



**CITY OF NEW BEDFORD**  
**JONATHAN F. MITCHELL, MAYOR**

November 12, 2019

**MEMORANDUM**

**TO:** New Bedford Conservation Commission

**FROM:** Sarah Porter, Conservation Agent

**cc:** Adam Hart - DPI, John Ramsey – Applied Coastal Research and Engineering, Inc.  
E. Feeney – DMF

**RE:** West Beach Nourishment Project

I have reviewed the Notice of Intent dated October, 2019 and the accompanying plans (Existing Conditions Site Plan dated 4/12/2019 and Proposed Conditions Site Plan revised dated 7/30/2019) and offer the following comments:

1. The following is noted in CZM's 4/30/2019 comments on the Expanded Environmental Notification Form (EENF), *additional information required during the permitting process includes 1) a detailed maintenance & monitoring plan that includes extension of the beach profiles to -4 MLW to detect migration of the nourishment seaward of the breakwaters; and 2) representative cross sections showing the existing and proposed configuration of the groins to be removed.*  
With regard to 1), the NOI monitoring plan states the transects will extend seaward to -2 MLLW (-4 feet NAVD). Figure 4-1 doesn't show these transects extending beyond the proposed breakwaters. The monitoring transects should extend beyond the breakwaters. With respect to 2) cross sections showing the existing and proposed groins to be removed should be provided.
2. The wooden connector groins are not shown on the cross section of the T-headed groins. These wooden groins should be shown in cross section.
3. Approximately how many survey points will be taken on each transect and how far apart are the points? How many survey points are taken for the berm monitoring and how far apart are these points? The pre and post - construction shoreline surveys shall be submitted to the Conservation Commission with the preconstruction survey submitted prior to the onset of construction.

4. As requested by DMF, the survey plan for assessing construction impacts to eelgrass beds should be reviewed and approved by DMF, with copies of all correspondence sent to the Conservation Commission.
5. A preconstruction survey of eelgrass beds during the growing season shall be required. The results of the survey shall be provided to the Conservation Commission, the DMF and the Contractor prior to the start of construction. If results of the eelgrass survey show eelgrass beds within 25' of the proposed breakwaters, a Request for an Amended Order of Conditions shall need to be filed to show how eelgrass beds will be protected during construction.
6. A NBCC EENF comment requested the applicant develop a construction monitoring protocol for eelgrass. The applicant responded that this was not necessary because construction would occur during late fall and winter when eel grass is dormant. The applicant stated during the Con Com Hearing on November 5<sup>th</sup>, that construction may occur during the summer. If this does occur, it will be happening during the eelgrass growing season and therefore, a construction monitoring protocol should be developed for eelgrass beds during the growing season.
7. Post-construction eelgrass monitoring shall occur for two years following construction completion and the results forwarded to the Con Com & DMF. If results indicate that eelgrass beds have been reduced since the project, then monitoring shall be required for an additional 2 years.
8. The Cross Section of the breakwater shown on the Proposed Site Plan shows the breakwaters toed into the substrate. Will it be necessary to dredge a shallow trench to set the breakwaters into the marine substrate? If not, how will the stone be embedded?
9. Any dune grass impacted by the project shall be replanted within one year of completion of the project. Spacing for dune grass plantings should be 12" on center.
10. Will the existing cast iron outfall pipes be abandoned in place or removed?
11. The removal of the rocks from the groins has not been addressed in terms of construction access. If the contractor determines that the rocks are to be removed via a barge, a Request for an Amended Order of Conditions shall need to be filed with the Conservation Commission.
12. With respect to mitigation for impacts to Land Containing Shellfish, the applicant stated at the 11/5/2019 Con Com Hearing that they will relocate shellfish from the project area prior to construction and seed the impact area. This shall need to be coordinated with the Shellfish Warden. This shall be a requirement of the Order of Conditions.
13. As requested by DMF, the Contractor shall incorporate materials and methods to maximize the biological value of the breakwaters such as creating tide pools and creating a wide variety of pore spaces.
14. Following initial beach nourishment, a new Notice of Intent shall be required for future nourishment projects.
15. A DMF Time of Year (TOY) restriction of January 15<sup>th</sup> through May 31 shall be included as a Special Condition of the Order of Conditions.

16. Only landward construction of the T-headed breakwaters and beach nourishment is permitted. Seaward access would require an Amended Order of Conditions.