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March 15, 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
North Coast Seafood
Review Letter
New Bedford, MA
CASE 06-16

Dear Mr. Radcliffe:

This letter is in regards to the proposed North Coast Seafood project located at 43 and 89 Blackmer Street in New Bedford, Massachusetts. Nitsch Engineering has received and reviewed the following documents for compliance with the Massachusetts Department of Environmental Protection (MassDEP) Stormwater Management Standards:

- Site Plans entitled, "North Coast Seafood, 43 Blackmer Street, New Bedford, MA 02744," prepared by Cavanaro Consulting, dated February 10, 2016; and

- Report entitled, "Application for Notice of Intent, Industrial Addition, Parking and Associated Improvements, 43 & 89 Blackmer Street, New Bedford, Massachusetts," prepared by Cavanaro Consulting, endorsed February 16, 2016.

Nitsch Engineering offers the following comments regarding the proposed stormwater management system design.

1. The site is a mix of new development and redevelopment. The site includes an increase in impervious surface of 16,449 square feet. The "new development" portions of the site need to meet the Stormwater Management Guidelines fully while any redeveloped areas need to meet the Guidelines to the maximum extent practicable.
2. An Erosion and Sedimentation Control Plan has not been submitted for the project. Erosion controls, consisting of silt fence and haybales, are shown on the landscape plan. We recommend that construction entrances be added to the plans as well as construction entrance details. We also recommend some type of filter fabric or silt sock be added to all of the catch basins.
3. The submitted Illicit Discharge statement should be signed.
4. The Applicant should confirm with the Department of Public Infrastructure that the existing drainage system in Blackmer Street is sized appropriately to handle an increase in peak flows. The existing drainage system is subject to tidal influence, and it is unclear how the tides impact the drainage system or its ability to accept additional flow.
5. It does not appear that soil testing was performed on the site. Soil testing should be performed to determine seasonal high groundwater elevations, as well as the infiltrative capacity of the soil.
6. The determination of seasonal high groundwater and soil infiltration rates will determine whether the proposed underground infiltration system is designed appropriately. Per the Stormwater Management Guidelines, there should be two feet of separation between seasonal high groundwater and the bottom of the infiltration system.
7. The Applicant used a soil infiltration rate of .09 inches/hour when sizing the underground infiltration system. This rate appears conservative, but without soil testing results we cannot comment on the accuracy of using this rate.
8. Pipe sizing calculations should be submitted.
9. Stormceptor sizing calculations should be submitted.

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10. Total Suspended Solids Calculations were not submitted.
11. The project design includes two catch basins located at the end of the loading dock connected by a trench drain. We would recommend a trench drain only connected to a drain manhole, provided the Stormceptor has been sized to treat 80% of total suspended solids.
12. Some of the proposed drainage structures are lacking invert information, including the drain manhole that connects the roof drain to the underground infiltration system. We recommend the appropriate inverts be added to the plans to insure the project is constructed properly. The catch basin located in the truck parking area also needs invert elevations.
13. Based on the Grading and Layout Plan, it appears that the flow to the catch basin located in the northern parking area will be receiving substantially more flow. The Applicant should confirm that the piping leading from this catch basin can accommodate the additional flow from the new driveway.
14. The Applicant should review the geometry of the piping that is shown entering and exiting the Stormceptor.
15. It is unclear whether the site is Land Use with Higher Potential Pollutant Loads (LUHPPL). The Guidelines define LUHPPL's as sites that have exterior fleet storage, as well as parking lots that generate over 1,000 vehicle trips per day. It appears there is some truck storage on the site.

Please contact us with any questions.

Very truly yours,

Nitsch Engineering, Inc.

Scott D. Turner, PE, AICP, LEED AP ND
Director of Planning

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