

June 15, 2018

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

RE: Nitsch Project #9972
Nemasket Street Soccer Field
Hathaway Boulevard
New Bedford, MA

Dear Mr. Dixon:

This letter is regarding the proposed Nemasket Street Soccer Field located off Hathaway Boulevard in New Bedford, Massachusetts. Nitsch Engineering has reviewed the following documents for compliance with the Massachusetts Department of Environmental Protection (MassDEP) Stormwater Management Standards:

- Notice of Intent, "Nemasket Street Soccer Field Project, New Bedford, Massachusetts," prepared by TRC Environmental Corporation; dated May, 2018;
- Drawings entitled, "Nemasket Street Recreation Area, New Bedford, MA," prepared by TRC Environmental Corporation, dated March 28, 2016; and
- Report entitled, "Stormwater Management Report, Nemasket Street Recreational Area, 225 Hathaway Boulevard," prepared by TRC Engineers, Inc., revised through March 2016.

Below are our comments on the proposed project:

1. Nitsch Engineering reviewed the project in the Spring of 2016. At that time, we expressed concern regarding the infiltration of stormwater onsite due to the presence of subsurface hazardous materials. Typically, infiltration is not allowed on sites that contain hazardous materials due to the possibility that the infiltrated stormwater could cause the hazardous materials to leach out or migrate offsite. The submitted Notice of Intent includes a letter from a Licensed Site Professional (LSP) from TRC that states, "there is no basis to conclude that concentrations of metals in groundwater will increase to a level that would pose a risk to potential receptors as a result of infiltration." Nitsch Engineering does not retain LSPs on staff. Therefore, we will rely on the sites LSP regarding the appropriateness of providing stormwater infiltration onsite.
2. A Stormwater Pollution Prevention Plan (SWPPP) was not submitted as part of the Notice of Intent. The applicant has indicated that the SWPPP will be submitted prior to construction.
3. A significant portion of the property has been classified as Urban Land. The applicant has chosen to categorize this area as hydrologic soil group A. Typically, we would categorize urban soils as hydrologic group D due to the high variability usually present in fill associated with urban soils. The soil testing performed onsite indicates there is high variability in infiltration rates onsite.
4. The submittal describes the proposed ground cover on the perimeter of the site to be either vegetative or stone. The ground cover should be determined, especially in the buffer zone, and the appropriate curve numbers used for the ground cover specified.
5. The hydrologic calculations summarize the offsite flows using a large existing wetlands system as storage. This analysis shows no net increase in peak flows offsite. The calculations show an increase in flows to this wetland system and the drainage narrative shows an increase in water elevation in this system due to the increase in flows from the existing condition to the proposed condition. Typically, onsite wetlands systems are not utilized for stormwater storage for purposes of meeting Standard 2. Also, the site perimeter, as defined by the limits of the drainage areas analyzed, do not include the wetlands or the additional areas draining to it. We recommend that the analysis point be changed to summarize flows that are discharged to the wetlands system for purposes of measuring compliance

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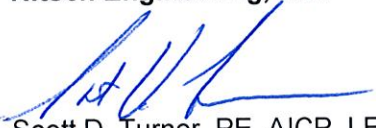
with Standard 2. This approach is consistent with other submissions to the New Bedford Conservation Commission.

6. We recommend the applicant verify that the stone layer depths and elevations that are shown in the Synthetic Turf Typical Section are consistent with the stone modelled in the hydrologic calculations.

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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