



STRATEGIC LAND VENTURES

March 21, 2022
Revised May 6, 2022
Revised May 31 2022

Ms. Sue Brown
Town Planner
Town of Manchester-by-the-Sea
10 Central Street
Manchester-by-the-Sea, MA 01944

Re: Response to Review of Response to Comments issued by Davis Square Architects on May 6th 2022.
The Sanctuary at Manchester-by-the-Sea – School Street
Manchester-by-the-Sea, Massachusetts

Dear Ms. Brown:

SLV School Street, LLC is providing responses to the comments that were raised in the May 6th 2022, “*Revised Preliminary Architectural Peer Review of Sanctuary Development*” letter prepared by Cliff Bohmer from Davis Square Architects which were in follow-up to their original comments issued on March 21st 2022 following review of our architectural package/submittal prepared by Embarc and Bohler in support of The Sanctuary multifamily residential development to be located off School Street in Manchester-by-the-Sea, Massachusetts (hereafter referred to as the “Project”).

We have cut and pasted the comments issued by Mr. Bohmer directly into the body of this letter. Mr. Bohmer highlighted his most recent comments in blue text. We have included our responses to his additional comments in ***red bold italic text***.

Dear Sue:

I am writing to provide you with a revised architectural peer review of the proposed 40B development on School Street in Manchester by the Sea. This letter reflects my review of recently submitted materials by the Applicant and others, as well as materials posted on the Town website following after the date of my first review letter. I am leaving most of my comments from my original letter dated March 21, 2022 intact as a frame of reference. New comments are highlighted in blue. Some of the original letter text is also highlighted in blue if it describes an unresolved concern (i.e., was not addressed in the Peer Responses).

As is typical at this stage of a development of this type, the architectural and engineering drawings are at a very schematic level, so for the purpose of this letter, I will restrict most of my comments to the “project



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fundamentals”, mainly discussing the site strategy, mitigation options, overall scale and massing, etc. (as opposed to detailed analysis of floor plans, building elevations, etc.).

I am looking forward to presenting these thoughts and answering any questions you or the Board may have at your virtual ZBA hearing that is scheduled for the evening of May 11, 2022.

1. **Review the developer’s application, plans and drawings, reports from other peer reviewers and Town officials, letters from neighboring residents, etc.** For the proposed project on School Street, I have reviewed the following materials (in addition to materials related to the past LIP application that are currently posted on the Town website):

From the Development Team:

- The Sanctuary July 16th, 2021 Comprehensive Permit Plan Submission prepared by Embarc.
- Site Development Plans for The Sanctuary prepared by Allen & Major dated July 16, 2021.
- Landscape Plans and Notes & Details prepared by Bohler dated 9/24/2020.
- Letter to Sue Brown from Vanasse & Associates dated March 7, 2022.
- Memo to Sue Brown from Allen & Major dated March 3, 2022.
- Memo to ZBA from Mead, Talerman & Costa dated March 2, 2022.
- Project Eligibility Letter from MassHousing dated September 16, 2021.
- Letter to ZBA from Strategic Land Ventures dated February 28, 2022.
- Email to ZBA from Geoff Engler dated February 16, 2022.
- Memo Re: MBTS EP Letter Peer Review from Embarc dated January 25, 2022.
- Letter to the Conservation Commission from Goddard Consulting dated February 19, 2021.
- Letter to Geoff Engler from Miller Engineering and Testing dated July 29, 2020.
- [Response to Davis Square March 21 letter report, undated \(formatted as insertions within DSA review letter\)](#).
- [The Sanctuary Architectural Peer Response Exhibits produced by Embarc dated April 15, 2022.](#)
- [Site Development Plans for The Sanctuary produced by Allen & Major dated 3/23/22.](#)
- [Updated Landscape Plan produced by Bohler dated 10/22/2021 \(posting date apparently 4/4/22\).](#)
- [Conceptual ADA Ramp Plan prepared by Allen & Major dated 7.16.21.](#)
- [Conceptual Land Plan prepared by Allen & Major dated July 22, 2020 \(re: potential conservation areas\).](#)
- [Answers to ZBA Questions on Proposed Interior Sidewalk letter to ZBA from Strategic Land Ventures dated April 13, 2022.](#)
- [Letter to Sue Brown from Strategic Land Ventures \(response to Beals & Thomas peer review\) dated April 5, 2022.](#)
- [Letter to Sue Brown from VAI \(Response to Requests for Information\) dated March 7, 2022.](#)
- [Letter to the ZBA from Mead, Talerman & Costa dated March 2, 2022.](#)
- [Letter to Geoffrey Engler from Miller Engineering & Testing dated March 2, 2022.](#)
- [Revised Drainage Report prepared by Allen & Major dated 3/23/2022.](#)
- [Memo to Sue Brown from Allen & Major dated March 24, 2022 \(re: snow storage\).](#)
- [Letter to ZBA from Strategic Land Ventures dated March 25, 2022 \(re: revised sewer strategy\).](#)
- [Memo to ZBA from David Formato, P.E. dated April 27, 2022 \(re: Town sewer capacity\).](#)

