

Riverbridge Fiscal Impact Study Update

TOWN OF BERLIN

FUTURE PHASE II
DEVELOPMENT

Community Opportunities Group, Inc.
May 19, 2020

Fiscal Impacts

2020 Update

RIVERBRIDGE

Berlin, Massachusetts

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Project Description

Riverbridge is a mixed-used development consisting of 204 apartments, a gas station, hotel, restaurant, daycare, and vacant retail space that was constructed over the course of several phases, commencing in 2009. Riverbridge is subject to a Development Agreement between the Town and the Riverbridge owners to ensure the municipal fiscal impacts related to the development are neutral. From time to time, this agreement is reviewed and updated.

Project History

Originally permitted in 2009, the iteration consisted of a mix of rental apartments and condominiums, a Continuing Care Residential Community, and 130,000 square feet of commercial space (primarily retail with some office). Market conditions changed and the proposal was modified in 2013, eliminating the CCRC and adding a hotel. Initial construction phases focused on the commercial components, with the apartments now coming online in Summer 2020.

Key Findings

-) Requirements for public safety mitigation currently stipulated in the Development Agreement for Riverbridge are primarily based on the fiscal impact analysis of 2009.
-) Changes in the town's tax rate structure, organization and capacity of its public safety departments, and to the project description over the past decade improve the Town's ability to accommodate this development while maintaining at least a neutral fiscal balance.
-) The requirement for private ambulance service for Riverbridge is now duplicative; it would be preferable to invest in a single enhanced municipal EMS service than to have two separate ambulance services operating in the town.
-) Mitigation payments totaling \$500,000 for transitional costs are justified by the need for additional staff (one recent hire and two projected), equipment and training, and upgrading to ALS ambulance service.

Community Opportunities Group, Inc. is pleased to present this independent and objective report authored by Roberta Cameron, AICP, to the Town of Berlin Planning Board.

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BERLIN RIVERBRIDGE FISCAL IMPACT UPDATE

Phase 1: Public Safety

Introduction



Community Opportunities Group, Inc. has been commissioned to evaluate the fiscal impacts on Town services from the Riverbridge Development, as the residential phase is currently under construction. Projected impacts from the proposed development were evaluated in 2009 when the project was originally permitted, informing a Development Agreement, dated December 2, 2009. An updated impact analysis was prepared in 2013, reflecting changes to the development program.¹ The Development Agreement was then amended in November, 2013, and again in December, 2017.

As phases of the Riverbridge Village Development have come on line, the updates of the fiscal impact analyses seek to incorporate data on the actual demand for services that has been generated, as well as updated projections and an evaluation of the Town's capacity to accommodate the projected need for services.

While a full update of projected fiscal impacts will follow the completion and occupancy of the first phase of residential development that is currently under construction, the present analysis provides a review of the prior fiscal impact studies and the mitigation agreements, with a particular focus on the projected impacts on the Town's Public Safety Departments.



¹ The 2009 study was prepared by Judi Barrett of Community Opportunities Group, Inc. The 2013 study was prepared by Roberta Cameron, AICP, also of Community Opportunities Group, Inc.

Riverbridge Village



The original Riverbridge Project was a 26- acre village style development with housing, restaurants, retail and 86 acres of preserved open space. The current proposed Riverbridge development includes 204 rental apartment units and a mix of commercial uses. **Table 1** shows the existing/proposed buildout mix, compared with the scenarios that were evaluated in 2009 and 2013. In 2009 there were different scenarios studied in impact analyses prepared in April and in October, where the total count of residential units was reduced to 115 from 135 units in addition to a Continuing Care Residential Community (CCRC) component.

Aside from the total number of units, the mix of residential units has also shifted from what was evaluated in prior impact studies. The CCRC component was eliminated due to market limitations; those 90 units were incorporated into the project as market rate apartments. As of 2013, the senior housing component was intended to be replaced by a 72 bed Memory Care Facility at a different site, however this alternative was subsequently withdrawn due to the difficulty of establishing a feasible project under current market conditions.

The 2009 study evaluated several different styles of residential units, but did not indicate the bedroom mix. The proposal evaluated in 2013 included all apartments in the short term, and showed a mix of one-, two-, and three-bedroom units, with 75 percent of the units having two bedrooms. The development as currently under construction will also have all apartments and will have 60 percent two bedroom and the remaining all one bedroom and studios.



