

OLD NORTH BRIDGE

TOWN OF CONCORD

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

November 22, 2023

Ms. Kat Miller
Planning & Programs Specialist
Massachusetts Housing Finance Agency
One Beacon Street
Boston, Massachusetts 02108

Re: Proposed 40B -The Residences at Thoreau, Concord, Massachusetts
MH ID No. 1206

Dear Ms. Miller,

This letter is in response to yours dated October 24 requesting comments on the Proposed 40B Application of Thoreau Residences, LLC for the construction of 216 units of rental housing on approximately 13.08 acres of land located at 275 Forest Ridge Road in Concord (the "Project"). You have requested our assistance in evaluating the site, the design concept, the financial feasibility of the proposal, and the appropriateness of the proposal in relation to local housing needs and strategies.

In an attempt to provide the broadest possible response, we have referred your request to our local housing agencies and Town committees and departments involved in the review and approval process or otherwise impacted by the Project. In order to assist you in evaluating the Project, we attach the following letters and memoranda in addition to our own comments:

1. Letter dated November 14, 2023 from Frank Feeley, President of the Concord Housing Foundation, Inc.;
2. A compilation of comments dated November 8, 2023 headed "Residences at Thoreau Staff Project Review;"

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3. A Memorandum dated November 15, 2023 from Planning Board Members and Elizabeth Hughes, Concord Town Planner;
4. A Memorandum dated November 9, 2023 entitled “Comments on Thoreau Residences, LLC’s application to MassHousing for site approval for a proposed 40B at 275 Forest Ridge Road” from Keith Bergman, Chair of the Concord Municipal Affordable Housing Trust;
5. A Memorandum dated November 14, 2023 re: “Building Codes and Multifamily/Affordable Housing (Chapter 40B)” from Eric Simms, the Town’s Sustainability Director; and
6. A Memorandum dated November 20, 2023 from the Concord Transportation Advisory Committee.

To summarize, these letters suggest that many aspects of the project are contrary to established or developing affordable housing policies in Concord for a number of reasons including that, because of its location a substantial distance from business and transit centers, it is not a Smart Growth, transit oriented development, the “additional traffic generated by cars travelling along Route 62 from the site [the 2.7 mi.] to West Concord will have obvious effects on travel times and vehicle pollution,” and the application shows no commitment to fossil-free or other sustainable principles. The Town is currently working hard to comply with the MBTA Communities Act, and we do not believe the location and other aspects of the Project are consistent with the assumptions underlying the MBTA mandate.

The Transportation Advisory Committee (the “TAC”) would like to see a thorough analysis of impacts on safety and traffic flow due to any proposed changes to traffic inputs or design changes to the Forest Ridge Road roundabout. Consideration should be given to multiple modes of transportation, including travel by cars, pedestrians, bicycles, and other mobility devices

The TAC also expressed concern about increased traffic volumes on Route 62 which it thinks should be studied and addressed along with increased pedestrian traffic. Particular

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concern was expressed with regard to the existing pedestrian infrastructure between the site and the West Concord train station and village center and the Maynard retail and business district each of which is over two miles distant, as well as the Powder Mill Shopping Plaza almost a mile away.

In addition to provision for alternative modes of transportation, planning for the project should consider the establishment of a regional public transit service that would connect future residents to the West Concord train station and village center, as well as the Powder Mill Shopping Plaza, Maynard Center, and other local destinations and the inclusion of a bus shelter in the project's design to provide residents with a comfortable and safe outdoor location to wait for public transit, school buses, and rideshare services.

