to the building included the following approvals:

- An amended Temporary Pollution Permit #2-0939 issued by the Agency of Environmental Conservation dated January 3, 1985.
- An amendment to the Act 250 Land Use Permit, #4C0310-3A, dated March 26, 1987.
- A second amendment to the Act 250 Land Use Permit, #4C0310-3B, dated May 4, 1987.

Currently there is approximately one acre of impervious surfaces. The pervious surfaces include grassed areas adjacent to the building and along the property lines. Along the northern property line is a wooded area with a grass channel that is a tributary to Potash Brook. Stormwater generated from this property discharges to this wooded area with a grass channel.

The stormwater runoff from the northern portion of the parking area sheet flows to the wooded area with a grass channel. Stormwater runoff generated from the building's roof and the remainder of the parking area discharges to catch basins and storm sewers that outfall to the

same wooded area with a grass channel near the northwest corner of the property. This wooded area with a grass channel has a slope of approximately 1% and provides some water quality treatment.

Table 2 in Appendix 'A' of the Residual Designation Engineering Feasibility Analysis indicates that the owners of properties should not be required to purchase property, potentially cause basement flooding or other hazards and/or remove or undermine existing impervious areas or infrastructure to satisfy the stormwater treatment requirements for existing impervious areas. Since the locations of the existing impervious areas are either adjacent to the building or along the property lines, use of any of these existing pervious area would not conform to the limitations provided in Table 2. The following is a review of the pervious areas on the site and the reason these areas should not be modified per Table 2:

- Use of the grassed area adjacent to the building could lead to basement flooding and would not be appropriate per part 8 of Table 2.
- Use of the narrow and steep sloped grassed strips along the eastern and western property lines and on the wooded steep sloped area along the northern property line would require work on adjacent properties, which is discouraged per part 2 of Table 2. In addition construction in these areas could undermine the existing parking areas on the referenced property and adjacent properties.
- The grassed area along the southern property line adjacent to the Kimball Avenue right-of-way is at an elevation above the adjacent impervious area on the property. To use this area would require pumping the stormwater runoff, which is discouraged in part 6 of Table 2.

This property was developed in conformance with applicable permits issued during the times of construction. Use of any of the existing permeable areas on this property could cause basement flooding, undermine existing structures or require work to be performed on adjacent properties. Such work is discouraged per Table 2 of Appendix 'A' for the Engineering Feasibility Analysis. Based on the development of this property and the applicable requirements and restrictions contained in the Engineering Feasibility Analysis, no new stormwater treatment should be required.

Please contact us should you have any questions or concerns regarding this analysis.