Town, Peer Review, and other Consultant Reports:

- Letter to Sue Brown from Beals & Thomas dated March 7, 2022.
- Letter to ZBA from McGregor Legere & Stevens dated March 1, 2022.
- Letter to Geoff Engler from the ZBA dated February 18, 2022.
- Letter to ZBA from Hill Law dated February 13, 2021.
- Letter to Citizen’s Initiative for Affordable Housing from Beals Associates dated February 8, 2022.
- Letter to ZBA from Massachusetts Division of Fisheries & Wildlife dated February 3, 2022.
- Letter to ZBA from Manchester by the Sea Police Department dated January 31, 2022.
- Letter to Sue Brown from the Manchester by the Sea Fire Department dated January 21, 2022.
- Letter to ZBA from Massachusetts DHCD dated December 8, 2021.



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- Letter to ZBA from Scott Horsley dated October 25, 2021.
- Letter to Dan Hill from Chessia Consulting Services dated October 25, 2021.
- Letter to ZBA from Hill Law dated October 25, 2021.
- Letter to Town Administrator from the Massachusetts Architectural Access Board dated July 15, 2021.
- [Letter to Sue Brown from Beals & Thomas dated April 6, 2022.](#)
- [Letter to Sue Brown from Beals & Thomas dated April 26, 2022.](#)
- [Letter to ZBA from Select Board dated April 26, 2022.](#)
- [Letter to Dan Hill from Chessia Consulting Services dated April 13, 2021 \(typo, should be 2022\).](#)

Communications from citizenry:

- Letter to ZBA from Manchester Athletic Club (undated).
- Letter to ZBA from Karin Gertsch dated November 7, 2021.
- Letter to ZBA from Denison Hall dated December 22, 2021.
- [Letter to ZBA from Hill Law dated April 27, 2022.](#)

(REFERENCE MATERIALS)

- Chapter 40B Handbook for Zoning Boards of Appeal published by MHP in cooperation with DHCD, MassHousing, and MassDevelopment dated March 2017.
 - Handbook: Approach to Chapter 40B Design Reviews, prepared by The Cecil Group, Inc. for DHCD, MassDevelopment, MassHousing, and MHP, January, 2011
2. **Participate in an initial meeting at the site with the developer's design team and a representative of the Town.** This reviewer made an unaccompanied visit to the site and neighboring areas on March 1, 2022. There has been no site visit with any member of the development team.
 3. **Conduct site visit and reconnaissance assessment of surrounding residential and nonresidential areas within 1/2 mile of the project site.** This letter is based on the site visit of March 1, 2022 as well as Google Earth review.

Brief Comments on site reconnaissance: The site is on the west side of School Street, approximately ½ mile north of the interchange of School Street with Route 128. The center of Manchester is approximately 1.7 south of the site. Immediately to the north is the Town line with Essex. Old School Street is to the west. Surrounding the site on all sides within ½ mile are large areas of undeveloped, heavily vegetated properties, with a few commercial uses along School Street and closer to 128.

There are no sidewalks or bike lanes on School Street along the site frontage. The sidewalk to the center of Town terminates at the southbound entry to 128 on the east side of School Street. There are paved shoulders at that point that cross south over 128 that are of a width to serve as a bike lane. Closer to town the shoulder is less broad, but traffic moves slowly enough that biking is a viable option.