It is the unanimous opinion of the Planning Board "that the site is not suitable for the type of development that is being proposed for the following reasons:

1. "The proposal is for three large buildings with a ring of surface parking completely surrounding the buildings, as well as parking between the buildings. This design does not take into consideration the existing topography and features of the site. The change in topography on the site in some locations is almost 40 feet. The flat and level design will require the removal of almost all of the existing woodland, and significant cut and fill grading of almost the entire 13 acres to create a completely level site.
2. "The site is partially located in the Town's Groundwater Conservancy District for a public water supply. The design proposes an extensive amount of impervious coverage and pavement in this resource area. Additionally, the proposal requires the relocation of the existing onsite sewage disposal leach field currently serving private recreational facilities from outside the Groundwater Conservancy District into the District, and proposes an additional large onsite sewage disposal leach field in the District.
3. "The location of the proposed driveway does not take into consideration the location of existing driveways and the design capacity of the private roadway and small rotary, which was not designed or constructed to accommodate the level of vehicular or pedestrian traffic that will be generated from this type of development."

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Another concern is potential groundwater pollution because the very extensive septic system needed to serve a project of this size (it will not be served by the municipal sewer system) is adjacent to a local Groundwater Conservancy District (public water supply). In addition, the configuration of the buildings limits Fire Department access and the project lacks water main redundancy.

The Project's proposed location is not listed in the FY 2023-28 Housing Production Plan as a potential location for a 40B development in Concord. By contrast, the pending NOVO Riverside Commons, LLC's site [a 201 unit 40B project now before the Zoning Board of Appeals] is specifically identified in Production Plan Strategy #3. The NOVO project, which will satisfy the Town's SHI requirement (at 12.77%) is sustainability based, on public sewer and is within walking distance of the MBTA West Concord station and retail center.

For the reasons stated above and in the attached letters and memoranda, the Select Board has serious concerns with regard to the location of the Project, the physical characteristics of the site and the commitment of the sponsor to sustainability. An additional concern is the ability of the Town to integrate a second project of this size into its existing community infrastructure and the costs which might be imposed on the Town as a result. Therefore, the Town does not recommend the granting of Site Approval for this Project.

Very truly yours,



Henry Dane, Chair
Concord Select Board

Cc: Ms. Miller via email: kmiller@masshousing.com

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.

P.O. Box 751, Concord, MA 01742

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

P.O. Box 751, Concord, MA 01742

Residences at Thoreau

Staff Project Review

November 8, 2023

Site suitability concerns

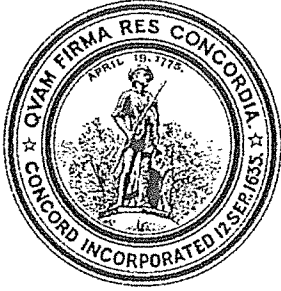
- The project as presented will require a significant amount of grading and tree removal resulting in a major change in topography and loss of forested habitat, inconsistent with adjacent developments.
- Height of the buildings inconsistent with the adjacent neighborhood
- Significant concerns about contamination within and just outside the local Groundwater Conservancy District. Contamination could come from proposed leaching fields, snow storage and stormwater runoff.
- Concord Municipal Light Plant: The proposed location lies within an underground distribution area. This area does not have the provisions for this proposed expansion. A significant line extension will need to be designed, constructed, and commissioned, at the Owner's expense.
- Concord Municipal Light Plant has safety and security concerns with the additional pedestrian traffic through and around the electrical substation property. The proposed location is only a short walking distance from one of the CMLP substations. Staff makes several trips to the substation property a day, and additional safety and security concerns will have to be addressed.
- Concerns about the fill proposed for the site and how it would impact infiltration opportunities and potential impacts to adjacent Town lands.

Project layout concerns

- Identified concern with the proposed parking between the buildings and courtyards. Safety concern for pedestrians navigating the site.
- Width of all roads must be a minimum of 20 feet wide without a median for Fire Department access.
- The configuration of the buildings limits the access to Fire Department ladder access.
- The project doesn't include any water main redundancy, which would be critical in a project this scale.
- Insufficient detail has been presented regarding the wastewater disposal system.
- Staff emphasized that solid waste, recycling and composting should be planned for and identified at the beginning of the project.

Traffic

- Forest Ridge is one of the busiest private roads in Concord.
- Concerns about the grading into Route 62, especially in winter conditions.
- There have been three reported accidents at this location since 2020.



