

Concord Planning Board  
141 Keyes Rd., 1<sup>st</sup> Fl  
Concord, MA 01742

Dear Chairperson Miller and Planning Board Members,

The West Concord Advisory Committee (WCAC) has reviewed the development plans prepared by Spruhan Engineering P.C. for 166 Commonwealth Ave, submitted by Thomas Falwell of Comins & Newbury LLP. The developers have joined two of our recent WCAC monthly meetings to present the plans to us and we have been able to give feedback and ask them questions.

The idea of this development, which proposes to add much-needed multi-family condo units, a restaurant, and additional retail space near the West Concord Commuter Rail and the Bruce Freeman Rail Trail, holds promise for increasing the vibrancy of the West Concord Junction Cultural District. However, its core details warrant further discussion.

One cannot develop a lot successfully in or next to a Cultural District piecemeal, without considering how it interacts with the existing structures and roadways. The proposed plans need to more fully show how this project integrates with other adjacent properties, driveways, and parking lots in the Cultural District.

The entire reason for West Concord becoming a Cultural District in the Commonwealth (which happened here in 2016), is to encourage holistic thinking about the Junction and to improve its pedestrian, resident and visitor experience. We are excited about the prospect of 166 Commonwealth Ave., with its prominent placement at the western edge of the Junction, becoming an appealing gateway to our town center. The current plans are not setting it up to fill that role.

The proposed design of 166 Commonwealth Ave. doesn't meet the priorities of the community: to encourage pedestrian activity, reduce motor vehicle traffic intensity, and encourage people of all ages to explore the independent shops and restaurants that West Concord Junction offers. We are hopeful that the concerns we're expressing in this letter can be addressed with modifications to the developer's plans.

The proposed development of this important site highlights the need to update zoning to better support the Cultural District, particularly related to parking location and requirements, signage that identifies parking availability, lighting in parking areas, and traffic circulation. West Concord has existing centrally located parking lots (Commuter Rail lot and Maple St./Bradford St. lot) that with better signage and clearer understanding of who can occupy the spots at what time(s), could potentially meet parking needs for businesses in the Junction. This would be a similar approach to the way the Concord Town lot, Walden St. lot, and Crosby's Market lot are available to retail and restaurant patrons in Concord Center.

We have the following specific concerns and questions about the 166 Commonwealth Ave site plan:

1. Per Concord's zoning bylaws, the 10 residential units being proposed should include 20% affordable units, which would equal 2 affordable units in this case. The developer didn't discuss the mix of market rate and affordable residential units with us, but has verbally stated to the Planning Board that their current plan provides for 1 affordable unit.
2. The proposed entrance to the parking area for the building is next to the separate entrance to the 152 Commonwealth Ave parking lot and across from the Minuteman Automotive entrance. It creates a perilous 5-way intersection in a location that doesn't have stop signs or a traffic light. It would be highly advisable to have one driveway that serves both 152 Comm Ave. and 166 Comm Ave. rather than two separate driveways for buildings that are right next to each other. The developer told us that they haven't been successful in coordinating with the owners of 152 Comm Ave. on driveway sharing. See Figure 1 or [Google Maps Street View of this location](#).

