

May 11, 2018

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

RE: Nitsch Project #9972
61 John Vertente Boulevard
New Bedford, MA

Dear Mr. Dixon:

This letter is in regard to the proposed driveway project located at 61 John Vertente 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, 61 John Vertente Boulevard, Assessor's Map 133 Lot 47, New Bedford, MA," prepared by Farland Corp., revised through April 2, 2018.
- Response to comments letter dated May 7, 2018.
- Report entitled "Stormwater Management Report and Narrative, Proposed Site Plan, 61 John Vertente Boulevard (Map 133 Lot 47), New Bedford, Massachusetts 02745," prepared by Farland Corp., no date.

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

1. The drainage calculations show the bottom of the rain garden to be elevation 84. The site plans, and the rain garden detail, show the bottom of the rain garden at elevation 85. The broad crested stone outlet implies the bottom of the rain garden is 84. The calculations and the plans need to be consistent.
2. The rain garden detail shows two feet of depth of planting soil. The Stormwater Management Standards recommend 2.5 feet to four feet of planting soil in rain gardens. The response to comments states that the rain garden has been designed to meet the Standards to the maximum extent practicable and the Applicant is requesting relief from providing the depth of planting soil described in the Standards. The Standards also require that two feet of groundwater separation be provided between the bottom of the raingarden and seasonal high groundwater. The plans show 1.2 feet of separation between the bottom of the planting soil and seasonal high groundwater. We consider the bottom of the raingarden to be the stone layer below the planting soil. Therefore, the separation is effectively less than the 1.2 feet shown on the plans. The depth of the stone is unlabeled. However, it is likely to be a minimum of six inches, which results in less than one foot of separation between seasonal high groundwater and the bottom of the rain garden. Given the site conditions it is unlikely that the rain garden can be built to comply with this requirement. Groundwater elevations are simply too high.

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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

JLJ/mma