


MEMORANDUM

TO: Seamus O'Rourke, Chair

CC: Village of Mamaroneck Planning Board
Carolina Fonseca, Building Inspector

FROM: John Kellard, P.E. 
Consulting Village Engineer

DATE: June 9, 2023

RE: Hampshire Club
1107 Cove Road
Section 9, Block 42, Lot 568

PROJECT DESCRIPTION

At the request of the Village of Mamaroneck Planning Board, Kellard Sessions Consulting has reviewed the site plan and supporting documents submitted in conjunction with the above-referenced application. The applicant is proposing to mechanically dredge 800 c.y. of accumulated sediment from the 8,093 s.f. irrigation pond located on the golf course's 6th hole. The pond is used to store water used to irrigate the golf course. Present sediment loads are above the irrigation pump intake pipe and, therefore, hampers use of the supply. The pond spoils will be stockpiled with the intent to use the material on-site in the future. The project is located within the FEMA AE Floodplain with a 100-year high water elevation of 12 feet. The project disturbance is noted at 0.74 acres.

GENERAL COMMENTS

1. The applicant has depicted the limits of disturbance and quantified the area of disturbance to be 0.74 acres. Projects with limits of disturbance greater than 1,000 s.f. require the applicant to prepare a Stormwater Pollution Prevention Plan (SWPPP) consistent with the requirements set forth in Chapter 294-8B (Subsections 1 - 3) of the Village Code. Projects with limits of disturbance between 2,000 s.f. and less than one (1) acre require the applicant to provide erosion and sediment controls, stormwater quality controls, and stormwater quantity controls. Stormwater quantity controls includes attenuation of the post-development, 25-year storm event to pre-development flow rates.

The applicant has prepared a Stormwater Pollution Prevention Plan (SWPPP) for the project. Since the project does not propose new impervious surfaces, the SWPPP primarily addresses erosion and sediment controls during the disturbance and stabilization phases of the project. The SWPPP includes a soil sampling report prepared by GZA GeoEnvironmental of New York. The report addresses sampling of the sediment within the pond and the analysis of the samples by Alpha Analytical Laboratories of Westborough, Massachusetts.

Our comment regarding the project SWPPP follows:

- a. The applicant shall include within the SWPP the Contractor Certification Statement, as per Chapter 294 of the Village of Mamaroneck Code.
- b. Sediment sampling results provide that:
 - i. Volatile Organic Compound – Acetone was detected within the soil sample at a level which exceeded unrestricted use requirements.
 - ii. Metals – Arsenic and Copper were detected at concentrations which exceeded unrestricted use.
 - iii. Pesticides – 4, 4' – DDD and 4, 4' – DDE were detected at concentrations exceeding unrestricted use requirements.
 - iv. The January 3, 2023 GZA Environmental Sampling Letter Report states that the material sampling meets the definition of general fill and are acceptable for reuse on-site. Since certain compounds were found which exceeded the unrestricted use, the applicant should clarify what specific restrictions are required if used on-site.

Also, if there is found to be no location on-site where the spoils can be placed without impact to the floodplain and, therefore, the spoils are removed from the site, what additional restrictions may be required and will a Benefited Use Permit from the NYSDEC be required. The report states that resampling of the VOC's should be performed if the material would be removed from the site.
2. The applicant is proposing to stockpile the excavated spoils on-site adjacent to the irrigation pond. The project site is located within the FEMA Floodplain Zone AE with a 100-year high water elevation of 12 feet. The proposed spoil stockpile would be located within the floodplain below elevation 12 feet, thereby resulting in a loss of floodplain volume on-site. In accordance with Section 18-5 (A)(3)(c) of the Village Code, fill placed within the 100-year floodplain shall be compensated for and balanced by a hydraulically equivalent volume of excavation taken from below the base flood

Seamus O'Rourke, Chair

June 9, 2023

Page 3 of 3

elevation. All such excavations shall be constructed to drain freely to the watercourse. No area below the waterline of a pond or other body of water can be credited as a compensatory excavation. The plan should demonstrate that compensatory flood storage can be provided to off-set the proposed fill in the floodplain or the fill relocated to an elevation above the 100-year floodplain (elevation 12 feet) or the fill should be removed from the site.

In order to expedite the review of subsequent submissions, the applicant should provide annotated responses to each of the comments outlined herein.

PLANS & REPORT REVIEWED, PREPARED BY KIMLEY HORN, DATED MAY 15, 2023:

- Cover Sheet (C-0.0)
- Grading and Erosion and Sediment Control Plan (C-3.0)
- Site Access Route Plan (C-3.1)
- Stockpile Profiles (C-3.2)
- Photos of Proposed Stockpile Area (C-3.3)
- Grading and Erosion and Sediment Control Details (C-3.4)
- Stormwater Pollution Prevention Plan Report, dated May, 2023

JK/dc