



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: August 2, 2023
SUBJ: Comments on NOVO Riverside Commons, LLC's application to MassHousing for site approval for a proposed 40B at 300-310 Baker Avenue with 201 rental units, of which 51 (25%) would be deed restricted as affordable at 80% of AMI

Please know that, at its meeting on August 1, 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 in support of NOVO Riverside Commons, LLC's application to MassHousing for site approval for a proposed 40B development at 300-310 Baker Avenue, with the following comments:

Housing Production Plan. This project's location is specifically identified in the [FY 2023-2028 Housing Production Plan](#) in Strategy #3, which provides, in part, that "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 . . ."

MBTA Communities Zoning. This 10-acre site is located within one half mile from the West Concord MBTA Commuter Rail Station and the Trust recommends it be considered-- along with other sites identified in the Housing Production Plan for affordable housing development-- for inclusion in the proposed MBTA Communities Zoning overlay district that will be brought to the April 2024 Annual Town Meeting for approval.

Subsidized Housing Inventory. Since 25% of this project's rental units would be deed-restricted as affordable at up to 80% of area mean income (AMI), all 201 units would be counted on the Town's [Subsidized Housing Inventory](#), increasing Concord's total number of SHI units from 715 to 916, and its 40B percentage² from 9.97% to 12.77%.

Housing Choice Designation. This project would also help the Town qualify for [Housing Choice Designation](#)-- with access to Housing Choice Community Grants and preferential treatment for many state grant and capital funding programs-- once it produces a 3% increase in new year-round housing units over the last 5 years, and demonstrates 7 of 15 Housing Choice "best practices."³ For Concord, 3% would be met by 216 units, which this project's 201 units would ensure.

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

² Concord's Chapter 40B goal is 717.2 SHI units-- 10% of its 7,172 year-round housing units, per 2020 US Census.

³ See Housing Choice [2023 best practices](#), which will be updated for 2024.

Host Community Agreement. The Trust recommends that the Select Board negotiate a host community agreement (HCA) with the developer to address such issues as the Select Board may determine, including but not limited to the following:

- (1) whether the Town should defray all or a part of the affordable units' share of this project's sewer improvement fee, for which the CMAHT trust fund could be a source of funding⁴;
- (2) whether the developer should make a financial contribution towards the Assabet River Pedestrian Bridge, as originally proposed by the Town to connect West Concord MBTA commuter rail station and the Concord Meadows Corporation Center; and, further, that the Select Board reexamine the scope of the "Assabet River Multi-Use Trail and Bridge Construction" project currently proposed for inclusion in the Boston MPO Transportation Improvement Program (TIP)⁵ so the priority would be to complete the bridge first; and
- (3) whether to require that as many of the project's rental units as possible remain as rental units for as long as possible, in order to remain countable on the Subsidized Housing Inventory.

The Trust would be pleased to participate in the HCA process to whatever extent the Select Board may desire.

MHP 40B Technical Assistance for ZBA. Once MassHousing approves the developer's application for site approval, the Trust urges the Town to obtain grant funding-- referenced in [MassHousing's June 21st 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.

⁴ The developer told the Select Board on July 24, 2023 that NOVO may ask the Town to defray the 51 affordable units' share of the \$1,500,000 sewer improvement fee for the project.

⁵ The [Boston MPO TIP for FFYs 2024-2028](#) notes on page 360 that the \$8,280,000 "Assabet River Multi-Use Trail and Bridge Construction" project "was originally a new Pedestrian Bridge with a \$2-3.6M price range. Scope has increased to include improvements for a multi-use trail alongside the bridge. Cost has increased accordingly and is now in preliminary design. Project location runs between the West Concord MBTA Station and the Concord Meadows Corporate Center with a hookup to the Southern Terminus of the Bruce Freeman" Rail Trail.