Project History

Since it was initially permitted, the development has been constructed in phases, at a slower rate than envisioned. The first segment of the Riverbridge development to be completed was the gas station, constructed in 2011. According to the Berlin Assessor, the gas station includes a 3,530 square foot building (along with outdoor areas covering a total of 9,083 square feet).² A daycare facility was constructed in 2013, which is described by the Assessor as having 12,766 square feet. More recently, the hotel building and a coffee shop/deli were completed in 2018.³ The apartments are currently under construction, with the first phase anticipated to be available for occupancy in Summer, 2020. The building site can accommodate additional commercial development, but there have not been specific proposals, as prospective tenants for these sites have not yet been identified.

Proposed/Existing Development	2020	2013	October 2009
Residential	Total 204 Units	Total 204 Units	215 Units
Mixed Income Rental Apartments	204 Units	204 Units	84 Units
Studio (Affordable)	1	x	1-2 bedroom, 21 affordable (25%)
Studio (Market)	2	x	
1 Bedroom (Affordable)	6	1	
1 Bedroom (Market)	71	46	
2 Bedroom (Affordable)	14	19	
2 Bedroom (Market)	110	136	
3 Bedroom (Affordable)	x	1	
3 Bedroom (Market)	x	1	
Condominiums	x	Possible long-term conversion of 120 market rate units	31 Units 2 affordable
Continuing Care Residential Community	x	x	90 units
Commercial	Total 128,656 Square Feet	Total 103,000 Square Feet	Total 130,000 Square Feet
Clubhouse	7,000		
Hotel	80,994 SF	78,000 SF	x
West Side Restaurant/Retail	4,366 SF	5,000 SF	8,500
Gas Station	3,530 SF	3,500 SF	1,500
Daycare	12,766 SF	12,500 SF	x
Commercial Space (Retail/Office)	20,000	4,000 SF	120,000

Note: Shaded cells indicate built-out, occupied square footage

² Vision Government Solutions Property Record Information, Valuation Year 2019

³ The building area recorded by the Assessor differs from the built-out occupied square footage based on building plans, as reported in a memorandum from the Building Commissioner to the Town Administrator dated 12/6/2019. The square footage provided by the Assessor is used for the purposes of this analysis.

Projected Impacts and Mitigation

Fiscal impact studies in both 2009 and 2013 found that the municipal operations most directly affected by the development would be public schools and public safety, although other municipal services may be affected to some degree as well.

Berlin is a very small town with a 2009 population of less than 3,000 people, which had grown to 3,144 by 2018. The local government provides basic municipal services: public safety, public works, public schools, a town library, licensing and permitting, limited health and human services functions, and administration and finance (general government).

❖ *2009 Fiscal Impact Study*

The April 2009 Impact Study evaluated an earlier iteration of a proposal for Riverbridge that included 135 residential units in addition to a 90 unit CCRC.⁴ Aside from differences in the number and mix of residential units, the analysis of municipal service needs provided in 2009 was largely carried forward and reflected in negotiations around the permitting of Riverbridge in the Fall of 2009. The analysis includes discussion about the capacity of Berlin's public safety departments to absorb the impacts from the Riverbridge Development. Noting that the Town had a small police department and call operations for fire and rescue, it was suggested that Riverbridge would be unlikely to be the sole cause of a need to increase capacity in these departments, particularly the Fire Department. The cost impacts attributed to the Riverbridge development represent a portion of what the town would most likely have to spend to serve existing development, near-term future growth in other parts of town, and the Riverbridge project.

In 2009, the Town had an underlying need to increase capacity in its public safety departments. Riverbridge was estimated to account for approximately 1/3 to 1/2 of the staffing increase that was anticipated to be required in the near-term.

-) The study assumed that police demands from Riverbridge would be equivalent to one patrol officer (1/3 of the cost of adding three officers to cover one 24-hour patrol position).*
-) The 2009 study estimated that the Town would need to hire two firefighters/rescue personnel in the near future, and attributed 50% of this increase in capacity (one full-time position) to Riverbridge.*
-) The study further assumed that the public safety personnel would continue to operate out of their existing facilities, and to replace vehicles and apparatus as scheduled in the existing capital plan, without need for additional capital expenditure.*

The April 2009 study further projected that the residential component of the development (non-CCRC) would generate a negative net fiscal impact, while the commercial and CCRC components would generate substantially higher revenues than the cost to serve, making the

⁴ An initial report on April 24, 2009 was updated on April 30, 2009, to reflect a change in the proposed mix of residential unit types.

development generate positive net revenues overall. (The largest expense would be the cost of education, based on the projection of 27 additional school children. The analysis does not comment on the mix of sizes of apartment and condominium units, but the children per unit ratios used to estimate the number of school-aged children are consistent with an average of two-bedroom units throughout the development.) **The study recommended that the Town establish a phasing schedule to reduce the possibility that fiscally negative uses build out more rapidly than fiscally positive uses, or alternatively that the developer make “advance” mitigation payments to enable the town to prepare for an increase in service demands before the project is fully occupied.** The need to accelerate adding capacity was noted to be a particular concern for public safety response.

