



TOWN OF CONCORD
Division of Natural Resources
141 Keyes Road, Concord, MA 01742
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To: Christine Zale, Senior Planner
From: Delia Kaye, Natural Resources Director
Re: Concord Country Store LLC, 166 Commonwealth Avenue, Special Permit with Site Plan Review
Date: March 2, 2026

The NRC is currently reviewing the proposed project under a Notice of Intent filed on December 23, 2025 (DEP File No. 137-1729). The applicant presented the project to the NRC on January 28, 2026 and February 18, 2026 and the hearing has been continued to April 1, 2026.

The Natural Resources Commission (NRC) and Division staff have reviewed the following plans:

- Proposed Site Plan Documents, Country Store and Fuel Station, 166 Commonwealth Avenue, prepared by Bohler, last revised February 5, 2026.
 - Invasives Species Management Plan, 166 Commonwealth Avenue, prepared by Goddard Consulting, LLC, dated February 4, 2026.
1. An invasive species mitigation plan is needed. *Comment partially addressed. A plan has been submitted. Mechanical removal and herbicide treatment are proposed within the 25-foot NDZ and 200-foot Riverfront Area for management of tree of heaven, Japanese knotweed, and bush honeysuckle. Herbicide treatments proposed include cut and dab, basal bark application, stem injection, and foliar herbicide spraying. Foliar spray should be removed from the ISMP. The waiver request for work in the 25-foot NDZ should be updated to reflect include invasives species management.*
 2. Snow storage should be shown on the plan and outside the 50-foot No Build Zone. *Comment partially addressed. The proposed snow storage shown on the Site plan is not clearly defined and appears to be at or over the landscape plantings.*
 3. A note should be added to the existing tree to be saved specifying replacement if it can't be saved. *Comment addressed. A tree protection / replacement note has been added to EXDM to match Landscape note.*

4. The proposed tree protection detail is inadequate. Please replace the proposed tree protection with the Town of Concord tree protection detail. *Comment partially addressed. The landscape plans have been revised accordingly, but sheet C-802 still shows a different tree protection detail.*
5. Provide a detail of the underground infiltration trench & confirm landscape treatment is appropriate. *Comment addressed. Infiltration Trench detail is located on Sheet C-903. Landscape treatment above infiltration trench has been updated and is reflected on sheet L-101*
6. Adjust the application to call out the amount of floodplain we are filling. *Comment addressed. WPA Form 3 updated. Specifically, Section B was revised to update volumes for 'Bordering Land Subject to Flooding'.*
7. The floodplain fill and floodplain storage table on Sheet C-401 is confusing. Please revise the table to indicate SF and CF of floodplain fill and compensatory storage. Please provide calculations for review. *Comment outstanding.*
8. Shield the light to minimize the spillage to the buffer zone. *Comment addressed. Lot lights have been shielded to minimize spillage to buffer. Sheet L-201.*
9. Add a note to the lighting plan that the lights need to be "wildlife friendly lights". *Comment addressed. Revised (5) pole light fixtures to be 2700K to be wildlife friendly. Sheet L-201.*
10. Some of the proposed plantings are not native and/or are cultivars of native species, including Arctic Fire red twig dogwood (*Cornus sericea 'farrow'*) and Eastern bluestar (*Amsonia tabernaemontana*). *Comment addressed.*
11. Please consider switching the location of the trash dumpster and the HC parking spot so that the dumpster is further from the brook. *Comment addressed. Switching the location is not feasible due to compliance with accessibility codes.*
12. What is the purpose of the riprap to the north of the building? *Comment addressed (to prevent the potential of erosion. There is a 1:1 slope at the corner of the ADA parking stall).*
13. What is "Proposed LSA" in the vicinity of the planting area near the brook? *Comment addressed. It is an abbreviation for "landscaped area" and has been added to the legend on sheet C-201*
14. Please provide the square footage of the area to be planted so that the proposed plantings' compliance with the NRC's spacing criteria can be confirmed (10-foot OC for full size trees and 5-foot OC for full size shrubs). *Comment outstanding. Although the site rendering showing landscaped areas is a helpful visual, please provide spacing of proposed plantings and calculate the total square footage of plantings within jurisdictional areas.*

15. Can softer engineered solutions other than riprap be considered for the section of perforated pipe and the outfall? *Comment addressed. The rip rap associated with the perforated pipe is underground and won't be seen from the surface. The rip rap will minimize the potential for erosion.*

Please note that it is our understanding that the proposed stormwater management and floodplain calculations review will be managed through the Site Plan Review process.