4. **Consult with the Applicant's design team, as appropriate.** The only contact with a development team member was a phone call to the project architect on March 18, 2022. At that time, this reviewer asked if there were any street level views available that would allow analysis of the impact the project would have on the public realm. The project architect committed to conferring with the rest of his team to determine what could be shared. [Street level perspectives have been provided.](#) **No comment required.**
5. **Provide an initial oral presentation to the ZBA. Said presentation typically includes comments and preliminary recommendations on the following** (presentation is scheduled for April 5, 2022) [\(second presentation scheduled for May 11\):](#) **No comment required.**
 - a. **Orientation of building in relation to parking areas, open space and on-site amenities**
Comments: Crucial to understanding the enormity of this project from a site planning perspective is the fact that the entire building footprint sits on a "man-made" plinth, 62 feet above the School Street entry point, created by massive removal of natural rock formations and some amount of soils



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on top of the rock. There is no cut-and-fill analysis included in the materials, so it's not known how much excavated material will remain on site, and how much will have to be removed.

Whatever the final case may be re: cut and fill, the submitted materials indicate that the slab level of the parking garage is 39 feet below the highest existing point on the site that will be excavated (the MECT estimates that the hilltop excavation will displace approximately 270,000 cubic yards of material). There are significant retaining walls proposed on all sides of the plinth to provide a broad enough space for the structure, the entry drive, infiltration areas, and a wastewater leaching field. It is clear that the area of the plinth is at its maximum, given existing environmental site constraints that include extreme grade changes, vernal pools, wetland setbacks, and a river setback...and, of course, the need to ring the buildable area with a ramped access drive. From the civil engineering drawings, it appears that in order to create the platform for the building, access to it, and area for infiltration, approximately 7.3 acres will need to be completely cleared of all existing vegetation, and virtually all of the existing grades within that area will be modified. Note that additional clearing and grading will have to happen on the southern extension of the site to provide additional leaching fields (with the switch to municipal sewage disposal and treatment, this is no longer the case). **No comment required.** This reviewer has made no assumptions as to other potential outdoor programming that may be slated for the southern site (as none are stated in the application materials).

The proposed building on top of the plinth is a large, H-shaped, 136-unit, three to four-story structure, at its highest, 46 feet above the adjacent grade. At its outside dimensions, the building spans 475 feet north-to-south, 264 feet east-to-west. The building residential footprint is approximately 57,000 GSF, with a building total of approximately 262,000 GSF that includes 92,000 SF of parking at the bottom level (the parking footprint is larger than the residential footprint). The garage encloses 220 parking spaces. There are an additional 16 spaces provided outside of the garage. 214 of the spaces are "standard", 6 are compact. The unit mix is 55@1-bedroom, 66@2-bedroom, and 15@3-bedroom. That makes a total of 232 bedrooms. **No apparent change. Correct. The Applicant has not made any changes to either the building square footage or the unit mix.**

Included at the first residential level is access to an amenity courtyard atop the parking garage, as well as a non-habitable garage roof area. It is not clear from the drawings whether the non-habitable roof area is vegetated or finished with a pattern of decorative stone ballast (landscape drawings say stone, architectural say "extensive green roof"). **Green roof reference has been removed from the architectural drawings (roof will be patterned stone ballast as shown on Landscape plan). No comment required.** Amenities in the north courtyard are not detailed in the landscape drawings, but a note indicates that they will include a 4-foot-deep pool, cabanas, site furnishings, synthetic turf activity area, planters, outdoor bar and kitchen, fire pit, and areas of green roof. It does not appear from the architectural plans that the units surrounding the courtyard will have direct access to it. Drawings note amenity courtyard is a total of 14,944 SF. Unspecified indoor amenities occupy 9,643 SF.

