

September 10, 2025

VIA EMAIL & MAIL

Trevor Cole, Senior Planner
Town of Plattsburgh Engineering & Planning
Town Offices
151 Banker Road
Plattsburgh, New York 12901

Re: **GSA Plattsburgh Site Plan**
Storm Water Pollution Prevention Plan Review
Town of Plattsburgh, New York

Dear Mr. Cole:

We are in receipt of the following documents for the "GSA-Plattsburgh 284 Idaho Avenue" as prepared by Engineering Ventures, P.C.:

- 1) Storm Water Management Report for GSA-Plattsburgh 284 Idaho Avenue, dated August 26, 2025; and
- 2) Project plans all dated 08-26-2025 as follows:
 1. Site Legend and Notes, C-001;
 2. Existing Conditions Plan, C-101;
 3. Demolition Plan, C-102;
 4. Site Layout Plan, C-201;
 5. Site Grading Plan, C-202;
 6. Utility Plan, C-203;
 7. Landscaping Plan, C-204;
 8. Storm Profiles, C-301;
 9. Erosion & Sediment Control Plan, C-401;
 10. Site Details, C- 501, and C-502;
 11. Water Details, C-503;
 12. Stormwater Details, C-504;
 13. Erosion & Sediment Control Details, C-505 and C-506; and
 14. Architectural drawings A-101.1 and A-202.

We have reviewed these documents relative to the following design requirements that include:

- 1) The Town of Plattsburgh Zoning Ordinance Section 7.5 paragraph FF and GG, and Section 7.8 paragraph F;
- 2) The NYS DEC Stormwater Management Design Manual July 31, 2024 (Design Manual);
- 3) The NYS Standards and Specifications for Erosion and Sediment Control, November 2016 (BB); and
- 4) The New York State Department of Environmental Conservation SPDES General Permit for Stormwater Discharges from Construction Activity Permit No GP-0-25-001 (CGP).

We recommend that the applicant address the following comments satisfactorily prior to site plan approval:

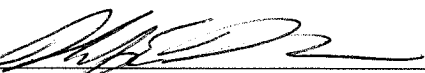
Stormwater Report/Plans

- 1) The report Section I Project Description should indicate the project is considered to be a redevelopment project and indicate the proposed area of disturbance. Lacking this information, we estimate the project's area of disturbance to be approximately 0.9 acres out of the total lot area of 1.67 acres.

- 2) All plan sheets should indicate the project's limit of disturbance and indicate the acreage of disturbance proposed.
- 3) The stormwater analysis is missing the results from a 50-year design storm. A revised report should include the results of the analysis that also show no increase in runoff from pre to post development conditions.
- 4) The stormwater analysis Point Of Interest #1 (POI#1) should be located at the low point of the drainage area and the analysis adjusted accordingly.
- 5) The project proposes surcharging the stormwater system for the drainage area discharging to POI#1 with overflow out of the top of the proposed catch basin ST1. This proposed design will create a point discharge the required mitigation. The exiting ditch at this location is located upslope of the discharge, and does not provide a designed discharge mitigation. Therefore, the design should be revised to include a flow spreader per the BB (BB ref. p 3.19). The design should confirm that the storm runoff can be released in sheet flow...without causing erosion...where the area below...is a uniform slope of 10% or less and the runoff will not-reconcentrate.
- 6) The project should include an operations and maintenance plan that includes the inspection and maintenance schedules and actions to ensure continuous and effective operation of each SMP.
- 7) The project has assumed an infiltration rate for design and proposes to confirm this during construction. The project should perform test pits to determine depth to restrictive layers (ledge, hard pan, seasonal high-water table), and infiltration testing during this design phase. Results should be included on the plans and in the report. The analysis/design should be revised based upon the testing performed using the confirmed infiltration rate and required 24" minimum separation to seasonal high-water table or bed rock
- 8) The Demolition Plan C-102 should refer to the erosion and sediment control plan and also required the installation of control measure prior to the start of construction to protect the existing storm drainage and management areas from sediment laden stormwater runoff.
- 9) The storm drainage from ST5, 4, and 3 should connect to the head of the isolator row for ST2 (the infiltration system).
- 10) The plans indicate the project is to comply with the 2016 Design Manual. The reference should be revised to the current Design Manual, July 31, 2024.
- 11) The underground infiltration ST2 detail should indicate a require minimum separation to ground water of 24" is required from the bottom of the stone elevation.
- 12) The erosion and sediment control details plans should contain a sequence of construction that includes the installation of erosion and sediment controls, soils restoration and the final stabilization and removal of temporary measures.
- 13) The fabric inlet protection detail is a non-standard BB practice and should be replaced with one of the standard storm drain inlet protection measures (BB ref. p. 5.57).

Please feel free to call our office if you have any questions.

Very truly yours,
LABERGE GROUP

By: 
Philip E. Koziol, P.E.
Project Manager

PEK: mae