



May 28, 2025

Haverhill Conservation Commission
4 Summer Street, City Hall Room 300
Haverhill, MA 01830

Attn: Rob Moore
Conservation Agent

**RE: Response Letter to
Conservation Agent Comments
85 Water Street, Haverhill, MA**

Dear Mr. Moore and Members of the Conservation Commission:

On behalf of 85 Water Street Redevelopment, LLC (Applicant), The Morin-Cameron Group, Inc. (MCG) has provided the following responses to comments issued by email on March 27, 2025, by Rob Moore. The comments are italicized and listed below in the same fashion as the email, and the MCG responses follow each comment.

Included with this submission is the following:

- Site Plans titled "Multifamily Site Redevelopment Plans for 85 Water Street, Haverhill, Massachusetts", (Sheets C-1 – C-10) prepared by MCG, dated March 7, 2025, and revised through May 2, 2025.
- Technical Narrative & Stormwater Management Report, 85 Water Street Redevelopment, prepared by MCG, dated March 7, 2025, and revised through May 2, 2025.

Comments:

- ***Comment:*** *Project generally consists of the redevelopment of the former Friends Landing property on Water Street, including the expansion and renovation of the abutting public River Rest Park.*

MCG Response: No response is required.

- ***Comment:*** *The applicant has filed with NHESP, as the riverward edge of the project site is within PH #2154.*

LEC Response: LEC provided the filing to NHESP via Heritage Hub on March 13, 2025. On March 31, 2025, NHESP issued the attached letter stating that the project will not adversely affect Resource Area Habitat of state protected rare wildlife species and will not result in a prohibited take of state listed rare species.

- ***Review Comment:*** *Application materials have been forwarded to CEI for the standard peer*

review of the stormwater system design and confirmation of the flood storage calculations.

MCG Response: MCG provided a response to the peer review comments by CEI on May 2, 2025. CEI provided additional comments in a peer review letter dated March 12, 2025 and MCG is in the process of preparing responses.

- **Review Comment:** *Please consider the following comments based on a review of the submitted materials:*
 1. **Review Comment:** *The Applicant should provide details for any garage security coverings proposed along the south side of the building. Submittal should demonstrate an unrestricted hydraulic connection to the first level garage. Similar details should be provided for the west and east sides of the building, including the garage door. This lower level should be as open as possible to accommodate flood flows. Please provide the west side elevation. What is the openness ratio of the building perimeter, below the 100-year flood elevation?*

MCG Response: As discussed at the March 27, 2025 Conservation Commission hearing, the building will feature flood openings between elevation 17 (garage slab elevation) and 22 (top of the Flood Zone AE). The current portions of the building walls proposed to have flood openings was added to the Site Layout Plan on sheet (C-4). All security coverings and the garage door will be designed to provide an unrestricted hydrologic connection for flow in and out of the garage. These walls, including the security coverings and garage door, will be designed by an architect prior to the issuance of a building permit and the start of construction. Examples of garage doors providing an unrestricted hydrologic connections are attached to this letter. The Applicant requests the Commission to condition the review and approval of the security coverings and garage door by the Conservation Agent within a potential Order of Conditions issued for the project.

2. **Review Comment:** *Will the garage levels have floor drains? If so, provide details, including connections to the sanitary sewer. Also if so, how would the first level drains exclude floodwater during an event? Show floor grades for the first level*

MCG Response: The garage will have floor drains as required by State Building Code and be designed by an architect or MEP engineer prior to construction and the issuance of a building permit. In order to prevent flood water from entering the municipal sanitary sewer system a valve will be installed inside the building prior to the separator. The valve will be closed prior to floodwater entering the garage and be paired with an audible and visual alarm to provide advanced warning of rising floodwater. Prior to being reopened the floor drain system will be pumped to one of the catch basins so it can be treated prior to discharging to the Merrimack River, rather than potentially overloading the sanitary sewer system. Any components of this system would be included within the Operations and Maintenance Plan for the Stormwater Management System. The Applicant requests the Commission to condition the review and approval of the floor drains, valve and alarm system, and any modifications to the Long Term Stormwater Best Management Practices Operation and Maintenance Plan by the Conservation Agent and/or City Engineer within a potential Order of Conditions issued for the project.

