TO: New Bedford Conservation Commission

c/o Michele Paul, Director

133 William Street

New Bedford, MA 02740

FROM: Bradford K. Bourque

98 Willard Street

New Bedford, MA 02744

SUBJECT: Clark Cove Beach Nourishment Project

I am a life-long resident of the South End and live within sight of Clark Cove. I am a US Air Force veteran having served during the Vietnam War from February 1970 until October 1973. I attended Bristol Community College receiving an associate degree in marketing and then attended UMAS Dartmouth in the Management Program. I worked in the fishing industry painting boats and in a fillet house the late 1970's. I accepted the job as Shellfish Constable for New Bedford in 1982. I retired from my job after 30 years. I maintain a Division of Marine Fisheries commercial fishing license #155567 with my family. I am asking you to consider my comments regarding the beach nourishment proposed for Clark Cove. I have lived through two of these projects throughout the years with the first in approximately 1960.

I worked under the umbrella of the Health Department and the Wastewater Division for most of my tenure with the City. My main goal was to eliminate pollution from entering the Cove so as to achieve water quality capable of sustaining a shellfish industry. I was confronted with lawlessness (poachers worked night and day) and skepticism from the Division of Marine Fisheries and from people in our own City.

The water in the Cove was pea green when I started my job. The water quality was impacted by a collection system that had not been improved in any way for who knows how long. I worked with City Engineers and with their guidance began to investigate the system. We found tide gates missing and weir walls that were built to prevent sewage from entering the Cove on good days leaking, non-existent or too small to make a difference.

The Shellfish Division in conjunction with the Health Department began testing the water for fecal bacteria and found that even during the winter months, fecal bacteria counts were as high as the water quality test could report. Meetings took place with various State agencies to find solutions. Mayor Rosemary Tierney raised the shell fishing flag at the old Pumping Station in March 1992.

The most notable events during this period were:

- 1. Mayor, City Council and Shellfish Committee Involvement in developing The Shell fishing program
- 2. State and City Public Health Support
- 3. State Division of Marine Fisheries approval
- 4. DMF Sanitary Survey and dye studies of the Cove and wastewater treatment plant currents and the effects of the discharge of wastewater 3,300 feet of Clark's Point. (Two twelve hour days on the water with a device to detect minute particles of dye, on two separate occasions)
- 5. Bacteria levels became predictable once the wastewater collection system was improved and maintained.
- 6. Water clarity went from 2' to 16' on calm days.

City worked hard with the Division of Marine Fisheries, the Massachusetts Health Department and the US FDA. We took thousands of water tests under all weather conditions to accomplish the Conditional Shell Fishery in the Cove and Acushnet River. This is the longest to date of any inshore shell fishery that has existed in New Bedford since approximately 1910.

Listed are my thoughts regarding the following issues:

EROSION CONTROL:

Daily: Clark's Cove is a current and wind driven ecosystem. The wind is primarily from south to north. (DMF sanitary survey) The prevailing wind is south west. Thus the build-up of sand on the south sides of the stone groins. The sand eventually migrates to the northwest corner of the Cove. Look at the beach behind the rocks.

Storms:

Following is the history of our last storm that occurred on October 19 & 20th reported in the Standard Times news paper:

- 10/19 Wind South East 4 8 mph with rain, then clearing with wind south @ 10 12 mph
- 10/20 Wind south @ 10 20 mph then south west 20 30 mph, then wind shifting to the east north east with wind gusting past 40 mph with rain. Then shifting west south west @ 15 25 mph then to northwest @ 20 mph

This is the typical storm track for our neck of the woods. Note the heavy east and south wind before, during and after the event.

My opinion:

The erosion control project as proposed for the Cove is well suited for our east facing shoreline and best suited from the Hurricane Barrier to Fort Tabor. The project as proposed would be like pointing your finger into the wind and hoping to make a difference.

WASTEWATER COLLECTION PROJECT:

I am 100% behind improvements to the collection system. Reducing the frequencies and amount of discharges will further improve the Coves ecosystem. Piggy backing repairs to the wastewater collection system in an effort to validate the beach nourishment project is nothing but a smokescreen.

Repairing the wall along the Cove and\or raising its height would be in the best interest of the residents that live along South Rodney French Boulevard and the performance of the collection system; however, moving the pipes further out into the Cove will change nothing in regards to discharge events. The pipes are only one piece of the problem. The release of the wastewater at CSO 004 on the Hurricane Barrier is the main cause of our noticeable pollution events in the Cove. This proposal as it stands will cause further negative environmental impacts to a water system that has adapted to what already exists. To make a difference to water quality in the Cove, eliminate to pipes.