TOWN OF CONCORD

Planning Board

141 Keyes Road, Concord, MA 01742

(978) 318-3290

MEMORANDUM

To: Select Board Members

From: Planning Board Members
Elizabeth Hughes, Town Planner

Date: November 15, 2023

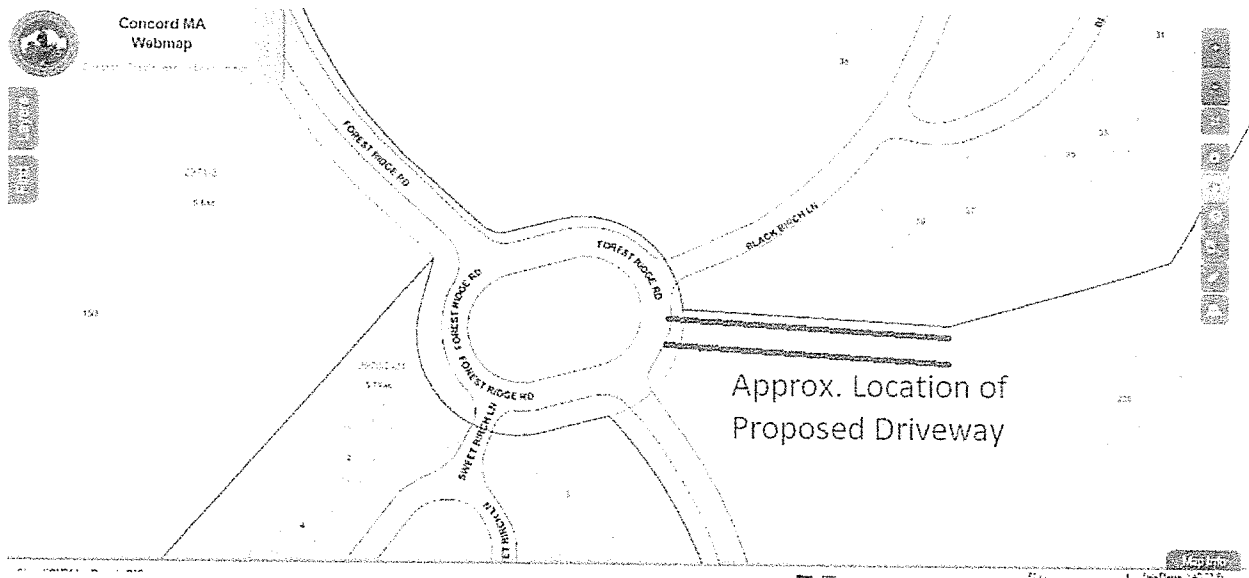
Re: 275 Forest Ridge Rd: Residences at Thoreau 40B – MassHousing Application

At the November 14, 2023 meeting, the Planning Board discussed the proposed 40B Comprehensive Permit application proposal submitted to MassHousing and the MassHousing site visit on November 2nd where the Applicant's engineer went over the aspects of the proposed project as it relates to the site.

The Planning Board is unanimous in its opinion that the site is not suitable for the type of development that is being proposed for the following reasons:

1. The proposal is for 3 large buildings with a ring of surface parking completely surrounding the buildings, as well as parking between the buildings. This design does not take into consideration the existing topography and features of the site. The change in topography on the site in some locations is almost 40 feet. The flat and level design will require the removal of almost all of the existing woodland, and significant cut and fill grading of almost the entire 13 acres to create a completely level site.
2. The site is partially located in the Town's Groundwater Conservancy District for a public water supply. The design proposes extensive amount of impervious coverage and pavement in this resource area. Additionally, the proposal includes the relocation the existing onsite sewage disposal leach field for the existing private recreational facilities from outside the Groundwater Conservancy District into the District and proposes an additional large onsite sewage disposal leach field in the District.

3. The location of the proposed driveway does not take into consideration the location of existing driveways and the design capacity of the private roadway and small rotary, which was not designed and constructed to accommodate the level of traffic or pedestrians generated from this type of develop.