❖ *Revised 2009 Fiscal Impact Study*

After a proposed Zoning Overlay District failed to pass Town Meeting in May, 2009, the development proposal was further revised to seek approval again in Fall of the same year. One of the terms of the revised proposal was the acquisition of an adjacent proposed 40B development site, thereby protecting the Town from a development project that, unrelated to Riverbridge, would likely have had a negative fiscal impact for the Town based on the findings from the April 2009 Riverbridge FIA. In addition to this, the Riverbridge project was refined to reduce the total residential units to 205, including the 90 unit CCRC.

The October 2009 study estimated that the total population at Riverbridge would be approximately 338 people, with an average of 22 school children per year. The development was expected to generate additional costs to the

town of approximately \$219,100 annually for public safety services, \$243,200 annually for education, contributing to a total of \$698,300 for all municipal service costs. Including real estate taxes, personal property taxes, and local receipts, Riverbridge was expected to generate \$759,600 in revenues to the town. Comparing the total cost and revenue, the resulting net revenue was \$61,300, for a cost/revenue ratio of 0.92.

The 2009 analysis projected that public safety impacts would be predominantly generated by demands associated with the commercial space and CCRC components. Police and Fire department personnel concurred with the scale of projected impacts, but had concerns that the CCRC could generate more emergency medical calls than anticipated. Based on this input and interviews with fire departments in communities with comparable developments, the residential portion of the development was estimated to generate 1.25 times the cost per capita multiplied by the projected population at Riverbridge. This suggests an expectation that the town would have to increase capacity to be able to respond to the medical emergencies anticipated for the development, particularly associated with the CCRC.

The 2009 FIAs projected the need for expansion of Berlin’s public safety departments by approximately 5 full-time staff to serve existing need as well as new growth. Accounting for the cost of two public safety staff and educating an average of 22 school children, Riverbridge could be expected to generate a net positive fiscal impact *if* the mix included the 90 unit CCRC. Without the CCRC component, a deficit was projected.

❖ *2009 Development Agreement*

A Development Agreement dated December 2, 2009, establishes the mitigation and other terms and conditions required of the development. Acquisition of the River Run site for \$675,000 enabled the Town to avert a proposed 40B development project which could have been expected to have a negative fiscal impact. Instead, the Agreement stipulated that half of the parcel would be donated to the Town (an equivalent value of \$337,500).

In terms of public safety, the agreement stipulates that the developer procure primary and backup ambulance coverage not involving town service covering both BLS and ALS levels of service in order to ensure that the CCRC is adequately served by ambulance service at no cost to the town. This ambulance service is also required to provide primary service for the residences and commercial uses of the project at no cost to the Town. The Developer is required to obtain approval to create a separate service zone for the Project area, so that the Developer's ambulance provider has the status of the Primary Ambulance Provider to which the Town can refer emergency calls.

In addition, the Development Agreement specifies cash payments from the developer to mitigate anticipated fiscal impacts. Recognizing the significant transitional costs associated with the expansion of public safety department capacity, the developer agreed to make five annual one-time payments of \$100,000 when the construction phase reached a threshold, in order to ensure that the Town would have sufficient capacity to meet the demands generated by the development. The payments were to be triggered upon the receipt of a certificate of occupancy for the CCRC or a Certificate of Occupancy for the 150,000th square foot of development, regardless of the use.

Moreover, on the basis of the April 2009 Fiscal Impact Analysis which projected that the CCRC was critical to the project maintaining a positive fiscal impact for the Town, the Agreement stipulates that the developer should be required to make annual payments to the Town of \$51,200 (indexed to inflation) for as long as the CCRC is not built, starting four years after the approval of the Village Overlay District.

