



**TOWN OF CONCORD
COMMUNITY PRESERVATION COMMITTEE**

141 KEYES ROAD, CONCORD, MA 01742
TEL. (978) 318-3290 FAX (978) 318-3291

Application for CPA Funding

Due no later than 4:00pm on Friday, September 20, 2019

Applicant: Concord Housing Authority

Co-Applicant (if applicable): _____

Project Name: Commonwealth Avenue Project

Project Location/Address: Commonwealth Avenue. between 365 and 369

Purpose: (Select all that apply)

- Open Space Community Housing Historic Preservation Recreation

Project Budget:

Amount of CPA Funds Requested: \$ 300,000.00

Amount from Other Funding Sources: \$ 50,000.00

Total Project Budget: \$ 350,000.00

(If multi-year project, note current phase only)

Please check which of the following is included with this Application:

- | | |
|---|---|
| <input checked="" type="checkbox"/> One Paragraph Project Summary * | <input checked="" type="checkbox"/> Timeline * |
| <input checked="" type="checkbox"/> Map (if applicable) | <input checked="" type="checkbox"/> Architectural plans, site plans, photographs
(if appropriate) |
| <input checked="" type="checkbox"/> Narrative * | <input checked="" type="checkbox"/> Copy of Audit or most recent Financial
Information (<u>Non Profit Organizations Only</u>)* |
| <input checked="" type="checkbox"/> Selection Criteria and Needs Assessment | <input type="checkbox"/> Letters of Support (if any) |
| <input checked="" type="checkbox"/> Detailed Project Budget * | |
| <input checked="" type="checkbox"/> Feasibility Assessment | |
| <input checked="" type="checkbox"/> Statement of Sustainability (if applicable) | |

* Required Documentation

The Contact Person for this Project is: Marianne Nelson

All Correspondence should be mailed to: 34 Everett St., Concord, Mass. 01742

The Contact Person can be reached by phone at: 978-369-8435 or by email at: mnelson@concordha.org

Signature of Applicant: Marianne Nelson

Signature of Property Owner (if different): _____

For Historic Preservation Projects Only – please check the box below left and acknowledge:

- I/We have read the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties and understand that planning for and execution of this project must meet these standards.



CPA 2020 APPLICATION

Category: Community Housing

Project Summary:

The Concord Housing Authority (CHA) is requesting \$300,00.00 for the construction of a two-bedroom single family home for the purposes of affordable housing. We would like to assist the Town with their efforts and their commitment to include an affordable housing opportunity as part of the overall development of the Gerow parcel. Our goal would be to design and construct a small energy efficient two-bedroom home that is consistent with the design and scale of the neighborhood.

Project Background:

In 2018, the Town purchased a parcel of land (Gerow property) for the purposes of creating a recreation area, identifying a portion of the property closest to Commonwealth Avenue for the development of one affordable house. The feasibility of building an affordable house in this location is covered in more detail in the April 2019 feasibility study prepared by Greenman-Pedersen for the Town of Concord and is included with this application. The study found that, though the parcel proposed for the affordable house is not alone a buildable lot, if combined with the CHA's existing house at 365 Commonwealth Avenue, it could provide for the possibility of a small additional two-bedroom house.

Project Goals:

The goal of this project is to add to CHA housing stock by constructing a two bedroom house on a parcel of land adjacent to existing CHA property at 365 Commonwealth Avenue and provide an equal opportunity for young families of low to moderate income the ability to live in Concord and take advantage of the cultural and education opportunities the community has to offer.

In addition to the construction of the new house, the CHA will make needed improvements with our own resources to the existing house at 365 Commonwealth Avenue so that, once completed, the new house in combination with the existing CHA house will add 2 affordable units to the Town's Subsidized Housing Index.



General Selection Criteria:

The current CHA wait list for a two bedroom includes over 300 families, 18 with a Concord connection (living or working in town), with a current estimated wait time of 6+ years.

With few available parcels for development, this project supports community response at both town meeting and in 2018 Comprehensive Long Range Plan by adding a small family home that will integrate well into the neighborhood and is close to a town center and transportation. This project meets the following General Selection Criteria as described by the 2020 Community Preservation Plan and referenced in the following documents:

2018 Housing Production Plan

2018 Envision Concord: Bridge to 2030 - Comprehensive Long Range Plan

2019 Analysis to Impediments to Fair Housing Choice Plan

Our project meets the specific goals of Concord Housing Production Plan as follows:

Goal 2: Increase the variety of housing options particularly near village centers

Goal 3: Encourage creation of affordable rental and ownership housing for households with low income, moderate, and middle incomes though out the community

Goal 5: Promote and support affordable housing for families including rental and home ownership

Goal 7: Continue to nurture and maintain working partnerships with organizations focused on addressing affordable housing needs in Concord and the region.

This project meets specific goals of 2018 Comprehensive Long Range Plan as follows:

Goal 1: Develop realistic achievable targets for preserving or creating housing of all types (beyond the State Housing Inventory)- most particularly smaller rental homes aimed at young and local work force.

The CHA continues to work with the many different agencies and town departments including the Planning Department and Regional Housing Services to identify potential opportunities for affordable housing development within town.

The CHA has solid experience and a proven track record in both property management and project development. In addition to the development of 4 units at 409-417 Old Bedford Road and the many capital improvement projects completed at CHA properties, the CHA completed a comprehensive mod rehab with the assistance of CPA funds at Peter Bulkeley Terrace, adding 24 one-bedroom elderly/disabled units in Phase 1 that was completed in 2013 and 4 units in Phase 2, completed in 2017.



