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September 18, 2019

Heather R. Shank, PLA, AICP - City Planner
Concord City Hall
41 Green Street
Concord, NH 03301

**RE: Conditional Use Permit – Disturbance to a Wetland Buffer
Unitil Gulf Street Substation
5 Gulf Street, Concord, NH
Tax Map 27, Block A1, Lot 8**

On behalf of our Client, Unitil Energy Systems, Inc. (Unitil), a conditional use permit for disturbance to a wetland buffer for a proposed substation expansion located on Gulf Street is requested.

The project proposes a removal, rebuild and expansion of the existing Gulf Street Substation, retiring vintage substation equipment and installation of new current technology electrical equipment. The substation upgrades will accommodate current and future load growth throughout the Downtown Concord Area.

The proposed project will require a disturbance to a wetland buffer per Section 28-4-3 of the Concord Zoning Ordinance. This section of the city ordinance requires the submittal of a conditional use permit application for “the recontouring or grading of the land, or the placement of impervious surfaces” within a wetland buffer. The proposed substation will require grading and expansion of the existing gravel substation yard within the 50-foot wetland buffer. Approximately 4,435 sq. ft. of wetlands buffer will be disturbed. All areas disturbed as part of this project were previously disturbed by the original construction of the Gulf Street Substation and adjacent Gulf Street.

Conditional Use permits may be granted under the circumstance that the proposed buffer impact meets the following conditions:

- The disturbance of the buffer is necessary to the establishment of an allowable principal or accessory use on the buildable land area of the lot. The proposed project is essential to the productive use of the land to provide reliable electrical service to the area. Rebuilding the existing substation over the footprint of the existing substation on land owned by Unitil provides the most efficient means of construction. The existing electrical infrastructure required to connect the new equipment, as well as the rights to do so, are already in place and can readily be tapped at the current Gulf Street substation location.
- The proposed disturbance to the buffer cannot practicably be located otherwise on the lot to eliminate or reduce the impact to the buffer and represents the minimum extent of disturbance necessary to achieve the reasonable use of those portions of the lot consisting of buildable land. The project has been refined to propose the least impacting layout that meets the needed electrical configuration for the rebuild of the substation and connection of the substation to the existing and rebuilt overhead electrical lines. Best management practices will be used during construction to minimize the impact to the site.
- The proposed disturbance to the buffer minimizes the environmental impact to the abutting wetland, and to downstream property and hydrologically connected water and wetland resources. The project

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has been refined to propose the least impacting layout that meets the needed electrical configuration for the rebuild of the substation and connection of the substation to the existing and rebuilt overhead electrical lines. Stormwater runoff from the substation yard will be collected via underdrains located within the yard and discharged to a stormwater management system consisting of an expansion of the existing infiltration basin and a proposed sediment forebay. The infiltration basin will be expanded to accommodate the potential of additional stormwater runoff associated with the substation rebuild. The sediment forebay is sized to adequately handle the anticipated stormwater flows. The stormwater management system has been designed to the City of Concord Design Standards, and there will be no increase in stormwater runoff from the site in pre- to post-development conditions for the storm events evaluated.

- Where applicable, wetland permit(s) have been received or are obtained from the NHDES and USACOE. No wetland permit(s) are required as no wetland impacts are associated with this project.
- Where applicable, permits or proof of compliance with all other state and/or federal regulations have been received or are obtained. No state or federal permits are anticipated for this project.

All conditions have been or are in the process of being met at this time. All standards of review have been considered and any supplementary engineering studies or analysis will be provided per Section 28-9-4.

Should there be any questions or concerns regarding this submittal or the project in general please do not hesitate to contact the undersigned at 472-4488 or ngolon@tfmoran.com.

Sincerely,
TFMoran, Inc.

A handwritten signature in black ink, appearing to read "Nicholas Golon". The signature is fluid and cursive, with the first name "Nicholas" and last name "Golon" clearly distinguishable.

Nicholas Golon, P.E.
Senior Project Manager