❖ *2013 Fiscal Impact Study Update*

Prompting a renegotiation of the project approval, the proposed development program was again altered in 2013 to reflect market conditions as components of the project were altered or stalled. The most significant change in the development program between 2009 and 2013 was the elimination of the CCRC component, with the proposed 90 CCRC units becoming market-rate apartments. Based on these changes to the development program, the projected population and school-aged children who would reside at Riverbridge increased, generating a corresponding increase in municipal costs. On the other hand, between 2009 and 2013 the Town instituted a split tax rate, so that the commercial portion of the development would generate considerably higher revenues per square foot than had been assumed in the earlier analysis.

The 2013 analysis projected that the net fiscal impact of this buildout scenario would break even - that is, that it would cost nearly as much to provide municipal services to the development as the property tax and other municipal revenue that it generates. An estimated

\$518,000 in school costs and \$343,000 in other municipal services is balanced by \$876,000 in projected revenues, generating a net surplus of \$15,000 for a cost/revenue ratio of 0.98.⁵ Although the 2009 FIA projected that the CCRC would be necessary to maintain a positive fiscal balance, this was not found to be the case in 2013.

Despite the agreement that the development would be served by private ambulance, the 2013 study noted that the Town would continue to respond to 911 calls and make referrals to the appropriate emergency services provider, which would place some burden on the Town's public safety departments. Thus the agreement for private ambulance service was not taken into consideration in projecting the public safety impacts from the development, as the Town's emergency response units were already extended beyond their functional capacity to absorb any level of increase in demand. The fiscal impact analysis attributed an estimated \$246,000 annually to provide public safety services, equating to three full-time staff positions, along with related vehicle and equipment costs.

The 2013 FIA found that the net fiscal impact from Riverbridge would break even; the development would generate enough property and excise tax revenue annually to cover the cost of three full time public safety staff and to educate an average of 41 children.

-) Contributing to the fiscal outcome, the Town's adoption of a split tax rate significantly increases revenue from the commercial portion of Riverbridge.
-) With fewer total bedrooms, the 2020 buildout can be expected to have a smaller resident population, shifting the fiscal balance positively.

❖ *Modifications to the Development Agreement*

In November, 2013, a modification to the Development Agreement allowed for the conversion of the 90 independent or assisted living units to dwellings. However, the agreement stipulates that the Developer remains obligated to provide ambulance service to Riverbridge at no cost to the Town regardless of whether a CCRC is built.

As there was an expectation that the Riverbridge developer would build a 72 unit Memory Care facility at an alternative site, the 2013 agreement allowed the construction of a memory care or nursing facility elsewhere in Berlin to satisfy the requirement forestalling the annual fee of \$51,200 which was intended to protect the Town from a negative fiscal balance projected in April, 2009. Failing to construct any CCRC, memory care, nursing, or assisted living facility, the developer would still be liable for this annual payment.

In January of 2018, a second modification of the Development Agreement extended the timeline for mitigation and recognized changes to the adjacent property known as "River Run" which

⁵ The 2013 analysis also considered a long range scenario in which additional commercial space was constructed and a portion of the rental units were converted to condominiums, in which case the net fiscal impacts would become more strongly positive for the Town.

the developer had purchased as part of the initial Development Agreement, and as required in the agreement had been subdivided into two lots, one of which the Town retained the option to purchase for \$1.00. Regardless of its acquisition of the lot, the 2018 Agreement established that the Town would receive 50% of leasehold revenues for an aerial adventure park that the Riverbridge Developer secured as a tenant for the site. The modification specified that the additional revenue from leasing of the site would not decrease the mitigation obligations pursuant to the original Development Agreement.

Public Safety and fiscal mitigation in the 2009 and 2013 Development Agreements includes:

-) Private ambulance service;
-) \$100,000 payments annually for 5 years to pay for transitional costs;
-) \$51,200 to cover the fiscal gap identified in 2009 if the CCRC was not built.

The 2018 modification also enabled the annual fee of \$51,200 to be avoided if the developer constructed a senior residence development containing at least 50 bedrooms at Riverbridge or elsewhere in Berlin, adding this use to the list of assisted living options described in the first modification.

Actual Impacts and Service Changes 2009-2020

Since the 2009 FIA was prepared, there have been substantial changes to the Town's public safety departments, ramping up capacity both in response to new development, as well as the need for modernization to ensure that the Town can continue to provide the needed level of service to existing residents.

