

Town of Concord
Zoning Board of Appeals
c/o Elizabeth Hughes, Town Planner
22 Monument Square
Concord, MA 01742
ehughes@concordma.gov

Re: Comments Following ZBA Site Visit (3-9-24) - Natural Resource Losses

Elizabeth,

We appreciated the opportunity to be part of the March 19 site visit, where we all were briefed by the applicant on the project's siting footprint and open space coverage. However, during and after the visit we were deeply troubled by what we and others learned about the current proposed siting of the project and the consequential impacts on natural resources. Such impacts are at odds not only with sustainability goals of the Town, but also possibly with State and Federal laws protecting natural resources. We write with the hope that the project can be significantly revised so that the ZBA and the community can support what is finally planned rather than oppose the project.

One major consequence of the proposed project is the massive loss of trees - likely in the many 100s if not 1000 - and forest habitat which will result from destruction and filling in of the natural ravine proposed at the problematic roadway entrance at the rotary. Rather than destroying the ravine and wooded habitat therein, it seems logical, far less destructive, and far more cost effective for the project to use the existing dirt road or graded and paved Camp entrance at the existing parking lot. We suggest that all involved seriously discuss flexibility and examine this entrance option. Using the existing entrance would also reduce some real safety concerns at the rotary that others expressed in writing and again during the site visit.

Our greatest concerns, however, pertain to the siting of the project and consequential damages to natural resources. As now configured, the massive project is set back on the property, many hundreds of feet from the road and beyond the existing building at the parking lot. The current project siting "pushes" the project hundreds of feet into the valuable wooded hillside on the backside (eastern side) of the parcel. This siting will result in: a-the total leveling of the wooded hills, now part of the natural landscape, with, b- loss of soils and soil coverage, (i.e., natural resource damages) resulting in, c- unknown impacts and damages to groundwater - another natural resource - within the groundwater conservancy district zone; d- loss of natural ecological habitat including, e- an additional loss of hundreds of mature trees.

The ecological habitat and groundwater protection losses are accompanied by the aesthetic insults to the area. The current siting and severe grading, as now planned, begins to come close to the signature, important, protected historical Powder Mill ruins and its

surrounding natural habitat, thus decreasing the human use and enjoyment of that historic resource to those frequenting the Town's conservation area and its trails. In their February 26, 2024 letter to the ZBA the Historical Commission has asked the applicant to examine this potential consequence, as a result of the project being "located on the former site of the American Powder Mills".

In light of these potential dramatic and consequential changes to the wooded landscape and enjoyment of same, and clear loss of and potential damages to natural resources, We would like the ZBA to request 1- that the applicant to seriously consider a shift of the project site much closer to the front parking area; i.e., where the existing building, slated for demolition, is now sited. 2- that the applicant seriously consider using the remaining open field area between between the current project site on Thoreau Cub and to reorient the rear building location to the open area (or eliminate it in its entirety), again to curtail the encroachment of the construction and destruction of the eastern wooded hillsides.

While we still believe that there are significant problems with the oversized scale of the proposed project, which hopefully are also being addressed by the ZBA, these suggested siting revisions would limit the destruction of valuable open space and natural resources therein. These revisions would also make more efficient use of areas at the front of the property near the roadway, which have already been altered.

Lastly, a further benefit of such a shift in project siting would be to lessen the noise, dust, and other impacts of actual construction on the adjacent Thoreau Hills neighbors.

Thank you.

Thoreau Hills Residents

Paul Boehm

11 Ridgewood Road

John Palusci

56 Border Road

Brian Burkhard

345 Border Road