

December 4, 2018

Mr. Craig Dixon
Chairman
New Bedford Conservation Commission
New Bedford City Hall
133 William Street
New Bedford, MA 02744

RE: Nitsch Project #9972
Bartlett Street Extension
New Bedford, MA

Dear Mr. Dixon:

This letter is regarding the Notice of Intent application submitted for Bartlett Street Extension in New Bedford, Massachusetts. Nitsch Engineering has reviewed the following documents:

- Notice of Intent Application for Bartlett Street Extension prepared by Prime Engineering and filed on August 1, 2018, including plan entitled, "Proposed Drive, Bartlett Street, Acushnet, Massachusetts."
- Letter prepared by Prime Engineering dated November 13, 2018 responding to comments including test hole logs and plans entitled, "Bartlett Street Drive Extension, Acushnet, Massachusetts," prepared by Prime Engineering, dated September 6, 2018 (Existing Conditions) and July 30, 2018 (Proposed Private Drive).
- Memorandum from Prime Engineering to Sarah Porter dated October 1, 2018.
- Letter prepared by Prime Engineering responding to abutters comments dated October 1, 2018.
- Email from Prime Engineering to Sarah Porter on October 1, 2018 responding to comments.
- Memorandum from Prime Engineering to Sarah Porter dated October 2, 2018.
- Memorandum from Prime Engineering to Sarah Porter dated October 2, 2018 responding to Department of Public Infrastructure (DPI) comments.
- Memorandum from Sarah Porter to Prime Engineering dated September 7, 2018.

The proposed project includes the development of an approximately 220-foot long 20-foot wide driveway extending Bartlett Street in an existing easement terminating at the New Bedford – Acushnet municipal border. The proposed plans show the extension of the driveway in New Bedford only and do not show any improvements in the Town of Acushnet. Below are our comments on the proposed plans and additional supporting information pertaining to stormwater management design only:

1. It is unclear whether the proposed project meets the thresholds for complying with the Department of Environmental Protection's (DEP's) Stormwater Management Standards. The Standards do not apply to single family homes, housing development, and redevelopment projects on four or fewer lots provided stormwater discharges do not impact critical areas, multi-family housing developments with four or fewer lots, and emergency repairs to roads or drainage systems. The Standards apply to the maximum extent practicable to single family housing development projects consisting of five to nine units, multi-family housing development projects consisting of five to nine units, marinas and boatyards, and footpaths, bike paths, and other paths for non-motorized vehicle access. The initial Notice of Intent indicated that the proposed project was to service a residential subdivision. The letter dated November 13, 2018 indicates that the proposed road is not intended to provide access to a subdivision. However, there is no indication what use the proposed driveway is intended to serve. Therefore, it is not clear how the proposed project would be exempt from meeting the Stormwater Management Standards and should comply unless the applicant can provide additional information demonstrating that the project is not required to meet the Standards.
2. The Notice of Intent form indicates that the project is not subject to the provisions of the Stormwater Management Standards but does not provide a reason why it is exempt. Neither a Stormwater Management Report or Stormwater Management Checklist was provided with the application.

3. The deed included with the Notice of Intent application references the use of the existing right-of-way for the development of residential lots on the property. This implies that the right-of-way will serve a residential project. We recommend coordinating with the Town of Acushnet regarding whether any residential lots are to be developed in Acushnet and accessed through New Bedford.
4. The proposed project includes limited Stormwater Management facilities. The only Stormwater Management facilities that are provided on the plans are two catch basins located at the southern end of the proposed driveway. The plans show two catch basins connected in series discharging to a flared end and 4'x4' areas of trap rock. We do not recommend the use of catch basin to catch basin connections. We recommend that catch basin to drain manhole details be provided. The piping provided has not been sized. No drainage calculations were provided for review.
5. We recommend that a construction detail of the proposed catch basins, flared end structure, and stone pad be provided.
6. We recommend that the stone at the end of the flared end structure be "Stone for Pipe Ends" as described in the Massachusetts Department of Transportation (MassDOT) Standard Specifications. We recommend that the stone pad be sized to accommodate the anticipated flows being discharged by the catch basins.
7. The proposed flared end and stone pad are located downstream of the erosion and sedimentation controls.
8. There are portions of the proposed drive that do not have any curbing or edging on the side of the driveway. It appears that some portions of the driveway will have a jersey barrier installed that will prevent stormwater from sheet flowing off the proposed driveway. There are other portions of the driveway where stormwater will simply sheet flow off the driveway into the adjacent wetlands or shoulder with no stormwater treatment.
9. The proposed submittal has not included any hydrologic drainage calculations that quantify predevelopment and post-development peak runoff rates to demonstrate compliance with Standard 2 of the Standards. Because there is an increase in impervious surface of approximately 4,500 square feet, there will be an increase in stormwater peak flows and volumes from the project area.
10. The proposed submittal does not include any groundwater recharge facilities. Therefore, it is unclear whether the proposed project meets the requirements of Standard 3 of the Standards.
11. Standard 4 of the Standards requires the removal of 80% of Total Suspended Solids. The only stormwater management facilities proposed include two catch basins. The maximum amount of Total Suspended Solids removal provided for catch basins is 25% provided they include 4-foot deep sumps and hoods. Since a detail has not been provided for the catch basins, it is unclear whether the sumps and hoods are proposed for the catch basins.
12. Standard 9 of the Standards requires a Long-Term Operations and Maintenance Plan be developed. A Long-Term Operations and Maintenance Plan was not submitted. Therefore, it is unclear who will maintain the stormwater management system.
13. Standard 10 of the Standards requires the submittal of an executed Illicit Discharge Statement. An Illicit Discharge Statement was not submitted.
14. The applicant's letter dated November 13, 2018 indicates that in the event that a subdivision is developed, the proposed subdivision will meet all of the Stormwater Management Standards. Since the amount of stormwater management proposed as part of the project is limited, this will likely cause significant disturbance to retrofit the driveway to meet the Standards. Presumably, any subdivision or lots that are developed will use the proposed driveway to access those lots.
15. The proposed driveway is pitched to drain towards Bartlett Street. There is a short segment of driveway approximately 25 feet long on the extreme northern end of the proposed driveway that will be pitched to drain into Acushnet.
16. The limit of paving is proposed to end on the New Bedford-Acushnet municipal border. There will likely be limited disturbance in the Town of Acushnet in order to construct the driveway.
17. We recommend that additional details be provided of the dry masonry block wall.

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If you have any questions, please call us at 617-338-0063.

Very truly yours,

Nitsch Engineering, Inc.



Scott D. Turner, PE, AICP, LEED AP ND
Vice President, Director of Planning

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