



CITY OF CONCORD
Community Development Department
City Hall • 41 Green Street • Concord, NH 03301 • (603) 225-8595

April 7, 2026

Rep. Joe Alexander Chairman
Housing Committee
New Hampshire House of Representatives
107 North Main Street
Concord, NH 03301

RE: SB 564 - Relative to Eliminating Lengths of Dead-End Streets and Permitting Utilities in Conservation Areas

Dear Chairman Alexander,

I am writing to you regarding SB 564 which is scheduled for a hearing before the Housing Committee on April 7, 2026. The City of Concord understands that this is one of several bills designed to address the state of the housing market in New Hampshire.

Concord is one of 28 municipalities designated as a "Housing Champion." Since 2020, 774 housing units have been constructed in Concord (380 of which have been income restricted affordable units), and another 2,000 units are currently under construction or in development. The City has taken many progressive actions to facilitate housing in Concord, including the adoption of permissive zoning amendments, sale of City owned real estate, procurement of grants (which were subgranted to housing developers), use of RSA 162-K Municipal Economic Development and Revitalization Districts (better known as Tax Increment Financing Districts), RSA 79-E Community Revitalization Tax Relief Incentives, as well as loans from our Revolving Loan Fund program to support construction of new housing.

While the City shares the goals of addressing housing needs for our State, we have concerns about the potential implementation of this bill as written.

Most specifically, the language of the bill would eliminate the ability of municipalities to limit the length of dead-end streets. Presently, Concord's development regulations limit new dead-end streets to a maximum length of 1,000'. The purpose of this regulation is to protect public health and safety.

Specifically, families residing on dead-end streets are at risk of being trapped in the event the roadway is blocked, whether due to floods, downed trees or power lines from ice / wind / snow storms, automobile accidents, or other emergencies. Our public safety personnel play a key role in ensuring the safety of our residents, and the ability to provide multiple means of access to developments remains a significant concern when reviewing both residential and non-residential development. Long dead-end streets result in a host of challenges for first responders in the event that access is compromised in any way. Hence, the City limits the length of cul-de-sacs to minimize the number of persons who may be at risk in such circumstances.

Further, the City notes that 72% of responses by our Fire Department are medical emergencies. Hence, we limit the length of dead end streets to ensure that, if a roadway is impassible for any reason, first responders do not have to traverse long distances on foot carrying required gear and equipment to reach residents in an emergency.

Additionally, the length of dead end streets is also set at 1,000' due to the challenges of providing fire fighting service. Specifically, there are very real and serious challenges with pumping water for more than 1,000'; especially in rural areas not served by potable water. Although Concord is a City, much of our community is rural and not served by public water.

Lastly, the City believes that provisions referencing the State Fire Code are insufficient to protect public safety. Relying solely on Chapter 18.2.3.3 of the NFPA 1 will likely create unnecessary confusion and frustration for municipalities and the developers alike.

While the City supports strategies to expand the State's housing supply, such strategies should not compromise public safety, or the ability of first responders to carry out their duties. We respectfully request that provisions related to maximum length of roadways, and density on dead-end streets, be removed from the bill. Alternatively, we ask that the Legislature exempt those communities whom have been designated as a "Housing Champion" by the State from the provisions of this bill.

Thank you for your consideration of our concerns.

Sincerely,



Matthew R. Walsh
Deputy City Manager - Development

CC: Rep. Matthew Hicks
Thomas J. Aspell, Jr. City Manager
John Chisholm, Fire Chief
Paul Sirois, Fire Marshall
Tim Thompson, Assistant Community Development Director