



Citizens' Initiative for Manchester Affordable Housing

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June 14, 2021

MassHousing  
One Beacon Street  
Boston, MA 02108-3110

To Representatives of MassHousing:

We are Board members of a recently formed non-profit called Citizens' Initiative for Manchester Affordable Housing (CIMA) and write to you in that capacity.

CIMA respectfully urges MassHousing to deny the request by Strategic Land Ventures (SLV) for a Project Eligibility Letter (PEL) for a site at O School Street in Manchester, MA because the project as proposed is inconsistent with the Town's needs, presents significant safety issues for its residents, and creates serious and substantial environmental risks.

The 136-unit multifamily project is flawed in many respects to include, but not limited to, the following:

**Life Safety & Health**

- As proposed, all 136 units are served by a single 1,900-foot driveway which ends in a cul-de-sac that itself provides a marginal turning radius for emergency fire equipment. The roadway is curvilinear with 6% to 8% grades, and is 3-4 x the typically allowable length of dead-end roadways (500-600 feet). A 1,900-foot roadway serving 136 units with no second point of access endangers the safety of both residents and visitors. A peer review analysis of the roadway design conducted by Stantec Consulting (attached as Exhibit I) stated, "Given the long cul-de-sac length, coupled with the proposed site driveway's horizontal and vertical curvature, the Applicant should provide two effective accesses to serve this site in a safe and efficient

**Reference: Traffic Impacts Peer Review Initial Findings Letter**

- Pertinent information from Manchester Complete Streets – Tier 2 report (August 2017) and follow up implementation plans.
- Appendix G of Manchester's Subdivision Rules and Regulations (traffic impact guidelines).
- Pertinent comments from municipal boards (December 17, 2020 Select Board meeting).
- Manchester Essex Conservation Trust (for nearby public trail locations)
- National Fire Protection Association 1® Guidelines on Fire Access needs applicable to the Commonwealth of Massachusetts.<sup>1</sup>

### 1.2 - Site visit

Due to peer review time constraints, a site visit to the Sanctuary at Manchester by the Sea (MBTS) was conducted on Tuesday, December 29, 2020. While usually we like to observe 'normal' peak traffic conditions, observed post-Christmas traffic demands were lower than normal. Late December is typically a low month for traffic demands as MBTS is a beach community with peak traffic, pedestrian, and bicycle activity occurring during the summer months of July and August. The on-going pandemic continues to reduce traffic volumes, and cold weather significantly diminished observed pedestrian and bicycle movements. The afternoon site visit was nonetheless useful as it included contextual low-side traffic observations, roadway markings, signs, geometric, and topographic features.

In addition to reviewing the TIA Study Area, we also observed the School Street corridor between Old School Street, a Manchester Essex Conservation Trust trailhead located just north of the Study Area, and the MBTS village center. For the same reasons cited above, downtown MBTS Village Center mid-day parking demands observed on December 29, 2020 were much lower than normal, especially those pertaining to the MBTA's downtown Manchester commuter rail station. During the site visit, recently installed variable speed feedback signs were observed on School Street near the Village Center as well as sight distance and 'complete streets' type cross walk intersection enhancements at the intersection of School Street with Central and Union Streets.

There is no specific traffic peer review guidelines criteria that pertain to the assessment of parking impacts at distant off-site locations for this or any other types of development. Nonetheless, we understand the Town is concerned about the future adequacy of its downtown parking supply to accommodate projected future increases in parking demands pertaining to the Sanctuary at MBTS within the MBTS Village Center and the Manchester MBTA Commuter Rail Station. We understand that MBTS has programed a separate village parking study in the near future. That upcoming study will assess peak Village Center parking demands and utilization characteristics and recommend any necessary changes to the Village Center parking supply or transit access services to address existing and future parking shortages.

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<sup>1</sup> Based on 1/7/21 discussions with Manchester Fire Chief Jason Cleary.

manner...". In a public forum, the author of the Stantec report, Gary Hebert went further, calling the single access roadway "not safe". Per NFPA code 7.1.5.2.4 Multiple Access Roads, access by a single road could be impaired by vehicle congestion, condition of terrain, climatic conditions, or other factors. Emergency response times accessing the isolated hilltop would be increased for Emergency Medical Technicians responding to time-sensitive medical emergencies.

- The proposed project includes no sidewalks, let alone ADA-compliant sidewalks. The lack of sidewalk along the 1,900-foot roadway appears to violate Fair Housing Standards. Given the average 8% grade and length of the roadway, pedestrian access without sidewalks is difficult and dangerous. Schoolchildren need a safe route to access their school bus stop and ride their bikes or walk to school. The grade is unsafe for a manual wheelchair, or a novice cyclist and for parents with strollers. An extensive ramp system is required – but not included in the design – to address access and safety challenges under ADA. Manchester has adopted the Safe and Accessible Streets Policy and plans to extend its sidewalks to the proposed development were it to be constructed. William Joyce, of the Massachusetts Architectural Access Board (MAAB), has indicated that MAAB would require that the project include sidewalks to link into the sidewalk infrastructure outlined in the Town's plans adjacent to the site.
- The subject site is surrounded on all sides by rivers or wetlands. Storm water runoff is a major concern. During construction, site plans submitted to the Town indicate that the height of the site will be reduced by 40 feet, which can only be accomplished by blasting into the largely granite hill. After construction has been completed, much of the vegetation surrounding the buildings will have been removed. To date, no Storm Water Management Plan has been submitted to the Town for its review. The two catch basins located at the intersection of the access road and School Street, within the riverfront boundary of the Sawmill Brook, are likely insufficient to prevent runoff on to School Street and critical water resources. Please see Plu attached Satellite image with project overlay attached as Exhibit II.
- Any storm water runoff entering Sawmill Brook will potentially impact the Lincoln Street well from which the Town draws roughly 50% of its drinking water. In addition, there are two public wells within 400' of the project that have been used in the past to augment the public water supply for the City of Gloucester. Manchester views these wellheads and the associated Cedar Swamp Aquifer as an emergency public water supply.

### **Environmental Risk**

- Sawmill Brook is a Coldwater Fisheries Resource (CFR), housing unique sea run brook trout native to the North Shore, as confirmed by DNA testing. These trout can be used for reintroduction into North Shore streams. If preserved, water quality testing indicates that Sawmill Brook will continue to support this fragile resource. According to the Massachusetts State Wildlife Action Plan, "Brook Trout are susceptible to degradations in water quality and have been impacted in many streams statewide;" "In small streams, small perturbations can have acute local impacts. One poorly designed parking lot can release enough hot water from a summer thunderstorm to eliminate a coldwater fishery." According to the Massachusetts Water

Management Act Permit Guidance, “There has been a significant loss in CFR habitat over time, partially because these temperature-dependent habitats are strongly influenced by groundwater and particularly vulnerable to impacts from groundwater withdrawals.” SLV’s proposed development threatens this sensitive resource and its associated Atlantic White Cedar Swamp.

- The proponent has proposed an on-site wastewater treatment plant which incorporates two leaching fields that appear to be on granite outcroppings with poor percolation characteristics. The leaching fields are connected to the treatment plant by a pipe which runs through an existing wetland.

### **Inappropriate Project Design for Proposed Location**

- According to The Trustees of Reservations, “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.” Please refer to the comment letter prepared by the Manchester Essex Conservation Trust for other environmental risks. The risks are substantial and numerous.
- Even after blowing 40 feet off the top of the site, the project as proposed will be the tallest structure in the Town of Manchester. The project would appear 107 feet tall - similar to an eleven-story building - higher than the top of the Congregational Church spire in the center of Town and grossly inconsistent with the town’s existing structures. The net result will alter irrevocably the character of an old New England seaside town.

### **Isolates Affordable Housing from the Community In Contrast to an Integrated Alternative**

- The site is almost two miles from the center of Town and public transit, is realistically accessible only by vehicles, and is isolated from the rest of Manchester. Pedestrian and bicycle access to and from the site is difficult at best. In contrast, the 29-unit affordable housing project North Shore Community Development Coalition (NSCDC) has recently purchased is highly accessible, in the center of Manchester on Powder House Lane. NSCDC’s project serves people at 50-60% of AMI, compared to SLV’s “affordable” units at 80% of AMI. SLV’s proposed “affordable” units are *33-56% higher* than NSCDC’s affordable units. The purchase of the Powder House Lane units was made possible through \$1.5 million of equity capital contributed by 250+ citizens of Manchester in demonstration of their commitment to affordable housing. Were MassHousing to grant a PEL to the SLV proposal, it would discourage local community development of affordable housing throughout the Commonwealth and allow an isolated, vehicle-dependent, luxury housing project with a less affordable component and significant safety and environmental risks to proceed to the next step in the process. Compared to an in-town, pedestrian-friendly, citizen-funded, safe and truly affordable housing alternative, we request that MassHousing not issue the PEL to the Applicant.

## **Additional Concerns**

- Additional issues pertaining to Parking, Water, Access, Grading, Wetlands, Sewage Disposal, Wetlands Replication are contained in a report dated February 10, 2021 prepared for the Citizens' Initiative for Affordable Housing by Beals Associates, a copy of which is attached as Exhibit III.

563 Manchester households, or more than 26% of the Town's households, have echoed those concerns in a petition asking MassHousing to deny SLV's request for a Project Eligibility Letter (attached as Exhibit IV). Manchester has taken concrete action recently to close its affordable housing gap through better, smaller-scale local solutions. The SLV project would encourage Manchester to meet its 10% affordable housing goal not through truly affordable housing but primarily through unaffordable luxury housing. MassHousing would harm the interests of those it exists to serve if it issued a PEL for this proposal.

Instead, we hope that MassHousing will encourage truly affordable housing of the kind that Manchester has already fostered through North Shore CDC, at lower AMI rates, fully integrated into its community. We hope you will allow the people of Manchester to finish our affordable housing work.

Thank you for your careful attention to this matter and for ensuring that Manchester families and children have access to safe, sustainable affordable housing.

Regards,

Jay Bothwick

Michael Carvalho

Catherine Creighton

Bill Cross

Victoria Esser

Michael Even

Denison Hall

Thomas Kehoe

Ashley Ochs

Susan Thorne

As The Board of the Citizens' Initiative for Manchester Affordable Housing (CIMAHA)

## EXHIBIT I



Stantec Consulting Services, Inc.  
65 Network Drive 2nd Floor  
Burlington, MA 01803-2767

January 11, 2021

**Attention: Gregory T. Federspiel, Town Administrator**

Manchester by the Sea Town Hall  
10 Central Street  
Manchester by the Sea, MA 01944

**Subject: Traffic Impacts Peer Review Initial Findings Letter  
Sanctuary at Manchester by the Sea, MA 40B Development**

Dear Mr Federspiel:

In accordance with our Agreement of December 18, 2020, Stantec Consulting, Inc. is pleased to submit this initial letter pertaining to ***Task 1 – Conduct a peer review of the Traffic Impact Assessment (TIA) prepared for a Proposed Multi-family Residential Development on School Street at Manchester by the Sea.***

The referenced TIA is dated September 2020 and was prepared by Vanasse & Associates Inc. (VAI) of Andover, Massachusetts on behalf of the Project Proponent, SLV School Street, LLC.

The Applicant proposes to construct the proposed multi-family development on a wooded undeveloped 27.72-acre site on the west side of School Street. Located adjacent to Route 128, the site has excellent regional access. Specifically, the Applicant proposes to construct 157 multi-family units in two connected 4-story buildings with site recreational amenities. Of the 157 units, 80 would be one-bedroom, 61 two-bedrooms, and 16 three-bedrooms. A total of 247 on-site ancillary parking spaces are proposed—most within a below grade parking deck. This provides a parking ratio of 1.57 spaces per unit including 7 accessible spaces, of which 3 would be van-accessible. On-site outdoor and indoor recreational amenities will be provided in the attached connector between the two residential buildings.