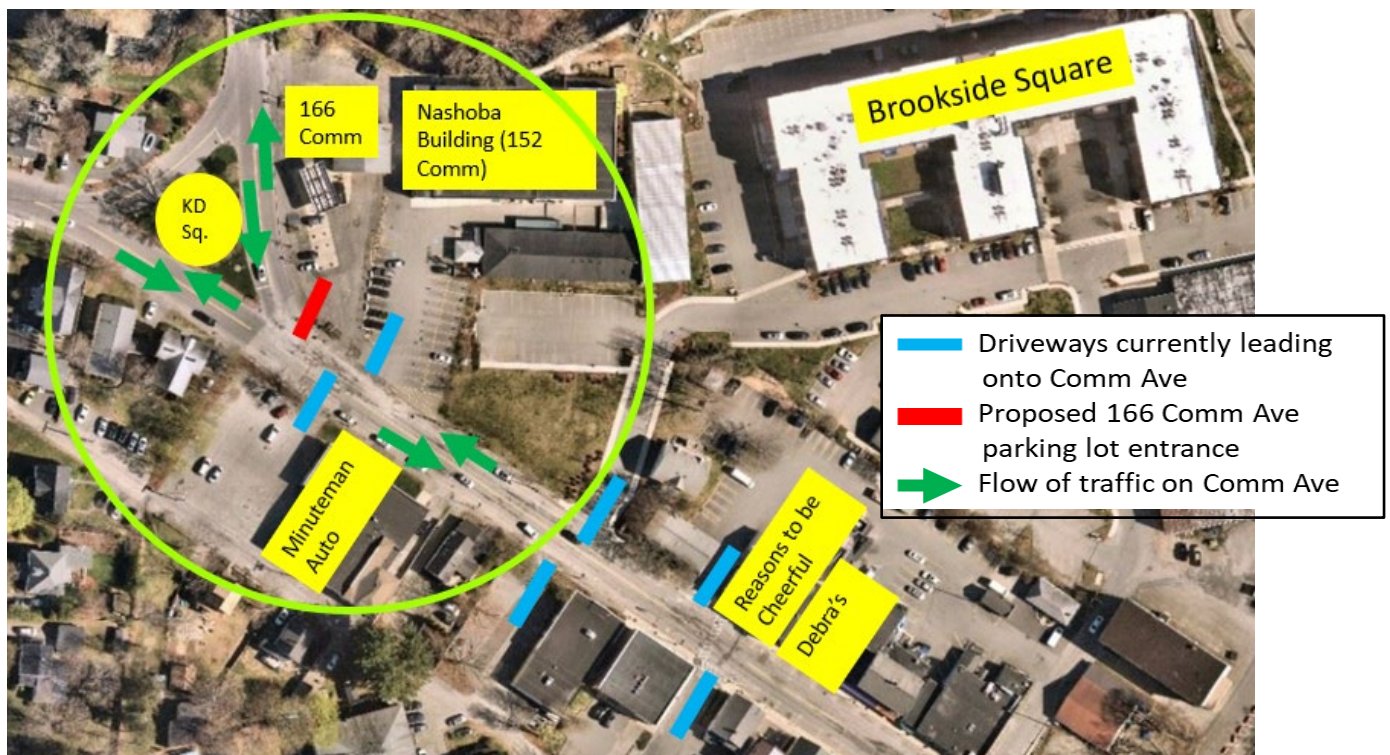


Figure 1. Drone view of the location of 166 Commonwealth Ave. with respect to other buildings, roadways, and parking entrances

3. The entrance to the proposed building's parking lot isn't wide enough for a large truck to turn around. Given the plan for a restaurant on the first floor of the building, it's predictable that trucks would visit frequently to deliver food and supplies. The building's dumpster would likely be emptied using a truck. The only way for a truck to leave the lot would be to back up into Commonwealth Ave. traffic in the middle of a 5-way intersection. This will be frustrating for other users of the road and will cause even more traffic chaos than currently exists in the Kenneth Dunn Square area. See page 2-3 of [166 Commonwealth Ave - Floor Plans, Elevations and Renderings](#)
4. When occupied, parking spots 1 and 2 will block the view of a driver or cyclist attempting to turn out of the parking lot onto Commonwealth Ave. See page 2-3 of [166 Commonwealth Ave - Floor Plans, Elevations and Renderings](#)
5. The placement of the building's parking lot along Commonwealth Ave. prioritizes parked vehicles in comparison to the building and is unwelcoming to pedestrians. In the West Concord Junction Vision Statement in the [West Concord Junction Design Guidelines Preamble](#), we say that new development should, among other things:
  - Prioritize pedestrians over automobiles and parking lots
  - Reinforce the Junction's coherent sense of place
  - Be welcoming to all people

Parking should be set back from the street and sidewalk or concealed so the building, not the parking, is the main focus of the parcel. We were all reminded about this as a best practice when the recently-created Thoreau Depot design guidelines emphasized this approach for the area around the Commuter Rail station in Concord. For most other mixed-use buildings on Commonwealth Ave in West Concord, their associated parking is in the rear of the building. See page 2-3 of [166 Commonwealth Ave - Floor Plans, Elevations and Renderings](#)

6. Given the site's size and shape, 166 Commonwealth Ave. as a future mixed-use development is at risk of becoming a parking lot surrounding a building whose design is distorted to meet parking requirements. This isn't consistent with our vision for West Concord Junction. We acknowledge that the amount of parking spaces included in the current plan will likely not fully serve the residential, restaurant, and retail needs of the building. The developer's parking relief request relies on Rideout Park municipal parking and street parking as overflow parking for the restaurant and/or visitors to the building. These overflow parking locations may not be available. Can a different parking solution be found, such as creating underground or podium parking for the building, offering building residents the option of renting extra parking spots elsewhere in the Junction, or installing signage that directs 166 Commonwealth Ave restaurant visitors to legal parking alternatives that are a short distance away? Ideally, parking requirements shouldn't constrain developing this lot given its proximity to the Bruce Freeman Rail Trail, the Commuter Rail, and other parking options that are nearby. However, our committee, the public, and business owners in West Concord are concerned that if the

offsite parking needs of this proposed development are not solved, there will be too much parking competition in the immediate area.

