

December 2, 2024

NEX-2400043.00

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

SUBJECT: 275 Forest Ridge Road, Concord, MA
Peer Review Letter #1 – Site Review

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

Greenman-Pedersen, Inc. (GPI) has performed a peer review of the materials submitted to the Concord Zoning Board of Appeals for the Proposed Residences at Thoreau Comprehensive Permit Application at 275 Forest Ridge Road. GPI is in receipt of following documents, which serve as the basis for our review:

- *Multi-Family Site Development, Residences at Thoreau, 275 Forest Ridge Road, Concord, MA;* prepared by Allen & Major Associates, Inc.; dated December 20, 2023, revised October 18, 2024.
- *Project Narrative and Drainage Report,* prepared by Allen & Major Associates, Inc.; issued December 20, 2023, revised October 4, 2024.
- *Residences at Thoreau, Planning Board Landscape Plan Set Submission,* prepared by Hawk Design, Inc., dated 11/8/24.

It should be noted that this review focuses on only the grading, drainage, stormwater management water distribution and Groundwater Conservancy District elements of the project. Additional comments on the traffic impacts, site circulation and access, and parking elements of the project are being provided under separate cover.

As requested, GPI has reviewed the above materials for compliance with the applicable sections of the Town of Concord Stormwater Regulations, Concord Public Works Design & Construction Standards & Details (hereinafter CPW Standards), Town of Concord Zoning Bylaws, MassDEP Stormwater Policy and Handbook (hereinafter MA Standards), MassDEP Drinking Water Regulations, Massachusetts Guidelines for Public Water Systems, American Water Works guidelines and standards, and general engineering practice. Based on our review, we offer the following comments for the Board's consideration:

General

1. We understand that the plans that have been submitted contain the information necessary for the review of the applicant's comprehensive permit application by the Concord Zoning Board of Appeals (ZBA) and to some extent provide only preliminary information with respect to exact details of site grading, drainage, and utilities. Notwithstanding the outcome of the current review of this application by the ZBA, we recommend that prior to the issuance of a building permit that final design plans and details be submitted to the Planning Division and Public Works demonstrating compliance with the following:
 - a. Town of Concord Stormwater Regulations
 - b. Concord Public Works Design & Construction Standards & Details
 - c. Massachusetts Department of Environmental Protection Stormwater Policy and Stormwater Management Standards

2. This project will disturb more than 1 acre of land and will require coverage under the US EPA 2022 Construction General Permit program. This includes the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and the filing of a Notice of Intent with the EPA at least 14 days prior to construction.

Plans

Cover

3. While minor, we recommend that in the List of Drawings that the sheet number for Existing Conditions be changed to V-101 – V-102 to match the actual sheet numbers.

Existing Conditions – Sheet V-102

4. This plan sheet shows several oval text labels containing numbers such as 21, 24d, 24e, etc. We recommend that the surveyor explain the meaning or intent of these labels.

Abbreviations & Notes – Sheet C-001

5. We recommend that General Notes note 2 be revised to say, “Groundwater *Conservancy* District”. Further, we recommend that the label that appears on all the plan view sheets be revised as well.
6. We recommend that Utility Notes note 5 be expanded to specify watertight joints for all HDPE drain lines as required by CPW Standard 2.3.1.2.D.4.

Abbreviations & Notes – Sheet C-002

7. Erosion and Sedimentation Control Notes 5, 9, and 20 refer to “Tubular Barriers” and “Erosion Control Berms”. The detail sheets contain only include details for silt fence and haybales as erosion control barriers. We recommend that the engineer clarify if tubular barriers and/or erosion control berms are proposed for this project and if so, show the location(s) and the Erosion control plan and provide corresponding details.

Erosion Control Plan – Sheet C-101A

8. We recommend that the leader associated with the text along the left side of the entrance driveway that reads “Install Silt Fence and Coir Log Along Limit of Work” be adjusted to point to the actual location of those items.
9. We recommend that the Legend on this plan be revised to say “Coir Log” rather than “Tubular Barrier” if that is the intended product to be installed at the locations shown.
10. We recommend that a detail for the proposed coir log be added to the plans.
11. We recommend that the limit of work shown on this plan be revised to include the PFES 1 and the pipe from PDMH 1.

