



December 9, 2019

Ms. Sarah Porter, Conservation Agent
City of New Bedford
133 William Street, Room 304
New Bedford, MA 02740

Re: 137-143 Popes Island
Notice of Intent
Response to Comments

Dear Ms. Porter:

BETA Group Inc. (BETA), on behalf of Shoreline Resource, LLC (the "Applicant") recently submitted a Notice of Intent (NOI) for the proposed site redevelopment at 137-143 Popes Island. The changes under this application generally includes improving the site layout of the existing marine fabrication industrial facility into a more appropriate layout for the proposed True Value Hardware and Marine Store.

Since submitting the initial application, the Applicant received review comments from the Conservation Commission and its Peer Reviewer, Nitsch Engineering. This letter is intended to address these comments and describe the respective alterations to the original site design, where necessary.

COMMENTS FROM CONSERVATION COMMISSION DATED OCTOBER 28, 2019

Note: Comments are paraphrased from email correspondence.

- C1. The parking lot in the southeast portion of the site (between 137 and 143 Popes Island) has stormwater which flows overland into the River at the southeast corner of the 143 Popes Island building. This is untreated stormwater and the flow is over a steep slope leading to the River. Something should be proposed to treat this stormwater before it discharges to the River.

BETA Response: A deep sump catch basin is now proposed near the southeast corner of #143 Popes Island to control runoff prior to discharge into the Acushnet River. The catch basin will tie into an existing outlet that will remain. Erosion during construction from this area will be mitigated through a row of compost filter tubes. Long-term erosion control will be mitigated through placement of dumped riprap onto the existing embankment for stabilization.

- C2. I also noted a staircase, gangway and dock on the east side of the property with a boat tied up to it (see photo). I have no record of this facility and it needs to be permitted if it is going to stay here - it is held in place by two pilings located in Land Under the Ocean.

BETA Response: Permitting of this dock is being completed under a separate NOI.

- C3. The area along the east side of the site (behind 143 Popes Island and east of the proposed parking lot), is primarily unvegetated with loose material covering the surface and erosion from this material is going downslope onto the coastal bank. This area and all unvegetated areas along the east side which are not part of the proposed parking lot should be loamed and stabilized with vegetation (salt tolerant seed mix).

BETA Response: The revised design now includes the removal of much of the existing ground cover, concrete pads, tanks, and other materials from this area followed by soil 4 to 6 inches of topsoil and revegetation with coastal seed mix.

COMMENTS FROM NITSCH ENGINEERING DATED NOVEMBER 1, 2019

- NE1. The existing pavement is in poor condition with severe cracks/heaving and rutting beyond the current proposed limits of pavement replacement. An unrepaired open trench from the installation of a small electrical conduit was also observed in the driveway. The plans indicate new paving only within the rear parking area; however, we recommend they consider replacement of all pavement within the limit of work. A detail of the pavement cross section should be provided and that all materials include references to Massachusetts Highway Specifications.

BETA Response: The Applicant plans to pave the entire rear parking lot in the Spring of 2020. A pavement cross section detail has been added to Figure 3. Existing pavement throughout the remainder of the parking and driveway areas shall be inspected and patched, as necessary. A note to that effect has been added to Figure 2.

- NE2. There is a concrete sidewalk proposed along the western face of the existing building. The existing roof drains discharge to the surface at the location of the proposed sidewalk which may result in significant icing of the sidewalk posing a safety risk for pedestrians. Additionally, this portion of the site does not have stormwater treatment measures. We recommend that the Applicant consider updating the existing drainage system to improve safety and provide water quality.

BETA Response: The latest revision of the plan set includes redirecting all roof leaders to connect directly to nearby drainage structures. Direct discharge to the pavement will be eliminated. Routing of roof leaders and collection pipes will not interfere with existing doors and windows. Refer to the roof leader detail on Figure 3.