Access to the site is proposed via a single two-way driveway approximately 1/3 mile in length.

### **1.1 - Review traffic/circulation study materials**

In addition to the TIA, we obtained and reviewed traffic-related access and parking elements of the site plan set prepared by Allen & Major Associates dated September 24, 2020.

Supplemental to these core review materials, we examined:

- 2019 and 2020 MassDOT counts on Route 128 exits.
- Pertinent information from the Final Draft Manchester Master Plan (November 2019).

**Reference:** Traffic Impacts Peer Review Initial Findings Letter

### 1.3 - Review study methodology, trip generation, and trip distribution assumptions

The TIA acceptably conforms to analysis procedures identified in MassDOT's Traffic Impact and Access Study guidelines (3/13/2014). The TIA used the latest ITE Trip Generation report, and the latest available US Census Journey to Work data to estimate trip generation and trip distribution for the development site. The TIA estimates the Sanctuary at MBTS will generate 854 vehicle trips per day – 427 in and 427 out. Of the typical weekday trips generated, the TIA projects 53 trips (39 out/14 in) will occur during the morning peak hour and 68 (27 out/ 41 in) during the afternoon peak hour. These estimates are reasonable.

Our review of the TIA trip distribution pattern assumed for the Sanctuary at MBTS occupants indicates it is also acceptable and reasonable. The TIA indicates that 60% of future site-generated AM and PM peak hour traffic will be oriented toward to and from Route 128 SB via Exit 15. Approximately 30% of site-generated peak hour traffic is expected to continue to and from the south on School Street. Relatively small 3-4% components of site-generated traffic will be oriented to and from the north on School Street, and east on Route 128 NB via Exit 15, respectively. The TIA trip distribution estimates are reasonable.

To summarize, the methods used to calculate trip generation and trip distribution reported in the TIA are reasonable and acceptable, and are based on typical traffic engineering methodologies.

### 1.4 – Review Study Area and existing volumes

From the site visit and our review of historical traffic volumes in Manchester, we conclude that the TIA Study Area identified and the number of intersections it includes is reasonable and acceptable from a traffic analysis perspective.<sup>2</sup>

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<sup>2</sup> We understand the Town is concerned about how the site will affect traffic operations at the intersections of School/Pleasant Streets and School/Union/Central Streets. These intersections are 1-2 miles south of the site driveway intersection with School Street. We are aware that the Town recently implemented Complete Streets sight line and crosswalk enhancements at the School/Central/Union Streets intersection. The TIA projects that the Sanctuary at MBTS will add approximately 16-21 new vehicle trips total in both directions to School Street south of the Route 128 ramps during the AM and PM peak hours, respectively. The TIA also estimates that, by 2027, School Street south of the Route 128 ramps will be carrying a total of 823 and 1,096 vehicles in both directions during the AM and PM peak hours, respectively. The relatively small 2% changes in peak hour volumes due to the Sanctuary at MBTS will be far less than normal day-to-day traffic variations. We therefore do not recommend adding the two intersections of concern to the Study Area, as both will operate similarly with or without the Sanctuary at MBTS development and will not trigger the need for improvements specifically related to this development.

**Reference: Traffic Impacts Peer Review Initial Findings Letter**

In accordance with MassDOT guidelines, the TIA authors increased actual Study Area traffic volumes counted during July 2020 by 30% to evaluate 'existing' traffic volumes. This was done to account for known pandemic traffic decreases. Also, MBTS, a beach community, has July traffic volumes that are normally 14% higher than average annual conditions. We therefore conclude the 'existing' traffic volumes reported in the TIA are conservative, being up to 44% higher than the likely 'average annual' volumes.

### **1.5 - Review accident analysis**

Crash analysis information as reported in the TIA is acceptable. Consistent with MassDOT guidelines, the TIA evaluated a 5-year period for crash analyses between 2013 and 2017, the most recent available period for crash analysis. None of the Study Area intersections had historic crash rates exceeding average crash rates at similar unsignalized intersections either statewide or within MassDOT District 4, which includes Manchester by the Sea.

### **1.6 - Review background traffic growth**

According to the TIA, background traffic growth to account for unspecific traffic growth sources was increased by 1% per year between the pandemic-adjusted 'existing' 2020 traffic volumes and the year 2027 for the No-Build and Build analyses. The TIA indicates that historical traffic growth rate was approximately 0.63%. Therefore the 1% used is conservative. The future traffic volumes analyzed were set to an aggregate growth rate of 7.2% for *adjusted* background traffic between 2020 and 2027 corrected for pandemic-related traffic reductions. As indicated in the TIA, Manchester's Town Planner confirms that no known developments are projected within the project impact area.<sup>3</sup> This is a reasonable assumption for background traffic growth.

### **1.7 - Review and evaluate level of service (LOS) analyses**

Our review of existing (2020), No-Build (2027) and Build (2027) indicates the LOS analysis sheets for all time periods were done acceptably.

VAI used Synchro® Version 10 for analyzing AM and PM peak hour traffic operations. The Synchro® traffic operations analysis software packages is accepted by MassDOT for the evaluation of unsignalized intersections such as those included in the TIA.

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<sup>3</sup> During the December 29, 2020 site visit, a sign was observed indicating that a Cornerstone Church is proposed for construction on the east side of School Street just south of the Route 128 northbound ramps. Sue Brown, the Manchester Town Planner, in a phone conversation on January 5, 2020, indicated that plans to develop this area have not yet been prepared. When they do become available, the Church will need to incorporate the Sanctuary at MBTS traffic in its background traffic, not vice versa.



**Reference: Traffic Impacts Peer Review Initial Findings Letter**

The TIA addresses three unsignalized intersections where levels of service (LOS) were evaluated for 2020 'existing' and 2027 No-Build AM and PM peak hour conditions. From north to south, these intersections include:

- School at Atwater Streets,
- Route 128 SB Exit 15 at School Street; and
- Route 128 NB Exit 15 at School and Mill Streets.

The future site driveway intersection with School Street was also analyzed in the TIA for the year 2027 Build AM and PM peak hour conditions only, as it does not exist in 2020, and would not exist under the No-Build condition.

The TIA analysis of 'existing' year 2020 conditions found that all traffic movements through two of the three evaluated intersections are operating acceptably during AM and PM peak hours. With existing volumes increased to reflect non-pandemic conditions, the TIA projects that only the eastbound left and through movement of the Route 128 NB off-ramp to School Street operates with congestion (LOS F) during the afternoon peak hour only. It finds that all the remaining traffic movements at the three intersections in the Study Area will operate at acceptable LOS A-D operations during 'existing' pandemic-corrected AM and PM peak hours. These findings are reasonable.

However, the TIA estimates that by the year 2027, left and through ramp traffic approaching School Street at both Route 128 Exit 15 NB and SB ramp terminals will experience congestion LOS E or F during the AM and PM peak hours. By adding approximately 25 vehicles to the Route 128 NB off-ramp's left turn demand, traffic from the Sanctuary at MBTS will degrade one of the 2027 No-Build traffic movements from LOS E to LOS F. The TIA also finds that peak hour traffic operations will be similar *with or without* traffic generated by the Sanctuary at MBTS. These findings are reasonable and acceptable.

The analysis shows that motor vehicle traffic at the future site driveway with School Street and School Street at Atwater Street should operate at acceptable levels of service A-D during the site-Build AM and PM peak hours. These findings are reasonable and acceptable.

### **1.8 - Assess the adequacy of proposed traffic mitigation measures**

The TIA recommends the following traffic mitigation measures:

#### Off-site

The TIA proposes preparing a study such that it will suffice for the Town to apply for MassDOT funding for the future construction of operational and safety improvements at the Route 128 Exit 15 interchange, with conceptual design features. This is an acceptable mitigation measure. In

**Reference:** Traffic Impacts Peer Review Initial Findings Letter

addition to signalization of the ramps, we recommend that VAI's recommended study of Exit 15 not only consider signalization, but the potential for roundabout configurations at both ramp termini. If future congestion and crashes indicate countermeasures are needed, two roundabouts may overall, be less expensive than signalization. They may also produce better operational and safety results based on the projected volumes as presented in the TIA. Roundabouts especially benefit left turning movements from the ramps because they are made as circular right turns. Also, if MBTS at some point constructs a sidewalk on the east side or both sides of School Street to the north of the interchange, roundabouts provide good opportunities for incorporating sidewalks and low-speed yielding conflicts without the need to signalize the crossings.

**Comment:** While the TIA did not address this issue specifically, we checked whether future volumes of left turns into the site would warrant the installation of a left turn lane on School Street with full site development. We conclude that minimum left lane warrants on the northbound approach to the future site driveway intersection are not met. Nonetheless, it may be beneficial, if feasible, to consider a minor shoulder widening in the northbound direction of School Street to create an opportunity for a right lane bypass without encroaching on the unpaved shoulder. If done, it should conform to MassDOT design guidance. With School Street design speeds of 40+ mph at the site driveway, a bypass lane could represent a future safety benefit by reducing the potential for rear-end collisions in when the site generated vehicles are waiting to turn left. This is optional consideration, as we recognize that even a modest shoulder widening potentially has adverse environmental drawbacks that must be considered along with its potential safety benefits.

Even if it is not possible to construct an ADA-compliant sidewalk on one side of the site driveway, observations indicate there is an unpaved, non-ADA compliant, shoulder on both sides of School Street that could be used by pedestrians. MBTS does not have existing plans to construct a sidewalk on one or both sides of School Street north of Exit 15. While not the Applicant's responsibility, at some time in the future, provision of a sidewalk on one or both sides School Street to Exit 15 would be advantageous for existing and site generated pedestrian and bicycle connectivity and for accommodating future transit shuttle stops on School Street, whether year-round or seasonal.

Project Access (TIA recommendations in parentheses)

- *The boulevard section of the Project site driveway should provide two (2) 14-foot wide (minimum) travel lanes separated by a 6-foot wide (minimum) raised median with openings or traversable areas provided along the median every 200-feet to allow for emergency vehicles to cross the median when necessary. The non-boulevard section of the driveway should be a minimum of 22-feet in width and designed to accommodate the turning and maneuvering requirements of the largest anticipated responding emergency vehicle.*

**Reference:** Traffic Impacts Peer Review Initial Findings Letter

**Comments:** MBTS has the following *safety* requirements in its Subdivision Rules and Regulations as they pertain to site access:

- Maximum cul-de-sac length of 500 feet “unless a greater length is deemed desirable by the topography or other local conditions”;
- Two means of access for any road serving more than 10 dwelling units;
- For roads serving more than 120 units, a paved width of 34 feet and maximum grade of 6% is required;
- Minimum sight distance of at least 100 feet from the centerline;
- Minimum centerline radii of 150 feet; and
- A sidewalk is required.

The Sanctuary at MBTS site plan, as proposed, has several features not in conformance with all of the above safety guidelines. These features should be addressed to the maximum extent possible.

We recognize that the 40B legislation does not require the Applicant to conform to Manchester’s cul-de-sac guidelines. However, the vast majority of communities within the Commonwealth of Massachusetts cite maximum lengths at 500-600 feet. Given the long cul-de-sac length, coupled with the proposed site driveway’s horizontal and vertical curvature, the Applicant should provide two effective accesses to serve this site in a safe and efficient manner, even if one of those accesses, while maintained during all seasons, is gated and used only during emergency conditions.