Site Preparation Plan – Sheet C-102A

12. We recommend that Note 3 on this plan and on Sheet C-102B be revised to read “Refer to Sheets C-101A and C-101B for erosion control.”
13. The limit of disturbance shown on this plan is somewhat misleading in that a significant portion of the Thoreau Club parking lot is to be reconstructed to accommodate this new development. While that work may be “performed by others” as stated on other sheets, that work is inextricably tied to the proposed

residential development and should be detailed on these plans as it appears that the new work is fully designed but simply faded back and lacking any relevant labeling. Further, there are additional improvements on either side of the limit of work line (light poles, underground utilities, trees) where it is not clear if ultimately they are to remain or to be removed as part of this project.

14. This plan shows the water line that currently provides water to one hydrant and the “Wooden Building to be Removed” will be cut and capped. According to the Utilities Plan, that water line is not being used for the residential development, implying that it will stay in place solely to provide water to that single hydrant. We recommend that the engineer confirm that is in fact the intention and if so, revise location where that water line will be cut and capped to be just after the gate valve for the hydrant.
15. There is a note on this plan that states “SMH TBR. Relocation and Coordination of Sanitary Sewer for Thoreau Club by Others.” Further, Note 7 on this plan states “The Onsite Existing Sewer and Drain Lines are to be Removed and Relocated as Shown on the Site Utility Plan. As noted in a comment to follow, no information regarding the relocation of the Thoreau Club sewer has been provided.

Layout & Materials Plan – Sheet C-103A

16. We recommend that the applicant acknowledge that the access driveway for his project will remain private in perpetuity and that all responsibilities for maintenance will rest solely with the developer and their successors and assigns.
17. Both the Groundwater Conservancy District regulations in the Zoning Bylaw and the MA Drinking Water Regulations 310 CMR 22.00 regulate the storage of deicing chemicals within a Zone II f a public water supply. We recommend that a note be added to the plans that there will be no outside storage of deicing chemicals within the Groundwater Conservancy District.
18. As stated previously, we recommend that the proposed layout and materials information related to the reconstruction of the Thoreau Club parking lot be shown on this plan to better understand the interface between the existing facility and the proposed access to the residential units.
19. The Landscape Plan set show a retaining wall and entry sign to the right of the entrance driveway. We recommend that these items be added to the site plan set of drawings. Further, we recommend that additional information regarding the entry sign be provided including size, proposed graphics, and method of illumination.
20. We recommend that the leader for the “5’ Wide Conc. Walk” text that is to the left of the entrance driveway be adjusted to point to the actual sidewalk location.
21. We note that there are sign symbols on either side of the two speed tables. We recommend that information regarding these signs be added to the plans.
22. While the Layout & Materials Plan sheets do not show the locations for any sidewalk curb ramps, we note that details for such are provided on the detail sheets. We recommend that prior to the issuance of a building permit that final design plans showing the locations for all proposed curb ramps be submitted to the Planning Division and Public Works for review.
23. There is a notation at the top of the page, above the sheet match line that says, “Chain Link Fence”. It is not clear if this is the entire notation and this text does not appear on Sheet C-103B, which is where we would expect to see it. We recommend that this be corrected.

Layout & Materials Plan – Sheet C-103B

24. We recommend that the leader for the “Transformer and Switch Gear with Bollards” and “Dog Park, See Landscape Plans” be adjusted to point to the correct locations.

25. The Landscape Plan set show a tot lot next to the dog park. We recommend that this be shown on the site plan set of drawings. Further we recommend that additional information be provided to the ZBA either on the plans or in narrative form outlining the intended amenities within the tot lot i.e., surfacing, lighting, fencing, etc. Our initial observation on the location of the tot lot prompts questions about security and safety as it is located behind a garage building limiting visibility from other areas on the property. We would encourage the project applicant to see if the tot lot could be relocated to a more visible and centrally located area on the property.
26. We recommend that accommodations for bicycle parking be shown or annotated on the plans.
27. There is a 124.4' dimension line pointing to nothing near the waste water treatment building. We recommend that this dimension be removed and that a dimension to the closest corner of the proposed building be added.
28. There is a label in front of the 8-bay garage behind Building B that reads "5' Wide Conc. Walk". We recommend that the label be changed to say "8' Wide Crosswalk" as we believe it is intended to read.

