

20 Masconomo Street
Manchester, MA 01944

December 22, 2021

Sarah Mellish, Chair
Zoning Board of Appeals
Town of Manchester, MA
Via email

RE: Proposed 40B project sponsored by SLV and Geoffrey Engler

Dear Chair Mellish:

First, thank you and other members of the Zoning Board of Appeals for the time, effort, and brain damage incurred in dealing with SLV's proposed 40B project. In many ways, it is not a fair fight since members of the ZBA are lay people dealing with a sophisticated development team with substantial experience in permitting 40B projects. Your efforts as a Board are much appreciated.

By way of background, I have 50 years of experience in real estate, the last 30 years of which has been devoted in part to acquiring, developing, re-developing, and managing affordable housing. Our firm, HallKeen Management, Inc., currently manages roughly 8500 units of affordable housing located from Maine to Florida. We have an ownership interest in approximately 26 of the affordable properties under management. It is fair to say our firm has a demonstrable commitment to the creation and preservation of affordable housing.

The proposed SLV project site has been evaluated by a number of developers over the past 25 years. In each instance prior to SLV's proposed development, the prospective buyers have concluded that the site was untenable due to a number of factors to include, but not limited to, the following:

- Steep grade and massive site costs due to the presence of granite on much of the site
- Proximity to wetlands and environmentally sensitive habitat
- Absence of sewer connections combined with a site lacking permeability for a septic system
- Storm water runoff into Sawmill Brook leading to the Town's primary source of drinking water
- Issues pertaining to ingress/egress, sidewalks, bike paths, etc.
- Costs associated with bringing water and utilities to the site
- Inability to comply with local Zoning regulations

From a pure real estate standpoint, SLV's project touches virtually all the wrong bases. Two miles from the center of Town, it is dependent on automobiles to go anywhere (transit oriented development it is not), there are no sidewalks, the access drive is a steep 1900 foot driveway ending in a cul-de-sac (safety concerns), the site is surrounded by wetlands and rivers, the proposed sewage treatment plant actually crosses a wetlands, and the plans call for blasting 40 feet from the top of Shingle Hill (where does all the material go?). Suffice to say the site is sub-optimal and I am being kind. Frankly, my worst fear is that SLV somehow is successful in securing the financing and the permits to build the project and goes broke in the middle of the construction due to cost overruns which in turn would require the Town to clean up the mess. That is a real possibility if the SLV project goes forward.

Given Mr. Engler's recent suspension by MassHousing due to lack of "forthrightness and candor", I suggest that with respect to the proposed SLV 40B project in Manchester, the ZBA require Mr. Engler to provide a similar certification to the ZBA as stipulated by MassHousing in its December 10, 2021 letter from its General Counsel to Mr. Engler. In addition, I suggest that the ZBA insist that Mr. Engler provide commitment letters for financing from both his debt and equity sources. My recollection is that Mr. Engler had indicated in a previous meeting that his equity source had a net worth in the billions. Just like with Mr. Engler, the Town is entitled to know with whom they are dealing. Transparency is important.

Thanks again for the work that you do.

Regards,

A handwritten signature in blue ink that reads "Denison Hall". The signature is written in a cursive style with a large initial "D".

Denison Hall