In 2009, Berlin had a small Police Department which would require expansion to serve major new development, as suggested in the 2009 FIA. Separate Fire and Rescue Departments relied on paid on-call firefighters and squad members, with only part time Chiefs. The 2009 FIA noted that it was becoming increasingly difficult for fire departments to fully rely on on-call staffing, particularly during the day, because of a lack of availability of firefighters who work locally and can respond to calls. This was confirmed in a study by Municipal Resources, Inc. (MRI) commissioned by the Town in 2015, which highlighted that the Fire and Rescue Departments were not consistently able to muster the sufficient number of responders needed to ensure safe and timely response to emergency calls, despite sizeable rosters of on-call personnel. The Town's lack of EMS capacity at the time contributed to negotiations for private ambulance service or agreements with neighboring communities to ensure adequate response to the existing and proposed major commercial developments. Implementing the recommendations of the MRI study, the Town combined Fire, Rescue, and Emergency Management into one department in 2016, and supplemented the on-call roster with career firefighter/EMS staff.

An opportunity and impetus for expanding capacity in the Town's public safety departments was the development of Highland Commons, which both necessitated and provided funding to support increased service. Located on the border with the Town of Hudson, the majority of the commercial development at the site is located in Berlin, and Berlin's public safety departments respond to calls generated there. In addition to \$1,152,735 in property tax payments for

property assessed at \$41,660,100⁶, the Highland Commons Development Agreement (2008) required annual payments for public safety mitigation. Prorated according to the amount of commercial space that is built out, the public safety mitigation payment at full buildout will be \$565,000 annually, indexed for inflation. In 2020 the Town invoiced Highland Commons for \$591,866 for public safety mitigation costs.⁷ These payments have contributed directly to public safety staffing to respond to the emergency calls generated at the site. Highland Commons mitigation also paid for capital needs for the public safety departments, including equipment, vehicles, and the purchase of a ladder truck.

Since the Highland Commons development came on line, the Town has added three full-time staff positions each to the Police and Fire Departments. Two Police officers were added to ensure capacity to serve the Highland Commons development, while one was added in

Public Safety changes since 2009:

-)] Establishment of combined Fire, Rescue, and Emergency Management Department;
-)] Highland Commons public safety mitigation;
-)] Purchase of ladder truck and safety equipment;
-)] Addition of 3 full time staff to both Police and Fire Departments.

preparation for the commercial space coming on line at Riverbridge.⁸ An additional full-time firefighter position is to be added later this year. Both the Police and Fire departments anticipate the need for further staffing increases (1-2 full time positions) to close gaps in coverage, while capital expenses (vehicles, equipment and apparatus) are anticipated to be managed through the existing replacement schedule.

As components of the Riverbridge development have been constructed, the number of public safety incidents has increased, according to data provided by the Police and Fire Departments.⁹ The annual calls in the vicinity of River Road West reported by the Fire Department

doubled, from 17 in 2017 to 34 in 2019, reflecting the opening of Homewood Estates in 2018. According to Police data, incidents in the vicinity of Riverbridge Road West represented 9 percent of the town-wide total in 2017, increasing to 13 percent in 2019. While the number of incidents fluctuated downward over the three-year span town-wide, the calls generated in the River Road West vicinity increased by 20%. Some of the increase is due to general traffic in the vicinity, and some is due to the increase in commercial activity.

As noted in the MRI study, the major commercial developments are contributing financial resources sufficient to enable the Town to provide for the increased public safety capacity needed to serve these developments, whether the increased capacity is brought about through intermunicipal agreement, private contract, or via the Town's departments. Subsequent to the 2009 and 2013 Development Agreements for Riverbridge, the Town has taken steps to increase its in-house capacity for emergency services, so that outsourcing EMS to a private contractor is now duplicating the Town's own capacity expansion.

⁶ Berlin Assessor's Database, 2020

⁷ Margaret Nartowicz, Town Administrator

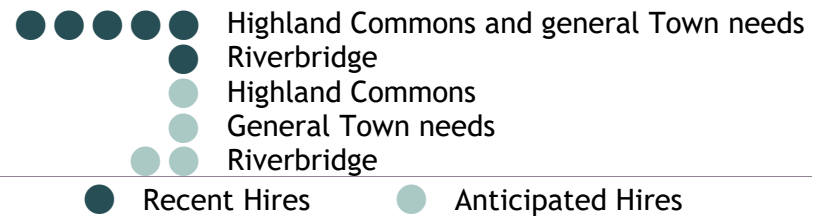
⁸ Interview with Chief Galvin, March 11, 2020

⁹ Nashoba Valley Dispatch District Call Analysis by Streets for calendar years 2017, 2018, and 2019; Incident Response data provided by the Fire Department

Projected Impacts and Needs

The actual increase in public safety capacity has been commensurate with the needs identified in the fiscal impact studies for Riverbridge. The 2013 analysis estimated that the impact on public safety from Riverbridge alone would require three public safety positions. To date, the Town has added one patrol officer in preparation for Riverbridge, and anticipates the need for approximately 4 additional positions between both departments to provide adequate service when Riverbridge and Highland Commons are both completed and to further supplement the on-call staffing of the Fire Department to serve existing residents. One of these positions would be covered under the maximum mitigation payment from Highland Commons, and one position is attributable to the existing need to increase the level of professional staffing in the Fire Department. Thus one existing and two new positions may be added to provide for the demand for service generated by Riverbridge.

