



MANCHESTER-BY-THE-SEA

BOARD OF SELECTMEN • TOWN HALL

Manchester-by-the-Sea, Massachusetts 01944-1399

Telephone (978) 526-2000

FAX (978) 526-2001

March 29, 2022

Mr. Michael Kennealy, Secretary
Executive Office of Housing & Economic Development
100 Cambridge Street, Suite 300
Boston, Massachusetts 02114

RE: Multi-Family Zoning Requirements for MBTA Communities

Dear Secretary Kennealy:

On behalf of the Manchester-by-the-Sea Board of Selectmen I offer these comments on the proposed Multi-Family Zoning Requirements for MBTA Communities.

There is no doubt we face a housing crunch both at the state and the national level. We agree that greater efforts are needed to increase the number and diversity of housing units. We also feel strongly that each community has a unique history, character and set of conditions that requires tailor made solutions –one generic solution will not work in all communities.

As a coastal community Manchester faces significant challenges related to sea level rise and more intensive storms. Our core village area, including the commuter rail station, sits at the head of the harbor and is very vulnerable to flooding. While recognizing that transit-oriented development is one response to reducing emissions and countering climate change, creating new multi-unit housing in an area subject to flooding does not make sense. More flexibility is needed on defining districts that are suitable for development, expanding beyond the ½- mile radius. Our town is closely settled beyond the ½-mile radius from the village core and includes many walkable neighborhoods with easy access to the train station.

None-the-less, we are willing to do our fair share to bolster the housing stock in the area. The draft guidelines have two standards for the number of by-right, housing units districts need to accommodate – a minimum of 750 housing units for smaller communities and a percentage of housing based on the 2020 census for larger communities. For us using the minimum 750 figure represents over 30% of our housing stock. This seems to be a disproportionate share of the burden when larger communities with a commuter rail station are asked to do half of this at 15%. Please consider making the percentages uniform for all communities in each category and eliminate the 750 housing unit minimum.

Given our constrained geography and limited infrastructure we believe there should be greater flexibility in where and how quickly new development should occur. Allow the phasing in of new projects. We should be allowed to gradually add acreage that is subject to the new by-right uses and/or be allowed to limit the number of new housing units added each year.

We recommend that the draft guidelines be amended as follows:

- 1) Eliminate the 750 housing unit minimum and use the proposed percentages of minimum housing for each category of community as proposed.
- 2) Expand the radius from the commuter rail stop to 1.5 miles from the train station, to allow more suitable land to be zoned for multi-family housing while still creating walkable neighborhoods with easy access to transit.
- 3) Allow for adjustments to the minimum number of housing units based on limitations to buildable land (new flooding due to sea level rise, documented infrastructure capacity limits, other constraints).
- 4) Provide the option of phasing in the new housing units and/or an annual cap on the number of new housing units to facilitate the orderly increase in capacity to handle the new growth.
- 5) Clarify how existing housing units within a proposed district can be counted toward the housing unit goals. It is not clear to us which existing units are to be counted toward the new district's minimum.
- 6) Allow existing multi-family housing units to be counted whether or not they occur in underlying by-right zones.
- 7) Add a process by which a community can request additional time to come into compliance.
- 8) Expand and extend access to state-funded planning support, in the form of grants and consulting services geared specifically to small and rural communities that may be less likely to be awarded aid through the Complete Neighborhood program.

While we have concerns about the draft regulations, we believe that with added reasonable accommodations for the unique features of a community and adding flexibility the goal of expanding the housing stock throughout the region can be achieved. We look forward to being a partner with the State as we craft a stronger future.

Sincerely,



Jeffrey Bodmer-Turner
Chairman, Board of Selectmen

Cc: Senator Bruce Tarr
Representative Jamie Belsito