Project Budget:

Planning & Permitting -

Source - \$50,000.00 request for funds appropriated under Article 23 for the purpose of affordable housing

Breakdown:

Architectural & Design	\$ 25,000.00
Site Design & Engineering	\$ 15,000.00
Legal & Permitting	\$ 10,000.00
TOTAL	\$ 50,000.00

New House Construction -

Source - \$300,000.00 CPA request

Breakdown:

Site Preparation	\$ 12,000.00
Foundation	\$ 40,000.00
Utilities	\$ 38,000.00
House Construction	\$180,000.00
Landscape and Driveway	\$ 10,000.00
Contingency	\$ 20,000.00
TOTAL	\$300,000.00

Existing House Construction -

Source - \$30,000.00 CHA self-funded

Breakdown:

Site Improvements	\$ 15,000.00
House Improvements	\$ 15,000.00
TOTAL	\$ 30,000.00



Feasibility Assessment:

Please refer to Enclosed Feasibility Study prepared by Greenman-Pederson, Inc.

Statement of Sustainability:

In 2011, Concord Select Board approved four sustainability principles to guide the town's decision-making toward creating a more sustainable Concord. These principles were adopted from the American Planning Association and *The Natural Step for Communities: How Cities and Towns Can Change to Sustainable Practices* by Sarah James. In keeping with these principles, the CHA intends to:

- Reduce dependence on fossil fuels, underground metals, and minerals by using high efficiency and, if practical, fossil fuel free HVAC equipment in the new home
- Reduce dependence upon synthetic chemicals and other manufactured substances by specifying eco-friendly products such as low-VOC paints in the new home
- Reduce encroachment on nature by working with consulting engineers and the Natural Resources Commission to minimize the impact of the new home on Warner's Pond.
- Meet human needs fairly and efficiently by following our own mission to provide affordable housing opportunities in the Town of Concord

Proposed Timeline:

Summer/Fall 2019- Transfer of land from the Town to CHA and secure initial funding

Fall 2019 - Submit CPA application for construction funding and hire design team

Fall/Winter 2019 - Begin design and start Conservation and Zoning approval process

Winter/Spring 2019 - Finalize design and secure Conservation and Zoning approval

Spring/Summer 2020 - Finalize construction drawings, secure CPA funding, and go out to bid; submit DHCD Local Initiative Program (LIP) application.

Summer/Fall 2020- Award construction contract, secure building permit and begin construction

Fall 2020 through Spring 2021- Complete construction and lease unit. Record Regulatory Agreement and add to Towns' Subsidized Housing Index (SHI)



The Concord Housing Authority (CHA) is a public agency established under the Massachusetts General Laws Chapter 121B. The Concord Housing Authority, operating under Federal, State and Town mandates has as its primary mission the development and administration of an adequate supply of housing for elderly, disabled and handicapped individuals and families of low and moderate income in the Town of Concord. The CHA currently owns and manages 121 properties within town serving 96 elderly and disabled individuals and 55 families and administers 85 Section 8 vouchers, most with a connection to Concord.

