



OLD NORTH BRIDGE

TOWN OF CONCORD

TOWN HOUSE - P.O. BOX 535
CONCORD, MASSACHUSETTS 01742

To: Concord Select Board
From: Concord Municipal Affordable Housing Trust c/o chair Keith Bergman
CC: Housing Roundtable c/o chairs, ZBA c/o chair, Town staff
Date: November 9, 2023
SUBJ: Comments on Thoreau Residences, LLC's application to MassHousing for site approval for a proposed 40B at 275 Forest Ridge Road

Please know that, at its meeting on November 7, 2023, the Concord Municipal Affordable Housing Trust voted unanimously (4-0)¹ to authorize the Trust's chair to send a letter to the Select Board with comments on Thoreau Residences, LLC's application to MassHousing for site approval for a proposed 40B development on 13.08 acres at 275 Forest Ridge Road, as follows:

Subsidized Housing Inventory. Thoreau Residences, LLC proposes to construct 216 rental units of which 25%-- 54 units-- would be deed restricted as affordable at 80% of AMI.

- The Town of Concord's Subsidized Housing Inventory (SHI) is currently 715 units, or 9.97% of the Town's 7,121 year-round housing units, based on the 2020 U.S. Census. As such, the Town is 3 units below its 10% goal of 717.2 SHI units per the 2020 U.S. Census.
 - *Of the 715 units currently on the SHI, only 357 units (4.98% of 7,121 total year-round housing units) are deed restricted at or below 80% of AMI.*
 - *The remaining 358 are market rate units countable on the SHI as part of a rental development in which at least 25% of the units are deed restricted at 80% of AMI.*
- NOVO Riverside Commons, LLC had earlier filed a comprehensive permit application with the Town Clerk on August 21, 2023 for 201 rental units, of which 51 would be affordable at 80% of AMI. Were the Concord Zoning Board of Appeals to issue that comprehensive permit, the Town's SHI would then increase by 201 units to a total of 916 units, or 12.77%.
 - *Of the 916 units then countable on the SHI, only 408 units (5.69%) would be deed restricted at or below 80% of AMI.*
- If MassHousing were to approve Thoreau Residences, LLC's application for site approval, and if the Zoning Board of Appeals were to subsequently approve a comprehensive permit for that project, the Town's SHI would then increase by another 216 units, to a total of 1,132 units, or 15.78%.
 - *Of the 1,132 units then countable on the SHI, only 462 units (6.44%) would be deed restricted at or below 80% of AMI.*

Housing Production Plan. This project's proposed location *is not listed* in the [FY 2023-2028 Housing Production Plan](#) as a potential location for a 40B development in Concord. By contrast, NOVO Riverside Commons, LLC's proposed site is specifically identified in HPP Strategy #3.²

¹ Linda Escobedo, Mike Lawson, Rich Feeley and Keith Bergman voted in favor; Kerry Lafleur was not present.

² "There are several parcels in private ownership which might be appropriate for residential developments across Concord, through 40B or other processes. | A. 300-310 Baker Ave. – a mixed use location . . ." – HPP p. 32.

MBTA Commuter rail. Unlike the NOVO Riverside Commons, LLC's 40B project, Thoreau Residences, LLC's proposed site is not located within one-half mile of any MBTA commuter rail station. The proposed site is 2.7 miles from West Concord station, 3.1 miles from South Acton station, and 5.5 miles from Concord station. The Town and the developer should explore transportation demand management solutions, including on-demand shuttles, to connect this remote location with transportation hubs and employment centers.

Fossil Fuel Free development - The proposed development does not appear to comply with Concord's fossil fuel free development standards.

Housing Choice Designation. This 216-unit project, together with NOVO Riverside Commons, LLC's 201 units-- would qualify the Town of Concord for [Housing Choice Designation](#) by producing a 5% increase in new year-round housing units over the last 5 years. For Concord, 5% would be met by 359 units; the two projects together would produce 417 units. Housing Choice designation provides access to Housing Choice Community Grants and preferential treatment for many state grant and capital funding programs.

MHP 40B Technical Assistance for ZBA. Should MassHousing approve the developer's application for site approval, the Trust urges the Town to obtain grant funding-- referenced in MassHousing's October 24, 2023 letter to the Select Board-- through the Massachusetts Housing Partnership (MHP)'s Chapter 40B Technical Assistance Program, to engage a qualified third-party consultant to work with the Concord Zoning Board of Appeals in reviewing the comprehensive permit application then filed by the developer.

Please let us know what questions you have about any of this. Thanks very much.