7. The current building design proposes an entrance across from Kenneth Dunn Square, facing west where traffic is heavy and loud, to serve the building's residences and also its restaurant/patio. This west entrance is also designated as the handicapped accessible entrance for the restaurant, though the handicapped parking spots for the building are at its south entrance. People with mobility challenges will likely find it frightening, unsafe and inconvenient to attempt to enter the restaurant at the west entrance to the building given the volume of motor vehicle traffic passing close to that entryway. See Figure 2 and page 3 of [166 Commonwealth Ave - Floor Plans, Elevations and Renderings](#)



*Figure 2. View from West side of 166 Commonwealth Ave lot, where restaurant entrance and handicapped entrance to building would be located*

8. Related to the orientation of the restaurant, the outdoor patio and windows will face west onto the northbound part of Commonwealth Ave (which connects to Rt. 2) rather than showcasing the view of Nashoba Brook from the building. The restaurant should be oriented to prioritize views of the greenspace adjacent to Nashoba Brook rather than views of Kenneth Dunn Square traffic. The remaining part of the building's first floor facing Nashoba Brook is devoted to bike storage, which also doesn't capitalize on this lot's view of the Brook. See page 3 of [166 Commonwealth Ave - Floor Plans, Elevations and Renderings](#)
9. The proposed crosswalk across Commonwealth Ave north of Kenneth Dunn Square doesn't connect with anything on the other side of the street (Laws Brook Rd.). There isn't a sidewalk there for the crosswalk to join up with. Will the developer install a new sidewalk as part of this project? See page 2 of [166 Commonwealth Ave - Floor Plans, Elevations and Renderings](#). This is a dangerous area for pedestrians. While there's been a Mass Works grant proposal submitted for improvement to sidewalks around Kenneth Dunn Square, the proposed Mass Works improvements don't cover the area this far north on Commonwealth Ave. The recording of the [WCAC's June 7, 2023 meeting](#)

[starting at 36:43](#) provides a description of the proposed changes to Kenneth Dunn Square should the grant be approved. The grant application can also be obtained from Concord Public Works.

10. The dumpster for the building will be placed in clear line of sight from the east/west portion of Commonwealth Ave, creating an unattractive viewing experience for pedestrians and drivers. This is inconsistent with the [West Concord Design Guidelines Preamble](#). See page 3 of [166 Commonwealth Ave - Floor Plans, Elevations and Renderings](#)
11. There is a sidewalk shown on the site plan. The existing sidewalk is broken/non-existent, sloping and in poor condition. Will the developer install a new sidewalk as part of this project? See page 2 and 3 of [166 Commonwealth Ave - Floor Plans, Elevations and Renderings](#)
12. Since the proposed development is next to Nashoba Brook, we want to check that the placement of the building on the lot and the proposed amount of impervious surface is allowable next to waterways and/or wetlands. We haven't seen any information on this one way or the other. We realize that nearly the entire lot is currently paved, however different regulations than what existed in the past may apply to its re-development.
13. On the next page, Figure 3 shows a map of reported motor vehicle accidents that had over \$1,000 of damage from Jan. – July 2023, provided by Town of Concord Public Safety Officer, Ron Holsinger. It shows how dangerous the half mile of road from Main Street down Commonwealth Ave to Kenneth Dunn Square is. We are concerned that adding a high-volume driveway on the edge of Kenneth Dunn Square, which expands the intersection to serve 5 directions of traffic, will exacerbate an already safety-challenged location in the Junction.