3. **Review Comment:** *Will proposed grades match existing on the west side of the building? Will the concrete swale in the SW corner still see stormwater?*

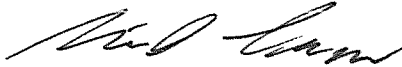
MCG Response: The proposed grades on the western side of the building are proposed to match existing grades. The concrete swale will be removed. Its function is to direct water from the

existing parking lot to the catch basin on Wall Street. Since the parking lot will be removed the concrete swale is not necessary.

We trust this information adequately addresses your comments regarding this proposed site redevelopment project at 85 Water Street in Haverhill. If you have any questions, please do not hesitate to contact our office at (978) 777-8586.

Sincerely,

THE MORIN-CAMERON GROUP, INC.



Daniel J. Powers, PE
Senior Project Engineer

DJP/jfp

Enclosures

cc: 85 Water Street Redevelopment, LLC



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DIVISION OF FISHERIES & WILDLIFE

1 Rabbit Hill Road, Westborough, MA 01581
p: (508) 389-6300 | f: (508) 389-7890
MASS.GOV/MASSWILDLIFE

March 31, 2025

Nicole Ferrara
LEC Environmental
380 Lowell Street
Wakefield, MA 01880

Haverhill Conservation Commission
City Hall Room 210
4 Summer St
Haverhill, MA 01830

RE: Applicant: Nicole Ferrara, LEC Environmental
 Project Location: 85 Water Street, & 0 Water Street
 Project Description: Multifamily Housing Development
 DEP Wetlands File No.: 033-1581

NHESP File No.: 25-19368

Heritage Hub Form ID: RC-93053

Dear Commissioners & Applicant:

The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (the "Division") received a Notice of Intent with site plans (dated 3/7/25, revised date N/A) in compliance with the rare wildlife species section of the Massachusetts Wetlands Protection Act Regulations (310 CMR 10.58(4)(b)). The Division also received the MESA Review Checklist and supporting documentation for review pursuant to the MA Endangered Species Act Regulations (321 CMR 10.18).

WETLANDS PROTECTION ACT (WPA)

Based on a review of the information that was provided and the information that is currently contained in our database, the Division has determined that this project, as currently proposed, **will not adversely affect** the actual Resource Area Habitat of state-protected rare wildlife species. Therefore, it is our opinion that this project meets the state-listed species performance standard for the issuance of an Order of Conditions.

Please note that this determination addresses only the matter of rare wildlife habitat and does not pertain to other wildlife habitat issues that may be pertinent to the proposed project.

MASSACHUSETTS ENDANGERED SPECIES ACT (MESA)

Based on a review of the information that was provided and the information that is currently contained in our database, the Division has determined that this project, as currently proposed, **will not result in a prohibited Take** of state-listed rare species. This determination is a final decision of the Division of Fisheries and Wildlife pursuant to 321 CMR 10.18. Any changes to the proposed project or any additional work beyond that shown on the site

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plans may require an additional filing with the Division pursuant to the MESA. This project may be subject to further review if no physical work is commenced within five years from the date of issuance of this determination, or if there is a change to the project.

Please note that this determination addresses only the matter of state-listed species and their habitats. If you have any questions regarding this letter please contact Melany Cheeseman, Endangered Species Review Assistant, at Melany.Cheeseman@mass.gov, (508) 389-6357.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jesse Leddick', with a large, loopy initial 'J'.

Jesse Leddick
Assistant Director

cc: Ann Marton
Frank J. Franzone , The Water Street Waterfront
Melinda Barrett (Mayor), City of Haverhill
Louis P. Minicucci Jr., 85 Water Street Redevelopment, LLC.
Haverhill Conservation Commission
DEP Northeast Region
Karen Pollastrino