An AutoTurn® or similar truck turning envelope analysis should be presented along the entire driveway system using the largest emergency or other moving/delivery vehicles expected to service the site. The requested AutoTurn® or similar analysis will be used to determine whether the proposed driveway may require widening on curved sections to accommodate simultaneous turning vehicles without encroachment on the opposing vehicle travel lane. The design speed of the driveway appears to be 10-15 MPH, given its horizontal and vertical curvature. Is a speed limit proposed to address the horizontal and vertical curvature of the site driveway? A required speed limit for both directions and speed feedback sign are appropriate along with edge speed reduction markings in the downhill direction.

We question whether there is a need to install a raised median for more than the first hundred feet of roadway. An undivided 34’ roadway, such as required by Manchester’s Subdivision access guidelines is less likely to become blocked than a median-divided 34’ edge-to-edge roadway.

- *Where perpendicular parking is proposed, the drive aisle behind the parking should be a minimum of 23-feet in order to facilitate parking maneuvers.*

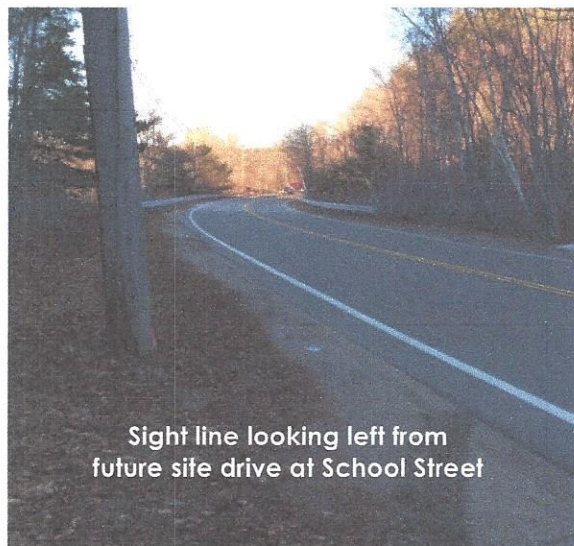
**Reference:** Traffic Impacts Peer Review Initial Findings Letter

**Comment:** This statement is acceptable. However, several of the parking spaces within the proposed parking garage have backing, side clearance, and circulation continuity issues. Refer to the site plan parking layout circulation features discussion further on in this letter.

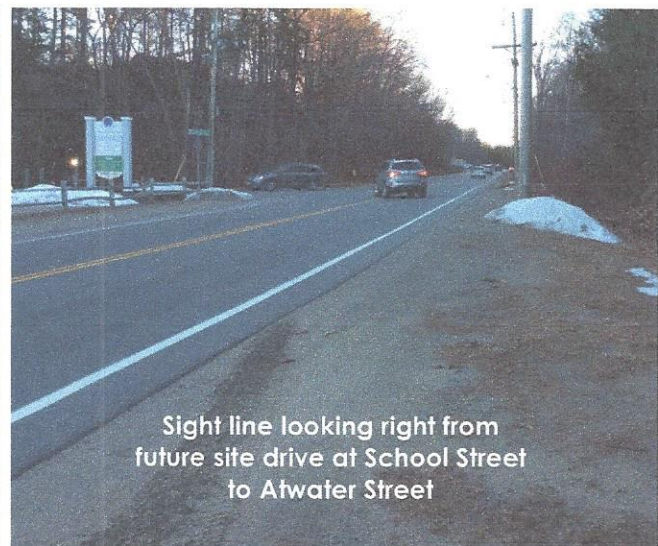
We concur with the following TIA recommendations:

- *Vehicles exiting the Project site should be placed under STOP-sign control with a marked STOP-line provided.*
- *All signs and pavement markings to be installed within the Project site should conform to the applicable standards of the Manual on Uniform Traffic Control Devices (MUTCD).*
- *Americans with Disabilities Act (ADA) compliant wheelchair ramps should be provided at all pedestrian crossings that are to be constructed or modified as a part of the Project.*
- *Signs and landscaping to be installed as a part of the Project within the sight triangle areas of the Project site driveway should be designed and maintained so as not to restrict lines of sight.*
- *Snow windrows within sight triangle areas of the Project site driveway should be promptly removed where such accumulations would impede sight lines.*
- *Consideration should be given to providing accommodations for electric vehicle charging for residents of the Project.*

Site Driveway at School Street – Sight Distance



Sight line looking left from future site drive at School Street



Sight line looking right from future site drive at School Street to Atwater Street

**Reference: Traffic Impacts Peer Review Initial Findings Letter**

The TIA found acceptable sight lines at the future intersection of the Sanctuary at MBTS driveway with School Street. Our on-site observations confirmed the acceptability of the sight line information as presented in the TIA.

TIA estimates of the required minimum stopping and intersection sight distances between 360 and 500 feet are acceptable and are exceeded in both directions of School Street for greater than a 45 mile per hour speed of approaching traffic.

Transportation Demand Management

The TIA cites that the MBTA provides commuter rail service to MBTS and that the service is a 7-minute drive from the site. It is unclear how the potential shuttle transit stop shown on the site plan adjacent to the end of the cul-de-sac will work to help alleviate site demands on the downtown parking supply or access to the MBTA commuter rail station.

The TIA recommends:

- *Information regarding public transportation services, maps, schedules and fare information will be posted in a central location and/or otherwise made available to residents;*
- *A “welcome packet” will be provided to new residents detailing available public transportation services, bicycle and walking alternatives, and commuter options available;*
- *Pedestrian accommodations will be incorporated into the Project and consist of sidewalks and ADA compliant wheelchair ramps at all pedestrian crossings that are to be constructed or modified as a part of the Project;*
- *Work-at-home workspaces will be provided to support telecommuting by residents of the Project;*
- *An internal mail room will be provided within the building; and*
- *Bicycle parking will be provided consisting of both an exterior bicycle rack located proximate to the building entrance and weather protected bicycle parking within the proposed parking garage.*

Without the appropriate supporting infrastructure, reasonable off-site bicycle or pedestrian access between the Town Center and the site will be problematic. Bicycle and pedestrian flow will be unfriendly due to the curved and relatively steep driveway access coupled with the absence of paved walking or biking infrastructure off-site on the relatively high-speed segment of School Street in front of the site.

Access to an Old School Street Manchester Essex Conservation Trust (MECT) trail just west of the site is not discussed in the TIA. MECT has nearby trails emanating from the Old School Street layout that should be discussed for possible site connectivity. Maps of MECT trails indicate that existing informal trails may actually exist on the development site. The post-development status

**Reference:** Traffic Impacts Peer Review Initial Findings Letter

of these connections should be addressed to enhance pedestrian and bike access to the Town's trail system and to determine how the site development affects them.

### 1.9 - Check the adequacy of the site plan circulation features

**Impact of the proposed unit count and cul-de-sac driveway on fire emergency access safety:** With regard to the proposed development quantity of 157 units, the Town guidelines would require a second access. The Commonwealth of Massachusetts fire protection guidance does not specify a maximum number of units that can be served by a single access road.<sup>5</sup>

There is no discussion in the TIA about the length of the proposed cul-de-sac, which we find to be excessive. At ±1,700 feet in length, the proposed cul-de-sac driveway far exceeds the maximum cul-de-sac length of 500 feet under Manchester's Zoning Bylaw. Manchester's cul-de-sac bylaw is not unusual, in that the average maximum cul-de-sac length in the vast majority of Massachusetts' communities rarely exceeds 600 feet.<sup>6</sup> Minimizing cul-de-sac lengths is good design practice<sup>7</sup> for emergency safety, water service, and transportation mode connectivity reasons.

Wetlands and topography make the provision of a secondary access at this site very challenging. Ideally, an emergency loop road configuration should be provided for the Sanctuary at MBTS.

**Impact of proposed access driveway steep grades on access safety:** Approximately ±750 linear feet of the proposed site driveway exceeds 6%, including grades up to 7.5%. Such steep grades will require diligent maintenance procedures to keep the driveway operational during winter snow/icing events, particularly given the driveway's horizontal curvilinear alignment.

Given the steep access driveway grade and absence of walking or biking infrastructure, few bicyclists and pedestrians are likely to use it to access School Street. While not impassable, the proposed access driveway will not be pedestrian or bicycle friendly, as it will not be ADA-compliant and will have a long stretch with 5%-7.5% running grades. Motor vehicles – whether cars or shuttles -- will be the primary mode for site residents and visitors to access this site.

**Site parking adequacy:** The Applicant proposes a parking supply of 247 spaces including 7 accessible spaces of which 3 will be van-accessible. This averages 1.57 spaces per unit, which exceeds the Town's zoning requirement of 1.5 spaces per unit. Additionally, based on the latest

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<sup>5</sup> While not applicable in this case, we are aware that there is ITE guidance recommending two accesses if more than 20 dwelling units are proposed.

<sup>6</sup> Dead Ends, Maximum Lengths, Pioneer Institute for Public Policy Research – (2004).

<sup>7</sup> Sustainable Neighborhood Road Design – A Guidebook for Massachusetts Cities and Towns, Massachusetts Chapter or APA – (May 2011).

**Reference: Traffic Impacts Peer Review Initial Findings Letter**

ITE Parking Generation report (5<sup>th</sup> Edition, 2020), site peak parking demands for 250 bedrooms within the proposed 157 units should range from 185-188 occupied parking spaces. We find that the proposed parking supply should be more than adequate to accommodate typical site parking demand peaks that are likely to occur during the overnight hours.

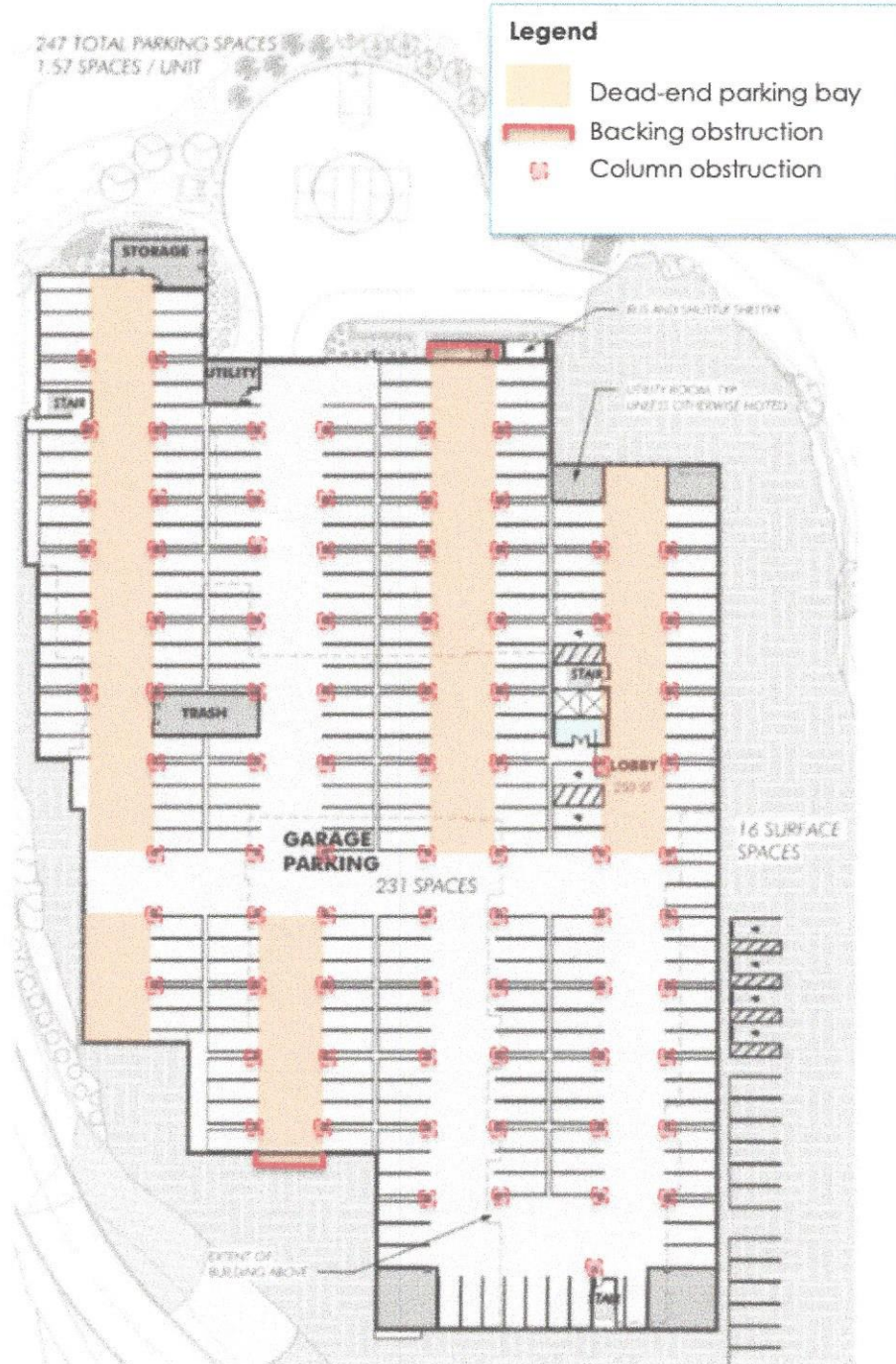
Augmented by an illustration on the next page, comments below pertain to circulation issues that warrant some discussion with the Applicant for safe garage operations, in order of importance:

- **Dead-end parking bays.** The site plan proposes a total of five 'dead-end' parking bays. Such dead-end bays are problematic and are not recommended. It is not always possible to see whether a space is occupied at the entrance to a dead end parking bay, even if all spaces are assigned to individual units. Additionally, if for any reason, an emergency vehicle must enter the garage, the absence of driving continuity could present a hazardous circulation condition.
- **Backing obstructions.** At least four parking spaces are located too close to walls for safe backing maneuvers. If possible, an indent of at least 6 feet should be considered to create a backing area for vehicles when exiting the spaces in question. We note that this issue is eliminated if there are no 'dead-end' parking bays.
- **Structural columns.** While not always practical to do so, it is best to minimize the use of structural columns in garages because they create safety hazards for users adjacent to them and a high incidence of 'fender-benders'. It is necessary to add some additional clearance areas around structural columns for the safety of motorists driving into or out of their spaces and walking between vehicles to or from their parking spaces, usually 2 feet additional width on each side of the column or, essentially a total envelope of 5 feet around the columns. The garage plan submitted calls for the installation of more than 80 columns that will directly affect the users of approximately 160 of the 231 parking spaces in the garage. The envelope around the columns seems to be 2 feet rather than 5 feet in width.

**ADA and MAAB compliance:** The TIA recommends the site plans be compliant with the federal Americans with Disabilities Act (ADA) and the Massachusetts Architectural Access Board (MAAB). As noted above, the Applicant proposes to create an accessible sidewalk system only adjacent to the building, not along the steep access driveway.

Reference: Traffic Impacts Peer Review Initial Findings Letter

### Site Parking Layout Issues of Concern



PARKING LEVEL PLAN



**Reference: Traffic Impacts Peer Review Initial Findings Letter**

Without an ADA compliant sidewalk, the site driveway will not be attractive for bicycle or pedestrian circulation, as more than 700 linear feet of the driveway averages a 7% grade.

**Transit/Shuttle stop:** A transit/shuttle stop is identified on the site plan at the end of the site driveway cul-de-sac adjacent to the northeast corner of the building. If available, the transit/shuttle stop will be the only reasonable way for residents to access MBTS Town Center services without driving. This stop, as illustrated on the architectural parking plan, seems to comply with ADA/MAAB accessibility requirements.

The potential shuttle service requires a relatively steep uphill/downhill vehicle trip via a 2/3-mile total route diversion from School Street (1/3-mile up; 1/3 mile down) to provide site service as a part of a public route service. The type, service level, and viability of such a proposed shuttle/transit service needs to be clarified.

The availability of funding through the Massachusetts Bay Transportation Authority (MBTA), which serves MBTS today, or the nearby Cape Ann Transit Authority (CATA), which could serve the site at the Town's discretion, is unclear. If either transit service entity is unable to obtain funding for the service, the Applicant should consider the possibility of a residential subscription van/shuttle service connecting downtown Manchester and the MBTA commuter rail station to the site. Permission for any new or shared service stops on School Street and in the Town Center must be obtained from the Town or the MBTA with appropriate transit/shuttle stop infrastructure provided.

**Site Loading and moving van access:** The Applicant should provide an AutoTurn® or equivalent truck turning analysis showing how site loading and turnaround at the end of the cul-de-sac will occur assuming the largest vehicles expected to access the site. The analysis should confirm whether geometric features of the site driveway and turnaround will be adequate to accommodate occupied envelopes of the largest vehicles approaching the site buildings to and from School Street.

## Conclusions

We find that the TIA was well done and generally complies with acceptable methodologies and procedures identified by MassDOT as they pertain to traffic generation, trip distribution and evaluation of existing and future traffic operations and off-site safety with and without the development. Off-site traffic operations and safety characteristics for the site's projected motor vehicle traffic impacts are reasonable and acceptable.

On-site, however, adverse site access features are driven by constraining steep topography and wetlands. The proposed approximately 1/3 mile length cul-de-sac site driveway creates several potential access safety issues.

**Reference: Traffic Impacts Peer Review Initial Findings Letter**

The proposed access road has steep grades and sharp horizontal curves that do not comply with the requirements of MBTS's Subdivision Rules and Regulations. Most state and national guidelines that we are aware of recommend a secondary means of access should be created to serve the proposed 157 apartment units, preferably in a loop road configuration.

As currently designed, the access driveway's grading and horizontal curvature will discourage pedestrians and bicyclists from traveling to and from the site. The approach to maintaining good site access at all times, including winter icing conditions and unforeseen road blockages, should be provided.

Proposed site plans should show how or whether the site will accommodate and access existing nearby off-site Manchester Essex Conservation Trust (MECT) trails.


The site's proposed 247-space parking supply should serve site related parking demands acceptably. We have identified concerns about the layout of the proposed garage and internal parking operations that should be addressed.

A shuttle/transit stop is proposed on the site. Operations of such a service should be clearly identified, as it may be the best way to enhance pedestrian and bike access via School Street and the Town Center.

We appreciate the opportunity to assist the Town with these services and look forward to working with the Applicant to the successful resolution of issues raised in this peer review letter.

Regards,

**Stantec Consulting Services, Inc.**

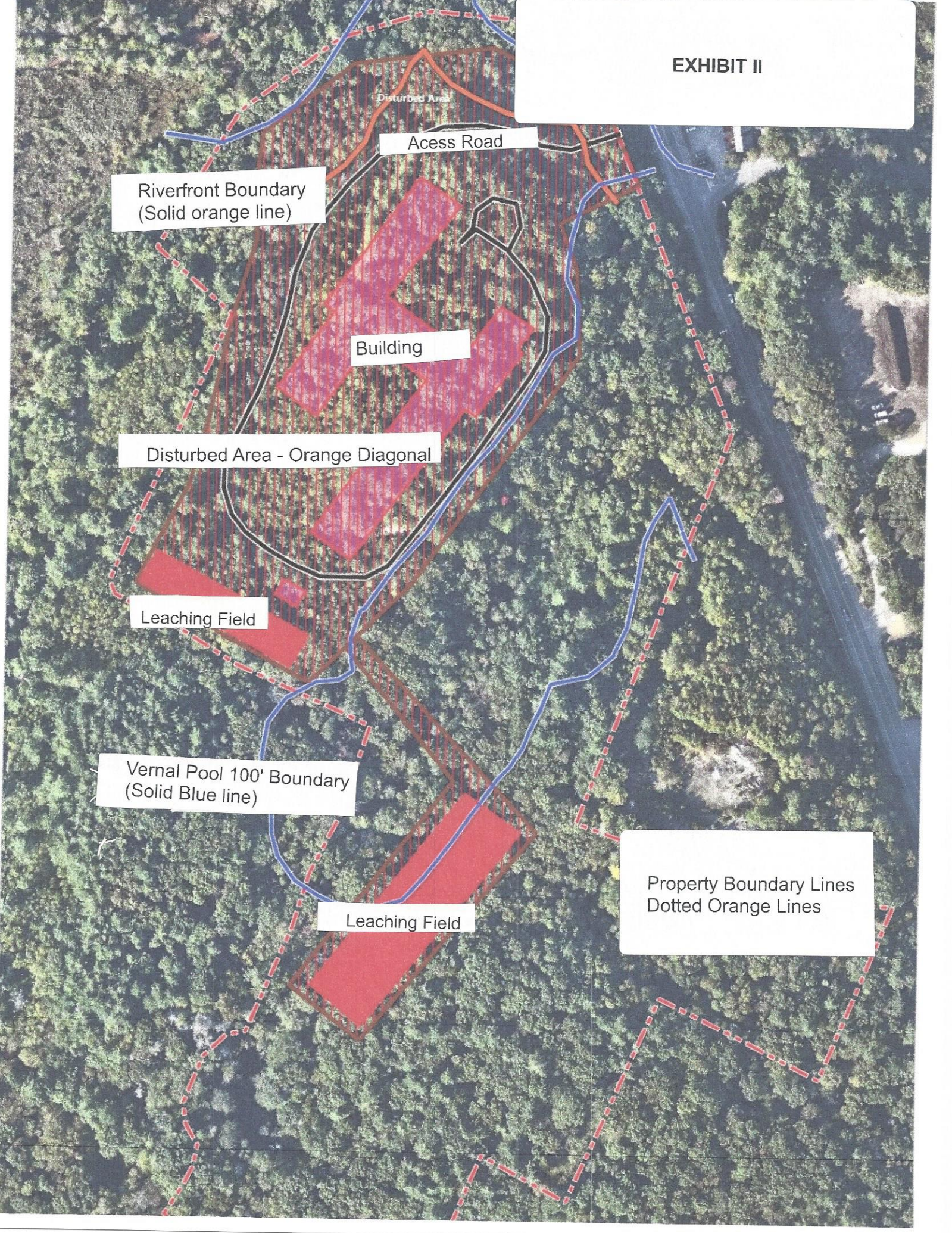


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**Gary L. Hebert, PE**  
Consultant/Peer Reviewer  
Phone: 781-249-0419  
Email: Gary.Hebert@stantec.com

Reference: 179411000

EXHIBIT II



Riverfront Boundary  
(Solid orange line)

Access Road

Building

Disturbed Area - Orange Diagonal

Leaching Field

Vernal Pool 100' Boundary  
(Solid Blue line)

Leaching Field

Property Boundary Lines  
Dotted Orange Lines

## EXHIBIT III

# BEALS • ASSOCIATES *INC.*

2 PARK PLAZA, SUITE 200, BOSTON, MA 02116  
PHONE: 617-242-1120

Citizens' Initiative for Affordable Housing  
c/o Dennison M. Hall  
Hall Investment Holdings  
40 Beach Street, Suite 203  
Manchester, MA 01944

### **Reference: The Sanctuary at Manchester-By-The-Sea Concerns and Questions**

In response to your request, Beals Associates, Inc. has performed an initial review of the proposed project entitled The Sanctuary at Manchester-By-The-Sea. Our initial review focuses primarily on a seven-sheet plan set entitled: ***Site Development Plans For The Sanctuary at Manchester By The Sea 0 School Street Manchester-By-The-Sea, MA*** which was issued for review on September 24, 2020. The following is a list of concerns and questions about the proposed development off of School Street in the northern portion of Manchester-By-The-Sea. As proposed, the development presents inadequate parking with no other transportation alternatives, no stormwater management plans, insufficient protection of environmental resources, and precarious access through the site considering topography and proposed grades. In sum, the proposed project raises substantial public safety and public health concerns and therefore must be reconsidered for the betterment of current and future residents of Manchester-By-The-Sea.