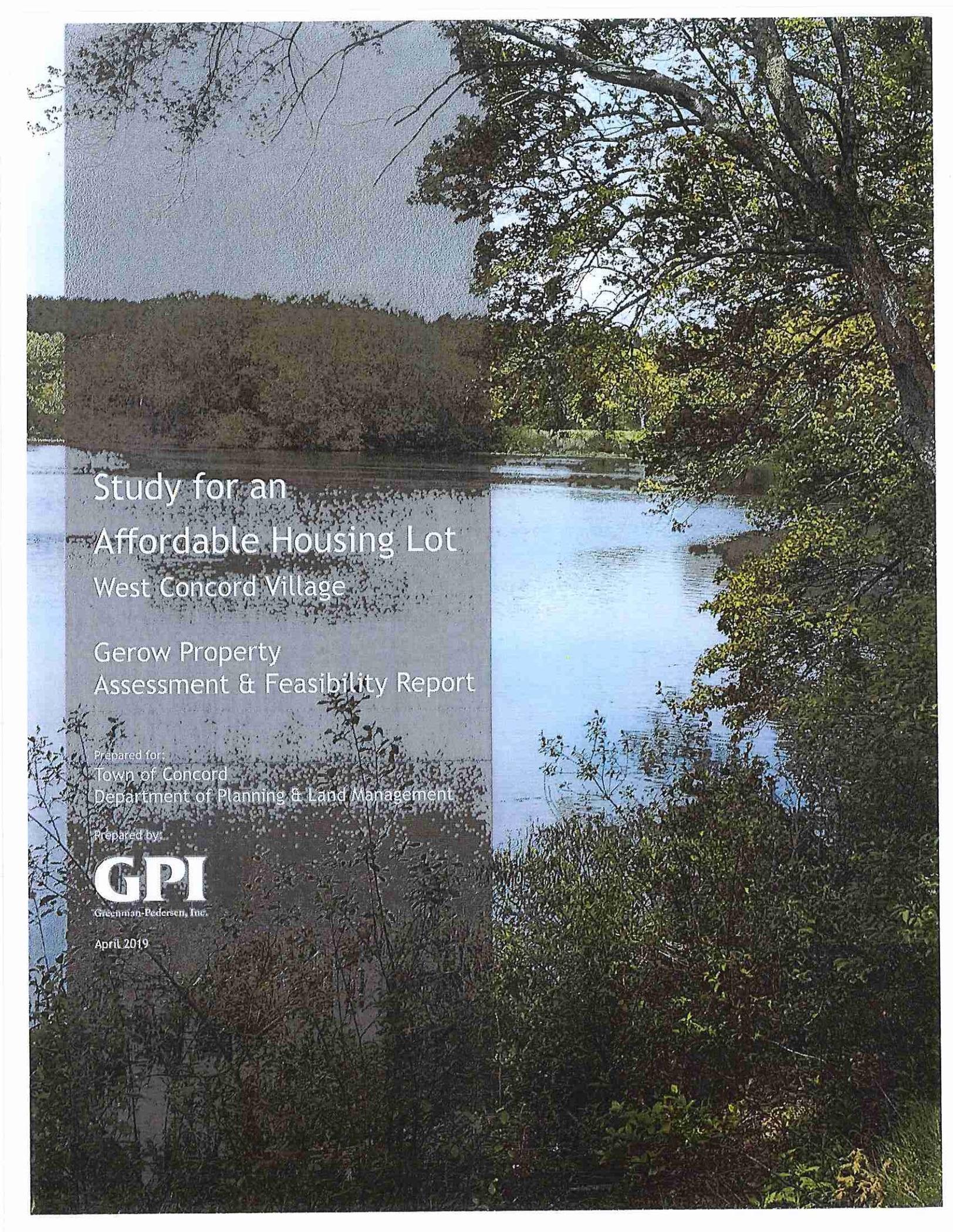
CHA Mission Statement

Our Values

- *Housing is a basic need and a foundation for success in life. By providing a safe and secure home, we support our residents' efforts to focus on other challenges and goals in their lives. All of us benefit when we have a safe place to call home.*
- *We support the Town's efforts to ensure equity and fairness in affordable housing opportunities through our work on the local, state, and federal level.*
- *Housing is a foundation which enables us to support the lives of residents as they seek to improve their own lives and personal welfare.*
- *As property managers, we provide safe and healthy homes by managing existing homes or developing and managing new housing opportunities.*
- *We collaborate widely to create and maintain a successful community that benefits all town residents.*
- *As a valuable and valued resource to our Town and beyond, we deserve the public's support and the resources they entrust to our agency. We understand that resources are finite and that our programs and services must be efficient, sustainable and economically viable.*
- *We respect and celebrate all people. Our work culture responds to the individual's needs and the benefit of the whole. We endeavor to be fair. We listen to everyone associated with our efforts.*

CONCEPT SKETCH
365-367 COMMONWEALTH
CONCORD HOUSING AUTHORITY
3.29.19





Study for an Affordable Housing Lot West Concord Village

Gerow Property Assessment & Feasibility Report

Prepared for:
Town of Concord
Department of Planning & Land Management

Prepared by:

GPI

Greenman-Pedersen, Inc.

April 2019

Study for an Affordable Housing Lot

Gerow Property
Assessment
& Feasibility Report

Prepared for:

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Department of Planning &
Land Management

Prepared by:

GPI

April 1, 2019

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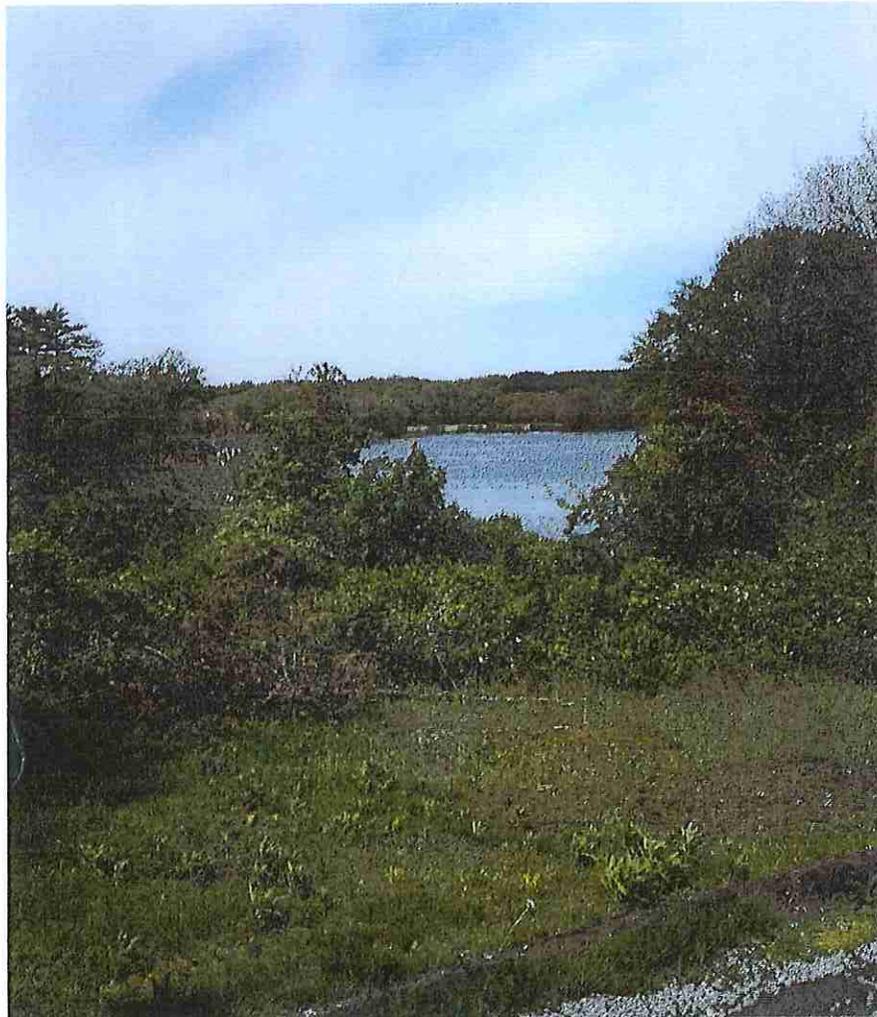


Figure 1: Photo of House Site.

