

February 5, 2026

Town of Concord
Natural Resources Commission
141 Keyes Road
Concord, MA 01742

**RE: Notice of Intent – NRC Response to Comments
Proposed Country Store and Fuel Station
166 Commonwealth Avenue
Concord, MA**

Dear Members of the Commission:

On behalf of the Applicant, Concord Country Store LLC, Bohler is submitting a response to comments received from the Natural Resource Commission during the 1/28/2026 meeting as well as comments received from the Natural Resource Division on 1/22/26 and 1/28/26.

The following materials are provided for the Natural Resources Commissions review and consideration:

- Two (2) copies of this Response to Comment letter;
- Two (2) copies of the revised WPA Form 3;
- Two (2) copies Invasive Species Management Plan, prepared by Goddard, dated 2/4/2026
- Site Plan Documents prepared by Bohler revised through 2/5/26 (**provided electronically**)

Summary of Updates:

- Site Plans
 - 'LSA' label is located within the Legend. Sheet C-102
 - Added tree protection / replacement note to sheet C-201 to match landscape note.
 - Added snow storage outside of 50' buffer. Sheet C-301.
 - Removed rip-rap hatching from infiltration trench area. The system is sub-surface. Sheet C-301.
 - Infiltration Trench detail is located on Sheet C-903
- Landscape Plan
 - Swapped non-native species to native. Sheet L-101
 - Added plantings above infiltration trench. Sheet L-101
 - Updated callout for existing tree to be protected and proposed replacement if unable to be preserved during construction. Sheet L-101
 - Updated tree protection detail to Town of Concord detail. Sheet L-102
- Lighting Plan
 - Shielded lot lights to minimize spillage to buffer. Sheet L-201
 - Revised (5) pole light fixtures to be 2700K to be wildlife friendly. No impact to footcandle values. Sheet L-201.
- Revised WPA Form 3.
 - *Section B was revised to update volumes for 'Bordering Land Subject to Flooding'. The cumulative flood storage added is still 35.6 CF*

Comments received from Natural Resources Commission meeting on 1/28/26 are provided in normal text. Bohler's responses are in **bold** text.

1. An invasive species mitigation plan is needed.
BOHLER: Goddard Consulting has prepared an Invasive Species Management Plan which is included with this submission.
2. Snow storage should be shown on the plan and shown outside of the 50 foot buffer zone.
BOHLER: Snow storage has been added outside of 50' buffer. Sheet C-301.
3. A note should be added to the existing tree to be saved specifying replacement if it can't be saved.
BOHLER: A tree protection / replacement note has been added to EXDM to match Landscape note. Refer to sheets C-201 & L-101.
4. Provide a detail of the underground infiltration trench & confirm landscape treatment is appropriate.
BOHLER: Infiltration Trench detail is located on Sheet C-903. Landscape treatment above infiltration trench has been updated and is reflected on sheet L-101
5. Adjust the application to call out the amount of floodplain we are filling.
BOHLER: We have revised WPA Form 3. Specifically, Section B was revised to update volumes for 'Bordering Land Subject to Flooding'. The cumulative flood storage added is still 35.6 CF
6. Shield the light to minimize the spillage to the buffer zone
BOHLER: Lot lights have been shielded to minimize spillage to buffer. Sheet L-201
7. Add a note to the lighting plan that the lights need to be "wildlife friendly lights"
BOHLER: Revised (5) pole light fixtures to be 2700K temperature to be wildlife friendly. No impact to footcandle values. Sheet L-201.
8. Add a note to the legend that "LSA" = landscape area
BOHLER: 'LSA' label is located within the Legend. Sheet C-102

Comments received from Delia Kaye, Natural Resources Director on 1/28/26 via email are provided in normal text. Bohler's responses are in **bold** text.

1. There are several invasive species adjacent to Nashoba Brook. Please provide a plan for invasives removal.
BOHLER: Goddard Consulting has prepared an Invasive Species Management Plan which is included with this submission.
2. Please consider switching the location of the trash dumpster and the HC parking spot so that the dumpster is further from the brook.
BOHLER: Switching the location is not feasible due to compliance with accessibility codes as we wouldn't then be able to provide an accessible connection to the sidewalk.
3. What is the purpose of the riprap to the north of the building?
BOHLER: To prevent the potential of erosion. There is a 1:1 slope at the corner of the ADA parking stall.
4. What is "Proposed LSA" in the vicinity of the planting area near the brook?
BOHLER: It's an abbreviation for "landscaped area" which is further defined on the landscape plans and has been included in the legend on sheet C-201

5. Please provide the square footage of the area to be planted so that we can confirm that the proposed plantings meet the NRC's spacing criteria (10-foot OC for full size trees and 5-foot OC for full size shrubs).

BOHLER: Areas were provided via email on 1/28/26. Please let us know if there is any further information needed.

6. Can softer engineered solutions other than riprap be considered for the section of perforated pipe and the outfall?

BOHLER: The rip rap associated with the perforated pipe is underground and won't be seen from the surface. The graphic is a little misleading and has been updated. However, the rip rap to the river is critical to minimize the potential for erosion and I would not recommend removing it.

Comments received from Rose Kaforski, Assistant Natural Resources Director on 1/22/26 via email are provided in normal text. Bohler's responses are in **bold** text.

1. Some of the proposed plantings within the 25-ft No Disturb Zone are not native and/or are cultivars of native species, including Arctic Fire red twig dogwood (*Cornus sericea 'farrow'*) and Eastern bluestar (*Amsonia tabernaemontana*).

BOHLER: Landscape sheet L-101 has been revised accordingly.

2. The proposed tree protection detail is inadequate. *Please replace the proposed tree protection with the Town of Concord tree protection detail.*

BOHLER: Landscape sheet L-101 and L102 have been revised accordingly to reflect the Town's detail.

3. Please submit the Field Data Sheets associated with the March 7, 2025 wetland delineation to accompany the submitted Wetland Border Report.

BOHLER: No data sheets were collected for the delineation since only the Mean Annual High Water line of Nashoba Brook was delineated and there is no BVW delineated on site that would constitute use of the field data forms. Upgradient of the stream on-site to the south consists of rock wall and forested upland.

4. The Planning Board will hear the application on February 2 with a recommendation to the ZBA for a Special Permit. Stormwater management review will be handled under the Planning Board's Site Plan Review.

BOHLER: Acknowledged.

We trust the materials provided are sufficient for your review. We look forward to presenting the application to the Commission at the 2/18/26 NRC meeting. In the meantime, please contact us at 508-480-9900 if you have any questions or need additional materials.

Sincerely,

BOHLER, LLC



Eric Dubrule, PE



John Kucick, P.E.