Even though the 40B process waives all local regulatory requirements, it is important to consider that many of the local regulations are based on good engineering practice and are also intended to protect public health and safety. Throughout this analysis, we cite the local regulations not to ensure compliance with the local regulations that are waived but instead to ensure that the proposed project respects good engineering practice while also ensuring the protection of public health and safety for the future residents of the proposed development and the current residents of Manchester-by-the-Sea.

The most significant concerns are outlined below and grouped in categories for clarity:

### **Parking**

1. 423 parking spaces are required by the Zoning By-laws but only 247 spaces are provided and therefore, there is a deficit of 176 spaces based on the standards in the Town's regulations. In essence, only 58% of the required parking is being provided in the proposed design.
2. In addition to inadequate resident parking, there is no mention of visitor parking in terms of number of spaces provided or location of those spaces.
3. There is no description or clarification of what the amenity space will entail and no parking has been dedicated to that use.
4. The proposed average parking ratio of 1.5 spaces/unit, below every parking requirement metric in the zoning.
5. 3-bedroom units are required to provide five parking spaces, but 1.5 is proposed.
6. 2-bedroom units are required to provide three parking spaces, but 1.5 is proposed.

7. Parking spaces are required to be 9 feet by 20 feet by zoning, but the surface parking spaces are 9 feet by 18 feet. Garage spaces are not dimensioned.
8. Residents will be reliant on driving since the nearest public transit (Commuter Rail station) is 1.7 miles from site, requiring a 7-minute drive, 10-minute bike ride, or 35-minute walk.
9. There is no bicycle infrastructure, such as bike lanes, existing or proposed on the access drive or on School Street.
10. There is no bicycle parking shown on any plan, but the Vanasse Traffic Impact Analysis states there is and should be located near the main entrance.
11. Vehicular speeds on School Street make biking on the "shared travel-way" uncomfortable at best and unsafe at worst, meaning most residents will not bike due to the safety risk
12. There is no sidewalk on School Street between the site and the Route 128 Southbound ramp making walking from the site uncomfortable/unsafe.
13. The conclusion of all of the above information is that additional parking, averaging at a minimum 2.0 spaces/unit, needs to be provided for this many units (and visitors) in this location in town.

#### Water

1. Section 6.11.1 of the Zoning states, "The Water and Sewer Department has provided evidence that the municipal sewer system can accommodate no more than 200 additional dwelling units and the public water supply is at or near capacity. The rate of residential and commercial development in Manchester-by-the-Sea is determined by and should not exceed the ability of the town to provide adequate public services to safeguard the health, welfare and safety of current and future residents." A water system analysis should be performed to determine if there is adequate water supply for 157 residential units coming online at once. This analysis should be done for volume, pressure, and fire flow.
2. It should be determined if there is adequate pressure and supply for fire protection considering the access drive length and elevation. No booster pump is indicated on the plans.
3. Fire hydrants are currently only proposed along the east side of the building. Is there an adequate number of hydrants and are they in the proper locations for a building of this size? The applicant should review the plans with the Fire Chief to determine if the Chief believes that the proposed design is sufficient for his fire protection needs.
4. Taken in aggregate, the number of hydrants does not fulfill the requirement of one hydrant every 500 feet, per Section 7.14 of the Subdivision Rules & Regulations. Although this is a local requirement, it is also good engineering practice and necessary to protect public safety.
5. There is no Stormwater Management Plan, which is crucial for a site with this much topography, bedrock, and wetland areas. The only indication of stormwater management is the drainage swale along the interior side of the access drive to the west of the building and two catch basins at the intersection of the drive and School Street. Absent any calculations to the contrary, two catch basins for such a large drainage area are inadequate and will likely result in water discharging into School Street. Adequate stormwater management is important to protect wetlands, the town's drinking water sources, prevent erosion, and limit runoff from the access drive onto School Street.
6. Section 5.10.1.3 of the zoning states, "All runoff from impervious surfaces shall be recharged on the site, diverted towards areas covered with vegetation for surface infiltration to the extent possible. Dry wells shall be used only where other methods are not feasible..." There is no information provided to determine if the current design achieves this requirement nor is there

sufficient subsurface information to determine if infiltration is possible. Recharge is necessary to maintain the water balance in the area in order to protect wetland resource areas and water resources.

#### Access Drive

1. The proposed driveway is approximately 1,900 feet long, exceeding the standard maximum dead-end length of 500 feet (Section 7.09.D.3. Subdivision Rules & Regulations). We are aware that the access through the site is a private driveway. However, it is intended to function as a roadway providing access to a large development and therefore in this case, there is no difference between a driveway and a roadway in terms of functionality. While 40B may waive local design standards, the reason for creating a maximum length of a dead-end roadway is to protect public safety in an emergency. It is commonly accepted that with a single point of access, public safety can be protected to a distance of 500 feet as reflected in the regulations. To ensure the protection of public safety for roadways or driveways in excess of 500 feet, a secondary means of access and egress must be provided. A 1,900' +/- driveway serving 157 residential units with no second point of access does not adequately protect public safety.
2. We have analyzed the accessibility of the site with a 40' pumper fire truck measuring the ability of a truck to negotiate the driveway. The tolerances are very tight and while a truck can negotiate the driveway, the turn-around at the building, and egress within the driveway, the tracks of the wheels are frequently on the very edge of the pavement and at times, the wheels are on the centerline of the driveway. On the east side of the building in the vicinity of the drop-off area, the pavement is reduced to a width of 22' which is relatively narrow, particularly considering that the area is bounded by a guard rail on the east side of the driveway. Attached at the end of this letter is a copy of the submitted Layout & Materials Plan on which we have overlaid a turning analysis showing the path of a 40' pumper fire truck as it navigates through the development. The red lines indicate the path of the tires on the ground surface and the green lines show the overhang of the truck. As indicated by this analysis, the truck must navigate through the site with very tight tolerances in order to travel to the turn around and to return.
3. Section 7.09.C.2. of the Subdivision Rules & Regulations states that subdivisions of over 25 lots shall require two means of access. Typically, one can assume an equivalency of one lot = one housing unit, but in this case one lot can equal six housing units and still exceed this metric. Two means of access is critical for public safety.
4. In Manchester-by-the-Sea, a road that provides access to more than 120 housing units is considered an Arterial Road, illustrating the importance of clear access through wider dimensions, lower gradients, and larger curve radii to accommodate the larger traffic volume. Although not technically a street, the proposed access drive functions as such for the 157 units on top of the hill but it does not comply with the standards deemed to be necessary for this scale of development.
5. No sidewalks are shown along the access drive. How do pedestrians walk safely between the building on top of the hill and School Street on a winding road with a large volume of vehicles traversing the drive daily?
6. Can pedestrians access the abutting trail network from the proposed building? If they access it from School Street, sidewalks along the access drive become more important.

7. Typically, arterial (and collector) roads that serve at least 120 residential units require sidewalks on both sides. Given the existing topography one sidewalk may be adequate, but zero are currently proposed and not acceptable
8. Will the access drive be lit? No information is provided and lighting is critical for the safety of pedestrians who may be walking in the driveway at night.

### Grading

1. The driveway to the project is steep, narrow, curvilinear and abuts very steep slopes in different locations.
2. The retaining wall on the east side of the building for the access drive, as shown in the section on the last page of the October 2020 presentation, will be 30 feet tall so assurances need to be made that the design can be constructed as shown safely, especially since this is the only point of access to the parking garage entrance/exit.
3. The entrance of the site is 37 feet below the top of the highest retaining wall and 61 feet below the turn-around at the end of the drive on top of the hill. Assurances need to be made that the design can be constructed as shown and safely. The applicant should provide plans showing the construction details along with a construction sequencing plan describing the steps necessary to construct the substantial walls.
4. The rendering on sheet A17 of the developer presentation from October 2020 is deceiving and fades the proposed building to minimize its visual impact from the roadway. In reality, it will loom large above the trees and the surrounding area.
5. Similarly, sheet A19 from the same presentation does not accurately represent the steep climb of the access drive and the height of the series of retaining walls at the foot of the hill.

### Wetlands

- The existing isolated wetland on the western side of the site is to be filled and replicated elsewhere at a ratio of 2:1. No replication area is shown on any plan. The selected location is essential for successful replication since most attempts are unsuccessful from an ecological perspective. The replication area should be shown before approval is granted to fill in the existing wetland as part of the access drive. In addition, the isolated wetland should be checked in the spring to determine if it contains any vernal pools, which sometimes occur within isolated wetlands.
- The 30-foot-tall retaining wall supporting the access drive on the eastern side of the building encroaches into the 100-foot buffer zone of a wetland to the east. What assurances are provided that snowplows will not simply direct snow off the roadway into the buffer and potentially contaminate the sensitive resource area? Because the massive wall is so close to the wetlands, the project proponent should produce plans and a sequence of construction documenting how the wall can be constructed without impacting the adjacent wetlands.
- The leaching field shown on sheet 102B can only be accessed by filling in the wetland directly to the northwest and should therefore be relocated. In addition, a sewer line would have to pass through this wetland area connecting the sewage treatment plan to the leach field and a permanent means of access must be created to ensure long term maintenance of the leach field.

The method of access should be designed to ensure that if constructed in combination with the other wetland filling, that the 5,000-sf wetland fill limit is not exceeded.

- Similarly, sheet C-102A states the exact size and location of wastewater treatment tanks are still to be determined, but their location and size are crucial to understand the potential impacts of the proposed design before approval.

### Sewage Disposal

- Insufficient information is provided to properly assess the adequacy of the proposed sewage treatment plant and the leach fields necessary for the disposal of the development's sewage effluent. The plans indicate that a limited number of test pits are located in areas of the proposed leaching fields but the test pit logs are not shown on the plans. In an environmentally sensitive area such as this site, extensive subsurface explorations should be performed to evaluate the soil profile including soil characteristics, permeability, depth to the seasonal high groundwater elevation, depth to bedrock and any other subsurface conditions that may affect the performance and adequacy of the proposed leaching areas.
- Hydrogeologically, the proposed development area appears to be a bedrock hill surrounded by wetlands and/or rivers on four sides. To the west of the site, there is an extensive area of wetland resources known as Cedar Swamp which includes bordering vegetated wetlands and a river flowing in the center of Cedar Swamp. To the north of the site is a large wetland known as Beaverdam Swamp which includes Sawmill Brook. Where Sawmill Brook changes direction from an easterly flow to a southerly flow, the brook flows in close proximity to a non-community groundwater well presumably serving the adjacent medical building. Sawmill Brook continues flowing in a southerly direction to a confluence with Cat Brook. Cat Brook continues to flow in a southerly direction where it flows in close proximity to a public groundwater well and due to its close proximity, the brook flows through both the zone 1 and zone 2 protected areas around this public water supply well. Finally, there is a large wetland area located to the south of the site known as Millets Swamp.
- As evidenced by the information above, it appears that any effluent disposed of in the vicinity of the proposed development, will be transported through both a surface water system and a ground water system that moves towards and through the protected areas of at least two known water supply wells. As a consequence, it is critically important that the performance of the sewage disposal system be assessed in detail to determine its impact on the groundwater supplies and whether the system is capable of protecting the health of those dependent on the two known wells and any other private wells that may exist in this area. With regard to the sewage disposal system design, the only information on the current plan set is notes stating: "***Wastewater Treatment Leaching Fields, Typ. (Exact size & Location to be Determined by Others)***" and "***Wastewater Treatment Facility, Typ. (Exact Size & Location of Treatment Tanks to be Determined by Others)***" The project is not viable without an adequate means of sewage disposal and with the downstream water supply systems, the adequacy of the sewage treatment plant and leach fields must be thoroughly vetted to ensure the protection of public health.