Executive Summary

Vision

The purchase of the Gerow property was made possible in part through the Town's Community Preservation Act (CPA). CPA is a smart growth tool that helps communities preserve open space and historic sites, create affordable housing, and develop outdoor recreational facilities. While CPA funds allocated for the Gerow land purchase were specifically for the purchase of open space, there has been an interest in trying to accommodate an affordable house within the property.

Therefore, working in collaboration, the Town of Concord and the Concord Housing Authority (CHA) are advancing the idea of siting an affordable home on the property frontage along Commonwealth Avenue. The intent of the house project is to add an additional housing unit adjacent to the existing residence which is owned by the CHA at 365 Commonwealth Avenue. The Town considers it a win-win if the purchase of the Gerow property not only provides open space and recreation, but also generates an affordable housing unit.

The mission of the Concord Housing Authority is to develop and manage safe, good-quality affordable homes for low- and moderate-income individuals and families, while promoting community and self-reliance. The proximity of the Gerow property to downtown West Concord makes the location ideally suitable, as it offers safe and functional pedestrian connections that directly link into the village center.

Design Process

The Town recommended the incorporation of an affordable housing lot as part of the Gerow Recreation Area development. In March of 2019, the Town of Concord selected GPI to develop an assessment and feasibility study for the development of an affordable housing lot.

Site Scenarios

This process arrives at three potential site plan scenarios based around access needs of the proposed park. This includes 1) maintaining a 20' access drive to the park, 2) preserving future rights of access only, and 3) elimination of all access.

These plans are presented with the primary issues for each scenario's development and rationale.

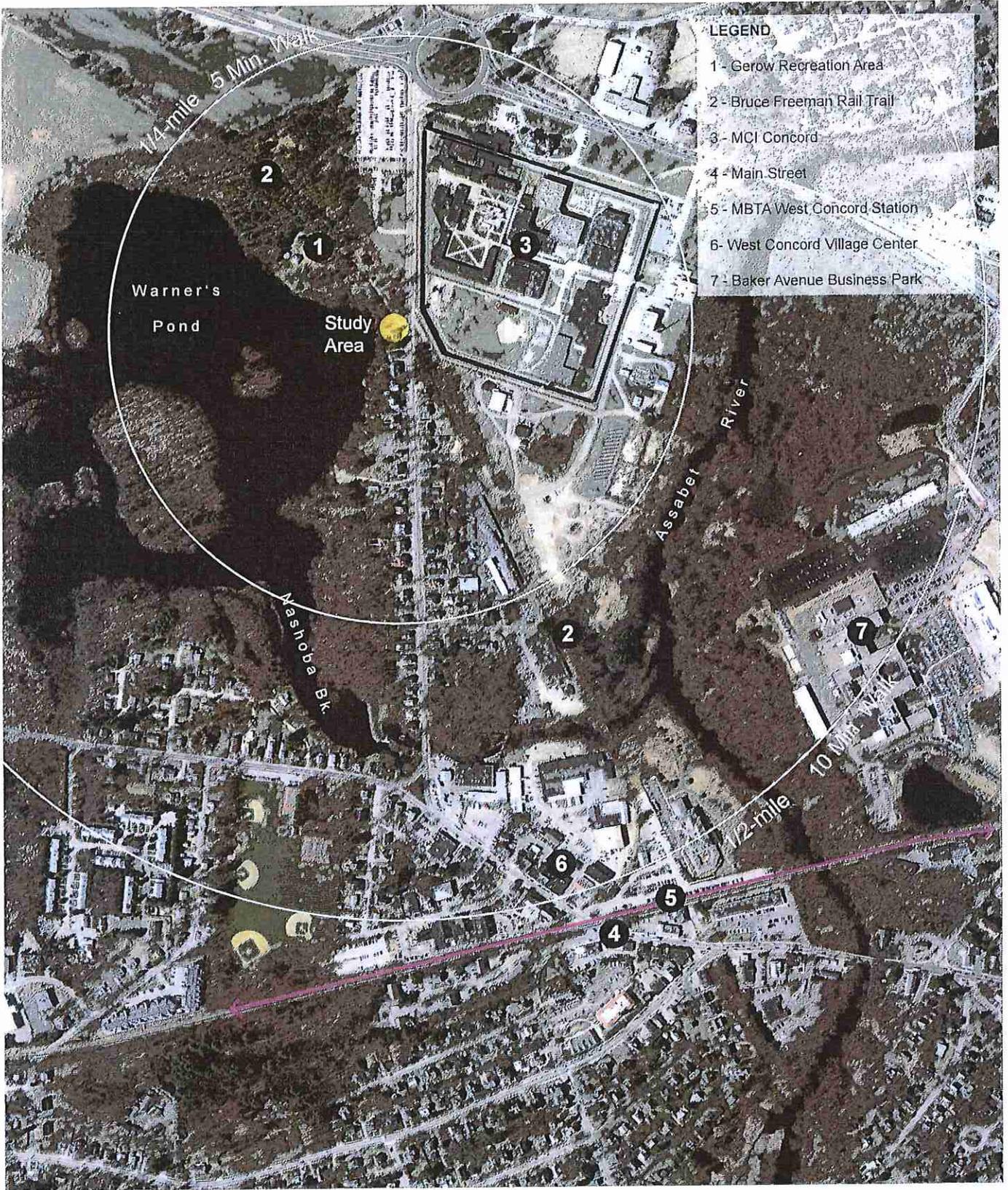


Figure 1: STUDY AREA

Study for an Affordable Housing Lot
West Concord, MA



GPI Greenman-Pedersen, Inc.

