

August 29, 2018

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

RE: Nitsch Project #9972
127 Duchaine Boulevard
Site Improvements
New Bedford, MA

Dear Mr. Dixon:

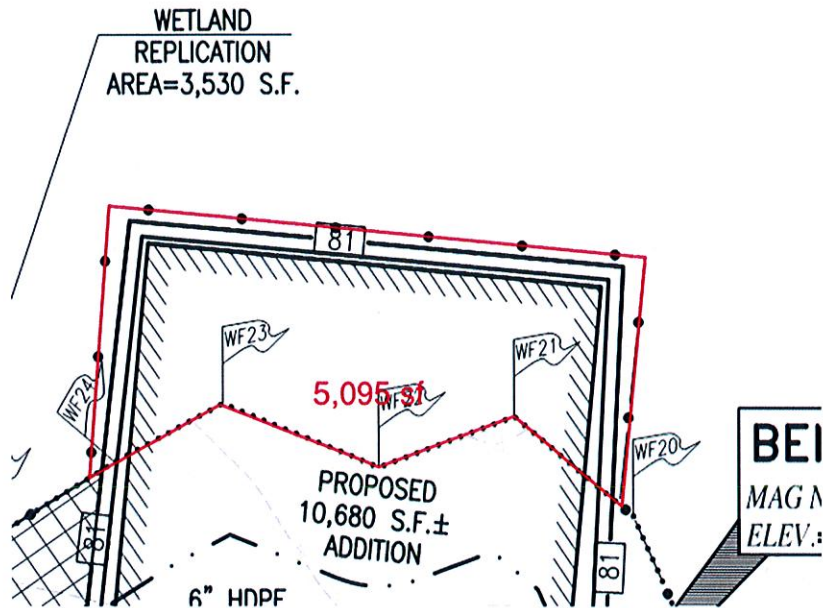
This letter is regarding the proposed site improvements at 127 Duchaine Boulevard in New Bedford, Massachusetts. Nitsch Engineering has reviewed the following revised documents for compliance with the Massachusetts Department of Environmental Protection (MassDEP) Stormwater Management Standards:

- Plans entitled "Site Plan, 127 Duchaine Blvd, Assessor's Map 133 Lot 21, New Bedford, MA 02745," prepared by Farland Corp., dated August 6, 2018; and
- Notice of Intent with Stormwater Report, prepared by Farland Corp., dated August 8, 2018.

The proposed project includes the construction of a 10,680-square-foot building addition and limited site work. The site is currently developed to include an existing commercial building and associated parking and loading areas. The site was developed prior to the Stormwater Management Guidelines being promulgated. Therefore, there is limited stormwater management on site.

Below are our comments on the proposed project, regarding stormwater management only:

1. The Stormwater checklist states that the project is a mix of new development and redevelopment. All of the proposed work occurs on unpaved areas, including the construction of the proposed building in the wetlands. Since there is no proposed work on unpaved areas, we interpret the project as a new development project.
2. The project includes the construction of a 10,680-square-foot building addition. Much of the building addition is proposed to be within wetlands. The limit of work within the wetlands is very close to the wall of the building. Also, since there are no contours shown in the wetland areas, additional grading may be needed to meet existing grade. The Notice of Intent describes 4,900 square feet of wetlands alteration. We are concerned that the actual amount of wetlands to be disturbed during construction will be greater than shown on the plans and described in the Notice of Intent. Nitsch Engineering scaled the amount of wetlands fill shown on the plans to the haybale line and measured the amount of fill to be 5,095 square feet (see below). We recommend that the Applicant verify that the building, and the grading adjacent to the building, can be constructed within the limit of work shown on the plans and the amount of wetlands alteration is accurate.



3. The proposed project recharges virtually all of the runoff generated by the roof of the proposed building. There are no other stormwater management improvements proposed on site other than the building addition and the proposed infiltration basin.
4. The top of the infiltration basin is at elevation 82. The 100-year flood elevation in the basin 81.76. We recommend the top of the basin be elevated to provide one-foot of freeboard consistent with the Stormwater Management Guidelines.
5. We recommend that a detail of the infiltration basin with the overflow structure be added to the plans.
6. We recommend that a detail of the rip-rap pad at the discharge point into the infiltration basin be added to the plans.

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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