



Citizens Initiative for Manchester Affordable Housing

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January 28, 2021

Mr. Geoffrey Engler
Strategic Land Ventures
257 Hillside Avenue
Needham, MA 02494

Re: Proposed 40B Development of Shingle Hill

Dear Mr. Engler:

Thank you for submitting your various materials to our Town's Board of Selectmen, relating to your proposal to erect a 157-unit multifamily complex on top of Shingle Hill.

We appreciate your work with our Selectmen to seek a mutually acceptable LIP. That said, as you know, we have a long list of questions for you, and we will continue to send them to you regularly, and publish them as open letters available to the Boards and citizens of Manchester and of other towns with an interest in your activities, so that you can respond to them thoroughly. We write you not in any official capacity, but simply as citizens wishing the best for our town.

Our topic for this week pertains to the ways in which you propose that your project will comply with the requirements of the State for eligibility for a Comprehensive Permit. As you know, under the State's Department of Housing and Community Development regulations CMR 760.56.04 (Project Eligibility), your proposal must contain:

"a narrative description of the approach to building massing, ***the relationships to adjacent properties***, and the proposed exterior building materials." [italics ours]

In addition, it must explain in what ways:

"that the conceptual project design is ***generally appropriate for the site on which it is located***, taking into consideration factors that may include proposed use, conceptual site plan and building massing, ***topography, environmental resources, and integration***

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into existing development patterns (such finding, with supporting reasoning, to be set forth in reasonable detail).” [italics ours]

CMR 760.56.04 further states (and please note that the Town has NOT adopted a 40R overlay district) that an applicant must prove:

“that the site of the proposed Project is ***generally appropriate for residential development***, taking into consideration information provided by the municipality or other parties regarding municipal actions previously taken to meet affordable housing needs, such as inclusionary zoning, multifamily districts adopted under M.G.L. c. 40A, and ***overlay districts adopted under M.G.L. c. 40R*** (such finding, with supporting reasoning, to be set forth in reasonable detail).” [italics ours]

We recognize that both you and our Town are on a steep learning curve but do not understand how these Regulations may be read to support building a large residential rental development on woodlands and wetlands sandwiched between existing large conservation areas. Neither are we aware of other projects that have received Project Eligibility Letters from either DHCD or Mass Housing in locations with these characteristics. Do you know of comparable structures alongside other conservation areas similar to the 1,600-acre Wilderness Conservation Area for which Shingle Hill is the gateway? You may be aware of the opinion of one of Shingle Hill’s abutters, The Trustees of Reservations, that:

“The site [is] ***particularly un-suitable*** for a development of this scale: the surrounding land owned by the Manchester-Essex Conservation Trust and by The Trustees is held in trust for all of us. It is everyone’s back yard. As such, it should be viewed as especially valuable, rather than targeted for ***a development which will likely have significant impacts on the conservation values of the area.***” [Letter of 13 January 2021 to Eli Boling, Chair, Manchester Board of Selectmen, from Jocelyn Forbush, Acting President and CEO of The Trustees of Reservations, italics ours]

We ask you to explain to the citizens of our Town, and to the abutters of the parcel you wish to develop, why in your view the Trustees are incorrect. Why do you believe that Shingle Hill’s “topography, environmental resources, and integration into existing development patterns” is ***“generally appropriate”*** for the project you wish to build on it?

LIP negotiations have now begun, but we believe your proposal remains ill-conceived. Why persist with it? Why not withdraw it now before investing more time and capital in a process that will unveil so many more challenging questions from citizens both of Manchester and of other towns?

In coming weeks, we will have other questions about your proposal and about other aspects of your business practices. In the meantime, we look forward to hearing your response, as do many hundreds of our fellow citizens. We will circulate it to them upon its receipt.

Thanks in advance for your illumination, and please let us know of any questions or comments.

Sincerely,

Citizens’ Initiative for Manchester Affordable Housing

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