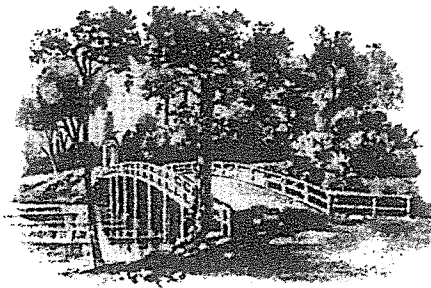


The Planning Board believes these issues represent significant safety concerns and recommends that the Select Board incorporate these comments into the Town's response letter to MassHousing.

On behalf of the Planning Board, thank you for your consideration of these comments.

Sincerely,

Linda Miller, Chair
Concord Planning Board



OLD NORTH BRIDGE

TOWN OF CONCORD

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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.



TOWN OF CONCORD
Office of the Town Manager
Town House
P.O. Box 535
Concord, Massachusetts 01742

TEL: 978-318-3000
FAX: 978-318-3002

Date: November 14, 2023

To: Concord Select Board

From: Eric Simms, Sustainability Director

Re: Building Codes and Multifamily / Affordable Housing (Chapter 40B)

This memo serves to address recent questions surrounding the capacity of the Town to require or encourage fossil fuel-free building construction for multi-unit housing projects. In particular, the questions have been raised in the context of the newly proposed Chapter 40B building project 'Residences at Thoreau' (275 Forest Ridge Rd.), and more broadly for any developments that include affordable housing.

Background

Concord's ability to regulate building construction rests in the local adoption of our building codes. The Town is currently in a unique position where our building codes are expected to undergo several changes in a relatively short period of time. The following outlines the current state of Concord's evolving building codes:

1. Updated Stretch Code (currently effective)

The Town currently operates under the MA Updated Stretch Energy building codes, which the Town adopted years ago and has been effective since that time. The Updated Stretch Code includes more rigorous energy efficiency requirements than the standard MA Base building codes— it was last updated by the State in 2022, and it became effective in January 1, 2023.

2. Specialized Stretch Code (effective in Concord on January 1, 2024)

At 2023 Town Meeting, Concord citizens voted to adopt the new MA Specialized Stretch Code for residential and commercial buildings. This enhanced code applies to new construction only - it is designed to promote the construction of all-electric and highly energy efficient new buildings, and to support the 2050 Net Zero greenhouse gas emissions limit outlined in the [MA Clean Energy and Climate Plan for 2050](#). The code does include a 'Mixed Fuel' pathway that allows the use of fossil fuels, but that pathway also requires that such buildings 1) achieve higher energy efficiency standards, 2) be fully pre-wired for future all-electric operation, and 3) in some circumstances, include solar energy generation.

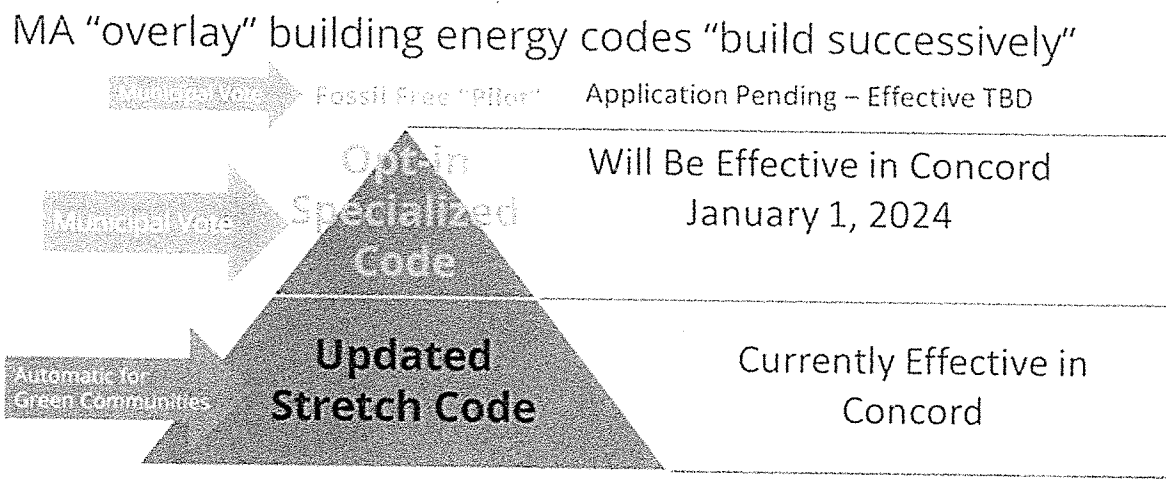
According to our Planning Division, 40B projects do not automatically get exemptions to our local building codes. However, the developer of a 40B can request a waiver from the Zoning Board of Appeals, the same as any other developer. The ZBA can reject the requested waiver. If the developer

