



The State of New Hampshire  
**Department of Environmental Services**



**Robert R. Scott, Commissioner**

**REQUEST FOR MORE INFORMATION**

September 30, 2025

Josh Gagne  
Manchester School District  
475 Valley Street  
Manchester, NH 03103  
(sent via email to: [jgagne@manchesternh.gov](mailto:jgagne@manchesternh.gov))

RE: Alteration of Terrain Permit Application #250822-151  
Southside Middle School  
75 Park Side Avenue – Manchester  
Tax Map 03, Block 96, Lot 008

Dear Mr. Gagne:

The New Hampshire Department of Environmental Services (DES) is in receipt of an application and supporting plans and information for an Alteration of Terrain (AoT) Permit for the above referenced project. After review of the information submitted, the following items need to be addressed for DES to make a **final determination** on the application for a permit:

1. Waivers:

NHDES hereby grants a waiver to the Site Specific Soil testing requirement, Env-Wq 1504.09(b)(3)b, due to the fact that this project is a redevelopment of an existing site where there is little variation in mapped soil types per USDA NRCS Web Soil Survey.

2. General Requirements:

Local Advisory Committee (LAC)

- The Piscataquog River Local Advisory Committee was notified of this project by DES on August 21, 2025. The Committee has 40 days to comment on the AoT application in accordance with Env-Wq 1503.18. Please be sure that DES has either received comments from the LAC or a letter stating that they will not be commenting on the application.

3. Application:

Section 10D.

- Provide a response.

Section 10F.

- Review impervious cover across all project documents. Additional impervious cover is noted as 0.923 acres here but 0.80 acres in GRV worksheet and 0.770 acres per comparison of pre- and post-development HydroCAD models.

Section 11. and Attachment A

- Complete checklists.

[www.des.nh.gov](http://www.des.nh.gov)

29 Hazen Drive • PO Box 95 • Concord, NH 03302-0095  
(603) 271-3503 • TDD Access: Relay NH 1-800-735-2964

4. Plans:

Existing Conditions Plan (C-101)

- Plans note that wetland delineation was performed in areas of interest identified for the project. However, no date was given for the field investigation. Note that field investigations must have occurred within the last 5 years. Otherwise, they would need to be revisited to certify the accurate representation of current conditions on the plans.
- In accordance with Env-Wq 1504.01(c&d), if the property does not contain any wetlands or water features, the plans shall be stamped, signed, and dated by a Certified Wetland Scientist (CWS) to include a statement that no water features were found on the property.

Site Preparation Plan (C-111)

- Remove proposed features from this plan as the intent is to show existing site demolition, limit of work, and perimeter controls.
- Review Legend relative to plan content. Observations include but are not limited to:
  - Limit of work linetype in legend does not match plan view.
  - “x” linetype assumed to be temporary construction fencing is not shown in legend.
  - Tree removal and temporary bituminous pavement have similar display properties.
- Plan does not show existing pavement sawcut lines.
- Provide project specific layout for silt barrier to resolve conflicts with crossing driveway entrances and being located uphill of proposed disturbances.
- Provide a construction entrance at the existing/proposed southern driveway curb cut.
- Provide a single construction entrance at the northern side of the site.
  - Review final location relative to existing features to remain (e.g. Sullivan Street).
- Revise references to detention basins and forebays in General Erosion Control Notes.

Layout & Materials Plan (C-121)

- Show pavement reconstruction necessary for the replacement of existing curb and sidewalk along Park Side Avenue.
- Show loop driveway as standard duty pavement.
- Define dashed lines on east side of existing building.
- Review feasibility of mill and overlay of pavement in play area and coordinate with pavement removal on Site Preparation Plan (C-111).

Grading & Utilities Plan I (C-131)

- Resolve pipe conflict between existing 24" RCP and Underground Filtration System 1.
- Resolve pipe conflict between existing 24" RCP and 15" HDPE connections at DMH 1.1.
- Provide contour labels on all proposed driveway contours.
- Provide additional grading information at driveway high and low points.
- Provide additional grading information at proposed driveway entrances.
- Provide additional grading information for proposed sidewalks to demonstrate whether they drain to Park Side Avenue or site stormwater systems. Revise Post-Construction Drainage Area Plan as necessary.
- Review appropriateness of noted inlet and outlet pipe elevation differences for proposed WQU design in accordance with Stormceptor Technical Manual.

