



Concord Housing Foundation, Inc.

Working to Preserve Concord's Housing Diversity

Nov. 14, 2023

Katherine Miller
40B Planning and Programs Specialist
Mass Housing
One Beacon St., 7th Floor
Boston MA 02108

40B Application
Residences at Thoreau Camp
275 Forest Ridge Road
Concord MA

Dear Ms Miller

The Concord Housing Foundation has reviewed the materials submitted to the Town of Concord by the applicant. Many aspects of the project seem contrary to established or developing affordable housing policies in Concord and Massachusetts. The Concord Housing Foundation continues to support the creation of more affordable housing in Concord, including through the "40B" process. Please note our previous letter supporting in principle the NOVO Riverside Commons project. Based on our review of the documents and the site visit on November 2, and for the reasons outlined below, we do not believe the "Residences at Thoreau Camp" proposal should be declared eligible to proceed under Section 40B.

First and most importantly, this is NOT a Smart Growth transit oriented-development. It is not possible to walk to the nearest MBTA station in a reasonable period of time. The walk is more than 2.5 miles from the site into West Concord. If residents of this development take the train, they must drive to the train station and park in West Concord. Even those wanting to take the one hour walk into West Concord must first cross busy Rte 62 to reach a sidewalk. Although there is a shopping center on Rte 62 near the corner of Forest Ridge Rd, it is a walk of nearly a mile down from the site to the stores, and a steep uphill walk back up Forest Ridge Road. Not many residents will choose to walk this route with a bag of groceries.

Only a short distance up the hill (although not connected by road) is the largest multi-family development in Concord, the Prescott, with 350 units. 250 more units at the Thoreau Club site would shift the locus of population even further from our Town centers, the opposite of transit oriented development.

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Concord takes its responsibility to comply with the new “MBTA zoning law” seriously. The zones under consideration are all far closer to village centers and MBTA stations than the proposed project. Most of the area to be designated is within walking distance to the train and villages, and thus are far preferable as sites for multi-family housing. In developing the MBTA zoning plan, our Planning Board has worked hard to balance the amount of land so zoned in Concord and West Concord. In addition to existing multifamily housing and the proposed MBTA zones in West Concord, we note that the former Best Western Motel is now an emergency housing site, further increasing the number of multifamily units in West Concord. The Best Western site is included in the proposed MBTA zone. Should the need for emergency shelter end, it can then be redeveloped as multi family housing. With a pedestrian bridge over Rte 2, this could provide pedestrian access to the large office park on Baker Ave and to West Concord center. If the Thoreau Camp project is approved, it would impose even more of a burden on West Concord, potentially making it difficult to maintain the delicate balance in our MBTA proposal and assure passage at Town meeting.

The additional traffic generated by cars travelling along Rte 62 from the site to West Concord and Rte 2 will have obvious effects on travel times and vehicle pollution. But this is not the only way in which the project fails to respect environmental needs. Concord has passed an ordinance banning fossil fuel use in new construction and is awaiting State approval to implement it. The Riverside Commons project has indicated the intent to build without fossil fuels, including the use an innovative ground source heat pump. We see no such commitment to sustainability principles in the plan for Thoreau Camp.

Because this project moves Concord (and the State) further away from the smart growth, low pollution transit-oriented development that the State seeks, we request that you reject this application.

Frank Feeley
President
Concord Housing Foundation
347 Lexington Road
Concord MA 01742

Cc: Select Board, Town of Concord
Linda Miller, Chair, Concord Planning Board
Theo Kindermans, Chair, Concord Zoning Board of Appeals
Kerry LaFleur, Town Manager
Megan Zamutto, Deputy Town Manager
Elizabeth Hughes, Town Planner

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