In addition to the north courtyard, there is a 3,350 SF, elevator-fed common roof deck indicated on the roof plan. There does not appear to be any additional information provided regarding the programming of that space. **No change. The Applicant does not anticipate programming that space until much later in the design process. All programming will be included on the Construction Document set .**

There is an exterior at-grade open space at the southwest corner of the building that would be accessible from the parking garage and from the southwest stairwell, potentially also from the driveway at the proposed fire access road. It appears to include about 8400 SF of "flat" space. That area is rendered on the Landscape Plan as a gridded pattern. It's potential function...other than snow storage...is not indicated on any of the drawings (civil, architectural, landscape). **This area is now designated as a "Nature Themed Play Area." No comment required.**

The civil engineering drawings indicate an accessory building at the southern most part of the built site, outside of the ring road. It is labeled Wastewater Treatment Facility. No additional information is included in the architectural series of drawings. **The wastewater treatment plant is no longer in the scope. The area occupied by the plant and associated infrastructure is now shown on the Landscape Plan as "Lawn Multi-use Open Space." Revised civil plans indicate tall retaining walls**



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(22 feet) that define that space and create an essentially flat area that can support programming. The area of the space does not appear to be indicated, but from scaling the plan, it looks like approximately 30,000SF. **No comment required.**

A snow storage plan was submitted in the newest civil drawings that indicates approximately 20,000 SF of snow storage area. It appears that there may be additional space rendered as storage area, but no square footage is called out. There is 67,425 SF of area requiring snow removal. The diagram does not appear to include the walkway to School Street in the areas requiring snow removal. The new multi-use open space area is not included as snow storage space. Drawing notes indicate that if the quantity of snow on the site exceeds the space available for on-site storage, it will be removed and disposed of off-site. **The Applicant will confirm that the Final Plan Set of Record will have all sheets reconciling. The Applicant is also comfortable with the current amount of snow storage shown on the snow storage plan .**

b. Function, use and adequacy of open space and landscaped areas.

Comments: Given the unit count and mix (232 bedrooms, which provides 96 bedrooms outside of the primary bedrooms), combined with the relative isolation of the site, this reviewer believes that the outdoor usable space is not sufficient. The residents of the proposed development will largely rely on on-site amenities for day-to-day recreation, which at a minimum, would suggest adding active play areas for children of varying ages to recreate with their families. This includes all children who are too young to walk or bike independently to the outdoor spaces nearby that could potentially be accessed by School Street and beyond. Importantly, current plans do not include a sidewalk or bike lane that connects the building to the public way, which beyond further isolating the residents, is likely a violation of requirements of the Massachusetts Architectural Access Board.

Revised plans include the large multi-use open space that could serve well as active recreation space for the residents. There remain a few concerns that should be addressed in the materials, primarily related to the fact that most of the space abuts a very high retaining wall. Drawings indicate that there is 42" high fall protection provided along the wall, but that would not be sufficient for stopping errant soccer balls, etc. Similarly, the southeast corner of the open space opens onto a very steeply sloped area that is not fenced off (same with the northwest corner, which is not as significantly sloped).

The proposed fall protection fence will be changed to a 6' high fence and will be extended to the of slope on either end of the multi-use open space.

Also, drawings should indicate an accessible path from the building to the open space (it is not clear that grass pavers would satisfy MAAB requirements).

A walkway is proposed from the west side of the garage to the play area and provides the accessible route to the play area. As shown on the updated landscaping plan, an additional accessible route to the Open Space area has been added. The walkway along the front of the building has been extended to the driveway across from the multiuse open space and accessible curb ramps have been added with a cross walk between. this reviewer believes that the space should include play equipment for young children. **The updated landscaping plan has been advanced to provide more information on the play area and potential uses .**

The Applicant has submitted a ramp diagram ("Interior Sidewalk") that provides an accessible path from the building to School Street. That was followed up with Answers to ZBA Questions on Proposed Interior Sidewalk. In the Applicant's letter response to this reviewer's March 21 letter, they state that they would be "comfortable with a condition requiring the construction of this internal sidewalk providing the Town designs and constructs sidewalks in School Street." It is my opinion that the walkway is not optional, whether or not the Town builds sidewalks. The only condition under which it would not be built is if the MAAB grants a variance (which does not seem likely given the Advisory Opinion that they issued). **We understand at the May 25th public hearing, the ZBA voted to require an internal sidewalk whether the Town constructs a sidewalk in School Street or not. While we disagree with the Board's action, and dispute whether the MAAB will require an internal sidewalk if a sidewalk does not exist in School Street, we will prepare our plans accordingly.**

While no detail drawings are provided, it appears that the function of the northern courtyard will accommodate a variety of uses. Care should be taken to ensure that there are suitable buffers that



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protect the privacy of the 7 units that surround and are at the level of the courtyard. [The Applicant's response letter states that the landscape buffer separating the units from the common courtyard areas "will be further defined as the project evolves."](#) .

