

January 28, 2016

Mr. John G. Radcliffe
Chairman
New Bedford Conservation Commission
New Bedford City Hall
133 William Street
New Bedford, MA 02744

RE: Nitsch Project #9972
Airport Gravel Road
New Plainville Road
New Bedford, MA

Dear Mr. Radcliffe:

This letter is in regards to the proposed Airport Gravel Road located between New Plainville Road and Old Plainville Road near the New Bedford Airport in New Bedford, Massachusetts. Nitsch Engineering has reviewed the following items submitted as part of the proposed project:

- Plans entitled, "Construct Gravel Access Road and Construct Obstruction Lights, NOI Permitting Plans," prepared by Airport Solutions Group, dated January 2016;
- Report entitled, "Notice of Intent, New Bedford Regional Airport, Gravel Access Road and Obstruction Lighting Project," prepared by Epsilon Associates, Inc., dated January 7, 2016.

Nitsch Engineering has reviewed the recently submitted information. We have the following comments:

1. The project includes the construction of a 20-foot wide gravel access road connecting the New Bedford Municipal Airport with New Plainville Road. The entire length of the proposed road is undeveloped consisting of woods and brush. Construction of the road as shown on the proposed plans involves the filling of approximately 1,170 square feet of bordering vegetated wetlands. The applicant is proposing to construct an approximately 1,400-square-foot wetlands replication area.
2. The project is limited in scope. As described in the Notice of Intent, the access road will be used sparingly and will not be open to general traffic. Therefore, there will not be typical pollutant loadings generated by the proposed road.
3. The Massachusetts Department of Environmental Protection Stormwater Management Standards do not specifically preclude a project of this nature from meeting the Standards.
4. The submittal does not provide information that is typically required to demonstrate compliance with the Standards. The applicant has provided a run-off analysis that demonstrates an increase in peak flow of .93 cfs – or 30% - during the 10-year storm. Calculations were not performed for the 2-year or 100-year storms.
5. The applicant has not provided any BMPs to provide mitigation for stormwater impacts generated by the project. As described above, there are no stormwater retention, detention, or infiltration facilities. The Standards require no increase in peak flows for the 2-, 10-, and 100-year storms. The Standards require infiltration as well as treatment of suspended solids. Typically, test holes are performed to verify seasonal high groundwater and soil types in the vicinity of any detention or infiltration facilities.
6. A long term operations and maintenance plan for stormwater best management practices is typically provided to meet Standard 9. An illicit discharge statement is typically required for compliance with Standard 10.
7. The Stormwater Management Checklist should also be submitted as required by the Standards.
8. We recommend the applicant consider incorporating the stormwater best management practices appropriate for the scope of this project. Strategies could include superelevating the road to direct stormwater to a swale that flows to a retention/infiltration facility. Construction details should be provided for any BMPs that are added to the site design.

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9. We encourage the applicant to examine ways to limit the amount of wetlands filling as well as impacts to the buffer zone. This could include adjusting the alignment of the road or providing retaining walls that would limit the amount of fill in the wetlands.

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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