Figure 1: Recent and Anticipated Public Safety FTE Hires



The cost of a full time position in the Police Department is approximately \$85,000 per year, including salary, benefits, equipment, and training. For the Fire Department, the cost of one full time position is approximately \$70,000. The total cost of public safety positions necessitated by Riverbridge is estimated to be \$225,000-\$250,000 annually. The 2013 Fiscal Impact Analysis projected that Riverbridge would generate approximately \$246,000 in cost impacts to the public safety departments. According to the 2013 study, the total property tax revenue that Riverbridge will generate when it is fully built out is projected to break even with the annual operating costs for municipal services, including the additional public safety staffing. An updated fiscal impact analyses based on current values, Town budget data, and observed impacts will be prepared at a later time.

The operation of a private ambulance service to serve the Riverbridge development duplicates and essentially competes with the Town's commitment to expand Fire/Ambulance capacity. As a three-story residential building without an elevator, medical calls for upper floor units will require augmented staff in order to safely carry people downstairs. It will be more efficient for one department to maintain adequate staffing levels, than to have two ambulance services operating in the same locale.

As shown in Table 2 below, fees are recovered for persons who are transported via ambulance. As they pick up a share of transport calls, the private ambulance service will divert revenue away from the Town. Based on an estimated 10-13 percent of the Town's emergency calls having been generated in the River Road West vicinity in 2018 and 2019, the private ambulance service may have captured \$70,000-\$100,000 in ambulance fees.

Table 2: Ambulance Fees				
	Billing Rates	2018	2019	2020
BLS	\$1,385	340	414	275
ALS 1	\$1,760	92	67	23
Total Revenue		\$632,820	\$691,310	\$421,355
Potential Riverbridge Ambulance Fee Diversion		\$69,000	\$100,000	

Conclusions

Given changes that have occurred since 2009 both in the Town's public safety staff and organizational capacity, as well as the development characteristics and the projected fiscal outcome, a reconsideration of public safety mitigation is warranted.

-)] The requirement for the development to provide private ambulance service is duplicative, since the Town has reorganized and increased its emergency response capacity over the years since the original Fiscal Impact Analysis. It would be more cost effective and provide better service for the Town to operate a single Emergency Department with the staff needed to provide coverage to Riverbridge.
-)] The \$500,000 total payment for transitional costs relates to anticipated one-time costs that the Town will have to absorb relative to the Riverbridge development, based on specific identified needs. The transitional costs associated with adding three full time positions in the public safety departments is approximately \$100,000 per hire, including recruitment, training, equipment, and first year's salary. The purchase of an additional vehicle may add \$70,000 to \$100,000. Finally, Berlin's Fire and Emergency Services Department could provide improved service both to Riverbridge and Town residents through the establishment of Advanced Life Support (ALS) service in addition to the existing Basic Life Support (BLS). Start-up costs for upgrading to ALS ambulance service, are estimated at \$100,000 to \$130,000 for planning, permitting, and equipment.¹⁰
-)] The need for ongoing "gap" funding of \$51,200 to cover an anticipated deficit if a senior housing component is not constructed was not justified in the 2013 Fiscal Impact Analysis. Changes to the projected fiscal outcome are driven by the implementation of a split tax rate, a reduction in the number of residential units, and a shift toward a larger share of one-bedroom units in the development mix. An updated fiscal impact analysis with actual revenue and school enrollment data will confirm whether the development generates sufficient revenue annually to cover the cost of municipal services that will be required of the businesses and residents at Riverbridge. A recommendation to eliminate this payment will likely be made when the report is finalized; in the interim, the payment should continue to be delayed.

A review of the Public Safety and fiscal impact mitigation for Riverbridge is warranted.

-)] It would be preferable to consolidate ambulance service under one enhanced department.
-)] The project is no longer expected to generate an ongoing fiscal deficit.

¹⁰ Interview with Chief Clark, March 18, 2020