Sincerely,
Llewellyn-Howley Incorporated

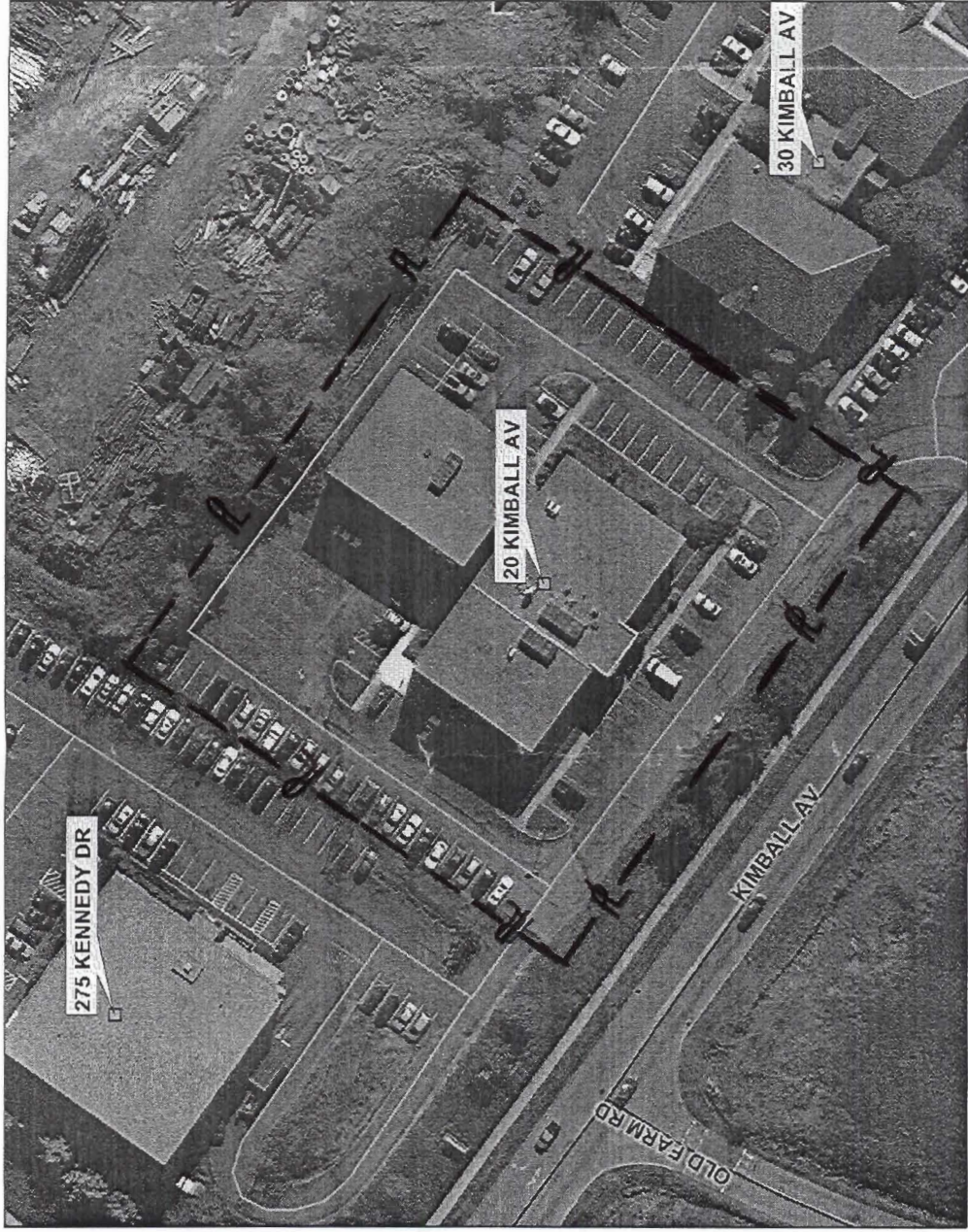
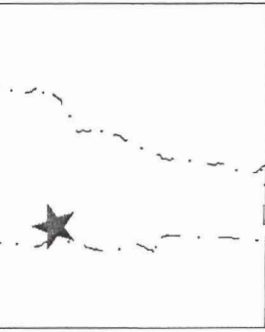


Mitchel Cypes P.E.

cc: Mr. Alan Palmer



Vermont Interactive Map Viewer
 Vermont Center for Geographic Information (VCGI)



- Legend**
- Airports
 - Mountains and Hills
 - Interstates
 - US Highways
 - VT State Highways
 - Rail Lines
 - Town Boundaries
 - Roads
 - Class 1-3
 - Class 4
 - Driveways
 - Rivers and Lakes
 - Streams
 - Intermittent
 - Perennial
 - Unassigned
 - Buildings
 - Cities
 - VT State Boundary

--R--
 APPROXIMATE
 PROPERTY
 LINE

VT State Plane Meters (NAD83)



Scale: 1:1,000

Map center: 447975, 217987



DISCLAIMER: This map is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. VCGI and the State of Vermont make no representations of any kind, including but not limited to the warranties of merchantability or fitness for a particular use, nor are any such warranties to be implied with respect to the data on this map.

URL: http://maps.vermont.gov/info/sites/VCGI_basemap/jsp/launch.jsp



4/18/11