1.0 INTRODUCTION

Greenman-Pedersen, Inc. (GPI) was retained by the Town of Concord to prepare a feasibility study for an affordable housing lot on a portion of the Gerow Property, located at 369 Commonwealth Avenue. This study was funded by the Town of Concord and The Concord Housing Authority (CHA).

1.1 BACKGROUND

The Gerow property is found along Commonwealth Avenue between the Route 2 rotary and the intersection at Laws Brook Road (see Figure 2). From this location, the project is within a half-mile walking distance of West Concord Center - either via Commonwealth Avenue or the Bruce Freeman Rail Trail (BFRT). Developed as a traditional village center, the compact nature of the downtown offers various shops and services that meet the daily needs of residents and workers alike – without the use of an auto. As such, walkability is a key characteristic of the village, and is considered an important aspect of West Concord.

1.2 PURPOSE AND NEED

This study provides analysis and findings for advancing the development of an affordable housing unit along Commonwealth Avenue in West Concord, where there are currently several affordable units along Warner's Pond (see Figure 3). The CHA owns Federal, State, and Locally aided housing. Because of the high demand for affordable housing, and comparatively low supply, it is not rare to be on a waiting list for several years. As such, the CHA is always looking for opportunities to increase their housing stock.

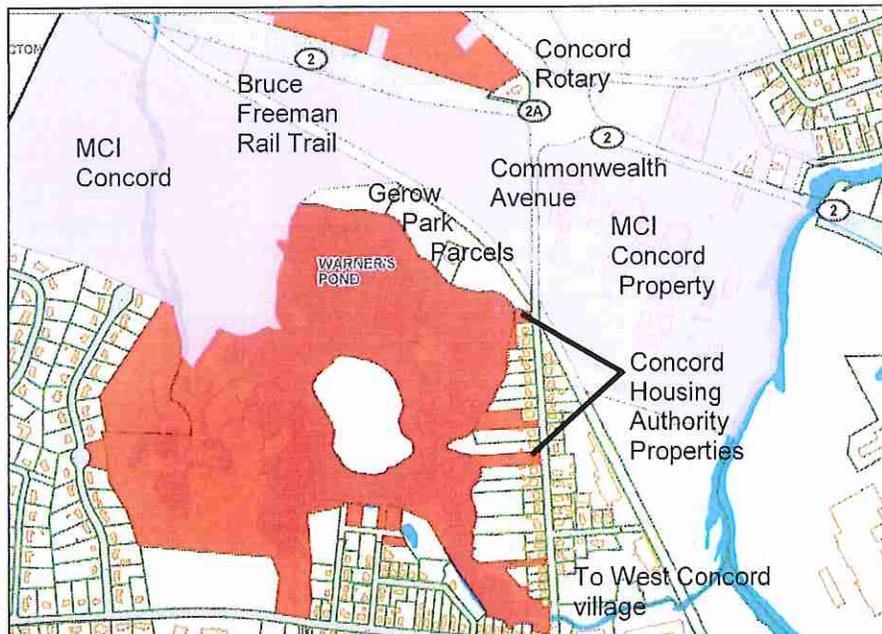


Figure 3: Affordable Housing Properties

2.0 PROJECT CONTEXT

The following built and natural features are found in the project study area:

2.1 COMMONWEALTH AVENUE

Commonwealth Avenue is a two-lane roadway running approximately north-to-south between the Route 2 rotary and West Concord Village. Significant portions of Commonwealth Avenue have existing sidewalk on both sides, although the sidewalk width varies. There are currently no bicycle accommodations along this route.

2.2 369 COMMONWEALTH AVENUE: GEROW PROPERTY

Located at 369 Commonwealth Avenue, the Town purchased the 7.03-acre Gerow Property in 2018, with the express intent to develop it as a recreational facility serving West Concord. The park is immediately situated upon Warner's Pond, a 54-acre body of water located immediately to the west of the property (see Figure 1). This property is highly valued for its access to the pond for kayaking and fishing, for its stunning views of the water, for its open space and wooded areas, and for its proximity to the BFRT. The Town believes that the combination of these assets is a significant gain for our residents.

Existing access to the property is via a narrow gravel driveway off Commonwealth Avenue. The current zoning of the property at 369 Commonwealth Avenue is Residence B.

Originally there was a small 3-bedroom, Cape Cod-style dwelling and a detached garage located in the center of the property. Initially, the Town had hoped to move this facility to a location where it could be used as an affordable housing unit. However, analysis of the cost and site constraints made this prohibitive. The unit was demolished in early 2019.