### Site Plan Review Criteria

Although the proposed project is exempt from zoning requirements as a 40B project, the underlying criteria for approving projects should not be ignored. Section 6.5 of the Zoning outlines the criteria the Zoning Board of Appeal must consider in approving a site plan and the proposed design does not meet the following:

*(a) Protection of adjacent areas against detrimental or offensive uses on the site by provisions of adequate surface water drainage, buffers against lighting, sight, sound, dust, vibration, and allowance of sun, light, and air:*

No Stormwater Management Plan is available to determine the adequacy of surface water drainage and given the topography, grades, presence of ledge, and proximity to sensitive environmental resources such information is even more crucial than usual.

*(b) Convenience and safety of vehicular and pedestrian movement within the site and in relation to adjacent areas:*

The 1900-foot-long access drive exceeds the standard length of a dead-end road in town, provides only one point of access off School Street, features average grades between 6-8%, increases in elevation over 60 feet, and includes a 30-foot-tall retaining wall on the east side, all of which reduce the ease of access and therefore safety. Furthermore, no sidewalks are provided along the access drive to facilitate safe pedestrian movement between the building at the top of the hill and School Street and nearby trails 60 feet below.

*(c) Adequacy of facilities of handling and disposal of refuse and other production by-products*

The plan set does not contain sufficient information to properly assess the adequacy of facilities for handling and disposal of refuse and other production by-products

*(d) Protection of environmental features on the site and in adjacent areas:*

Without adequate stormwater management, which is unknown as this time, abutting wetlands will be subjected to runoff from the roadway. The isolated wetland that will be filled is to be replicated but no location is given, and since most replications are unsuccessful ecologically this detail is important. Additionally, the development will lead to deforestation, blasting, and site work that will irrevocably change this natural area in close proximity to conservation land. This work is governed by the state Massachusetts Wetlands Protection Act and therefore it is not waived by 40B.

*(e) Promotion of appropriate arrangement of structures within the site and in relation to existing structures within the district and neighborhood:*

The proposed structure is located at the top of a hill, over 60 feet above School Street, and with only one point of access. Combined with the necessity of blasting and excavation to create the pad for the building, and the filling of a wetland for the access road, it is clear this site is not suitable for the scale of the proposed project.

*(f) Coordination with and improvement of systems of vehicular and pedestrian access, drainage, water supply, sewage disposal, lighting, landscaping, wetlands, water courses, buildings and other features that support the neighborhood:*

At this time, there is no indication of off-site improvements but there is no safe pedestrian or bicycle access along School Street or from School Street to the proposed building, no drainage details provided, no indication of water source, only vague outlines of potential sewage disposal locations (one of which would necessitate filling another wetland to access it), no information about lighting, and admitted damage to abutting wetlands.

(g) *Compliance with all applicable sections of the Zoning By-Laws.*

### **Subdivision Design Objectives**

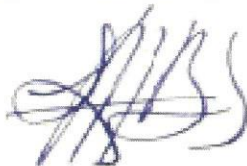
Furthermore, the local Subdivision Rules & Regulations outline several Design Objectives (Section 7.02) that we believe are appropriate to a project of this size. The following should be reduced to the greatest extent possible:

1. *Volume of cut and fill:*  
No detailed analysis is provided but given the proposed project is located on top of a hill, it is reasonable to assume significant cutting will be required. The highpoint on the site is at elevation 152. The plans indicated that the first-floor elevation of the proposed building is 119 with a garage under the first floor. To achieve the finished grades, the existing site will have to be lowered in overall elevation by approximately 40 feet. This will result in the removal of a significant amount of soil and rock. The applicant should be required to provide a cut and fill analysis of the proposed site plan to evaluate how much material will have to be removed from the site.
2. *Area over which existing vegetation will be disturbed, especially if within 200 feet of a river, wetland or waterbody or in areas having a slope of more than 15%:*  
The proposed project will result in deforestation within 200 feet of multiple wetlands (including filling one in) and in areas of steep slopes.
3. *Number of trees removed having a diameter over 12" at breast height:*  
No detailed analysis is given, but for a mature forest such as the one located on-site, it is reasonable to expect an abundance of trees with a diameter over 12" and that many will be removed during the construction process. More details should be provided to account for this destruction.
4. *Extent of waterways altered or relocated:*  
Although no defined waterways will be impacted, one wetland will be filled for the access road and a second may be filled to access the sewage disposal area southeast of the building. Furthermore, the lack of stormwater management currently proposed puts all abutting wetlands at risk for alteration of their ecological conditions.
5. *Dimensions of paved areas except as necessary for safety and convenience, especially in aquifer recharge areas*
6. *Buildings located within 500 feet of existing Town roads:*  
The proposed building is over 800 feet from the closest Town road (School Street), and there is only one point of access. The building is over 60 feet higher than the intersection with that road, average proposed grades are 6-8%, and there is a 30-foot-tall retaining wall to support the access drive, all of which raises serious concerns about vehicular and emergency access.

In summary, the proposed project is inadequately designed and does not provide sufficient protection of public health and safety. We question the advisability of placing 157 units on top of a hill, surrounded by steep slopes, with only one point of access via a challenging access drive and no alternative access or means of transportation. We provide this initial review for your consideration and with the intent of highlighting the improvements necessary to make this a viable project.

Sincerely,

**Beals Associates, Inc.**



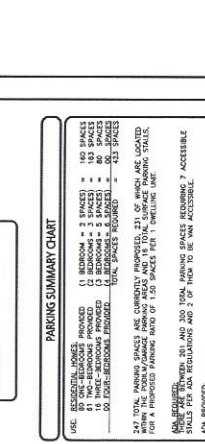
Lawrence M. Beals



Patrick Connolly

THE LOCATIONS OF EXISTING UNDERGROUND UTILITIES ARE SHOWN IN THE ATTACHED UTILITY PLAN. THE CONTRACTOR SHALL VERIFY THE LOCATION OF ALL UTILITIES PRIOR TO CONSTRUCTION. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROTECTION OF ALL UTILITIES. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROTECTION OF ALL UTILITIES. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROTECTION OF ALL UTILITIES.

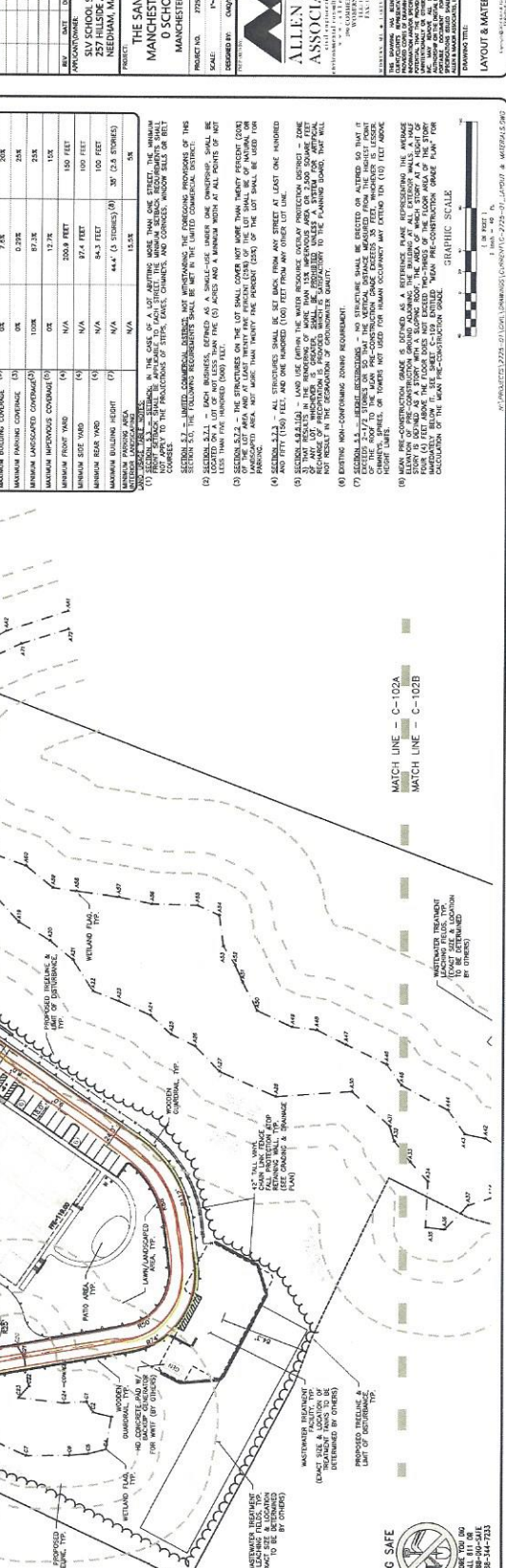
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**LAND USAGE TABLE - LIMITED COMMERCIAL DISTRICT (LCD) & WATER RESOURCE OVERLAY PROTECTION DISTRICTS - ZONE 3**

MINIMUM DIMENSIONS OF 9 FEET BY 9 FEET.

(1) SET-BACK PARKING SPACES SHALL BE DESIGNED WITH MINIMUM DIMENSIONS OF 9 FEET BY 9 FEET.



**LEGEND:**

- PROPERTY LINE
- SET-BACK
- BUILDING ARCHITECTURE
- CHUB
- RETAINING WALL
- PARKING STRIPING
- TRAFFIC SIGNAGE
- HEAVY DUTY CONCRETE
- ASPHALT DRIVEWAY
- ASPHALT DRIVEWAY
- ASPHALT DRIVEWAY
- WOOD SHED
- CHAIN LINK FENCE
- TRAIL LINE
- TRANSFORMER

**PARKING SUMMARY CHART**

USE: 1. 10 SPACES (1 BEDROOM + 2 SPACES) = 10 SPACES  
 2. 10 SPACES (1 BEDROOM + 2 SPACES) = 10 SPACES  
 3. 10 SPACES (1 BEDROOM + 2 SPACES) = 10 SPACES  
 4. 10 SPACES (1 BEDROOM + 2 SPACES) = 10 SPACES

**LAND USAGE TABLE - LIMITED COMMERCIAL DISTRICT (LCD) & WATER RESOURCE OVERLAY PROTECTION DISTRICTS - ZONE 3**

MINIMUM DIMENSIONS OF 9 FEET BY 9 FEET.

(1) SET-BACK PARKING SPACES SHALL BE DESIGNED WITH MINIMUM DIMENSIONS OF 9 FEET BY 9 FEET.

**ISSUED FOR REVIEW**

PROFESSIONAL ENGINEER FOR CIVIL & PUBLIC UTILITIES, INC.