- NE3. The proposed compost filter tube for erosion control should be relocated around the proposed location of construction-period staging and stockpiling. The Limit of Work should be shown on all Proposed Conditions Plans.

BETA Response: Perimeter erosion controls have been shown on the drawings to surround the proposed stockpile/staging area (Sheet 2). The Limit of Work is now depicted on this sheet.

- NE4. The proposed project is considered a redevelopment project under the Massachusetts Department of Environmental Protection (MassDEP) Stormwater Management Standards, and therefore is required to meet the following Stormwater Management Standards only to the maximum extent practicable: Standard 2, Standard 3, and the pretreatment and structural best management practice requirements of Standards 4, 5, and 6. Existing stormwater discharges shall comply with Standard 1 only to the maximum extent practicable. A redevelopment project shall also comply with all other requirements of the Stormwater Management Standards and improve existing conditions. The information provided in the submittal appears to be consistent with these requirements.

BETA Response: Comment Noted.

- NE5. The Time of Concentrations (Tc) used in the HydroCAD model for the pre- vs post-development analysis are not consistent for the first 84-feet where there are no improvements proposed. Additionally, the Tc calculated for the "sheet flow" condition assume grass cover. Based on the existing site conditions and available soil information Nitsch recommends revising the Surface Description to "smooth surfaces." These changes will result in new discharge rates; however, Nitsch understands that regardless of these changes the post-development discharge rates and volumes will not exceed pre-development rates and volumes due to the pre- and post-developments having the same weighted curve number in the analysis.

BETA Response: Comment Noted. The HydroCAD calculations have been revised to better reflect site conditions.

- NE6. It appears that the hydrodynamic separator will be installed with a portion of the structure above grade and allow stormwater runoff generated from the parking lot to directly enter the custom inlet (6" x 24" opening) of the structure. We recommend that the outlet be revised to a standard circular opening in lieu of the custom 6" x 24" opening to allow for the connection of a section of pipe or flared end to prevent scour of the concrete opening that can discharge to the riprap apron.

BETA Response: The hydrodynamic separator has been revised to include a short pipe at its outlet and a level spreader.

- NE7. The Long Term Operation & Maintenance Plan should be revised to include the recommended inspection and maintenance procedures provided by the manufacturer for the proprietary stormwater BMP (Stormceptor STC900). A schedule of these activities should be included with the inspection checklist.

BETA Response: Maintenance and inspection procedures for the hydrodynamic separator are outlined in Appendix H of the Stormwater Management Report. An inspection and maintenance schedule has been added to Appendix B of the Report.

- NE8. The Notice of Intent indicates that a portion of the Project site is located within the 100-foot Coastal Bank Buffer Zone. As part of the redevelopment, Nitsch recommends that the applicant provide further improvements along the coastal bank adjacent to the project site including the removal and disposal of all existing debris, unnecessary tanks, and concrete pads along with the restoration of the Bank with coastal wetland vegetation and riprap where necessary. These improvements will further enhance the function of the levee and provide further coastal resiliency.

BETA Response: The plan has been revised to require the removal or relocation of any tanks, materials, or other equipment located in this area. Impervious surfaces shall be removed and the entire area revegetated with coastal seed mix. Eroded portions of the levee will be repaired and stabilized as depicted on Figure 3.

- NE9. Stormwater generated from the southern portion of the site (existing parking lot) within the 100-foot Coastal Bank Buffer Zone currently discharges overland directly to the Acushnet River. Nitsch recommends that the applicant provide stormwater improvements at this location to collect trash/debris and provide any potential sediment capture possible prior to discharge.

BETA Response: See response to comment C1.

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If we can be of any further assistance regarding this matter, please contact either of the undersigned.

Very truly yours,
BETA Group, Inc.



Alan D. Hanscom, LSP
Vice President



Stephen Borgatti
Staff Engineer

cc: Scott Taber, Shoreline Resources, LLC
Ms. Tabitha Harkin, Director of City Planning