In addition, we have gathered overall reported motor vehicle accident data for 2022 and 2023. It seems that 16-17% of the accidents in West Concord occur on Commonwealth Ave or Laws Brook Rd., either at the intersection of these streets or on each roadway. In the last year and a half, accidents in West Concord have been higher overall than they are in Concord. We would hope to *reduce* accidents with the redevelopment of 166 Commonwealth Ave. We are concerned that the proposed plan, which will increase the frequency of turning from and onto Commonwealth Ave, will increase accidents between motorists, not to mention motorist encounters with pedestrians and cyclists. See Figure 4.



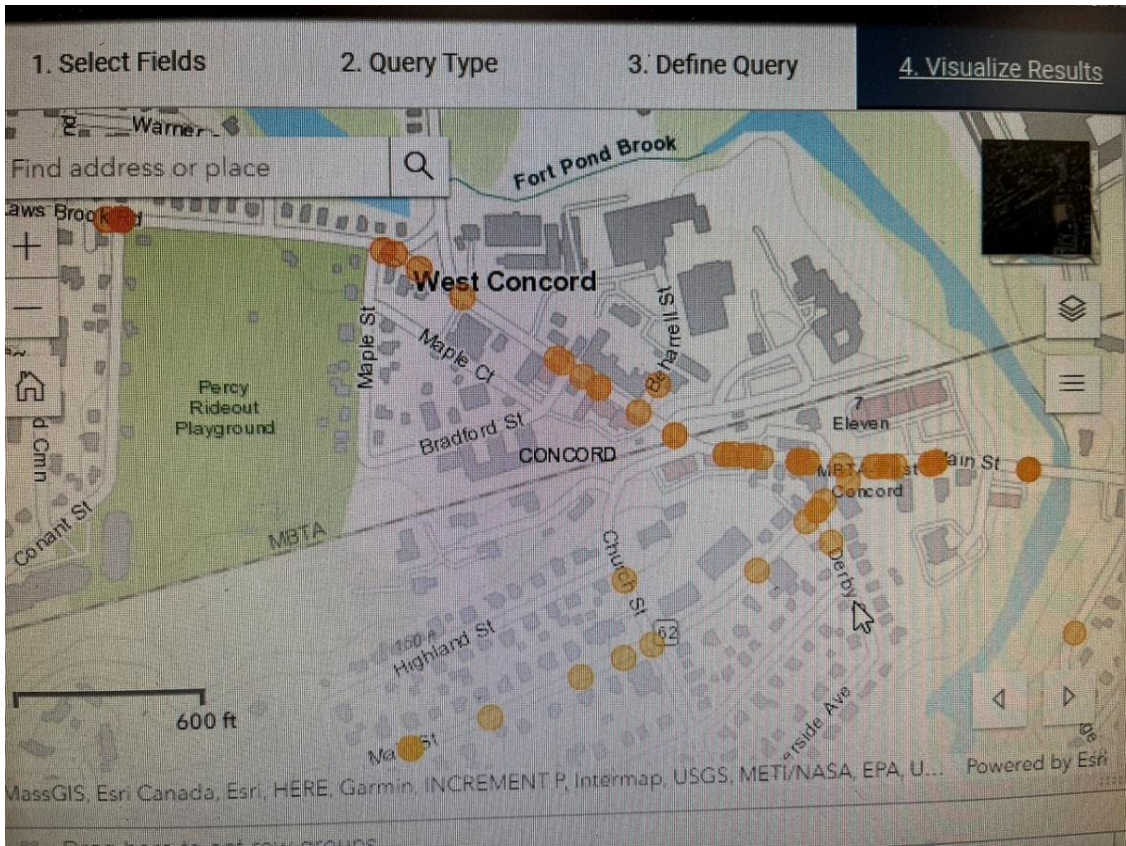


Figure 3. Reported motor vehicle accidents with over \$1000 in damage in the vicinity of West Concord Junction, Jan. – July 2023.

Year	Concord Accidents	West Concord Accidents	Commonwealth Ave. and Laws Brook Accidents (subset of West Concord Accidents)	Percent Comm/Laws Brook Accidents of overall West Concord
2023 YTD	48	88	14	16%
2022	105	128	22	17%

Figure 4. Reported motor vehicle accidents in Concord and West Concord, 2022 and 2023 YTD.

Our committee hasn't had the opportunity to review the façade and external appearance of the proposed building as we've been focused on basic concerns such as building position on the lot, parking, and circulation. We are happy to weigh in on other aspects of the project at the

appropriate time. We look forward to continuing the dialogue about this project with the developer, the Planning Board, and the ZBA.

Respectfully submitted,  
The West Concord Advisory Committee