PROJECT: THE SANCTUARY AT MANCHESTER BY THE SEA 10 SCHOOL STREET MANCHESTER, MASSACHUSETTS, MA

PROJECT NO. 1702011011  
 SCALE: 1/8" = 1'-0"  
 DRAWN BY: CEMPA  
 CHECKED BY: CEMPA

**ALLEN & MAJOR ASSOCIATES, INC.**

1100 STATE STREET, SUITE 200  
 MANCHESTER, MASSACHUSETTS 01750  
 TEL: 603-881-1100  
 FAX: 603-881-1101  
 WWW.AM-MAJOR.COM

THE SANCTUARY AT MANCHESTER BY THE SEA 10 SCHOOL STREET MANCHESTER, MASSACHUSETTS, MA

PROJECT NO. 1702011011  
 SCALE: 1/8" = 1'-0"  
 DRAWN BY: CEMPA  
 CHECKED BY: CEMPA

LAYOUT & MATERIALS PLAN C-102A



1" = 40' - 0"

1" = 20' - 0"

1" = 10' - 0"

1" = 5' - 0"

1" = 2' - 0"

1" = 1' - 0"

1" = 0' - 6"

1" = 0' - 3"

1" = 0' - 1.5"

## EXHIBIT IV

### Open Letter to MassHousing

June 12, 2021

MassHousing  
One Beacon Street  
Boston, MA 02108-3110

To the Representatives of MassHousing:

We, the undersigned citizens of Manchester, respectfully request that for three reasons MassHousing deny Strategic Land Ventures (SLV)'s request for a Project Eligibility Letter (PEL):

**The Town of Manchester has made real progress towards its Affordable Housing Goals.** North Shore Community Development Coalition (NSCDC) recently purchased 1-3 Powder House Lane, with 29 existing rental units located in the heart of Manchester. NSCDC, a mission-driven non-profit, will preserve these 29 affordable units in perpetuity. More than 260 local families demonstrated their support for integrated, affordable housing by donating more than \$1.5 million to NSCDC. No tax dollars were needed. NSCDC's project serves people at 50-60% of AMI, compared to SLV's "affordable" units at 80% of AMI. The Manchester Affordable Housing Trust (MAHT), established in 2016 to increase the diversity of housing options for Manchester's low- and moderate-income households, endorsed the project, which is compatible with the town's Housing Production Plan.

**SLV's proposal poses risks to the life, health and safety of residents.**

- **Dangerous road.** With a single, steep cul-de-sac access road 1900 feet long and no secondary access road, even SLV agrees with the Town's independent Traffic Impact Consultant, who characterized the project as "less safe." Emergency vehicles might block families seeking to leave the property. Worse still, vehicles double parked or broken down could block emergency vehicles seeking access to the site.
- **No sidewalk.** The proposed project appears to violate Fair Housing standards by placing at risk any resident who seeks to exit the property on foot or wheelchair. An extensive ramp system is required – but not included in the design – to address access and safety challenges under ADA.
- **Threatens drinking water supply.** Sawmill Brook, which wraps around three sides of Shingle Hill, links downstream via induced infiltration to the Lincoln Street well – the source of roughly half of Manchester's drinking water. The project would generate

significant stormwater runoff on this water supply, and on the related aquifer recharge area and reserve public water supply.

- **Harmful blasting.** Repeated exposures to air overpressure and ground vibration from the removal of 40 feet of rock on Shingle Hill poses risks to the public water supply and the outstanding wildlife habitat within adjacent Town-owned conservation areas.
- **On-site wastewater treatment a major environmental risk.** It deploys two large leaching fields in granite outcroppings connected by a pipe running through a highly sensitive wetland.
- **Menaces Conservation Land.** The site abuts or overlooks 1600 acres of conservation land conserved by, among others, Manchester-Essex Conservation Trust and The Trustees of Reservations - each of which has expressed its strong opposition to SLV's proposal.

**SLV's proposal is inappropriate for the site and inconsistent with local needs.**

After blasting 40 feet of rock off the top and north section of Shingle Hill, SLV's large structure will tower over a 90-degree sloped ledge. SLV's plan entails monumental engineering for 136 units (only 34 of which would be designated affordable) and 226 cars, with rampart-like retaining walls that will strip vegetation from the hillside and loom 65 feet over School Street. Because of the severe drop-offs, the project is in many cases surrounded by a chain link fence "for fall protection". The project from the roof to the bottom of the retaining wall would reach approximately 75 feet, the equivalent of a seven-story high building. Considering the elevation from the entrance of the property, the project would appear 107 feet tall - similar to an eleven-story building and grossly inconsistent with the town's existing structures. It threatens the natural environment, it is vastly out of scope in relation to its surroundings and municipal planning, and it is a devastating blow to generations of care for open space.

The 34 units of affordable housing would be priced for people earning 80 percent of area median income or more, isolated from the rest of the town, and nearly two miles away from public transportation. Manchester needs affordable housing priced at lower AMI rates and fully integrated into our community. Manchester has taken concrete action to close the affordable housing gap in our town with local solutions to our town's housing needs. We hope that you will deny a PEL for this inferior project which poses concerns to the health and/or safety of the occupants and the residents of Manchester and allow us to finish our work.

Thank you for considering our request.

The undersigned residents:

1. Chris Abbott
2. Ellen Abbott
3. John Abbott
4. Katharine Abbott
5. Trina Abbott
6. Robert Agnello
7. RoseMarie Agnello
8. Elizabeth Akerley
9. Michael Alden
10. Lee Allen
11. Diane Allenberg
12. Carrie Almog
13. Anthony Aloï
14. Barrett Alston
15. Jessica Alston
16. Elizabeth Alt
17. Patricia Ambrose
18. Susannah Ames
19. Arthur Anderson
20. Carl Anderson
21. Elizabeth Anderson
22. Lorna Andersson
23. Alison Anholt-White
24. Cook Ann
25. Caroline Armington
26. Stephen Armington
27. Alan Armstrong
28. Rosemary Armstrong
29. Lynn Atkinson
30. Nancy August
31. Eugene Ayott
32. Sarah Ayott
33. Michael Azevedo
34. Peter Baciù
35. Gale Bacon
36. James Bacon
37. Andrea Basso
38. Rem Baviu
39. J. Robert Beatty
40. Leslie Beatty

41. Elaine Beggan
42. Joseph Beggan
43. Connie Behnke
44. James Behnke
45. keith bellucci
46. KAREN BENNETT
47. Carolyn Bergeron
48. Donald Besser
49. Helen D. Bethell
50. John T Bethell
51. Henri Bichet
52. Stephanie Bichet
53. Nancy Bildner
54. Catherine Bilotta
55. Kjetil Birkeland
56. Jeffery Bistrong
57. Isabelle Black
58. Camilla Blackman
59. Jane Blau
60. Kristen Bock
61. William Bonaccorso
62. Lisa Bonneville
63. Jay Bothwick
64. Kathleen Bothwick
65. Florence Bourgeois
66. Eric Bourke
67. Erin Bourke
68. Janet Boynton
69. Reid Boynton
70. Davis Bradford
71. Miriam Bradford
72. Adrienne Bradley
73. Deborah Bradley
74. Timothy Braier
75. Charles Brennan
76. Jill Brennan
77. Adam Briggs
78. Margaret Briggs
79. Kristen Brousseau
80. Catherine Brown



81. Elizabeth Brown
82. Roxanne Brown
83. William Brown
84. Catherine Browne
85. Gail Browne
86. Roseanne Bruno
87. Alida Bryant
88. Christopher Bryant
89. Carol Bundy
90. John F. Burke
91. Neil Burke
92. Tracey Burke
93. Tamera Burns
94. Dolores Burroughs
95. Elyse Campanelli
96. Joseph Campanelli
97. James Campbell
98. Rebecca Campbell
99. Samuel Campbell
100. Jean Capello
101. Leonard Capello
102. Jeff Carovillano
103. Bernadette Carr
104. Gracia Carr
105. James Carr
106. Sheila Carrassi
107. Sherilyn Carroll
108. Francis Caruso
109. Michael Carvalho, Esq.
110. Jon Casey
111. Frances Caudill
112. Thomas Chafe
113. Martha Chapman
114. Aaron Chase
115. Meghan Chase
116. Philip Chase
117. Pamela Ciccone
118. Nora Cifric
119. Andrew Clark
120. Diane Clark

121. Elisabeth Clark
122. Anne Coccoluto
123. Jeff Cochand
124. Betty Lou Colarusso
125. Clay Colarusso
126. Peter Colarusso
127. Elizabeth Colbert
128. Frances Colburn
129. Amy Coleman
130. Linda Coleman
131. Shoshanah Collins
132. Tonya Colpitts
133. T. Philip Comenos
134. Catherine Comiskey
135. Cynthia Conant
136. Stuart Conant
137. William Condon
138. Hannah Conlon
139. Thomas Conlon
140. Kathleen Connolly
141. Elaine Conway
142. Alice Coogan
143. Ann Cook
144. Douglas Cool
145. John Costello
146. Pearce Coues
147. Phoebe Coues
148. Clement Courcy
149. Eilen Courcy
150. Anne Cowman
151. Terry Cowman
152. Beryl Cox
153. Martha Cox-Stavros
154. ROBERT COYNE
155. Bradley Crate
156. Catherine Creighton
157. Peter Creighton
158. Jeff Crispen
159. Andrew Crocker
160. BOB CROCKER

161. Julie Crocker
162. Ruth Crocker
163. Catherine Crockett
164. Gregory Crockett
165. Skylar Crofton
166. Linda Crosby
167. Ellen Cross
168. William Cross
169. Deborah Cummins
170. Jordan Cummins
171. Carisa Cunningham
172. Jill Curatolo
173. Peter Curatolo
174. Richard Curran
175. Gerald Dackert
176. Patricia Dackert
177. Marcus Dahllof
178. Mary Dalton
179. Michael Dalton
180. Tracy David
181. David Davis
182. Ed Davis
183. George Davis
184. Jean Davis
185. Katharine Davis
186. Megan Davis
187. Deborah de Sherbinin
188. Nick de Sherbinin
189. Julie de toledo
190. Craig Deery
191. Laurel Deery
192. Jeffrey Delaney
193. Nancy Delaney
194. Christina Delisio
195. Aaron Dell
196. Sharon Deveney
197. Nicole Lattanzi Dickerson
198. Stephen Dickerson
199. Tanya Dickson
200. Winifred Diedrich

201. Carl Doane
202. Kate Dodge
203. Nina Doggett
204. Anthony Dolan
205. Mark Dolan
206. Marlene Dolan
207. Scott Doneghy
208. Arden Dore
209. William Dore
210. Eleanor Dorr
211. Lawrence Dorr
212. Donna Dowal
213. Katharine Dreier
214. Elise Dudley
215. Jim Dudley
216. Liza Dudley
217. Lori Dumont
218. Brian Duncan
219. Patricia Duncan
220. Peter Durand
221. Susan Durkin
222. James Elder
223. Sharon Els
224. Steve Elterich
225. Faith Emerson
226. Joan Endicott
227. Anne Engelhart
228. Caitlin Eppes
229. Charles Eppes
230. Jan Eschauzier
231. Morgan Evans
232. Joan Even
233. Michael Even
234. Rebecca Even
235. Zack Even
236. Jennifer falconer
237. Alison Falk
238. Ruth Faulkner
239. Caroline Fedorowich
240. Richard Fedorowich

241. Alba Figueroa
242. Dina Flood
243. BOB FOLEY
244. Laurie Franco
245. Brenda Furlong
246. Charles Furlong
247. PHILIP Furse
248. Tobias Gado
249. Judith Gamble
250. Gail Gang
251. Tara Gans
252. LISA GARLITZ
253. Robert Garlitz
254. Michael Gates
255. Timothy G. Gates
256. Mark gauthier
257. Michele Gaythwaite
258. Bart Geer
259. Sue Geer
260. Ann Marie Gentilucci
261. Page Gentleman
262. Helen George
263. Paul George
264. Timothy George
265. John Gillis
266. Patricia Gillis
267. Jeffrey Gilson
268. Pat Glennon
269. Laurie Glimcher
270. Sheila Goddard
271. Christopher Gosline
272. Renée Gosline
273. Asa Gosnell
274. David Gosnell
275. Nina Gosnell
276. Anastasia Goulakos
277. Lauren Grace
278. Erin Graeter
279. Elizabeth Graham
280. Catherine Greenough