Layout & Materials Plan – Sheet C-103C

29. In the "Off-Street Parking Summary - Lot 5F2" table, it states that 7 ADA spaces are provided. Upon review of the plans, it appears that 9 ADA spaces are intended to be provided. As stated previously, we recommend that all changes to the Thoreau Club parking areas be shown on these plans including the type and dimensions of parking stalls. Further, we recommend that the number and percentage of proposed compact parking spaces be included in the parking summary table.

Grading & Drainage Plan – Sheet C-104A

30. We recommend that the applicant acknowledge that the maintenance of the drainage system be the sole responsibility of the developer and their successors and assigns in perpetuity.
31. This sheet shows proposed retaining walls in two areas with a typical detail included on Sheet C-503. We recommend that prior to issuance of a building permit that design drawings of these retaining walls prepared by a MA licensed geotechnical or structural engineer be provided to Concord Public Works and the Building Department for review. Further, we recommend that these walls be evaluated for the need of guardrail or protective fencing for fall protection as may be required by applicable local and State codes.
32. For the proposed retaining wall between the driveway to the residential units and the reconstructed parking area for the Thoreau Club we recommend that top and bottom of wall elevations be added to the plan.
33. This plan shows three new drainage structures along the proposed edge of the parking lot. We recommend that structure rims and inverts along with pipe data (size, slope) be added to the plans.
34. There is a label that reads "Prop. Stone Check Dam Every 100-ft" however the stone check dam detail on Sheet C-501 specifies a spacing based on the toe of the uphill check dam being equal in elevation to the top of the downhill check dam. We recommend that the engineer revise the plan to match the detail.

Grading & Drainage Plan – Sheet C-104B

35. This plan shows a fence around the infiltration basin on the Thoreau Club property. We recommend that provisions for access to that basin for inspections and maintenance in accordance with CPW Standard Detail DR-11 and the MA Stormwater Handbook be added to the plans.

36. Within that same infiltration basin there are three proposed drywells. We recommend that a detail for those structures be added to the plans.
37. The MA Stormwater Standards prohibit the infiltration of roof runoff from metal roofs within a Zone II. We recommend that the applicant confirm that all buildings within the Groundwater Conservancy District will have non-metal roofs.
38. We recommend that the applicant provide a narrative explaining how this project does or does not comply with MA Drinking Water Regulations 310 CMR 22.00, which generally prohibits “the removal of soil, loam, sand, gravel and any other mineral substances within four feet of the historical high groundwater table elevation” within a Zone II of a public water supply.
39. This sheet shows the locations of several test pits however no test pit logs have been provided. In accordance with CPW Standard 2.2.3.E.5., we recommend that test pit information logged by a Massachusetts Registered Soil Evaluator and witnessed by the Town be provided for each stormwater infiltration practice.
40. We recommend that prior to the issuance of a building permit that final design plans showing detailed grading at all accessible parking spaces and along all accessible routes, including to the building entrances, demonstrating compliance with Federal ADA and MA AAB regulations be submitted to the Planning Division and Public Works for review.
41. We recommend that prior to the issuance of a building permit that final design plans showing more detail for the subsurface infiltration system, including connections from the on-site structures to the chambers and inspection port locations, be submitted to the Planning Division’s peer review consultant and Public Works for review.
42. The subsurface infiltration system south of Building A contains an isolator row over 220’ in length. In consideration of providing access for future maintenance, we recommend the engineer evaluate if additional structure(s) are warranted.
43. Catch basins PCB 19A & PCB 19B are located within the footprint of the subsurface systems but are routed through pipes to additional structures prior to entering the systems. We recommend the engineer evaluate if these can be routed similar to PCB 17A & PCB14A. If the routing does not change, we recommend the engineer review the pipes from PCB 19A & PCB 19B to ensure no conflicts with the chambers.
44. We recommend the engineer review the subsurface system inverts for isolator row and manifold piping. Typically, the manifold is designed as a ‘top’ connection to the chamber endcaps to ensure all incoming runoff will enter the isolator rows until the elevation in the system exceeds the isolator row capacity. As designed, there is less than a 1-inch difference in invert between the isolator row and manifold inverts which would allow incoming runoff to enter all rows equally.

