



CITY OF NEW BEDFORD
JONATHAN F. MITCHELL, MAYOR

April 29th, 2019

Secretary Mathew A. Beaton
Executive Office of Energy and Environmental Affairs
Attn Page Czepiga – MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: EOEA #16008 - EENF
West Beach Nourishment Project, West Rodney French Blvd., New Bedford

Dear Secretary Beaton,

The New Bedford Conservation Commission (NBCC) has reviewed the Expanded Environmental Notification Form (EENF) for the West Beach Nourishment Project and offers the following comments.

The construction related impacts need to be carefully considered including:

- Ensuring terrestrial sand gradations are comparable to the existing grain analysis (with care taken to minimize silt, which can cause turbidity and impact eel grass beds).
- Ensuring that the platform sand tongues to construct the T heads do not wash sand over to the eel grass beds. Silt curtains have not been proposed for this activity but should be considered.
- Developing a construction monitoring protocol for the eel grass beds.
- Providing construction access to the beaches which avoids impact to any dune grass colonies.

Protection of Marine Fisheries and Shellfish is critical. The NBCC is pleased that the applicant has proposed to protect these resources by incorporating the following mitigating measures:

- Adhering to the Time of Year restrictions imposed by the Division of Marine Fisheries.
- Harvesting of shellfish from the impact area prior to beginning the project.
- Re-seeding of shellfish into the impact area after completion of the project to mitigate for shellfish impacts.

The NBCC will likely require the following post construction:

- Incorporating the Preliminary Maintenance and Monitoring Plan for the beach nourishment program (refer to page 73,74 of the EENF) into the Order of Conditions.
- Eel grass monitoring to continue for at least a 3-year period.

- replanting of eel grass should substantial losses occur. Eel grass is a valuable marine habitat which has recolonized Clark's Cove in the past several decades. It is imperative that it be protected.

Sincerely,

Craig Dixon,
Chairman, Conservation Commission

cc: Conservation Commissioners, S. Syde, A. Hart