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March 6, 2017

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

RE: Nitsch Project #9972
1494 East Rodney French
Boulevard
New Bedford, MA

Dear Mr. Dixon:

This letter is in regards to the proposed project located at 1494 East Rodney French 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:

- Plans entitled "Proposed Site Improvements, Building Razing, and Pile Installation" prepared by CLE Engineering, dated February 28, 2017;
- Response to comments letter prepared by CLE Engineering dated February 28, 2017;
- Sediment forebay sizing calculations prepared by CLE Engineering dated February 2017; and
- Operation and Maintenance Plan and Long Term Pollution Plan, revised through February 28, 2017.

Below are our comments on the revised materials regarding stormwater management only:

1. As described in our comment letters written in December of 2015, the project is a redevelopment project and is required to meet the MassDEP Stormwater Management Guidelines to the maximum extent practicable.
2. The project discharges to a shellfish suitability area, which is defined as a critical area per Standard 6 of the Guidelines. Under the Guidelines, projects that discharge to a critical area must provide 80% Total Suspended Solids (TSS) removal. The proposed project includes a sediment forebay and vegetated filter strip that provide 59% TSS removal. The proposed project is an improvement over the existing condition, which does not have any water quality treatment. However, the proposed use includes a higher intensity of parking that will generate a higher sediment load than the current use and previously approved project. Therefore, we encourage the Applicant to provide 80% TSS removal on the project. The Applicant has not proposed any additional stormwater management features for this project in the revised submittal.
3. Sediment forebay sizing calculations were provided demonstrating the required water quality volume for the 1-inch storm and the 0.1-inch storm as well as the proposed treatment volume. The proposed sediment forebay can hold 464 cubic feet. Under the Guidelines, a stormwater treatment volume equal to the 1-inch storm is required due to the fact that the proposed project discharges to a shellfish growing area. The 1-inch storm requires a treatment volume of 3,475 cubic feet. Therefore, the provided treatment volume does not meet the Guidelines for discharges to a critical area.
4. We recommend that stone used in the sediment forebay and porous pavers be double washed stone.

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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
Director of Planning

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