The current landscape plan indicates "Unit screening to be a combination of shrubs and planters". The final landscape plan submitted as part of the CD set will be advanced to specify plant materials, panels and planters to provide a visual buffer between the amenity courtyard and adjacent units.

c. Use and treatment of natural resources.

Comments: Most natural resource issues associated with this project are outside of this reviewer's expertise, and much has been written and submitted for record. Included are concerns for wildlife, well water contamination, wetland and vernal pool disturbances, etc. However, while it is outside of my expertise, it is clear that this proposal has no "slack" built into the site plan for accommodating unforeseen conditions that may be encountered during construction, or environmentally-related consequences that may emerge over the life of the project after it is occupied. All aspects of the project that make it arguably credible are pushed to the limit, ranging from driveway slope to available area for storm and wastewater management. In this reviewer's opinion, this absence of "slack", combined with the shortage of usable outdoor space creates a strong argument for cutting down on the scale of the development. [The elimination of on-site septic \(along with the construction of significant retaining walls\) has opened up programmable space on the "plinth", but has also relieved the project of some of the environmental concerns expressed by other reviewers.](#) **No comment required.**

d. Building design, setbacks, massing and scale in relationship to the surrounding context and topography.

Comments: As noted above, the surrounding context within a half mile in all directions is dominated by undeveloped, wooded areas, with a minimal amount of nearby commercial uses. The site falls within the Limited Commercial District established by the Town. While it is clear that the proposed housing type is not typical for the Town (or anything nearby, whether in Manchester by the Sea or Essex) the application materials that have been submitted for review are not sufficient to understand how visible the project may be from the public realm.

The most important missing documentation are ground-level perspectives that accurately coordinate the proposed site contours, the Landscape Plan, the building, the entry drive, and the screening landscape materials that will be left in place on the periphery of the site. Critical to understanding the views at night and during winter months is cataloging the types of vegetation left in place (specifically, deciduous or evergreen, and well as height). Of primary concern are views from both directions on School Street, as well as from the trail along Old School Street.

[These perspective views have been provided, and appears to be for the most part coordinated with the Landscape Plan and civil plans. Of primary interest is the view from the bottom of the entry drive \(B2\). It is clear that breaking up the retaining walls into planted terraces helps to mitigate scale of the earthworks \(although more information must be provided regarding the wall construction and materials...see comments in April 13 Chessia Consulting letter\). The other two views depict the building as significantly screened by existing, and some introduced plantings.](#) **No comment required.**

[Regarding B2, this reviewer believes that a less "formal" strategy should be considered. Rather than the wall of arborvitae and other linear planting arrangements, along with the clean-cut edge of existing vegetation that frame an open lawn, large-scale plantings could be interspersed throughout the lawn area that visually tie in with the existing vegetation, but also create foreground elements and screening. This approach would help to break down the monumentality of the project.](#)

The use of Arborvitae at the top of slope/edge of the cul de sac is appropriately located within the available narrow level area at the top of slope. Additional conifer evergreen trees are proposed to extend the visual buffer at the top of slope where a larger level area exists .

[Note that B2 includes the structure at School Street level, that in addition to providing a covered school bus waiting area, presumably houses the water booster pump, back-up generator \(?\), and perhaps other equipment related to the connection to Town sewer. However, there are some](#)



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elements missing from the perspective, including the accessible sidewalk/ramp and its railings, building signage, turnaround guardrails, pole-mounted lighting, and any overhead electrical services. Note that the civil plans indicate that the generator is surrounded by an 8-foot fence, which if the intention, that element is also missing from the perspective. **The Perspective has been updated to include the features listed above and has lowered the vantage point to that of a pedestrian or vehicle travelling past the site entry which is a more realistic vantage point .**

If the building is visible from School Street, the north and east elevations would be the most prominent. Along the east, the building is virtually all 3-stories in height, and features the main drop off and resident entry. The north elevation is four stories, and includes the vehicular entry with the driveway turn-around. The most notable aspect of the building is the length of the facades, versus their height (the north elevation is 402 feet long). Efforts have been made in the buildings 's design to break up the length of the elevation with two-story bays/balconies separated by periodic full-height, monochromatic breaks, along with variation in color between the ground level and upper two stories. Clapboard exposures are also varied to create articulation and visual interest. The moderate height of the building is accentuated with a heavy, projected cornice and layered fascia.

