



# DiPrete Engineering

December 11, 2025

Andy Charpentier, Environmental Scientist III  
Rhode Island Department of Environmental Management  
235 Promenade Street  
Providence, Rhode Island 02908

RE: 135 All American Way  
North Kingstown, RI  
Project #: 1794-001-G01

Dear Mr. Charpentier:

DiPrete Engineering has received your comments dated June 27, 2025. We have reviewed these comments and offer the following in response. The original comments are provided in italics with responses in bold.

## Biological Review Comments:

- 1. Please be advised that during a site inspection held on April 24, 2025, site work was observed to have begun. Please cease and desist all work in RIDEM Jurisdictional Area until a wetland permit has been issued. Please ensure that erosion and sediment controls are properly installed and maintained until all disturbed areas are stabilized.*

All work within the jurisdictional area will be halted until further notice. Erosion and sediment controls will be properly installed and maintained until disturbed areas have been stabilized.

- 2. Please provide evergreen plantings such as Great Laurel (*Rhododendron maximum*) and/or Mountain Laurel (*Kalmia latifolia*) within the 25-foot buffer zone west of proposed "Pond Complex 2" and the 25-foot buffer zone southeast of proposed "Sediment Trap 2" (associated with wetland flags A42-A47). Details of these planting (species, spacing, and height after planting) must be depicted on revised landscaping plans.*

The landscaping plans have been revised accordingly.

## Engineering Review Comments:

- 1. Please note that due to the lack of relevant application materials that were submitted for this application, this reviewer was unable to conduct a full review. Therefore, additional review comments may arise once all the pertinent submittal requirements are provided*

Acknowledged.



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- 2. The submitted analysis indicates that the proposed project will result in a 1.66 ac-ft increase in total runoff volume during the 100-year storm (possibly more when the existing swale/basin is accounted for in pre-development analysis). Please note that when requesting a waiver for providing on-site detention to avoid dual-peak coincidences, every possible effort should be made to minimize new impervious areas, maximize infiltration and avoid increases in runoff volume versus existing conditions given the existing localized and downstream flooding issues (see Rhode Island Stormwater Rule 250-RICR-150-10-8.7A). Therefore, please revise the design to avoid increases in total runoff volume to the maximum extent practicable.*

Additional stormwater BMPs have been designed to promote infiltration and reduce peak runoff rates to the maximum extent possible given the proposed operation's spatial requirements. The proposed underground infiltration systems have been designed to infiltrate all storm events up to and including the 100-year storm. Redesign of Sand Filter 2 also promotes additional runoff infiltration for volume mitigation.

- 3. Please provide a pre-development watershed map, node diagram, and HydroCAD analysis for the existing site only (the submitted pre-development map only considers the site as part of the overall watershed which does not meet submittal requirements). Please be sure that this watershed map also considers all upgradient areas that contribute run-on into the site (i.e., the adjacent site and the existing culvert that drains into the existing drainage system that is proposed to discharge into sand filter #3). Please also ensure that the pre-development watershed map and analysis accounts for the existing swale/basin that captures and infiltrates runoff from All American Way (i.e., the area proposed to be redeveloped into sand filter #3).*

The Stormwater Management Report has been revised to include the requested pre-development watershed map, node diagram, and supporting HydroCAD analysis. Watershed boundaries have been updated to include the appropriate portions of adjacent sites that contribute runoff to on-site stormwater systems.

- 4. Please revise the post development watershed map and the HydroCAD analysis to include the off-site areas that contribute runoff into the All-American Way existing drainage system that is proposed to outlet into sand filter #3 (specifically the flows from Plat 180 Lot 7 and the entirety of All American Way; not just the last 500' of the road). Please ensure that the BMP has sufficient storage and conveyance capacity to adequately handle these additional flows that were omitted from the submitted analysis.*

The watershed maps have been revised to include all catchment areas that contribute runoff to Sand Filter #3. The original BMP that exists where Sand Filter #3 is proposed was designed to accommodate runoff from the section of All American Way up to its intersection at Foliage Drive. This intersection is a localized high point for All American Way, so runoff generated in the northly section flows away from the on-site BMP. The development at Plat 180 Lot 7 has dedicated underground chamber systems for managing roof runoff and surface BMPs for



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parking lot runoff, so the only portions of this lot that reach All American Way are the undetained landscaped areas and railroad track directly adjacent to the road.

- 5. Test-hole DTH 24-3 indicates a SHWT depth of 5' below grade (approximate elevation 52.5'), which would provide 3' or more of vertical separation to the SHWT for the Western and central portion of proposed sand filter #2. However, test-hole DTH 24-4 was dug in an area where existing grade is approximately 59.0' and the SHWT was indicated to be 53" below grade, which corresponds to an elevation of 54.6'. Therefore, the Eastern side of proposed sand filter #2 would only provide 0.9' of vertical separation to the SHWT in the area where the deepest cuts are proposed. Even if you use the results from test-hole DTH 24-2, the most separation that could be provided based on the proposed design would be 2.7' to the SHWT; which is still not adequate. Please revise the design of the proposed BMP to provide at least 3' of vertical separation to the SHWT throughout the entire BMP footprint. Please also address the concern that test-hole DTH 24-4 may indicate a notable lack of vertical separation to the SHWT in the Eastern upgradient half of sand filter #2.*

Sediment Forebay #2 and Sand Filter #2 have been redesigned so that Sand Filter #2 has adequate separation to the seasonal high-water table. The geometry and elevations of the BMP have been optimized to provide at least 3' of vertical separation to the SHWT relative to both DTH 24-4 and DTH 24-2. Additional system profile information has been added to the plans.

- 6. Please revise the note on site plan sheet 10 about the impermeable liner for Sand Filter #3 so that it is incorporated in all areas of the BMP where there is less than 3' of vertical separation to the SHWT (this site is located in an area with GAA groundwater and the runoff entering this BMP is from roadways, so the system must provide at least 3').*

Sand Filter #3 was designed with the intent that the entire system will be lined. The notes on Sheet 10 have been updated to clarify the liner extents.

- 7. Please revise the site plans to provide berms, curbing, or more effective grading along the Western border of the proposed "non-pervious area" to ensure all flows are captured by the proposed collection/treatment system.*

The grading has been revised along the western border of the site and bituminous berm has been added to the non-pervious edge.

- 8. Please clarify if the proposed site will host any Land Uses with High Potential for Pollutant Loading (LUHPPL) sources. If any LUHPPL activities are to take place on the proposed site, please identify such areas and revise the design as necessary to provide appropriate controls for any proposed LUHPPL areas.*



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The proposed site is intended to obtain a No Exposure Certification Exclusion from RIPDES and will incorporate the necessary elements to comply with the applicable regulations.

9. Please depict and label the roof leaders on the site plans.

Roof leaders have been shown and labeled on the plans.

Please, feel free to contact me if you have any further questions regarding this matter.

Sincerely,  
DiPrete Engineering Associates, Inc.

Eric Prive, PE  
Senior Project Manager  
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