2.3 365 COMMONWEALTH AVENUE: CHA PROPERTY

The current Lot at 365 Commonwealth Ave (property #2156) is owned by the Concord Housing Authority and includes an area of 8,776 SF with approximately 55' of frontage. This house is in the Residence C district which requires a minimum lot size of 10,000 SF and 80 feet of frontage. The lot is currently not compliant, but it is considered "grandfathered" because a house was constructed on the lot prior to the adoption of zoning and the minimum lot size.

The current living area square footage is 1,684 SF.

2.4 WARNER'S POND

Warner's Pond, located immediately to the south of the Gerow property, is a 54-acre body of water within a larger Town-owned parcel totaling more than 77 acres – highlighted in Figure 2 in RED. Warner's Pond was created in the 1800's by damming the Nashoba Brook in order to impound water to power the nearby mills. Abutting the property to the west is 67-acres of conservation and agricultural land owned by Massachusetts Correctional Institution (MCI) - Concord. The land is leased to farmers who grow field

crops there. The remaining Red parcels highlighted in the picture showcase other Town-owned lands, held mostly by the Natural Resources Commission Division. There are two parcels along Commonwealth Avenue which are currently owned by the CHA and are rented units of Affordable Housing.

2.5 BRUCE FREEMAN RAIL TRAIL

The Bruce Freeman Rail Trail (BFRT) is a non-motorized shared-use path currently under construction along the former route of the old New Haven Railroad – Framingham & Lowell Line. This rail-to-trail path, once complete, will run 27-miles in length from Framingham to Lowell. Approximately 3.5-miles of the trail falls within Concord, stretching from the border of Sudbury near White Pond, north through the West Concord Village to just south of Route 2 at the Acton Town border. After two decades, the majority of the Concord section of the BFRT is nearly complete, with an opening anticipated in the spring/summer 2019.

The BFRT provides north-to-south access and passes directly through Junction Park and the West Concord Commuter Rail Station. The trail is expected to provide recreational and commuter access from surrounding neighborhoods to the village center.

3.0 PROJECT CONSIDERATIONS

The existing Gerow property has a number of physical and regulatory constraints that make development of the affordable house lot challenging in addition to the access and utility requirements that must be maintained. These include the following:

3.1 ZONING

The Gerow property is currently zoned Residence B. As shown in Table 1, this zoning district requires a minimum lot area of 20,000 square feet; minimum lot frontage of 125 feet (or 100 feet applying the frontage exception); and minimum lot width of 100 feet. The "yard" or setback requirements for this property are also: 20-foot front yard, 15-foot side yard and the lesser of 30-feet or 25% of lot depth for the rear yard.

The current zoning of the CHA property at 365 Commonwealth Avenue is zoned Residence C. Potentially, an area of land could be transferred from the Gerow Property to the ownership of 365 Commonwealth Avenue, and rezoned from Residence B to Residence C. As shown in Table 1, this zoning district requires a minimum lot area of 10,000 square feet; minimum lot frontage of 80 feet; and minimum lot width of 64 feet. The "yard" or setback requirements for this property are: 20-foot front yard, 15-foot side yard and the lesser of 30-feet or 25% of lot depth for the rear yard.

	Residence B	Residence C
Lot Size	20,000 SF	10,000 SF
Frontage	125 feet (100 feet with frontage exception)	80 feet
Minimum lot width	100 feet	64 feet
Front Yard	20 feet	20 feet
Side Yard	15 feet	15 feet
Rear Yard	The lesser of 30 feet or 25% of lot depth	The lesser of 30 feet or 25% of lot depth

Table 1. Overlying Zoning Requirements

This presents a considerable spatial challenge as the 'neck' of the Gerow parcel has very limited frontage as well as a 50' Buffer from the wetland dedicated as a 'no build zone'. Carving off a 20,000 SF parcel, or even a 10,000 SF is made more difficult by issues of access and topography.

3.2 PARK FRONTAGE

The existing Gerow property is zoned as Residence B, which requires a minimum frontage between 100-125 feet. The existing property only has 40 feet of frontage along Commonwealth Avenue, due in part to the acquisition of a small triangular parcel from the railroad in 1949. In 1951, the then-owners prepared a subdivision plan utilizing a 40' wide right-of-way, which was approved by Planning Board (note: the 50' right-of-way requirement was not adopted until 1960). The 1,000 feet long right-of-way provided frontage for multiple lots, but only one was developed.

Unlike a house lot, the conversion of the lot to a public park has no frontage requirements.

3.3 PARK ACCESS

Access to the proposed park property is currently served by a 10' wide gravel driveway within a 40' Right-of-Way. While adequate for a private residence, this driveway width will need to be widened to at least 20' to serve two-way traffic to the park. Furthermore, an engineering review of the driveway recommended relocation of the driveway entrance to the north side of the BFRT for a variety of safety reasons. Perhaps most importantly, the preferred relocation option provides increased separation from the BFRT crossing, which will greatly reduce conflict as the Town transitions the property to public use.

The Town of Concord is in the process of trying to obtain a lease or easement over the BFRT from the State to facilitate this new alignment. This access agreement would likely be in the form of an amendment to the 99-year lease that the Town currently holds for the state-owned rail corridor. So even if access over the BFRT is granted, it will likely have similar terms to the trail lease, meaning that it would not be a permanent means of access.

With the exception of the 40' Right-of-Way, the proposed park is otherwise landlocked, therefore maintaining a right of access to the park is a top priority for the Town. As such, the Town is unlikely to give up total control over its current access from Commonwealth Avenue. However, retention of the 40' Right-of-Way greatly restricts the amount of buildable area near the public street.