The four-story areas of the building introduce a base of field stone that surrounds the garage space. From the rendered elevations, it would appear that a fully mechanically-ventilated garage is anticipated, as there are no large areas of louvers indicated that would accommodate a naturally ventilated system. This assumption should be confirmed by the design team, or alternative facades submitted that include **façade** areas dedicated to garage ventilation. **Potential louver areas are now shown on the building elevations. No comment required.**

In summary, this reviewer's opinion is that beyond the use of clapboard and stone, this structure will be perceived as unique, unlike anything else in Manchester or Essex. The answer as to whether it is "contextually appropriate" (as stated in the application materials), may be based on how visible it is from the public realm. Given that the base zoning of the site is commercial, an argument could be made that the structure would not necessarily have to resemble typical residential housing types in order to "fit in."

Under the assumption that the renderings are accurate, it appears to be the case that the overall scale of the building is largely mitigated by existing vegetation from most views, and has the potential to be mitigated from the most "open" perspective at, and near the building drive entry (see suggestions above regarding other approaches to the introduced plantings from that viewpoint). Note that all of the views indicate all fully leafed trees. Understanding where significant view corridors might open up during winter months could inform the proposed planting plans (i.e., it may be beneficial to introduce evergreens in selective locations in areas otherwise not disturbed by the construction of the project).

The combination of existing mature forest to remain and proposed evergreen trees will provide four season visual screening of the primary built area from School St and the surrounding adjacent properties. The landscape plan indicates proposed evergreen trees to be strategically placed along Old School St to close views between Old School St and the development.

e. Viewsheds of the project visible from the public street, public areas and from the vantage point of nearby residential neighborhoods.

Comments: Most importantly, as noted above, more information is required from the development team to accurately assess the visual impact of the project from the public realm.

Shadow studies have been included in the submitted materials. Not surprisingly, given the isolation of the site, there is little concern generated by these studies (other than perhaps shadows cast within the northern courtyard). These studies would be more useful if the included "pre-construction" along with the post-construction diagrams (primarily to understand if there is any change on sunlight exposure on surrounding wetlands, vernal pools, streams, and trails, which is a "non-architectural" concern that has been voiced by other reviewers). **New shadow studies included in the recent submission indicate that no shadows cast by the proposed construction will fall on vernal pools. No comment required.**



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- f. **Pedestrian and vehicular access and circulation; adequacy of accessibility provisions. Of particular interest are the implications of access and egress in terms of pedestrians, bicyclists and motorists. Adequacy of parking facilities.**

Comments: The location of the site is currently not pedestrian friendly, although it appears that the Town will expand the sidewalk along School Street if this project proceeds. As important, as noted above, there is no walkway or bike path that brings the residents down 62 feet from the garage level to public street level. Even if there were a sidewalk and bike path, as has been discussed by numerous reviewers, the slope and length of the driveway are of serious concern. Particularly in poor weather conditions, it could be daunting for children and parents to reach School Street for School bus drop-off and pick-up. If parents are forced to drive down, where will they park while waiting?

While this reviewer will not opine on the adequacy of vehicular parking, the board should request more detail regarding the number and type of bike spaces that can be accommodated in the area designated “flexible bike and tenant storage” on the garage plan. Given the location of the development, one would expect a generous ratio of bike spaces per unit. [New plans indicated 8 ground bike parking spaces and 138 vertical mount \(total of 146 spaces\).](#) [This seems like a sufficient number to this reviewer.](#) [The Landscape Plan indicates bike racks near the building entry.](#)
No comment required.

