

April 11, 2024

NEX-2300312.00

Ms. Elizabeth Hughes, AICP, Town Planner
Town of Concord
Planning Division
141 Keyes Road
Concord, MA 01742

SUBJECT: NOVO Riverside Commons Comprehensive Permit Application
292-294 Baker Avenue
Follow Up to Site and Stormwater Peer Review Letter #2

Dear Ms. Hughes and Members of the Zoning Board of Appeals:

As a follow up to our second peer review of the site plan and stormwater management report that have been submitted to the Concord Zoning Board of Appeals for the Proposed NOVO Riverside Commons Comprehensive Permit Application at 292-294 Baker Avenue, we offer the following additional commentary on our responses to the following items:

28. Executive Summary:

- b. Table 2 notes increases in runoff volumes at DP-2, DP-3, DP-5, and DP-6 during some or all design storms. Section 2.2.1.A of the Concord Public Works Design & Construction Standards & Details requires that rates and volumes not exceed pre-development conditions. We recommend that the design engineer either revise the design to reduce the post-development runoff volumes to either match or be less than pre-development volumes or provide justification for why this standard cannot be met.

B+T Response: The stormwater management system has been designed to meet the DEP Stormwater Policy and Stormwater Handbook Standard for groundwater recharge (at a minimum). The proposed stormwater management system includes two subsurface infiltration basins that recharge rooftop runoff as well as the majority of parking areas that are outside the floodplain. It is not possible to recharge additional areas due to the minimal vertical relief between the parking lot grade to the pond/wetland elevations. We respectfully request relief from the Concord Public Works Standards due to the constrained site conditions.

GPI Remark: Based on our discussions with the design engineer and the limitations described above, this item has been addressed to our satisfaction. We defer to the Board for acceptance of the requested relief from CPW Standards Section 2.2.1.A.

GPI Follow Up: GPI conducted two Teams calls with the design engineer (1/12/24 and 2/14/24) to discuss various comments and concerns and to get a better understanding of the design intent for the proposed stormwater management systems. The design engineer explained that conservatively, no infiltration credit is taken within Systems 2 & 3 due to potential proximity to seasonal high groundwater table. The design engineer indicated that test pits will be conducted and that a geotechnical engineer will be engaged to identify groundwater elevations in the vicinity of all stormwater management systems. Some infiltration may ultimately be possible in Systems 2 & 3, however as designed the engineer has made efforts to be conservative with the proposed stormwater model. Additionally, discharges from Systems 2 & 3 will be routed through the proposed compensatory storage chambers where stormwater infiltration may also be achieved during non-flood conditions, but which is also not accounted for in the stormwater model. GPI agrees with the conservative assumptions used in the stormwater modeling, and understands that while the stormwater report does indicate increases in post-development runoff volumes at some of the design points, more groundwater recharge will occur than is accounted for, hence our support of the requested waiver. We also note that the requested waiver does not violate any provision of the MassDEP Wetlands Regulations.

34. Floodplain & Proposed Compensatory Storage – We agree that the compensatory storage design provides excess storage for lost floodplain volume from the development at each incremental elevation. However, we disagree that the excess compensatory storage volume provided is proper mitigation for the increase in stormwater runoff volume during a 100-year design storm. We recommend the engineer provide justification for this method or revise the design to reduce stormwater runoff volumes as stated in CPW Standards Section 2.2.1.A.

B+T Response: As noted previously in comment 28b, it is not possible to mitigate for runoff volumes from the site development. By providing additional compensatory floodplain storage, we are allowing the additional runoff volume that would take place during larger storm events to be stored in the Stormtrap chambers. Regardless of the proposed additional floodplain compensation, we have requested relief from the Concord Public Works standard.

GPI Remark: Based on our discussions with the design engineer and the limitations described herein, this item has been addressed to our satisfaction. We defer to the Board for acceptance of the requested relief from CPW Standards Section 2.2.1.A.

GPI Follow Up: Adequate compensatory storage is provided for lost volume due to work within Bordering Land Subject to Flooding. What we questioned in their design related to their use of “excess” compensatory storage as mitigation for increases in stormwater runoff volume during a 100-yr storm, which we said wasn’t necessarily a fair comparison. With respect to compensatory flood storage as required under the MassDEP Wetlands Regulations, they provided detailed earthwork and volume analysis demonstrating that they meet the MassDEP standard.

Should you have any questions or require additional information, please contact me directly at (603) 374-7912 or by email to djordan@gpinet.com.

Sincerely,

GREENMAN-PEDERSEN, INC.



David R. Jordan, P.E., P.L.S., LEED AP
Vice President
Director of Project Delivery – Land Development

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