Details I (C-501)

- Temporary Construction Entrance (A1)
  - Revise length or add berm in accordance with Env-Wq 1506.09(b).

Details II (C-502)

- Area Drain (G1)
  - Evaluate need for this detail.
- Subsurface Filtration System (G6)
  - Underdrains including stone envelope shall be entirely outside the required 24-inch filter course depth.
  - Review inlet and outlet pipe sizes relative to project plans.
  - Revise filter course specification to ASTM C-33 concrete sand. NHDOT Item 304.1 allows up to 30 percent of material to be retained on #4 sieve up to 6-inch diameter.
- Subsurface Infiltration System (H1)
  - Revise filter course specification to ASTM C-33 concrete sand. NHDOT Item 304.1 allows up to 30 percent of material to be retained on #4 sieve up to 6-inch diameter.
- Subsurface Filtration System (H6)
  - Underdrains including stone envelope shall be entirely outside the required 24-inch filter course depth.
  - Review inlet and outlet pipe sizes relative to project plans.
  - Revise filter course specification to ASTM C-33 concrete sand. NHDOT Item 304.1 allows up to 30 percent of material to be retained on #4 sieve up to 6-inch diameter.
- Outlet Control Structure (G10) and Outlet Control Structure with Orifices (C10)
  - Review and revise description and values for variable C and D.

Details III (C-503)

- Infiltration Trench (D1)
  - Detail is not specified in Drainage Analysis or Infiltration Feasibility Report.

5. Notes:

Please add the following notes to the plan set:

Wildlife Protection Notes (Env-Wq 1504.17)

- All observations of threatened or endangered species shall be reported immediately to the New Hampshire Fish and Game Department Nongame and Endangered Wildlife Environmental Review Program by phone at 603-271-2461 and by email at [NHFGreview@wildlife.nh.gov](mailto:NHFGreview@wildlife.nh.gov). Email subject line: NHB25-1647, Parkside Middle School, Wildlife Species Observation.
- Photographs of the observed species and nearby elements of habitat or areas of land disturbance shall be provided to NHF&G in digital format for verification as feasible;
- In the event a threatened or endangered species is observed on the project site during the term of the permit, the species shall not be disturbed, handled, or harmed in any way prior to consultation with NHF&G and implementation of corrective actions recommended by NHF&G, if any, to assure the project does not appreciably jeopardize the continued existence of threatened and endangered species as defined in Fis 1002.04
- The NHF&G, including its employees and authorized agents, shall have access to the property during the term of the permit.

Infiltration Systems

- Do not traffic exposed soil surface with construction equipment. If feasible, perform excavations with equipment positioned outside the limits of the infiltration system.
- After the infiltration system area is excavated to the final design elevation, the floor should be deeply tilled with a rotary tiller or disc harrow to restore infiltration rates, followed by a pass with a leveling drag.

- Do not place infiltration systems into service until the contributing areas have been fully stabilized.

## 6. Stormwater Management Report:

### General

- Display HydroCAD errors and warnings in accordance with Env-Wq 1504.09(b)(4).

### Project Narrative

- Provide a table summarizing the total runoff volume for the 2-year design storm.
- Provide a discussion of how the project complies with Channel Protection Requirements as set forth in Env-Wq 1507.05.

### BMP Worksheets

- Groundwater Recharge Volume (GRV) Calculation
  - Provide Stage-Area-Storage tables for infiltration practices showing storage below lowest outlet equal to or greater than required GRV.
- General Calculations – WQV and WQF
  - Provide WQF calculations for inflow to each pretreatment practice.
- Filtration Practice Criteria
  - Review area draining to the practice and impervious area draining to the practice for agreement with Post-Development HydroCAD Model.
  - Review Ewqv in relation to provided volumes.
  - Provide Stage-Discharge table for Pond 1P and 3P with underdrains.
  - Review elevation of top of the practice in relation to HydroCAD & Details II (C-502).
  - Review Designer's Notes for System 2 which notes infiltration in an area of high groundwater. Also, note design intent to draw down groundwater for System 1 and 3.