Grading & Drainage Plan – Sheet C-104C

45. Several proposed pipes have less than 3’ of cover as required by CPW Standards 2.3.1.2.A.1 and 2.3.1.2.D. We recommend the design engineer revise the design to meet this standard or if it cannot be met, provide justification for the design as proposed.
46. We recommend that the existing catch basin in the entrance driveway be added to the Drain Structure Table so that the proposed rim elevation is provided.

Utilities Plan – Sheet C-105

47. This sheet shows a new water main connected to the existing 12” water main in the Thoreau Club driveway and looping around the two new residential buildings. While internally the water main is looped, there is no ability to provide drinking water or fire protection to the 237 residential units if a break were to occur in the first 750 feet of water main in the access driveway. We recommend that the applicant work with Concord Public Works Water & Sewer Division to identify a second connection to an existing water main to provide a true looped water system to maintain water quality within the system and ensure the delivery of safe drinking water to the residential units.

Utilities Plan – Sheet C-105A

48. As previously mentioned, there is an existing water line just east of the entrance driveway that is being shown on another sheet as being cut and capped, implying that the remainder is to remain in place and feed a single hydrant. We recommend that the engineer confirm that this is the intention.
49. No information is provided as to how the sewer from the Thoreau Club will be connected to the new proposed sewer within the residential development. We recommend that this essential information be added to the plans.

Utilities Plan – Sheet C-105B

50. This sheet shows the proposed locations for a Waste Water Treatment Building, a Waste Water Handling Tank Area, and a Proposed Waste Water Leaching Field however, no design information is provided. We note that the first two items are located wholly or partially within the Groundwater Conservancy District. We recommend that design information be provided for review as the proper design and function of this private wastewater plant is essential to the protection of public health and the environment. We do note that the new proposed wastewater leach field is located completely outside the Groundwater Conservancy District, which is something that is supported by the Concord Public Works Water & Sewer Division.
51. We recommend that the locations on each building where the domestic and fire protection water lines will be entering be shown on this sheet. Concord Public Works Water and Sewer Division is requesting that the fire protection system mechanical room have access from the outside of the building and be equipped with a Knox Box for Fire Department and Water Department access.
52. We recommend that prior to submission of final plans as part of the building permit process that the engineer review the layout of the proposed utilities and where possible revise to eliminate or reduce pipe crossings and to verify vertical clearances between utilities at crossings. Two specific areas that we believe should be looked at are at the east end of the entrance driveway where it connects to the driveway/parking loop around the buildings where drain line crosses between and through three water gates and near the northeast corner on Building B where a drain line, water line, and underground electric/communications lines all cross at a single point.

Snow Storage Plan – Sheet C-106B

53. Both the Groundwater Conservancy District regulations in the Zoning Bylaw and the MA Drinking Water Regulations 310 CMR 22.00 regulate snow storage within a Zone II of a public water supply. This sheet shows proposed snow storage locations in the Groundwater Conservancy District as being limited to only snow from the adjacent driveways and parking areas within the Zone II. A larger snow storage area is shown on the north side of the site where it appears snow will be hauled to and dumped is located completely outside the Zone II. We note that this complies with local and State regulations.

Lighting Plan – Sheet C-108A

54. It is not clear on this sheet or from the Site Preparation Plan if one or more of the existing pole lights between the proposed driveway and the reconstructed Thoreau Club parking lot are to remain. Further, no information has been provided regarding any proposed lighting in the Thoreau Club parking lot. We recommend that this information be added to the plans.

Details - Sheet C-501

55. We recommend that CPW Standard Detail EC-10, Fiber Roll Detail, be added to the plans.
56. This sheet includes a detail for a “Temporary Stone Check Dam Placed in Swale”. It would appear from the Grading & Drainage Plan that the check dams are intended to be permanent. We recommend that the engineer provide clarification.

Details - Sheet C-503

57. The “ADA and Standard Parking Striping” detail shows 8’ wide ADA spaces and an 8’ wide access aisle. On the Layout & Materials plan these all appear to be 9’ wide. We recommend that the engineer provide clarification.

