



OLD NORTH BRIDGE

TOWN OF CONCORD FIRE DEPARTMENT

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January 4, 2021

Elizabeth Hughes, Town Planner
Town of Concord
141 Keyes Rd.
Concord, MA 01742

Elizabeth:

As has been the past practice with applications submitted to the Planning Board, the Fire Department was requested by you to review the plan, and to provide feedback in the form of comments and concerns relative to the safety of the public. Both Assistant Fire Chief Walter Latta and Fire Prevention Inspector Dave Nichols, received this request from you via email, and reviewed the plan together. As is the practice of the Fire Prevention Office, both Assistant Chief Latta and Fire Inspector Nichols contributed to the document submitted on October 21, 2020 on behalf of the Fire Department. Assistant Chief Latta was deployed out of state due to a federal disaster declaration for an extended period following our review. The comments were submitted by Fire Inspector Nichols with Assistant Chief Latta's approval and permission while he was away.

As you requested, below are the Concord Fire Department's Fire Prevention Office comments on the additional materials and revised plans submitted by applicant Quarry North Road, LLC dated December 22, 2020 as they relate to the mission of the Concord Fire Department. These comments are again the collaborative comments of Concord Fire Department staff: Fire Inspector Nichols, Assistant Chief Latta, and Fire Chief Thomas Judge.

In the December 22nd letter from the Applicant's attorney, he references a letter from the Sudbury Town Manager's to the Sudbury Select Board and attributes the following comments to Chief Judge:

"In fact, what the Concord Fire Chief has stated is very different. According to the Town Manager, in his letter to the Sudbury Select Board dated November 19, 2018, what the Concord Fire Chief stated was as follows: With regard to emergency / public safety response, the Concord Fire Chief notes that the proposed project is in the mutual aid response area for Concord's Station 2 apparatus (A3 located in West Concord) which currently has an ambulance that is staffed only

12 hours per day. When mutual aid is requested during hours that A3 is not staffed, response will come from Station 1, which is located in Concord Center. This is the current practice now for these communities.”

Followed by:

“The Chief went on to state that additional large-scale development as proposed for the site in Sudbury would increase the demand for emergency and public safety resources.”

All of what is quoted was somewhat accurate at the time; we have always had 24 hour fire apparatus coverage, and we now have 24-hour ambulance coverage in West Concord. Regardless, this does not take away from the reality that it is a long response for the Concord Fire Department to this proposed subdivision.

The Applicant’s attorney goes on to state in his response:

Thus, the Assistant Concord Fire Chief has not, as represented by staff, indicated that average emergency response time would be “extensive”. That statement is a misrepresentation. What the Concord Fire Chief himself has stated, on the record, is that the entire West Concord area is staffed by a substation 12 hours a day, and that when that substation is not staffed, response is by mutual aid. The Chief noted “this is the current practice now for these communities”. Since this is the current practice for all of West Concord, this should be the current practice for the applicant’s site. Any other position is utterly arbitrary.

The Assistant Chief’s statement is not a misrepresentation. There is nothing contradictory in the Fire Chief’s or the Assistant Chief’s comments. Yes, the Fire Department currently serves properties in the area, and yes, the response time is extensive, both are true. Also true, is that response time will be more extensive for a property located 1.3 miles further away from the location that the applicant uses as their point of reference (Attachment A).

Response time to this proposed subdivision was mentioned by the Fire Department as a concern. The attorney’s December 22, 2020 opinion to the Planning Board is completely inaccurate. He states:

“Immediately adjacent to the site, or located within 500 feet are (1) four single-family homes; (2) two commercial properties; (3) and a private country club with a large building far more “remote” than the proposed development.”

In fact, none of that is correct. In reviewing the location used by the applicant’s attorney to make these claims, it was clear from the maps provided in his response, found on pages 15 – 18 of the response, that he did not use the correct location. The location that the time analysis and the description above was derived from using “Google Maps” is on Fitchburg Turnpike in Concord on the easterly side of Garfield Road; between Garfield Road and Lee’s Bridge approximately 330 feet from the Lincoln town line (Attachment A). The location of the proposed subdivision is 1.3 miles from the location depicted in the applicants map (Attachment B).

The Nashawtuc Country Club Clubhouse is located approximately 1.3 miles from the start of the proposed access road on Rte. 117 in Sudbury (and has a monitored sprinkler system, a monitored fire alarm system, a professional staff on site during business hours, and no permanent population). There are no Concord homes or businesses immediately adjacent to the proposed subdivision.

The information source used, Google Maps, is a web mapping service, and is not intended to accurately depict fire department response times. This service calculates normally expected Drive Time and Distance. The nationally recognized standard used for determining fire department response times is documented in *NFPA 1710: Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments*. This standard recognizes that Alarm Answering Time, Alarm Processing Time, Turnout Time, First Engine Arrive on Scene Time, and Initial Full Alarm Time all factor in to calculating Total Response Time. The Fire Department estimates a potential Total Response Time to this subdivision from both Concord fire stations to be as much as 15 minutes.

Regarding the statement in which the Applicant's attorney asserts:

"The effort by staff is clearly to create the impression that a public safety concern is presented by the creation of one lot in Concord. This has no basis in fact, and if such a public safety concern exists here, it exists for all of West Concord, the four single-family houses adjacent to the site, the two commercial businesses adjacent to the site, and the large private Country Club adjacent to the site whose clubhouse is further away from the Concord fire stations."

The effort by staff is to present a clear picture of Fire Department concerns with the long response time and potential for loss of life and property and presents the information in this letter as a factual opinion without bias.