### Pre-Development HydroCAD Model

- Expand Subcatchment EX-2.0 & EX-3.0 to include the entire hillside tributary to project area.

### Post-Development HydroCAD Model

- Expand Subcatchment PR-2.1, PR-3.0, and PR-3.2 to include the entire hillside tributary to project area.
- Revise boundary between Subcatchment PR-2.1 and PR-3.0 consistent with Subcatchment EX-2.0 and EX-3.0.
- Split Subcatchment PR-1.0 into two separate subcatchments. One that includes runoff tributary to WQU 1.1 and a second that includes runoff to WQU 1.2. Also, provide delineations for CB1.6, CB1.9, and CB1.16 to demonstrate that tributary impervious area does not exceed 0.25 acres in accordance with Env-Wq 1508.16(a).
- Revise boundary between Subcatchment PR-1.0 and PR-3.0 consistent with proposed driveway high point adjacent to 194-foot contour.
- Split Subcatchment PR-2.0 into two separate subcatchments. One that includes runoff tributary to WQU 2.1 and a second that includes runoff direct to Park Side Avenue to include driveway and sidewalk runoff not collected by CB 2.3 and CB 2.5. Also, expand as necessary to include tributary area to 6" HDPE building connection to DMH 2.5.
- Revise
- Add outlet device to Pond 1P for 15-inch outlet pipe. Route Device #1 and #2 to this device.
- Add outlet device to Pond 2P for 12-inch outlet pipe. Route Device #1 and #2 to this device.
- Add outlet device to Pond 3P for 15-inch outlet pipe. Route Device #1 and #2 to this device.

Drainage Area Plans

- Do not display existing or proposed water and sanitary sewer lines.
- Label all ponds on Post-Construction Drainage Area Plan.

Hydrologic Soil Group Plans

- Provide plans prepared in accordance with Env-Wq 1504.09(g).

**7. Infiltration Feasibility Report:**

Provide the following information referenced in the report:

- Geoprobe exploration logs noted as contained in Appendix A (not provided).
- Boring logs as contained in Appendix B (not provided).
- Infiltration test boring logs as noted as contained in Appendix D (not provided).

**8. Inspection and Maintenance (I&M) Manual:**

General

- Tree Box filters are not proposed for this project.

**9. Revisions:**

Pursuant to Env-Wq 1503.15(b), changes to the revised plans are to be called out and a revision date must be added to each page that has been changed. Graphical revision callouts should be included on the plans. Provide a response letter stating how each individual comment in this RFMI has been addressed. Do not simply state “revised” or “addressed” if the comment required a design decision or additional analysis. If any changes to the project documents were made other than those requested in this RFMI that may be pertinent to this permit review, please provide a narrative describing these additional changes that were made in your response letter.

**10. Electronic Files:**

Pursuant to Env-Wq 1503.15(e), provide, in electronic format, a copy of all project documents that were modified in response to the request for more information. As a separate document, provide a copy of the complete application with all documents current to reflect any modifications from the original application. All documents shall be clearly visible and keyword searchable.

Please be aware that pursuant to RSA 485-A:17, **all the information requested above must be provided in a single and complete response within the next 120 days, by January 28, 2026, or your application will be denied.** Please include the file number on your response to this request, as well as a narrative of the changes from the current application. If you have any questions, please call me at (603) 271-3249 or email at: [Kevin.D.Thatcher@des.nh.gov](mailto:Kevin.D.Thatcher@des.nh.gov).

Sincerely,



Kevin D. Thatcher, PE, CPESC  
Alteration of Terrain Bureau

cc: Manchester Planning Board ([planningboard@manchesternh.gov](mailto:planningboard@manchesternh.gov))  
Laura Swan, SMMA ([lswan@smma.com](mailto:lswan@smma.com))

Hamdi Cobanglu, Leftfield Project Management (hcobanoglu@leftfieldpm.com)

Mark Gomez, City of Manchester (mgomez@manchesternh.gov)

Tim Clougherty, City of Manchester (tclougherty@manchesternh.gov)

John Magee, Piscataquog River Local Advisory Committee (mooseseer@tds.net)