AIRPORT SOLUTIONS GROUP, LLC
Innovative Airport Development Specialists

June 12, 2017

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

RE: New Bedford Regional Airport
Terminal Aprons Redevelopment Project
Application for Notice of Intent

Dear Mr. Dixon;

ASG has prepared responses to Nitsch Engineering's comments dated February 7, 2017.

We offer the following response to each of Nitsch's comments:

1. The applicant has explained that additional services are proposed at the Airport that includes the removal of 100,000 square feet of impervious surface. However, there are no guarantees that these services will be funded and plans have not been provided. Additionally, they have asked for a waiver from providing dedicated stormwater infiltration facilities because of these plans to remove 100,000 square feet of impervious surface. Nitsch Engineering is comfortable with not providing the dedicated infiltration facilities if it is confirmed that the additional 100,000 square feet of impervious surface is removed. We are uncomfortable with waiving this requirement if the removal of the 100,000 square feet of impervious is not confirmed. We do not feel it is in the best interest of the Commission to waive this requirement – allowing the additional 22,000 square feet of impervious surface – and subsequently have the future projects canceled and all existing impervious surface remain. This scenario would result in an additional 22,000 square feet of impervious surface with no dedicated infiltration facilities and would be inconsistent with the Stormwater Management Guidelines. *As stated in the previous correspondence, the 100,000 of pavement has already been removed. However, ASG has modified the design such that the 22,000 square feet of proposed pavement complies with all Stormwater Management Guidelines for new development.*

2. The Applicant indicates that the location of the proposed headwall cannot be located due to grading considerations. We feel that grading could be included that would provide a positive flow path to the wetlands and allow the headwall to be pushed back from the wetlands line, allowing a longer flow path from the discharge point to the edge of wetlands. *We have modified the design to eliminate the headwall in question. The modified design includes three outfalls all with flared ends at the outlets.*

3. The proposed design includes an increase in flows to one wetlands system and a reduction in flows to two others. The design could include a bypass manhole that more evenly splits these flows to the other wetland systems. *We have modified the design, which now better balances discharges amongst all three wetland systems. Outfall 1 through Oi-Water Separator 1 (OW- 1) handles drainage associated with the proposed 22,000 SF of pavement and meets all stormwater requirements for new development. The other 2 outfalls OW-2 and OW-3 treat stormwater from the redevelopment areas. For these two areas, and as previously mentioned, the Airport currently has an open MDEP Variance Order of Conditions, and included in that variance is a requirement that as funding becomes available, LUHPPL areas be treated with oil-water separators. The project we are proposing, and seeking a permit for, includes areas subject to the variance; therefore we are proposing the two oil water separators OW-2 and OW-3.*

   Similar to the previous design, the redesigned drainage design also includes three analysis points, associated with the wetland systems: AP-1, AP-2, and AP-3. Whereas, the previous design was based upon the majority of the stormwater outleting via a single analysis point, which increased by more than 7 CFS, the redesigned drainage system better balances the discharge. Analysis points one and three equal or decrease the discharge when comparing pre and post development. Analysis point two has a 0.67 CFS increase of discharge for the two year event, but decreases for the ten year and 100 year events. As previously discussed, analysis points two and three are associated with stormwater from existing conditions and qualify as redevelopment projects, with this in mind, the drainage is required to meet Stormwater standards to the maximum extent practicable, which we feel has been met.

4. A detail sheet for the proposed hydrodynamic separator has been provided. The detail and unit appears sufficient based on the flow information provided. We request the TSS removal rates be provided to ensure it meets the Stormwater Management Guidelines requirements. W*e have reviewed the manufacturers technical data, which confirms that Stormwater Management Guidelines have been met, and will include the data with the submission.*

5 In addition to the headwall discharge being located close to the wetlands line, the proposed design includes pavement areas within the 25-foot buffer. In most cases, this pavement is only a few feet within the 25-foot buffer line. It is unclear why the pavement cannot be shifted a few feet in these locations to respect the 25-foot buffer typically requested by the Commission. *The 22,000SF of proposed pavement has been designed to provide parking for aircraft, and meets FAA criteria regarding plane parking and taxying. As previously stated, the Airport is seeking credit for the approximately 100,000 SF of pavement that has been removed at the airport during the past three years to offset the proposed pavement that encroaches within the 25-foot buffer zone. The pavement that was removed was available for aircraft parking and taxying and was removed to meet FAA criteria for safety criteria*

Please do not hesitate to contact us if you need to further discuss this issue.

Very truly yours,

AIRPORT SOLUTIONS GROUP, LLC

Richard A. Lasdin, P.E.
Project Manager

Cc: Scot Servis, New Bedford Airport
Amanda Atwell, Epsilon Associates