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December 2, 2016

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

RE: Nitsch Project #9972  
Runway 14-32  
New Bedford Airport  
New Bedford, MA

Dear Mr. Radcliffe:

This letter is in regards to the Runway 14-32 Project at the New Bedford Airport in New Bedford, Massachusetts. Nitsch Engineering has reviewed the following items submitted as part of the proposed project:

- Report entitled "Reconstruct, Mark, Light and Groove Runway 14-32 Stormwater Management Report," prepared by Airport Solutions Group, dated October, 2016; and
- Notice of Intent entitled "New Bedford Regional Airport, Reconstruct Runway 14/32 Project," prepared by Epsilon Associates, dated November 3, 2016. The Notice of Intent includes permit drawings.

Nitsch Engineering has reviewed the recently submitted information for compliance with the Massachusetts Department of Environmental (MassDEP) Protection Stormwater Management Guidelines. We have the following comments:

1. The submitted plans show only the work within the 100-foot buffer zone and not the entire project. The Stormwater Management Report describes work for the entire project, including work on the existing runway.
2. Work in the buffer zone includes grading and some changes to ground cover on the western side of the runway. The work on the eastern side of the runway includes grading work only and no changes in ground cover. There is no additional impervious surface proposed within the buffer zones and these areas will rarely, if ever, experience vehicular traffic. These areas will not generate any Total Suspended Solids loads. Groundwater recharge should not be impacted by this work.
3. The grading work involves some fill in the wetlands as well as the replacement of an existing culvert.
4. The Stormwater Management Report describes work to Runway 14-32 including reducing the width of the runway from 150 feet to 75 feet to comply with the Federal Aviation Administration requirements. This results in a reduction in impervious surface of approximately 10 acres, which results in a decrease in stormwater flows from the airport. All of this work appears to be outside of the buffer zone. It is our understanding that the existing stormwater management system will remain in place without upgrading the stormwater system.
5. Following the initial submittal, we requested that Airport Solutions Group forward additional plans for the work along the runways that was described in the Stormwater Management Report. ASG submitted Demolition Plans (5 sheets) and Grading and Drainage Plans (5 sheets). These plans show the reduction in runway widths as described in the Stormwater Management Report. There are some isolated areas of new pavement and also the inclusion of some new drainage structures. Overall, it appears that there is a significant reduction in pavement, which is consistent with the reduction in peak flows shown in the calculations. Typically, new pavement areas are treated as new development and

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are required to meet the Stormwater Management Guidelines. Based on the additional plans received, these newly paved areas do not appear to meet the requirements for groundwater infiltration or Total Suspended Solids removal. These areas are located outside of the 100-foot buffer zone.

6. Our comments on the drainage calculations are similar to the comments we made on the Airport Aprons project. We disagree with some of the factors that were used in the calculations. For example, we disagree with the use of sheet flow lengths of dense grass as well as a sheet flow length of 100 feet. 50 feet is traditionally used in New England. Some of the times of concentrations that have been calculated are extremely long which have impacts on the calculations of peak flows.

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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