



**TOWN OF CONCORD**  
**DIVISION OF NATURAL RESOURCES**  
**141 KEYES ROAD, CONCORD, MA 01742**  
**TEL: (978) 318-3285 FAX: (978) 318-3291**

October 6, 2023

Theo Kindermans, Chair  
Concord Zoning Board of Appeals  
Concord, MA 01742

**Re: Site Plan and Special Permit Review – 166 Commonwealth Avenue (Assessors Map 2184-2)**

Dear Mr. Kindermans,

On behalf of the Natural Resources Commission (NRC), please see below comments relating to the proposed redevelopment of 166 Commonwealth Avenue.

1. A Notice of Intent was submitted to the NRC for the redevelopment of the above-referenced parcel and is currently under review. A public hearing was opened on June 28, 2023 and has been continued to October 11, 2023.
2. The lack of available outdoor space on site which could accommodate residential amenities is a concern. As proposed, the only usable outdoor space is within the 25-foot No Disturb Zone, additional alterations in this zone will not be permitted by the NRC. We recognize that the rooftop will provide gardens and some outdoor space, however, this will not offer an opportunity for other expected residential outdoor uses such as grilling, storage, fire pits, etc. Reducing the size of the building may create additional outdoor space for use by tenants outside the No Disturb Zone.

Thank you for the opportunity to comment.

Sincerely,

Bert Comins  
Assistant Natural Resources Director

cc: Natural Resources Commission