comes back to say that by not granting the waiver it would make the project economically infeasible, then the developer would have to provide the financial evidence of this for review by the Board.

3. Fossil Fuel Free Building Demonstration Program

Based on a home rule petition and bylaw passed locally in 2021 (and again in Jan. 2023), Concord is positioned to be one of only ten MA municipalities to participate in the Fossil Fuel Free Building Demonstration Program managed by the MA Dept. of Energy Resources (DOER). Participation in this program will allow Concord to prohibit the use of fossil fuels in new construction only, with a few notable exceptions. Concord's application to participate in the program is currently under review by DOER, with a decision anticipated within the next few months. If approved, the effective date would be 90 days after notification by DOER.

Additional information about the Updated Stretch Code and Opt-In Specialized Building Code can be found [here](#). The following graphic depicts how the MA opt-in building codes 'build successively' upon one another to achieve the highest energy efficiencies and the elimination of fossil fuels.



The Challenge Presented by 40B Projects and Affordable Housing

1. Any building permit applications submitted *prior* to Dec. 31, 2023 will be subject to the **Stretch Energy code** currently in effect, which allows for fossil fuel use.
2. Any building permit applications submitted *on or after* Jan. 1, 2024 will be subject to the new **Specialized Stretch Energy code**. As noted above, this code also allows fossil fuel use in new buildings with increased efficiency requirements, including multi-family housing. Presumably, any of the currently proposed 40B projects will fall into this category, assuming their building permit applications will not be submitted until after the start of 2024.
3. As the bylaw is currently written, the fossil-fuel prohibitions included in the **Fossil Fuel Free Building Demonstration Program** will **NOT** apply to building projects that include affordable housing. Concord's bylaw specifically states an exemption for affordable housing:

“3.2 The provisions of this bylaw shall not apply to (i) the development of new affordable housing, as defined in Mass. Gen. Laws c. 184, § 26; (ii) to cooking stoves and ovens used in restaurants or commercial kitchens; (iii) any fossil fuel infrastructure the exclusive purpose of which is to fuel backup electrical generators; (iv) public utilities, their operations, or installations other than in the Buildings constructed by others; or (v) research laboratories for scientific or medical research, or to hospitals or medical offices regulated by the department of public health as a health care facility.”

My understanding of the central reasoning behind Concord’s exemption of affordable housing from the Fossil Fuel Free Building Demonstration Program bylaw was to ensure that requiring all-electric and high energy efficiency building construction did not add prohibitive cost premiums to affordable housing projects. Although this argument may have been justified even only a few years ago, mounting evidence suggests that the costs of highly efficient, fossil fuel-free, new multifamily building construction has approached parity with that of traditional new construction. This parity is often realized without the inclusion of generous financial rebates/incentives, reduced operation and maintenance costs over the lifetime of the building, and the improved quality of indoor environmental health conditions associated with fossil fuel-free new building construction. Several resources that provide supporting data include:

[MA Dept. of Energy Resources - Summary of Stretch Code Study Energy Efficiency Analysis](#)

[Built Environment Plus – Massachusetts is Ready for Net Zero](#) (“Affordable Housing makes up 44% of all residential Net Zero and Net Zero Ready square footage.”)