The turning analysis submitted by the applicant utilizes the dimensions and specifications of a Sudbury Fire Department vehicle, and therefore is not accepted. In accordance with the Massachusetts Fire Code Chapter 18 the fire department requested a turning analysis utilizing the dimensions and specifications of the Concord Fire Department's largest vehicle, Ladder 1.

18.1.1.4 The fire apparatus access road plans must include an analysis and evaluation of fire apparatus maneuvers throughout the access roads created by swept path analysis and turn simulation software.

18.2.3.4.3.1 The minimum inside turning radius of a fire department access road shall be 25 feet. The AHJ shall have the ability to increase the minimum inside turning radius to accommodate the AHJ's apparatus.

Concord Fire Chief Thomas Judge spoke with Sudbury Fire Chief John Whalen about the statement attributed to him:

“Finally, the Sudbury Fire Chief has indicated directly to the applicant that, if for any reason Concord cannot respond to the site, that Sudbury will respond...”

This may be semantics, but according to Chief Whalen, what he said was that Sudbury Fire would be available to respond upon request of Concord Fire. This is no different from any other arrangement with all of our mutual aid partners. Mutual aid would be provided if the Sudbury Fire Department were available to respond at the time.

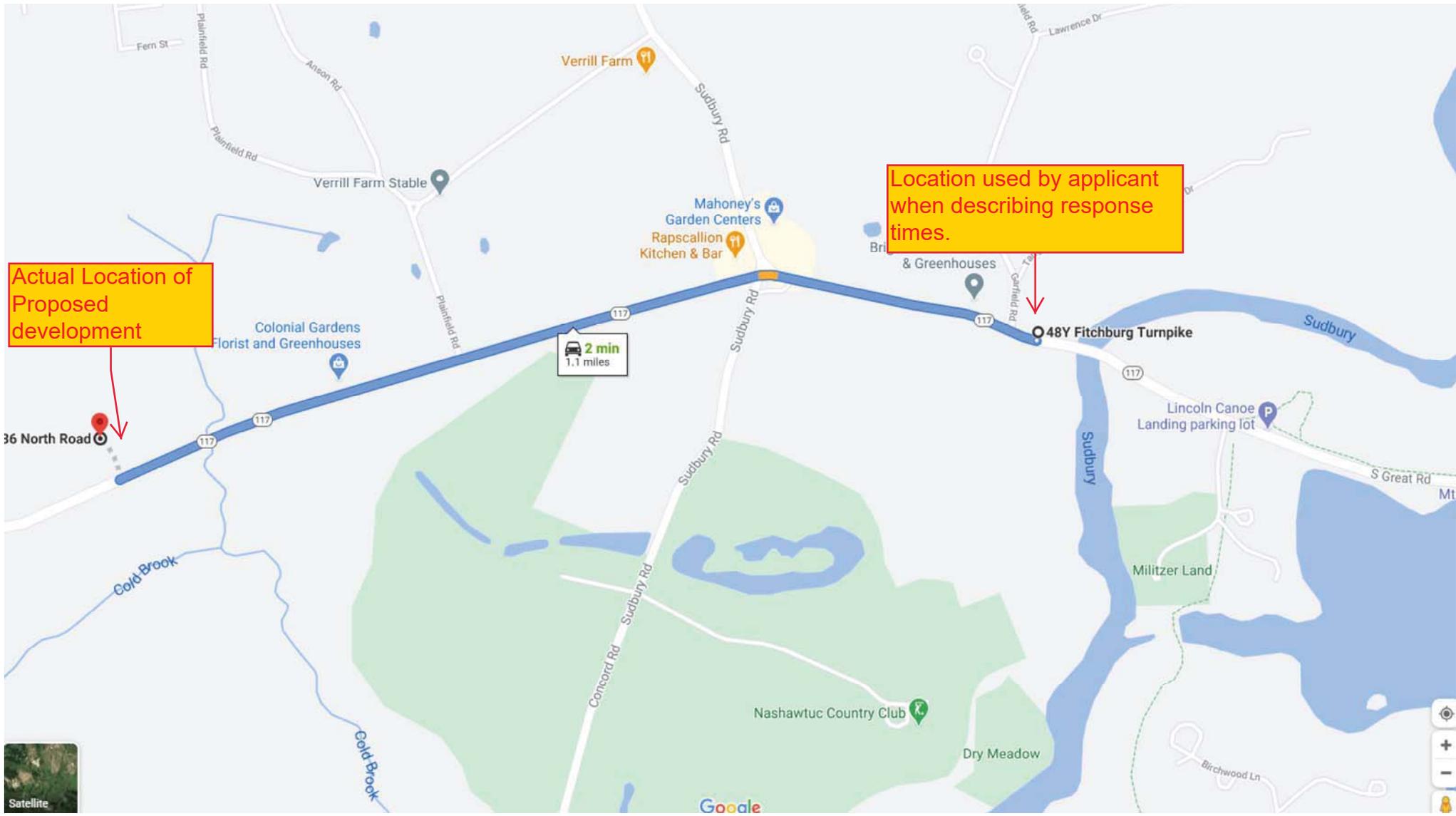
I hope that this additional information will help clarify the comments and concerns submitted by the Fire Department with respect to this proposed subdivision.

A handwritten signature in black ink, appearing to read 'Thomas M. Judge'.

Thomas Judge
Fire Chief

Attachment A





Actual Location of Proposed development

Location used by applicant when describing response times.

2 min
1.1 miles

Satellite

Google