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November 13, 2015
Project No. 2064

Ms. Sarah Porter, Agent
City of New Bedford Conservation Commission
New Bedford City Hall
133 William Street
New Bedford, MA 02744

RE: **NEW BEDFORD-RAW SEAFOODS**
DEP File No. SE 049-0720 - Response to Notice of Intent (NOI) Review Comments
Samuel Barnet Boulevard

Dear Ms. Porter:

Field Engineering has received your NOI review comment letter dated November 4, 2015 as well as the review letter dated November 11, 2012 prepared by Nitsch Engineering and has prepared the following response narrative and supporting documentation for consideration by the Commission.

Responses to Conservation Comment Letter dated November 4, 2015

1. The NOI application makes note of the possibility of 70' of temporary alteration of inland Bank. The temporary alteration and any restoration should be described. The erosion control plan shows the erosion controls abutting the Banks of the stream. It appears it will be necessary to remove Bank vegetation to install the erosion controls.

RESPONSE: A general discussion of the requirements for restoration of any temporary alteration areas has been provided on the revised plans. The applicant is currently working with Mass Coastal Railroad on the exact details of the construction of the proposed rail spur and will provide the Commission with final design drawings prior to construction. A note has been placed on the plans that any wetland resource areas or buffer zone areas adjacent to the rail spur that are temporarily disturbed will be seeded with a New England Wetland Seed mix for stabilization. An environmental monitor will be required on-site to ensure compliance with the approved plans and Order of Conditions for all work within the wetland resource areas and buffer zone. We have also included additional detail related to dewatering that will be required during the construction of the rail spur to the Erosion Control Plan in the attached drawings.

2. The erosion control line for the western tracking pad should be moved to the western side of the pad.

RESPONSE: The erosion control line has been revised as suggested on the attached revised plans.

3. The seasonal high groundwater elevation of the proposed wetland replication area and the wetland adjacent to the wetland replication area should be provided along with accompanying soil logs. A discussion of the hydrology and the hydro period associated with these wetlands should be provided. The cross section of the wetland replication area should be from an actual section through the replication area and should note where the seasonal high groundwater elevation is.

RESPONSE: A cross section through the actual wetland replication area has been provided on the revised plans. The estimated seasonal high groundwater observed in test pits performed in the wetland replication area has been shown on the cross section. The intent of the design is to intercept this seasonal high groundwater with depressions within the wetland replication area to maintain the hydrology and a flow of groundwater into the area. As the notes on the plans

discuss, it will be a requirement of the approval to have a wetland scientist observed the excavation of the wetland replication area to ensure that proper hydrology has been created with the seasonal high groundwater as well as the surface water within the adjacent wetland. The wetland scientist will also ensure that an adequate hydrologic connection is provided on the surface between the wetland replication area and the adjacent wetland.

4. The Wetland Replication Area Notes on sheet 8 of 12 state pit and mound topography shall cover the replication area (50% pit and 50% mound). The plans of the replication area should indicate the approximate depth of the pits and heights of the mounds. The proposed wetland plantings need to be adaptable to pit and mound topography.

RESPONSE: A typical cross section of the pit and mound micro-topography that is being proposed for the wetland replication area has been provided on the revised plans.

5. The following Special Conditions are recommended...

RESPONSE: We take no exception to the proposed Special Conditions provided in the Conservation Agent's letter.

Responses to Nitsch Engineering Letter dated November 11, 2015

1. A small portion of the site driveway is within the 25-foot no activity zone. The proposed work in this area includes a sliver of the site driveway and a short segmental retaining wall.

RESPONSE: As discussed in the narrative and is shown on the plans, we have provided mitigation for the small portion of work within the 25-foot no activity zone by way of an area to be left undisturbed greater than 25' from the wetlands in perpetuity.

2. The construction of the proposed rail spur includes work within wetlands including filling 4,640 sf of Bordering Vegetated Wetlands and an additional 3,290 sf of Riverfront Area. Although a profile of the proposed rail spur is provided, details such as the type of wall/abutment should be provided. It does not appear that there are any proposed plantings or stabilization of the slopes that tie into the abutment. We recommend that some type of stabilization plan for these slopes be provided. Also, the vegetation in the buffer zone and wetlands area is extremely thick. The applicant should provide additional details regarding construction including how the disturbance to the buffer zone area will be confined to the square footages shown on the plans. Monitoring of the construction will be important to insure that the area of disturbance is limited to the square footages described on the plans.