As far as other “circulation issues”/questions:

- What is the Applicant’s proposal for a school bus (and perhaps future MBTA shuttle bus) waiting area/shelter? [A covered waiting area is now depicted in the perspective drawing, and is blocked out on the Landscape and civil plans.](#) [The final design of this should be clarified in the architectural drawings.](#)
Architectural plans for the pump house/bus shelter will be provided as part of the CD set. The pedestrian access will be accessible between the bus shelter and bus pick up area.
- Given the “motor-dependence” of the site, a significant number of EV parking stations should be provided. At a minimum, infrastructure for expansion of the number of spaces should be built into the project, including the capacity of the project’s transformer(s). [Not clarified at this point.](#) **We have submitted an updated parking plan representing 10EV charging stations which will be available to the residents of the building. They are NOT permanently assigned spaces and vehicles will be allowed to charge and then are expected to be moved to their assigned space.**
- Bicycle parking should be provided at appropriate locations within the site for visitors. [Bike racks are located near the building entry.](#) **No comment required.**

- g. **Integration of building and site, including but not limited to preservation of existing tree cover, if any.**

Comments: The building is not integrated into the existing site, and only marginally fits into the site that is created through large scale excavation and creation of retaining walls. No tree cover is preserved within the primary built area, and more information is required to fully understand the proposal for retaining existing trees outside of the modified site (see comments above). [See comments above regarding the Landscape Plan and perspective drawings.](#) **No comment required.**

- h. **Exterior materials.**

Comments: Building elevations have been annotated to indicate material selections. This reviewer has no issues with what is proposed. **No change. No comment required.**

- i. **Energy efficiency.**

Comments: Materials are not adequately developed at this point to determine the degree to which the developer may commit to sustainable features that exceed what the Massachusetts Building Code requires. Current plans do not indicate areas of PV or solar hot water panels. **No change. No comment required.**

- j. **Exterior lighting.**

Comments: The latest application materials include a site lighting plan, with reference to both building-mounted and pole-mounted fixtures. It is not clear whether they are Dark Sky compliant.



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Depending upon the project's visibility from School Street, and given the project's significant elevation off of the public way, consideration could be given to substituting bollard-mounted fixtures for pole-mounted to limit visibility from below. 20-foot pole-mounted fixtures are proposed to follow the driveway up the hill, and are also shown at the turn-around area near the garage entry. It is the turnaround where the fixtures may be the most visible, and at a minimum, where alternative fixture types should be considered. **The Design has been updated to include shorter poles around the cul-de-sac. Site lighting will be designed and constructed to be Dark Sky compliant.**

k. Proposed landscape elements, planting materials, and planting design.

Comments: Landscape plans are included in the submission, and this reviewer has no issue related to how the landscaping functions within the project site. However, it is not clear how the landscaping design, including the preservation of areas of existing growth, will serve to buffer the views of the project from the public realm. **See comments above about the potential enhancement of existing landscaped areas. See comments above.**

l. Feasibility of incorporating environmental and energy performance standards in the design, construction and operation of the buildings.

Comments: There are a multitude of third party environmental and energy performance standards that are more rigorous than the building code minimum, including LEED, Energy Star, Passive House, and Enterprise Green. Because Manchester by the Sea is a Stretch Code community, as that code continues to evolve, the base line for energy efficiency will be higher than non-adopting communities. **No change. No comment required.**

m. Any other design-related considerations identified by this peer reviewer, ZBA, town staff, or the citizenry of Manchester by the Sea or their advisors.