BEACH NOURISHMENT:

The mile or more of shoreline that is the target of the beach nourishment project is a natural environment germane to New Bedford. It has been negatively impacted by the construction of the original wastewater collection system, the construction of the stone groins, wall, and the hurricane barrier to name a few. Each of these projects caused problems for the natural environment and yet it bounced back to a certain degree from each event all be it little poorer for it and generally speaking twenty years or more for recovery. The most devastating was the construction of the barrier. Vast schools of fish and fish species vanished. Sea weed disappeared and water quality was adversely affected. No one really knows how bad.

RESOURCES:

The Coves shoreline and adjacent waters contain more than 1,000 bushels of shellfish, crustaceans, shrimp, worms, vegetation, etc. It is a nursery for varieties of bait fish like silver sides and menhaden for example. It's an incubator and feeding ground for commercial species as well, including scup, sea bass, tautaug, bluefish and stripe bass. Other residents include toad fish, flounder and cunner (A relative to tautaug) as well as species that migrate through during the seasons. (Bonito, false albacore, king mackerel, pilot fish)Each spawning season increases to monetary value of the Cove. The resource suffered serious pressure from the poaching, the DMF shellfish relay in the mid 1980's and commercial fishing since 1991.

WILD LIFE

There is a vast number of sea birds that depend on a food rich viable Cove. They come and go as the seasons change:

FALL/WINTER:

Black duck, Brant Geese, Golden Eye, Eider Duck, Bufflehead (See Coalition for Buzzards Bay for Complete List)

Seals

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SPRING/SUMMER:

Merganser Osprey, Common Turns, Egret, Heron and Cormorant (I did not include sea gulls)

These organisms are all dependent on the rhythms and seasons of our Cove. Shellfish spawning events provide energy that drives this ecosystem in a positive way. Vegetation living and dying over the course of the seasons is another example of positive energy.

BEACHES LOST IN SINCE 1962:

- Gifford Street Beach
- 2. David Street Beach
- 3. Beetles Beach (Now a Boat Ramp)
- 4. Carols Beach (South of Old Davies Locker)
- 5. Riply's Boat Yard (Bottom of Shore Street)
- 6. The entire beach behind the Mill

CONCLUSION:

I estimate that one mile of shore line and hundreds of acres off shore will be adversely affected by this proposal. The direct burial and the silt that will result by the project will impede sunlight penetration and contribute to the destruction of other untold amounts of sea life. We are creating a desert devoid of any life that can't absorb excess nutrients from CSO activity.

This project will generate a lot of noise. I don't think this has been discussed. Trucks filled with sand will be dumping for days. The trucks are equipped with a loud signal when they are in reverse. The drivers employ a technique of banging the back gate several times to ensure the dump is complete. I also feel the bulldozer could experience problems.

We just went indirectly through a summer of construction on Valentine Street. (We are one street north of Valentine) Noise started promptly at 0700 hours and went until 1600 hours in the afternoon or more. This project has the ability to generate even more noise spread over a larger area.

Beach nourishment done in a responsible manner is a perfect fit for New Bedford's historical beaches. (East and West and Fort Tabor Beach) The east side of the peninsular is best suited for the erosion

control project as proposed. Please don't point a finger into the wind and expect the results intended. We can't change the hydro and wind dynamics of our Cove.

Beach nourishment done in a responsible manner is a perfect fit for New Bedford's historical beaches. (East and West and Fort Tabor Beach) The east side of the peninsula is best suited for the erosion control project as proposed.

I am sorry for the lengthy comment. I feel that this project as proposed is not in the best interest of our City, is on the same level as the building of the hurricane barrier and leaves us open for ridicule from our neighbors; however, some small portions are good for our residents and should be implemented. Put the erosion control system on the east side where it belongs. It is best suited for east beach.

Fix the wall on Clark Cove and implement real fixes to the collection system. Please do not waste a golden opportunity to do the right thing for the people and the environment. It's time to think of some portion of our waters as critical for fish and shellfish. We need to look more under the sea as opposed to just the surface. I can be reached at tel: 774-202-7585 if you have questions.

Thank You,

98 Willard Street

New Bedford, Massachusetts

IN CITY COUNCIL, December 12, 2019

Referred to the Committee on City Property, Conservation Commission and Conservation Agent Michele Paul.

Dennis W. Farias, City Clerk

a true/yopy, attest:

City Clerk