3.4 WETLAND RESOURCE AREAS

All work within the study area is subject to the Wetlands Protection Act (M.G.L. 131 §40) and implementing regulations (310 CMR 10.00), and the Concord Wetlands Bylaw. For this project, wetland resource areas include Bank, Bordering Vegetated Wetlands, Land under Water Bodies and Waterways, and the 100-year floodplain (Land Subject to Flooding).

Relevant to this study, there is a designated 50' No-Build buffer to any wetlands along the pond edge. This significantly impacts the narrower portions of the parcel located near Commonwealth Avenue.

Close coordination with the Concord Natural Resources Commission (NRC) will be required to insure that all proposed improvements comply with the Wetlands Protection Act and Concord Wetlands Bylaw for work which will remove, fill, dredge or alter any wetland resource area.

3.5 TOPOGRAPHY

The Gerow property is served by a narrow 'neck' that includes the gravel driveway and a steep bank down to the pond. Due to the overlying 40-foot Right-of-Way and a 50-foot No-Build buffer to wetlands along the pond edge, this area is considered unsuitable as a house lot.

Under current zoning requirements, one would need to go almost 400 feet into the site before the topography and land is wide and flat enough to provide a buildable area. This is considered by the Town to be too intrusive to the park development, as it would occupy some of the flattest and most usable space – which is currently slated as a playground area.

3.6 DRAINAGE

There is an existing 6" drainage line that passes through the study area. This pipe appears to be associated with storm drains located within Commonwealth Avenue near the former RR line crossing. The current condition of the pipe is unknown as the outlet could not be located, but it would be feasible to relocate the pipe if needed.

3.7 SEWERAGE

The house placement will be served by connections to the present public sewer, water, and electric/telecom lines found along Commonwealth Avenue. An initial review of the house lot and the Town of Concord's *Design and Installation Standard Specifications for Sewer Services in the Town of Concord, Massachusetts, April 2005* suggests that a gravity sewer connection to an existing sewer manhole in front of #355-357 Commonwealth Avenue is feasible. Consider the following:

- While the ground elevation within the buildable area of the lot is roughly EL. 130, it is assumed that the front yard of the new unit would be filled to match the adjacent house. This would raise the grade of the lot to approximately EL. 136. This suggests that the First Floor EL. of the house is around EL. 138.0.
- No building sewer shall have less than 4-feet of cover over the crown of the pipe unless approved by the Superintendent. Therefore, the service connection leaving the house would need to be around EL. 131.5 or lower.
- Per Water and Sewer regulations, 6" service connections shall be designed with slopes between 1/8- and 1/4-inches per foot wherever possible. The existing SMH has an invert at EL. 128.8, so the line at the house would need to be between EL. 130.3 to EL. 131.8.
- No sewer service shall exceed 200-feet in length without prior approval of the Water and Sewer Superintendent. Connection to the existing sewer manhole (SMH) in Commonwealth Avenue would require a 6" service connection approximately 150-feet in length.
- Connection directly to the SMH will require approval of the Water and Sewer Superintendent. In all likelihood, the line would actually connect to the service connection coming from 365 Commonwealth Avenue, which already ties into the SMH.

4.0 REGULATORY FRAMEWORK

The project intentions as directed by the Town seeks to define an appropriate area of property for the affordable house as an extension of the CHA parcel, but to maximize the property retained for the park.

With a goal to develop an affordable house lot using a portion of the Gerow property, a number of regulatory approaches were reviewed with planning and town administrative staff as shown in Table 2.

These options were weighed against leaving the existing 40' Right-of-Way in place or changing to an easement.

	Viable?	Comment
Existing Zoning	No	Would require over an acre of land to obtain buildable area.
Re-zoning	No	Would require over an acre of land to obtain buildable area.
Combining Lots	No	Would require over an acre of land to obtain buildable area.
Accessory Dwelling	No	Must be interior to building.
Residential Compound	No	Would require 5x zoning lot area.
Residential Development Cluster	No	Would require 5x zoning lot area.
Chapter 40B	Yes	State Process
Planned Residential Development	Yes	Meets Special Permit for CHA.

Table 2. Alternate Scenarios Reviewed

After a review of options, there are two viable approaches for the Concord Housing Authority to develop a small house adjacent to the existing house at 365 Commonwealth Ave, including the following:

- Option 1 - the first is through the application of the comprehensive permit process (State process under MGL Ch. 40B); and
- Option 2 - the other is through use of the special permit provision expressly for the Concord Housing Authority found in the Concord Zoning Bylaw (ZBL) Section 10. Planned Residential Development).

A brief explanation of each follows:

4.1 CHAPTER 40B

The comprehensive permit process provided by state statute enables local Zoning Boards of Appeal to approve affordable housing developments under flexible rules (including waiver of all zoning requirements) if at least 20-25% of the units have long-term affordability restrictions. In order to be eligible to submit an application to the Board for a Comprehensive Permit, the Developer must prepare a Project Eligibility submittal and meet certain threshold requirements, which include:

- Nature of the developer;
- Project is fundable; and,

- Developer has site control.

4.2 SECTION 10: PLANNED RESIDENTIAL DEVELOPMENT

The second path, the special permit provision of the Concord Zoning Bylaw (ZBL), may provide a more streamlined approach because the Concord Housing Authority would not be required to obtain a 'site eligibility' determination from the State, but would follow the local special permit process which begins with submitting an application to the Zoning Board of Appeals (ZBA). Prior to submitting the application, town review staff is available to provide a review of preliminary plans if desired to identify any major issues in advance of submitting a full application.