Details - Sheet C-504

58. This sheet includes a “Block Drainage Structure Detail”. We recommend that the location(s) for this structure be identified or remove the detail if it is not relevant to this project.

Details - Sheet C-505

59. We recommend that the “Typical Grassed Swale Detail” be revised to specify a minimum bottom width of 2 feet in accordance with CPW Standard 2.2.4.F.2. Further, we recommend that the proposed grading shown on Sheet C-104A be revised to reflect this increased width.
60. We recommend the “Flared End Section with Rip Rap” detail be replaced with CPW Standard Details DR-10 and DR-10A.
61. The snout oil & debris trap detail contains a callout for Nyloplast inline drainage structure which does not appear applicable to this project.

Details - Sheet C-508

62. We recommend the Stormtech SC-740 detail be revised to show geotextile fabric between the bottom stone and the subsoil in accordance with CPW Standard 2.3.1.4.D.1.

Project Narrative and Drainage Report

Section 2.0 – Existing Conditions

63. Under Section 2.2, the total lot is reported as 30.05 acres, we believe this should be 33.05 acres.
64. Section 2.4 refers to test pits performed though as previously noted, we do not find any test pit logs included in the report.

Section 3.0 – Proposed Conditions

65. Section 3.1 of the narrative states that spaces for electric vehicle charging will be provided at initial occupancy. We recommend that the location(s) for those space be identified on the plans.
66. Section 3.1 of the narrative states that trash and recycling will be handled internally to each building with pickup by a private hauling company. We recommend that additional information about this be provided. Will barrels or carts be stored inside the building and brought out or wheeled out for pickup and if so, where are those locations? Will trash trucks actually enter the building?
67. Section 3.2 notes that Watersheds P-4 and P-5 are not changed in the proposed condition and are therefore not reanalyzed. We recommend the limits of the study area be adjusted to only include areas impacted by the project. This is further addressed in a comment below.
68. Section 3.4 contains a description that pipe sizing calculations are “performed for a 25-year storm event and analyzed for effects during the 100-year event”, and calculation inputs listed below refer to the 25-year storm in parenthesis. We recommend references to the 25-year storm be removed and the calculations be performed for the 100-year storm as required by CPW Standard 2.2.1.F.
69. Section 3.6 of the narrative provides some level of detail regarding the private on-site wastewater treatment facility, which will require review and approval by MassDEP through the issuance of a Groundwater Discharge Permit and that final plans are being/will be prepared by Fuss & O’Neill. We continue to recommend that additional information be provided at this time to understand how public health and environmental concerns typically associated with wastewater treatment facilities are being met.

Section 4.0 – Stormwater Management

70. As a general comment, CPW Standard 2.2.1.A. lists among other things permeable surfaces, Low impact Development (LID) techniques, and related Best Management Practices (BMPs) as means for providing on-site stormwater management. Historically, the Town has asked project applicants to consider employing LID measures to the maximum extent feasible. We recommend that the applicant explore opportunities for LID measures such as permeable pavement and treebox filters for this project or provide explanation for why these are not part of the current design. Podium parking as the Planning Board has discussed could significantly reduce the amount of impervious cover on the parcel and in turn, the associated drainage structures, pipe, and underground chamber system.
71. Within the description for Standard 3, we recommend the impervious surface table be filled in to include areas within each HSG.
72. In the report the cumulative volume for recharge is claimed as 67,281 cubic feet, but we find the total volume stored within HydroCAD model to be 92,470 cubic feet. We recommend the engineer provide clarification or additional information.
73. The drawdown calculation utilizes a rate of 8.27 in/hr which is the Rawls Rate for sand, while the NRCS soil mapping information provided identifies Hinckley loamy sand, which has a Rawls Rate of 2.41 inches per hour. We recommend the engineer provide test pit logs to justify the rate used.
74. We recommend an additional TSS removal calculation be shown for the runoff captured by catch basins within the westerly portion of the driveway to Forest Ridge Road.
75. On the Checklist for Stormwater Report, we recommend the subsurface infiltration and water quality structure be removed from the LID Measures. 310 CMR 10.04 defines Low Impact Development Techniques as “*innovative stormwater management systems that are modeled after natural hydrologic features*”, which these are not.

