

To: Theo Kindermans  
Chair, Zoning Board of Appeals  
Town of Concord

13 March 2024

I am writing neither to support nor to totally oppose the construction of the Additional Dwelling Unit (ADU) proposed for 262 Virginia Road.

The Town needs to consider if it wants to allow the morphing of ADUs into medium-sized houses that command significant rent. Changing the rules to prevent/discourage such expansions is not the job of the ZBA or the Building Department, but deserves strong consideration.

An important goal for the Town's adoption of zoning bylaw §4.2.2.2 in 2020 was to encourage creation of more affordable housing in Concord. My main concern about the 262 Virginia Road ADU project is that it will not serve that end. Instead, it would provide healthy income to the owners from a good-sized house (2,000 rentable square feet (rsf) or more) that will not be affordable under accepted definitions.

If the planned 1,000-sf basement were to be built out with 2 more bedrooms and another bathroom, doubling to 2,000+ rsf, the house would rent for \$3,500-\$4,000/month in today's market.

This design is poised for such an expansion. There is no practical/physical reason why the basement could not be retrofitted with baseboard electric heat, another bathroom, and perhaps a kitchenette—plus 2 bedrooms in what plans show as storage space. Water and waste hookups will be there for the laundry room. Original plans called for 10-foot ceilings in the basement—unheard of in my basement and probably yours. They still feature basement windows, needed for habitation but not for laundry and storage.

A further sign of intended expansion is the inclusion of four parking spaces. Zoning bylaw §4.2.2.2 (h) states in full: "One parking space shall be provided for the additional dwelling unit." The applicant told us he plans to add a detached garage on the property to shelter two of the four planned spaces. 262 Virginia Road would then have at least eight parking spaces.

If the town approves ADUs that meet the letter of the law (750-1,000 rsf) at approval and construction but are soon doubled in size to maximize income because the Town cannot deny build-out permits, the intent of bylaw §4.2.2.2 is being flouted.

For this reason, I urge the board to scrutinize this request for variances closely, keeping in mind the precedent it may set for other ADUs in town. A starting point might be to deny the request for the main floor to be 1,000 rsf, limiting it to 750 rsf.

Sincerely,

David Godolphin  
232 Virginia Road