RESPONSE: A general discussion of the requirements for restoration of any temporary alteration areas has been provided on the revised plans. The applicant is currently working with Mass Coastal Railroad on the exact details of the construction of the proposed rail spur and will provide the Commission with final design drawings prior to construction. A note has been placed on the plans that any wetland resource areas or buffer zone areas adjacent to the rail spur that are temporarily disturbed will be seeded with a New England Wetland Seed mix for stabilization. An environmental monitor will be required on-site to ensure compliance with the approved plans and Order of Conditions for all work within the wetland resource areas and buffer zone. We have also included additional detail related to dewatering that will be required during the construction of the rail spur to the Erosion Control Plan in the attached drawings.

3. The applicant's wetland scientist should confirm the elevation of the proposed wetlands replication area. The proposed replication area is graded to two low points at elevation 80. The proposed wet basin has been graded to an elevation of 79.

RESPONSE: Test pits have been performed within the area of the proposed wetland replication area to confirm seasonal high groundwater elevations within these areas. The results of these test pits are shown on the provided cross section of the proposed replication area. As the revised plans show, the replication area will be constructed at such an elevation to provide an adequate hydrologic connection to the adjacent wetlands as well as a source of groundwater to maintain wetland vegetation.

4. We disagree with the Time of Concentration described in the proposed drainage calculations for post conditions watersheds 1 and 2. The applicants engineer has delineated flow paths parallel to the proposed face of the building. The grading between the building and the site drive will direct water away from the building per Massachusetts building code and towards the driveway. Therefore, we think a more accurate flow path is within the site driveway, which will result in a shorter Time of Concentration that may impact the performance of both basins 1 and 2. We also disagree with the use of Grass: Dense as a run-off coefficient for sheet flow, and recommend that Grass: Short be used. Grass: Short should be used when calculating the Time of Concentration for post conditions watershed 3 as well.

RESPONSE: We have reviewed and revised the Time of Concentration flow paths for the three Post Development Watershed Areas. As a result of the revisions, a minimum Time of Concentration of 6.0 mins was determined for the two watershed areas flowing through the stormwater management system. The revised flow paths are shown on the revised Post Development Watershed Plan, included in Stormwater Management System Report Addendum #2, attached to this letter. As the Addendum shows, even with the change in Times of Concentration, the stormwater management system will still function to meet or reduce the rates of runoff to the analysis point in the analyzed storm events.

5. The outlet orifice shown on the detail for Detention Basin 1 should be revised to be consistent with the drainage calculations.

RESPONSE: The detail for the outlet orifice for Detention Basin 1 has been revised to be consistent with the hydrologic calculations.

6. The pipe sizing calculations do not include sizing for the 24-inch pipe that flows parallel to the wetlands. This pipe is shown as .25%, which is really flat. The applicants engineer should confirm that the pipe can convey the flow for the 10-year storm and provide calculations.

RESPONSE: Pipe sizing calculations for the 25 year storm event for the 24-inch pipe have been performed and are included in the Stormwater Management System Report Addendum #2.

7. The Long Term Pollution Prevention Plan should include language prohibiting storing snow in the proposed basins.

RESPONSE: The Long Term Pollution Prevention Plan has been revised as suggested. The updated Long Term Pollution Prevention Plan has been included in the Stormwater Management System Report Addendum #2, attached to this letter.

8. The emergency spillway in Wet Basin #2 is shown in the sediment forebay. We recommend that it be relocated so that flows from the main storage of the basin flow through the emergency spillway.

RESPONSE: The emergency spillway for Wet Basin #2 has been relocated as recommended on the attached revised plans.

9. The site plans show two areas of what is presumed to be expansion parking. The drainage area plans only show one area of expansion parking. Both areas should be included in the drainage calculations.

RESPONSE: An updated Post Development Watershed Plan is included in Stormwater Management System Report Addendum #1. The revised Post Development Hydrologic Analysis takes into account the two areas of expansion parking.

10. During the site visit, we observed the presence of monitoring wells which typically indicate that testing has been done with regards to the presence of hazardous materials onsite. This was a concern since the project includes a significant amount of groundwater infiltration. Therefore, we reviewed the Phase II report that was performed for the site. Based on the review of the Phase II report, there are no concerns with regards to infiltrating groundwater on the site.

RESPONSE: No response required.

We feel that we have adequately addressed the review comments with this letter and the attached plans and documentation and look forward to further discussing this exciting project with the Commission at the next Hearing on November 17. Please do not hesitate to contact me should you have any questions or require additional information.

Sincerely,

Field Engineering Co., Inc.

Richard R. Riccio III, P.E.
Project Manager

cc: Judith Nitsch Engineering (Scott Turner)
Jason Hutchins, Raw Seafoods

Attachments

1. Revised Site Development Plan Set (Dated 11/13/15)
2. Stormwater Management System Report Addendum 2 (Dated 11/13/15)