CITY OF NEW BEDFORD
JONATHAN F. MITCHELL, MAYOR

November 4, 2019

MEMORANDUM

TO: New Bedford Conservation Commission

cc: C. Farland, Farland Corp. S. Syde – DPI

FROM: Sarah Porter, Conservation Agent

Re: SE:49-0831 Parallel Products glass recycling facility and rail siding

The following comments are provided upon review of the following documents and plans:

- Wetland Resource Area Analysis Report dated 10/3/2019 and prepared by LEC Environmental Consultants, Inc.
- Notice of Intent dated 10/2/2019 for Site Plan - Map 134, Lot 5, 100 Duchaine Boulevard prepared by Farland Corp.
- Plans revised dated 9/13/2019 (sheets 1 through 25 of 25) prepared by Farland Corp.

1. The resource areas (BVW, Bank and Riverfront Area) need to each have a specific line type so that the resources can be differentiated. These line types should be shown on a legend. In addition, the dash dot dash bold line along the perennial stream on sheet 14 should be added to the legend so that we know what this represents.

2. Straw wattles are not permitted as erosion controls – either haybales with trenched silt fence or compost filter tubes (12" diameter) should be used.

3. A cross section of the wetland replication area should be provided which includes the elevation of seasonal high water table. The replication area size should be based on the area which is at the seasonal high water table. The slopes in the replication area shown on sheet 14 ranges in elevation from 79' to 76'. It is unlikely that the seasonal high water table is sloped to this degree.

4. The demolition of the existing steel and wood railroad bridge across the perennial stream requires additional detail. The structure is substantial and methods for the dismantling of the bridge should be provided. Is the stream to be bypassed for the demolition? How are the slopes to be stabilized once the abutments are removed?

5. The existing crossing of the perennial stream is a span over the entire stream and stream banks. It is preferable to maintain a span over the stream rather than the proposed culvert. The applicant needs to explain how a through-plated ballasted-deck bridge would result in 2,000 square feet of wetland alteration. More information is also needed on a steel bridge span and why the initial and ultimate impacts would be greater than a raised track section.

6. The existing stream substrate needs to be characterized to ensure similar material is placed in the stream bed following installation of the crossing. Sheet 22 has a note that: *backfill of a similar size and type as the geotechnical findings from boring GZ-1B* will be placed in the channel but these boring results are not provided. A description of the material to be placed in the low flow channel should be provided (is it to be angular or rounded, size of material, etc).

7. The text from LEC on page 5 states the low flow channel is 5' wide whereas the cross section on Sheet 22 shows a 4' width where loose bedding material is to be placed.

8. Sheet 23 states that the temporarily disturbed wetlands (adjacent to the permanent wetland impacts from the rail crossings) will be restored with wetland soils and seed mix as described on Sheet 17. Sheet 17 however, has Temporary Disturbance & Restoration Notes but they do not detail the temporary wetland impacts. It appears some notes apply to the upland and others to the wetland areas. The temporary wetland impacts need to be described more. Who will supervise the removal of the O and A horizons of the wetland soils, where will these soils be stockpiled and for how long? A wetland seed mix should be placed on the restored wetland areas.

9. According to LEC, the soils to be used in the replication area consist of an organic rich topsoil. A definition of organic rich topsoil is needed (% organics?).

10. There are numerous places where the 25'No Disturb Zone has been encroached upon. A list of the locations is as follows:
    - A portion of the eastern side of Photovoltaic Canopy #2 and the erosion controls encroach into the 25' No Disturb Zone. This area is currently forested.
    - A portion of the eastern side of the proposed side bunker building w/ roof mounted solar array and the erosion controls encroach into the 25' No Disturb Zone. This area currently has a walkway located within the 25' No Disturb Zone which would be removed for the proposed bunker building.
    - The edge of the entire proposed stormwater wetland is within the 25' No Disturb Zone. The stormwater wetland should be pulled back to allow for the 25' No Disturb Zone to remain intact. The only area where the 25' No Disturb should be disturbed is where the spillway is located.
    - The erosion controls along the northern edge of the rail siding encroach into the 25' No Disturb Zone on Sheet 13.
    - A wall is proposed along the northern edge of the rail siding on Sheet 13. A detail needs to be provided for this. In some areas only 1' separates the wall from the erosion controls which border the wetlands. As shown there does not appear to be enough room to install the wall footings without disturbing the wetlands.
    - On sheet 14, the rail encroaches into the 25' No Disturb Zone in the vicinity of Wetland Flags TEC A89 through TEC A 95.

All efforts should be made to minimize these encroachments. The applicant should address each of these encroachments and explain how the design can/cannot be modified to avoid impacts to the 25' No Disturb Zone.

11. A solar canopy is proposed over a vegetated stormwater basin. This solar canopy should be eliminated as the vegetation will not thrive due to the shading by the canopy.