76. On the Checklist for Stormwater Report, Standard 5, we recommend the boxes for “The NPDES Multi-Sector General Permit does not cover the land use” and “All exposure has not been eliminated...” be checked.
77. The existing HydroCAD rainfall events used are NRCC 24-hr with curve ‘D’. We recommend these storm events be revised to Type III 24-hour as was used in the proposed HydroCAD and as required by CPW Standard 2.2.1.D.
78. The existing and proposed HydroCAD analyses include several subcatchments with a Direct Entry time of concentration of 6.0 minutes however, the Tc lines shown on the watershed plans suggest that some may in fact be longer than 6 minutes. We recommend that the engineer use a calculated Tc value for any subcatchment where it is greater than 6 minutes.
79. The existing HydroCAD model includes hydrographs which are still discharging near the peak runoff rate at the maximum time of 24 hours. We recommend the storm time increment be increased to capture the entire hydrograph. This will likely result in changes to the runoff volumes reported in the design point summary tables in Section 3.
80. In the existing HydroCAD, Pond 3P includes a Discarded outlet with a rate of 2.41 *cfs* at all elevations. We recommend the engineer correct this to reflect 2.41 *inches per hour*, which is the Rawls Rate for loamy sand.
81. The proposed HydroCAD total area is listed as 32.437 acres which does not match the 37.812 acre study area used in the existing HydroCAD. The total areas need to match to provide a true comparison between the pre- and post-development model.
82. In the proposed HydroCAD, Subcatchment P-8B includes a Tc calculation which differs from the calculation in existing Subcatchment E-8 though a large majority of those segments along the Tc path are unchanged. For consistency, we recommend the engineer revise the calculations to be the same within undisturbed areas.
83. In the proposed HydroCAD, several subcatchments include shallow concentrated flow time calculations for “unpaved surfaces”. We recommend that these be revised to either “grass” or “woodland” as these appear to be more appropriate.
84. In the proposed HydroCAD, we note that an infiltration rate of 8.27 in/hr is used in several ponds which is the Rawls Rate for sand. We recommend the engineer provide test pit logs to justify the rate used.
85. In the proposed HydroCAD, Pond 4P includes a Discarded outlet with a rate of 2.41 *cfs* at all elevations. We recommend the engineer correct this to reflect 2.41 *inches per hour*, which is the the Rawls Rate for loamy sand.
86. In the proposed HydroCAD, several ponds indicate a total inflow volume greater than the total outflow volume, suggesting that the entire storm hydrograph is not captured in the 0.00-24.00 hour time span analyzed. We recommend the time span be increased to capture all volumes.
87. We recommend that the drawing title for Sheet O&M-1 be revised. Currently it states Proposed Watershed Plan.
88. We recommend that the Operations & Maintenance Plan narrative be expanded to require that operations and maintenance inspection reports be maintained for at least the last three years and that copies of the reports from the preceding year be submitted to CPW Engineering annually.

89. The figure contained in the Operation & Maintenance Plan includes a callout for the existing infiltration basin in the woods north of the new entrance driveway. We recommend that the O&M Plan clarify if maintenance of this area will become the responsibility of the residential development or if it will remain the responsibility of the Thoreau Club. Further, we recommend that the location for access to this infiltration basin and to the infiltration basin opposite the south side of Building A be identified on this plan in accordance with the Checklist for Stormwater Report, Standard 9.
90. On the Existing Watershed Plan, we do not find Tc paths shown for E-5, E-6, or E-7. We recommend that these be added.
91. On the Existing & Proposed Watershed Plans, several subcatchments include off-site contributing areas, however, the associated Tc flow paths begin at the property line. We recommend the engineer evaluate the time of concentration paths for the longest time regardless of if these begin on or off-site.
92. We recommend the Tc path for P-8B be shown similar to that for E-8 within undisturbed areas.
93. We recommend a Rational Method Divide Plan corresponding to the pipe sizing analysis be added to the report in accordance with CPW Standard 2.2.3.D.

CPW Engineering has reviewed these comments and is in agreement. They have stated that they reserve the right to comment on future submittals related to any new or previously submitted information provided to the Town for review.

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

F:\Projects\NEX-2400043 - Concord, MA - 275 Forest Ridge Road Peer Review\Peer Review Letters\2400043_First Site Review LTR.docx