

# **ZBA CORRESPONDENCE LOG**

**NOVEMBER 29, 2011**

**RE: TOWN AGENCIES -15 GREAT ROAD 40B PROJECT**

**ITEMS 1-3 ON CORRESPONDENCE LOG DATED 9/21/11**

**ITEMS 4-6 ON CORRESPONDENCE LOG DATED 9/27/11**

**ITEM 7 ON CORRESPONDENCE LOG DATED 10/11/11**

**ITEM 8 ON CORRESPONDENCE LOG DATED 10/12/11**

**ITEM 9. LETTER FROM CONCORD PUBLIC WORKS DATED NOVEMBER 17, 2011**



## CONCORD PUBLIC WORKS

Water/Sewer Division  
135 Keyes Road  
Concord, Massachusetts, 01742

TEL: 978-318- 3250 FAX: 978-318- 3204

November 17, 2011

Maren Toohill  
Littleton Planning Administrator/Permit Coordinator  
Shattuck Street Municipal Building  
PO Box 1305  
Littleton, MA 01460



RE: 15 Great Road Littleton, MA  
Comprehensive Permit Application Comments

Dear Members of the Board:

On behalf of the Town of Concord, I would like to offer the following information in response to the Comprehensive Permit Application proposed 40B project located at 15 Great Road in Littleton, MA. The Town has one primary concern and reservation about the level of development proposed by this project because of its proximity less than 500 feet northerly of Nagog Pond, which is part of the Town of Concord's public water supply system. Approximately half of the proposed development (including more than half of the onsite WWTP leaching field) is within the watershed for Concord's Nagog Pond. For your reference, please find the attached map which references the 15 Great Road development with the Nagog Pond Watershed/subbasin.

Since 1884, Nagog Pond has been and continues to be an important water supply resource for the Town of Concord. Over the past 100 years, Concord has invested a considerable amount of resources into the development and continued protection of this valuable resource.

Nagog Pond is a protected water supply resource for the Town of Concord and is classified by the State as a Great Pond. Nagog Pond is a 284 acre pond on the Littleton-Acton border directly adjacent to the south side of Route 2A/119. It has been categorized in the Massachusetts Landscape Inventory as a "distinctive landscape".

The critical concerns with development of the site at 15 Great Road relate to

- a.) Potential impacts resulting from the construction/silt management on-site and along Route 2A/119 during construction.
- b.) Potential impacts from the on-site waste water disposal system, where it is located on-site at a point relatively close to Nagog Pond and within a Zone B to the Nagog Pond drinking water supply.

- c.) Nagog Pond Watershed protection with regards to hazardous materials storage onsite (especially at the WWTP and Club House).
- d.) Limiting the presence of attractive nuisances and groundwater discharge/catch basins/outfalls within the watershed.

The Town of Concord believes regular groundwater monitoring may be necessary to assure that the quality of groundwater reaching Nagog Pond is not compromised and that any stormwater management system is adequately maintained to assure that any surface water does not pollute or otherwise impact Nagog Pond.

While the Planning Board is evaluating the developments Comprehensive Permit Application, the Town of Concord asks that special consideration be paid to the following items along with the attached comments from Concord's Engineering Department:

1. Concord requests the submission of all information/calculations for the stormwater mitigation for the project. This submission should include appropriate details, calculations and back-up information to ensure the Project meets MA DEP Water Quality Standards.
2. Concord requests the submission of all information regarding onsite discharges (i.e. treated wastewater and/or storm water infiltration) and withdrawals (i.e. private drinking water/irrigation) for comment.
3. Concord requests that the developer evaluate alternative locations for the WWTP and leaching field which are located outside of the Nagog Pond Watershed (see attached map).
4. Concord requests the opportunity to comment on the design for the WWTP/facility and Emergency Response Plan to ensure the incorporation of controls to prevent a significant release that would directly impact Nagog Pond or the groundwater reaching Nagog Pond.
5. Concord requests that the bounds of the Nagog Pond Watershed/subbasin/Zone B be included on any and all plans just as any wetland delineation would be included.

If you have any questions please do not hesitate to contact Water and Sewer Division Superintendent, Alan Cathcart or myself at 978-318-3250.

Sincerely,



Melissa Simoncini

*Environmental and Regulatory Coordinator*

Cc: Keith Bergman, Littleton Town Administrator  
Littleton Zoning Board of Appeals  
Marcia Rasmussen, Concord Planning Department

Enclosures (2)

**CONCORD PUBLIC WORKS  
ENGINEERING DIVISION**

**Tel: 978 - 318 - 3210  
Fax: 978 - 318 - 3245**

**133 Keyes Road  
Concord, MA 01742**



**DATE: 11/17/11**

**MEMORANDUM**

**TO: Alan Cathcart, Water & Sewer Superintendent**  
**VIA: Melissa Simoncini, Environmental and Regulatory Coordinator**  
**VIA: Bill Renault, P.E., Town Engineer**  
**FROM: Chris Olbrot, P.E., Public Works Engineer**  
**SUBJECT: 40B Development at 15 Great Road, Littleton**

CPW has completed a cursory review of the above mentioned project. It is anticipated that a full site design will be submitted in the future, including stormwater design calculations, at which time this office can provide specific comments with regards to site design and stormwater mitigation. The comments below are based upon a review of the limited items at this preliminary stage:

1. It appears more than half of the site falls within the Nagog Pond Sub-basin. We recommend that the applicant's design meets or exceeds the amount (volume) of stormwater infiltration within this sub basin with regards to pre and post construction conditions. This basin should be clearly shown on the plan set, and the calculations showing the infiltration rates specifically to the basin should be provided for review. These "basin recharge" calculations shall not be a substitute to demonstrate compliance with regards to groundwater recharge for the site as a whole, as outlined in item #2.
2. The project proponent shall utilize all of the MA-Stormwater Standards in the design of site Best Management Practices for stormwater mitigation. No waivers from these standards should be permitted.
3. The project proponent is urged to utilize Low Impact Development techniques. It appears that the conceptual design is a standard closed drainage system utilizing catch basins, manholes and treatment structures that eventually outlet to "Stormwater Management Basins" (SMBs) throughout the site. It is recommended that these SMBs are designed to be "Infiltration Basins" as defined in the MA-Stormwater Handbook (Handbook). Additionally, these SMBs shall be designed with pre-treatment sediment forebays in conjunction with deep sump hooded catchbasins, and proprietary pretreatment structures. No waivers from the design guidelines in the Handbook should be permitted.
4. Hardscape design should be minimized. Design considerations such as reduced pavement width, pervious pavement parking lots, sidewalk locations limited to one side of the road, etc. should be incorporated into the design. Additionally, all rooftop runoff should be detached from the closed drainage system and infiltrated nearby via drywells, or other infiltration/detention systems.
5. Soil exploration and percolation tests should be required at the locations for the SMBs as well as other locations designed to infiltrate stormwater. High groundwater elevations shall be determined as defined in 310 CMR 15.00, Title V or other approved method.

6. It appears that the location of two of the SDBs is in close proximity to an existing pond and other resource area (i.e. BVW). It is unclear if this is a feasible design, based on the Town's Wetland Bylaws and Conservation Commission's policies. It is recommended that all resource areas that are jurisdictional under the Wetlands Protection Act, should maintain a minimum of a 25' "No Disturb" zone around its entire perimeter.
7. It is recommended that the site be prohibited to utilize pesticides and herbicides, specifically within the area designated as "Zone B" to the surface water body, Nagog Pond.

# 15 Great Road Littleton MA

October 2011