281. Erin Greenwood
282. Klara Gregory
283. Martha Gubbins
284. John Gurley
285. Leslie Gurley
286. Ann Guyer
287. David Haley
288. Denison Hall
289. Marion Hall
290. OWEN HALL
291. Stephen Hall
292. Susan Halpern
293. Stephen Hamilton
294. James Hammond
295. Leslie Hammond
296. Maddie hammond
297. Nancy Hammond
298. Whitney Hammond
299. Susan Harrington
300. James Harris
301. Rebecca Harvey
302. David Haskell
303. lisa haskell
304. Olga Hayes
305. Susan Henderson
306. Cook Henry
307. Charles Herlihy
308. Deborah Hersey
309. Jenny Hersey
310. Richard Hersey
311. Mark Heslop
312. Sheila Hill
313. Michela Hirnak
314. Jonathan Hodges
315. Leslie Hoff
316. Arthur Hofmann
317. Charles Hogan
318. James Holley
319. Janis Holley
320. Joan Houghton

321. Charles Hovey
322. Charles Hovey
323. Nancy Hovey
324. Clifford Hughes
325. Mary G Hull
326. John Huss
327. Sally huss
328. Bill Hutchins
329. Anne Hutchinson
330. MichelleHuth
331. Lorraine Iovanni
332. Al Ireton
333. Elaina Jacobs
334. Laurie Jaekle
335. Emily Jay
336. John Jay
337. James Jodice
338. Bruce Journey
339. Cynthia Journey
340. Malia Judge
341. John Julian
342. Diane Kaneb
343. Gary kaneb
344. Tasso Kaper
345. Stephen G Kasnet
346. Alex Kaufman
347. Thomas Kehoe
348. Gillian Kellogg
349. Carolyn Kelly
350. Karen Kenny
351. Pamela Kenworthy
352. Dorota Keverian
353. Kenneth Keverian
354. Anderson Kilgore
355. Diane Kilgore
356. Jeanne Kinch
357. Anne Kneisel
358. Tyler Kneisel
359. William Kneisel
360. John Knowles

361. Anton Kobus
362. Marilyn Kobus
363. Marisa Kobus
364. Philip Kobus
365. Mary Koch-King
366. Dianne Koeplin
367. Lauren Komishane e
368. Pavel Korzine
369. Brianna Koslowski
370. Peter Koslowski
371. PornwadeeKoslowski
372. Elizabeth Kross
373. Andre Kuehnemund
374. Michele Kulick
375. Joan Kulukundis
376. Miles Kulukundis
377. Jacqueline Lamb
378. Lawrence Lamb
379. Natasha Lamb
380. Jessica Lamothe
381. Melissa Landsvik
382. Gloria Landy
383. Andrew Lane
384. Charlie Lane
385. Judy Laspesa
386. Lewis Lattanzi
387. Suzanne Lattanzi
388. James Latham
389. Deborah Ledbetter
390. John Ledbetter
391. Virginia Lehar
392. Carol Lipartito
393. Mimi Locke
394. Bob Lockwood
395. Charles Lodge
396. Susan Lodge
397. Margaret Logue
398. Michael Logue
399. Elizabeth Loomis
400. Susan Love



401. Heather Lovett
402. Mary Lumsden
403. Lucy Lydon
404. Mary lydon
405. Patrick Lydon
406. Susannah Lydon
407. Judith Lyons
408. Michael Lyons
409. James Maccarone
410. Michael Mack
411. Susan MacKinnon
412. Gayle Macklem
413. Richard Macklem
414. Robert MacNeille
415. Stephen MacNeille
416. Jacek Makowski
417. Mary Makowski
418. Thomas Makowski
419. Ursula Makowski
420. Michael Mangini
421. Lisa Mann
422. William Mann
423. Marion MARIOTTI
424. Chrissa markos
425. Carolyn Marletta
426. John Marletta
427. Drayton Martin
428. Sam Martin
429. Jacob Martz
430. Mary Beth Massillon
431. Sean Masterson
432. Veronica Matthews
433. Martha Mayne
434. Roy Mayne
435. Kate Mazzini
436. Donna Mazzone
437. Frank Mazzone
438. Jeffrey McAvoy
439. Gale McCAnn - Bacon
440. Jane McConnell

441. William McConnell
442. ALLEN MCCOY
443. Mr. Laurie McCoy
444. Frederick Mcdonald
445. Mary McDougal
446. Mimi McDougal
447. Scott McDougal
448. Mary Ann McGovern
449. Amanda McGrath
450. Gavin McGrath
451. Kathleen McHugh
452. Virginia McIlvaine
453. Lisa McLaughlin
454. Michael McLaughlin
455. Nurhajati McMahan
456. Françoise Meahl
457. Robert Meahl
458. Kurt Melden
459. Dana Menon
460. Brooke Merluzzi
461. Dave Merrill
462. David Metrano
463. Jane Metrano
464. Thomas Miller
465. Jeff Milne
466. Scott Milne
467. Charlotte Minasian
468. Patricia Mitchell
469. Su Mittermaier
470. Alison Moerland
471. Daniel Moerland
472. Timothy Molinari
473. Amy Moore
474. Peter Moore
475. Mary Lou Morison
476. Thomas Morison
477. Kris Moroney
478. Fred Morris
479. Garlan Morse
480. Jody Morse

481. Eileen Morsett
482. Cindy Morton
483. Jeff Morton
484. Peter Morton
485. Victoria Morton
486. Paul Murray
487. Elisabeth Nalley
488. PAMELA Nelson
489. Adam Neves
490. Elaine Nichols
491. H. Owen Nichols
492. Meghan Nichols
493. alexander Noble
494. Ann Noble-Kiley
495. Malcolm Noriega
496. Elizabeth Novak
497. Lucy Noyes
498. Marlon Nunez
499. Aileen O'Rourke
500. Augustine O'Keeffe
501. Alli Ocean
502. Ashley Ochs
503. Daniel Ochs
504. Andrew Oldeman
505. Melanie Oldeman
506. Sylvie Oldeman
507. Chris Oliver
508. Christopher Oliver
509. Jane Olson
510. John Olson
511. Dorina Omari
512. Genci Omari
513. Carole Oneil
514. Stephen Osterman
515. Erica Owen
516. Sally paddden
517. Alicia Palmer
518. Collin Palmer
519. Kathleen Palmer
520. Stefan Palmer

521. Eunice Panetta
522. Jeanne Paratore
523. Maria Parisi
524. Betsy Parker
525. BETH PAYSON
526. Leah Peavey
527. Todd Peavey
528. Emma Perryman
529. Gregory Petsko
530. Barrett Petty
531. Lydia Petty
532. Christopher Phillips
533. Jane Phillips
534. Sarah Pierce
535. Erin Pinstein
536. Tyler Pinstein
537. Janet Pletcher
538. Dustin Plomondon
539. Marcia Polese
540. Geoffrey Pope
541. Craig Porter
542. Louisa Porter
543. Marion Powers
544. Lisa Pratt
545. Michael Pratt
546. Kevin Prentice
547. George Putnam
548. Stuart Pyle
549. Elaine Quinn
550. John Quinn
551. Lindsay Ratushny
552. Kevin Rautio
553. Kimberly Ray
554. George record
555. Chris Reed
556. Julie Reilly
557. Sheila Reindl
558. Rebecca Riff
559. Jennifer Riggs
560. Any Rizzo

561. Peter Robbins
562. Daniel Rodier
563. Diane Rodier
564. Douglas Rodier
565. Richard Rogers
566. Sandy Rogers
567. Stephanie Rogers
568. Erin Ronder Neves
569. Ellen Rosen
570. Kathryn Rosenthal
571. Steve Rosenthal
572. Andrea Rosmarin
573. Cynthia Ross
574. Mark Ross
575. Linda Rossetti
576. Ronald Rossetti
577. Faith Rossi
578. Brian Rothe
579. Rachel Rothe
580. Joseph G. Sabella
581. Judi Sabella
582. C. Denise Samolchuk
583. James Samolchuk
584. David Saunders
585. Jeanne Scalley
586. Jeanne Scalley
587. LINDSAY SCANLON
588. Anne Schennum
589. Leslie Schoenherr
590. LANDMARK SCHOOL
591. Hendrea Schwartz
592. Ian Schyelling
593. Jack Schyelling
594. Robert Scott
595. Denise Shane
596. Ellen Shaughnessy
597. Keith Shaughnessy
598. Dana Shell
599. Thomas Sherman
600. Judi Shipman

601. William Shipman
602. Jay Sibulkin
603. Dorothy Sieradzki
604. Manny Sieradzki
605. Teresa Silverman
606. Dick Singleton
607. David Slade
608. Patricia Slade
609. Thompson Smalley
610. george p smith
611. Julie Smith
612. Llewellyn Smith
613. Ralph Smith
614. Richard Smith
615. Joan Snow
616. Emily Snyder
617. Greg snyder
618. Susan Snyder
619. Ruth Sones
620. Bob Spintig
621. Jeanne Stanton
622. James Staudt
623. Ana Stefanovich
624. Ailsa Steinert
625. David Stember
626. Danielle Stern
627. David Stern
628. Sarah Stock
629. Bridget Stone
630. Paul Stone
631. Sarah Stone
632. Eileen Storey
633. Cynthia Stowell
634. Harley Stowell
635. Madeline Stowell
636. Ian Strachan
637. Margaret Strachan
638. Paul Stremple
639. Daniel Strimpel
640. Harriet Strimpel

641. Oliver Strimpel
642. Zoe Strimpel
643. Adam Strout
644. Jackson Strout
645. Lucia Strout
646. Samuel Strout
647. William Strout
648. Connie Sullivan
649. Paul Sullivan
650. Peter Surdam
651. Kurt Svetaka
652. Robin swayze
653. David Taliaferro
654. Lynda Taylor
655. Joel thomas
656. Wendy Thomas
657. Robert Thompson
658. Susana Thompson
659. Pamela Thorne
660. Merrill Thorpe
661. Erin tillman
662. Julie Tosi
663. Santana Tosi
664. Ellen Trojan
665. George Trojan
666. David Turnbull
667. Susan Turnbull
668. Maureen Twombly
669. Juni Van Dyke
670. Jane Van faasen
671. Dana Vermilye
672. Leslie Victorine
673. Christine virden
674. Eduardo Vivanco
675. Sarah Vivanco
676. Michele Vivian
677. Ernst von Metzsch
678. Gail von Metzsch
679. Sylvia Vriesendorp
680. Michal Vytopil

681. Susan Wadia-Ells
682. Frederick WALES
683. MarthaWales
684. Leland Wallace
685. Matthew Walsh
686. Ken Warnock
687. Alby Waugh
688. Andrew Waugh
689. David Weaver
690. Kitty Weaver
691. Theresa Weinheimer
692. Sable Weisman
693. Laura West
694. Nadia Wetzler
695. Allison Wheeler
696. Kristopher Wheeler
697. Trayne Wheeler
698. Nick White
699. Jennifer Wiese
700. Christine Wight
701. Karen Wilk
702. Bill Williams
703. Lee-ann Willwerth
704. Tom Willwerth
705. Byron Winn
706. Nancy Winslow
707. Joan Wogan
708. Christopher Wolcott
709. Cornelia Wolcott
710. Benjamin Wolsieffer
711. Gary Wolsieffer
712. Martha Wood
713. Veronica Wu
714. Adrienne Young
715. David Young
716. Suzanne Young
717. Christina Yukins
718. Lisa Zanetti
719. Pat Zeller