



Preserving natural beauty, wildlife, and resources at the gateway to Cape Ann

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Zoning Board of Appeals
Town of Manchester-by-the-Sea
10 Central Street
Manchester-by-the-Sea, MA 01944

July 26, 2022

Dear Board Chair Mellish and members of the ZBA,

I am writing you today to ask that you deny SLV's application and attendant waivers to build its large apartment block on Shingle Place Hill. This ZBA process has been long and the applicant has had ample opportunity to address both the ZBA's and experts' concerns on a host of issues. In my opinion, the applicant has tried to avoid providing answers to the most important issues by either postponing them to some indeterminate date in the future after the public portion of the process closes, or by providing partial answers when pressed repeatedly. Obviously it is in SLV's best interests to do this; it is not, however, best for the town or its citizens.

The project site sits next to nearly 1500 acres of conservation land and protected watershed. In fact, without waivers to the town by-laws protecting these resources, this project would never see the light of day. Vernal pools stud the applicant's property, and both construction disturbance areas and the finished project would intrude well into the buffer zones of those vernal pools. Worse, our experts have demonstrated that the impervious surfaces and stormwater runoff plans will significantly change the balance of the vernal pool recharge rates and flows. Changes to these recharge rates are not permissible. Further, the change in salinity and turbidity of these vernal pools as a result of runoff containing road salts, vehicle oils and other contaminants from the site's access roadway are an open and largely unaddressed concern. These are serious issues and, in our experts' well-researched opinions, they demonstrate clear deficiencies in this project's, scope, planning, and regard for necessary protections for fragile environmental areas.

On almost every front, this large and unwieldy project is inappropriate for the site and town. In regards to typology, or fitting in with surrounding architecture and buildings, the design falls flat. There are no surrounding buildings or architecture. SLV seems to presume that in the absence of neighboring construction, anything goes. The project site itself is formidable, requiring vast amounts of blasting in order to create a level building site and the construction of large, permanent and unsightly retaining walls to allow vehicular access to future residents, emergency crews, and visitors. The final monolithic structure will loom over the conservation land to the west and north and will be clearly visible from School Street and Atwater Avenue. This issue will be compounded during the long stretches of the year when the trees have lost their leaves. SLV would seemingly regard the lack of development as a blank



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canvas, giving them carte blanche to put any structure they can conceive in the place of the current natural environment. This cannot be the case.

Our experts' analysis further calls in to question the project's stormwater infiltration plans and effects on groundwater. Because of the nature of the surrounding soils and ledge, they believe a groundwater mounding analysis is not only recommended but necessary. This, of course, hasn't been done. Access and safety concerns remain unanswered, even while other 40B projects have been denied because of similar issues concerning grading and the length of access roads required. It would be convenient to sweep these environmental and other concerns aside as "addressed thoroughly" by the designers of this project in the interest of creating affordable housing. Sadly, these designs are deficient on the environmental and other fronts and do precious little to address the *true* needs for affordable housing in Manchester. Too many questions remain and too much data points to the unsuitability of SLV's project for the site, environment, and town. I respectfully ask that the ZBA deny this permit and these waivers.

Sincerely,

Matt Plum
President, Manchester Essex Conservation Trust
130 Rocky Hill Rd.
Essex, MA 01929