- Car sharing spaces (ZIP Car, etc.) should be included within the parking garage. **Applicant states that ZipCar would not support a space at this location. No comment required.**
- Create a detailed Transportation Demand Management program for the site. This may include an Applicant-provided shuttle service to the MBTA, build sidewalks along School Street frontage, etc. **No change. The Applicant will provide a Transportation Demand Management Plan as a condition of the occupancy permit. A shuttle service is not contemplated nor necessary. The Applicant will not be building any sidewalks in School Street.**
- Given the scale and intensity of site coverage, provide a preliminary construction management plan that ensures constructability and minimizes impact to the community. Of particular interest is development of cut and fill quantities. Recognizing that there is a need for fill in some parts of the site, note that if the cut required to take down the hill is actually on the order of 270,000 cubic yards as noted in the MECT letter, there could be a truly significant number of truckloads of material taken off the site (270,000 cubic yards represents between 17,000 and 27,000 truckloads). **Applicant states that most excavated materials will stay on site as fill material, and has committed to providing a preliminary cut and fill analysis prior to closing of the public hearing. A preliminary cut and fill has been provided..**
- Integrate Universal Design features in the development. **No change. A universal design narrative has been provided as an attachment to this document.**
- Developer should provide an evacuation plan for all vehicles on the property. **Applicant notes that they have met with the fire department on "multiple occasions", and has stated that additional fire safety details will be provided as a condition of the building permit issuance. No comment required.**
- Provide additional details for retaining walls, particularly in areas where they may be retaining storm or wastewater. **Applicant states that "we will endeavor to provide some representative samples of what the project's retaining walls may look like." As the appearance of the retaining walls is a major element in the public's perception of the project, this is material that is critical for the ZBA and public to see. Refer to attached product brochures for potential retaining wall material.**
- Applicant should provide more details for the wastewater treatment plant. **This has been eliminated. No comment required.**



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n. Techniques to mitigate visual and other impacts.

Comments: This reviewer believes that the proposed development poses some very challenging problems, in no small part because of its aggressive approach to “making” the site, combined with its relative isolation from public amenities. At the end of the day, the built development has a need for “self-sufficiency” that can be very difficult to achieve, particularly because the manufactured site is so thoroughly filled with building, vehicular circulation, and other critical infrastructure.

So, while mitigation of visual and other impacts must be considered in order to determine if the project is adequately adapting to, or screened from the existing pattern of development with respect to physical form and associated impacts (which is why more descriptive materials should be required from the Applicant by the ZBA), as important is the need to assess the quality of life for the future residents, particularly with respect to the project’s capacity for “self-sufficiency.” See comments above regarding analysis of the newly submitted materials. The self-sufficiency of the site has been enhanced through the provision of significant areas of programmable outdoor space.

No comment required.

Expanding on the issue of integration into the community...and connected to the isolation that may be experienced by residents due to the minimal on-site useable outdoor space and the difficulty, other than by car, of accessing “downtown” Manchester...consideration should be given to studying mechanisms that will foster better integration of the development with the Town at large. Other than to visit residents, the site offers little that would be inviting to anyone who doesn’t live there.

The construction of a walkway and bike path along the entry drive would help make the connection. Another possibility could be to develop a trail system (and parking) so that the community could utilize the significant unbuilt site area. In that way the development would become familiar to a broader population. As noted above, it is this reviewer’s opinion that the walkway to School Street is not optional. Integrating access to, or creation of trail system(s) into the proposal should be considered. This possibility is even more attractive given the elimination of the on-site sewage treatment system, as the scope of work on the southerly portion of the site opens up more space for a possible conservation restriction (reportedly 13.2 acres versus 5.5 acres). Please see the Applicant’s previous comment as it relates to the sidewalk. Based on extensive verbal and written testimony from the MECT and those attending the public hearings, there is no interest or desire from the MECT to have any trails or paths connecting the proposed project to the existing system of walking trails.

6. **Participate in meeting(s) with municipal staff and the developer team (“working sessions”), to address to the ZBA’s charge(s) to the developer.** No working session has occurred at this point, nor has one been scheduled. No change. **No comment required.**

In the briefest of summaries, this reviewer believes that while this site could be well suited in some aspects for a 40B development, the multitude of problems created by the sitework necessary to support a project of this scale are daunting. Typical strategies for cutting back on scale of the project to provide “slack” to make things work better still face significant issues given the topography and adjacency to resource areas. Significant progress has been made by the expansion of usable outdoor space on the site. While there remain some concerns about details related to the open space (noted above), the desirability and long-term sustainability of the site plan have advanced in a positive direction. **No comment required.**

Of critical importance at this stage is getting better depictions of the proposal from nearby context that will make it possible to assess its impact on the public realm and abutting properties, and as importantly, to facilitate consideration of alternative approaches to a very tough site. Renderings have provided a good tool for advancing the approach to integrating the development into its setting through effective landscaping. **No comment required.**

Sincerely,
DAVIS SQUARE ARCHITECTS, INC

Sincerely,



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Geoffrey Engler
Principal of SLV School Street, LLC