

# Stewart's

6/1/21

Chairman John Litts  
Town of Lloyd Zoning Board  
12 Church Street  
Highland, NY 12528

Chairman Litts,

This letter is in response to the correspondence Stewart's was copied on between yourself and the Ulster County Planning Board regarding the use of permeable pavement at our proposed location.

Stewart's does not utilize permeable pavement primarily because the NYSDEC Stormwater Design Manual, Chapter 5.3.11, page 5-108 prohibits the use of permeable pavement to treat runoff from "hotspots". Our site is classified as a "hotspot" due to the re-fueling operations that will take place on-site.

Additionally, Chapter 5.3.11, page 5-107 states that permeable pavements should only be used in soils that fall into hydrologic soil groups A, B or C. The on-site soils at the project location fall into hydrologic soil group D. Documentation supporting this can be found in Exhibits A.4 and E.1 of the project Stormwater Pollution Prevention Manual (SWPPP).

For these above reasons, the use of permeable pavement at our proposed location should be removed from consideration as an acceptable means of stormwater management.

If you have any further questions and/or concerns please feel free to reach out at your convenience.

Sincerely,

Scott E. Kitchner, PE  
Site Work Project Manager



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