[Passive House Network Releases a Report on the Low Costs and Improved Occupant Health of Multifamily Projects](#)

[Rocky Mountain Institute - The Economics of Electrifying Buildings: Residential New Construction](#)

Unlike Concord, several other towns participating in the Fossil Fuel Free Building Demonstration Program did not include specific language exempting affordable housing. Lexington and Acton, for example, included language in the waiver section of their bylaws that says “in considering a request for a waiver, the Building Commissioner may consider as a factor the requesting party’s status as a non-profit or government-sponsored affordable housing entity.” The assumed intent of this language was to allow discretion in case there a large enough cost premium to develop affordable housing could be argued, but as the evidence referenced above shows, such an argument is becoming less sound.

Future Considerations

The most direct pathway to encouraging 40B multifamily housing developers to build without including fossil fuels in new construction would be to amend our current bylaw related to the Fossil Fuel Free Building Demonstration Program to remove the explicit exemption for affordable housing. An alternative would be to instead include language to suggest that developers of affordable housing can request a waiver to the bylaw, which is the approach that has been taken by Lexington and Acton.

It should be noted that Concord’s application to the MA Dept. of Energy Resources (DOER) to participate in the Fossil Fuel Free Building Demonstration Program is currently under review (as are the applications from the other nine pilot towns), including a review of our associated bylaw. Applications are being

reviewed on a rolling basis and it is not known exactly when DOER will make notifications, but decisions are not necessarily expected prior to the end of the 2023 calendar year. If, and when, Concord's application is approved, the bylaw will take effect 90 days after the official notification.

To: Concord Select Board
From: Concord Transportation Advisory Committee
CC: Concord Select Board
Date: November 20, 2023

Subject: 40B Application: Residences at Thoreau Camp - Transportation Advisory Committee Recommendations

At its meeting on November 20, 2023, the Concord Transportation Advisory Committee voted unanimously (5-0) to authorize the committee chair to send a letter to the Select Board with comments regarding the proposed 40B development, the Residences at Thoreau Camp.

The Transportation Advisory Committee's comments are as follows:

- Strong support for transportation-related comments made by the Concord Housing Foundation in their letter to Katherine Miller on November 14, 2023.
- Strong support for concerns about the Forest Ridge Rd roundabout highlighted by the Planning Board in their letter to the Select Board on November 15, 2023. The TAC would like to see a thorough analysis of impacts on safety and traffic flow due to any proposed changes to traffic inputs or design changes to the Forest Ridge Rd roundabout. Considerations should be made for multiple modes of transportation, including travel by cars, pedestrians, bicycles, and other mobility devices.

TRAFFIC

- Concern about increased traffic volumes on Route 62, which should be studied and addressed. We recommend considering whether a traffic control device may be required to manage traffic flow at the intersection of Route 62 and Forest Ridge Rd.

PEDESTRIAN ACCESS

- The construction of this development would increase pedestrian traffic, and this should be studied and addressed.
- The adequacy of the existing pedestrian infrastructure between the site and the West Concord train station and village center, as well as the Powder Mill Shopping Plaza, and Maynard Center should be reviewed.
- There is a gap in the sidewalk adjacent to Route 62 between Knox Trail and High Street in Acton which should be addressed.

PUBLIC TRANSIT

- This site is located 2.5 miles from the West Concord train station & village center, 2.2 miles from the center of Maynard, and 0.8 miles from the Powder Mill Shopping Plaza.

- Should this development move forward, the TAC recommends the establishment of a regional public transit service that would connect future residents to the West Concord train station and village center, as well as the Powder Mill Shopping Plaza, Maynard Center, and other local destinations.
- Recommend inclusion of a bus shelter in the project's design to provide residents with a comfortable and safe outdoor location to wait for public transit, school buses, and rideshare services.

BICYCLE FACILITIES

- The adequacy of the existing cycling routes and infrastructure between the site and West Concord should be reviewed.
- There are no bicycling facilities on Forest Ridge Road or along Route 62, nor are there alternative cycling routes that connect directly to this site.
- Recommend inclusion of covered and secure bicycle parking facilities to ensure residents can enjoy the same, if not greater, convenience when accessing a bicycle as they do when accessing their car.