

From: Lorraine Iovanni

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Date: 01/10/2024 12:45 PM EST

Subject: "NO" to Ch 91 MBTA Zoning/Photos from today's flooding/flood walk Jan 10, 2024

Attn: MBTA TF, PB Members, SB

Cc: TA, ConCom Members, CZ Committee members

(Ms. Hunter, please distribute to all MBTA Zoning TF and PB Members. Thank you.)

(Ms. Powers, please distribute to all ConCom Members and Coastal Zone Committee, and SB Members. Thank you.)

(Ms. Marletta...please post my email to the MBTA Zoning Town website under correspondence. Thank you.)

Good Afternoon,

En route in a 4 mile "flood" walk this AM, I am forwarding several key Jan 10, 2024 photos that document and relate to my concerns regarding the push by some MBTA TF Members to zone for multifamily under Ch40 A, Sec 3A, in the Harbor Point area and other Ch 91 (filled tidal land). I also know that all of you are already very familiar with these threats.

The photos surrounding Town Hall, Reed Park, and Masconomo Park, Beach St clearly show what is to come, probably sooner than later per the NS State CZM projections. [MA Sea Level Rise and Coastal Flooding Viewer \(CZM\) \(arcgis.com\)](#)

Below is the trail of email that I have presented to the MBTA TF to avoid zoning Ch 91 lands. Once again, the EOHLC is "not encouraging" zoning Ch 91 land for MBTA 3A purposes.

Ref the Dec 15, 2023 Town Administrator blog:

At the December 8th Annual Awards luncheon of the Massachusetts' American Planning Association, Manchester received the Sustainability and Resiliency Award for our "Coastal Vulnerability Action Plan" we recently completed for protecting the Village core area from sea level rise and greater storms. The plan was crafted by a steering committee of residents along with a team of consultants from Fuss and O'Neill, an engineering and planning firm with offices in Boston. The work to create the plan was funded by a grant from the state's Coastal Zone Management office.

The graphic intensive 100-page report provides a wealth of information and a road map for action steps that can be taken in the short, medium, and long terms to protect the village core area from flooding. Even without increased sea-level rise the village has been subject to high waters. Many of the Town's critical facilities – the sewer plant, the police station, and the fire station – have flooded in the past and will be subject to more frequent and more destructive flooding in the future. Private structures are vulnerable as well. Thus, steps are needed to maintain the viability of these buildings and facilities."

The MBTA TF consultant (INNES) advised to avoid the Harbor Point area for Sec 3A zoning. Yet, as of January 4th, Mr. Gar Morse has pushed to recircle with the consultant. We can't have it both ways. Most developers will not be able to raise buildings, roads, the MBTA rail to build in this area. It would be cost prohibitive. The MIT students did recognize the dangers of Ch91 and the massive undertaking for such an area.

My takeaways here:

1. The MBTA TF is compelled to avoid all CH 91 areas and areas known to flood. We are not even close to flood mitigation, notwithstanding the Award.
2. While Fuss and O'Neill offered an erudite plan; who will execute and when will any of these actions be executed? A timeline is no guarantee. We have been at mitigation plans with the State EPA since 2016.
http://www.manchester.ma.us/DocumentCenter/View/895/FINAL-CZM-Sawmill-Brook-Report_6-30-16?bidId=
3. It seems to me that Manchester by the Sea, should refocus its efforts on mitigation of flooding through engineering plans and a design located in the actual harbor that will actually prevent flooding for our downtown. This should be the focus and securing Federal funds for this purpose.
4. In his Dec 15, 2023 blog, our TA cited a "floodable" Masconomo Park, to save the rest of the downtown: the Fuss and O'Neill plan *"recommends a study of how Masconomo Park could be reconfigured as a "floodable park" that helps buffer the village area from surging seas. A community design exercise will be taking place later in the winter and into the*

spring of 2024 as part of the latest grant the Town has received to help implement part of the Action Plan. This area, like many other areas in the village, was once tide lands that have since been filled in. Selective reversal of some of these areas could form part of a strategy of protecting remaining built-up areas."

While I do not have a science background, I find this direction extreme, if not irresponsible. My recommendation is to find an engineering company, who can make suggestions to protect our Parks, Beach St (which is the only ingress/egress to residential areas toward Singing Beach), and Harbor's Point, which will be flooded per the State CZM.

Suggestions by Fuss and O'Neill, MIT students, and others, are laudable brain trusts. However, we need a *better* plan to save what we need to save.

We do not need TF Members, as cited below, to encourage residential areas in soon to be flooded areas. We seem to be operating in contravention to our best interests and even to the recommendations of the EOHLC and our own consultant, who worked on the actual MBTA Zoning tool for the State, citing avoidance of Ch 91 areas.

I would like to see our Town Coastal Zone mitigation team, our ConCom, and our SB request **additional** engineering ideas from throughout the country to mitigate flooding in this area..., **namely a Harbor break/dam engineering idea. This locus is just as important as saving our Rotunda.**

I hope you find these data points useful. Thank you for your work and attention to this difficult matter.

I plan to distribute widely to my town resident email and ask them to forward, as well. At his time, I cannot support the direction that certain members of the TF are taking to designate MBTA zoning in Ch 91 areas and those areas known to flood.

I welcome a response from Ms. Harrison to be part of the record.

Regards,

Lorraine

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