ZBL Section 10.3.1 *Special Provisions for the Concord Housing Authority and Town of Concord Projects* waives all standards found under Section 10.2 except the height and access from a public or private way, provided that 75% of the units will be low income dwelling units which can be counted toward the Subsidized Housing Inventory and are affordable. The standards that are waived include:

- minimum tract size;
- maximum permissible density;
- diversity of dwelling units
- permitted uses;
- lot area,
- frontage and yard requirements;
- area of residential development;
- common open space; and,
- limitation of subdivision.

Once a ZBA application is formally submitted or filed, the information is distributed to Town staff for review and comment. Comments are shared with the applicant at a staff meeting, after which additional information may be provided or a report prepared.

The application is then reviewed at a Planning Board public meeting and a Natural Resources Commission public meeting for these boards to prepare a recommendation to the ZBA. The ZBA then holds a public hearing (which requires notification to abutters and abutters to abutters) to receive the recommendations, hear public comments and receive any additional information.

After the public hearing is closed, the ZBA prepares its decision (with findings to approve, approve with conditions or deny), which is then filed with the Town Clerk. Following filing with the Town Clerk there is a 20-day appeal period after which, the decision is filed at the Middlesex South Registry of Deeds.

4.3 PREFERRED APPROACH

The preferred approach is to develop a Planned Residential Development (PRD) consisting of two low income units (the existing house and construction of a new house) located on a combined lot measuring

18,176 SF. This will be accomplished by adding a 9,400 SF portion of land from the Gerow parcel to the existing 8,776 SF affordable housing lot located at 365 Commonwealth. In keeping with the requirements of Section 10, access to the tract shall be provided from Commonwealth Avenue, and the maximum height of any structure is limited to thirty-five (35) feet.

Planned Residential Development (PRD) allows by special permit from the Board an alternative pattern of residential land development. It is intended to encourage the conservation of open space, while at the same time providing for a mixture and diversity of housing types in the Town at somewhat greater dwelling unit densities than is otherwise permitted without a significant increase in Town-wide population density. In a PRD, dwelling units should be constructed in appropriate clusters that are harmonious with neighborhood development and will not detract from the ecological and visual qualities of the area. The overall site design and amenities should enhance the quality of living for the residents of the development, the immediate neighborhood and the Town generally. Attention, however, shall be given by the Board as to whether the proposed site design, development layout, number, type and design of housing constitute a suitable development for the neighborhood within which it is to be located.

Use of ZBL Section 10.3.1 *Special Provisions for the Concord Housing Authority and Town of Concord Projects* waives all standards found under Section 10.2 except the height and access from a public or private way. Both units will be low income dwelling units which can be counted as affordable units toward the Subsidized Housing Inventory. A comparison of the zoning requirements to the proposed affordable lot are as follows:

	Residence B	Residence C	Proposed PRD
Lot Size	20,000 SF	10,000 SF	18,176 SF
Frontage	125 feet (100 feet with frontage exception)	80 feet	95 feet
Minimum lot width	100 feet	64 feet	95 feet
Front Yard	20 feet	20 feet	18 feet
Side Yard	15 feet	15 feet	12+ feet
Rear Yard	The lesser of 30 feet or 25% of lot depth	The lesser of 30 feet or 25% of lot depth	45+ feet

Table 3. A Comparison of PRD Approach to Standard Zoning.

5.0 FINDINGS

The study has identified three different scenarios for the affordable house location, driveway and other considerations for the site development. These are shown on the following pages.

5.1 SCENARIO 1

This plan (Dwg. L1.1) is predicated on denial of the Town's request for access across the BFRT for the Gerow Recreation Area, and therefore the Town must retain the gravel access route for primary access to the park.

- The house placement is significantly affected by the constrained area, with the 20' ROW and a 3' setback plus the wetland setback. There is a feasible location for a modest sized house to be developed, although it is very close to the access road.
- This plan shows the road at 20' wide.
- The house is placed on a gradual west facing slope with a walk out basement on the pond side and the house entrance closer to the elevation of the front lawn facing Commonwealth Avenue.
- Parking is defined as two pull off spaces along the access road.

5.2 SCENARIO 2

This plan (Dwg. L1.2) is predicated on approval of the Town's request for a lease agreement across the BFRT for the Gerow Recreation Area. The scenario reserves a 20' ROW along the route of the gravel driveway to preserve a future right of access for the park property. However, this easement would only be for future use if necessary, but could be used otherwise by the affordable unit as a driveway.

- The house is still placed outside of the 20' ROW, but the narrower driveway at 12' leaves 8' of lawn or open space as a separation from the drive to the house façade.
- Parking is achieved with head-in parking pulled closer to the house for convenient access from the driveway.
- The house is placed on a gradual west facing slope with a walk out basement on the pond side and the house entrance closer to the elevation of the front lawn facing Commonwealth Avenue.

5.3 SCENARIO 3

This plan (Dwg. L1.3) is predicated on the successful negotiation of a permanent ROW across the Bruce Freeman Trail such that the gravel driveway is no longer required for anything other than access to the proposed affordable house. With this in mind, the house can actually occupy the flatter ground of the existing driveway, making it much more suitable for the house's placement.

- The house can be planned as a freestanding project without the ROW constraints.
- The separate driveway off Commonwealth Avenue is much like the majority of houses up and down the street.