



To the editor:

For nearly 60 years, Manchester Essex Conservation Trust (MECT) has been protecting the land in this community: we safeguard its wildlife, we ensure the sustainable protection of clean drinking water, and we advocate on behalf of a public who now, more than ever, appreciate the grave need for action in the face of the possible destruction of Shingle Place Hill in Manchester to site a 136 unit rental housing project under Chapter 40B. We are proud to represent a community that has been speaking out in support of the ZBA's pursuit of data despite discouraging tactics from an applicant who plainly wants a comprehensive permit approval without the corresponding investment in sufficient testing and design.

In our opinion, it looks like Geoff Engler of SLV never intended to design a compliant wastewater management system, judging by his quick refusal to provide necessary documentation that an onsite system is not possible. This documentation was requested by the ZBA chair to satisfy the Water and Sewer Commission policy for consideration of a new sewer connection. Mr. Engler claims to be asking for a sewer hookup out of concern for the environment, but he also submitted a stormwater plan with 40 deficiencies flagged by MECT civil engineering consultant John Chessia- deficiencies that negatively impact the environment. While the applicant claims to want the sewer system to "respond" to environmental concerns "from the community", we know that the environmental constraints, including difficult topography and geology, existed here before Mr. Engler committed this over-sized project to this sensitive area. He could have easily pursued a piece of land on the other side of School Street on an available parcel, already leveled to the ground, but it wouldn't have the same kind of hilltop view that is so attractive to a developer when selling units.

As land stewards in service of a particularly knowledgeable and engaged public, it is MECT's duty to see that this proposal is fully reviewed and vetted. And it's a good thing we have: SLV failed to recognize two wetlands directly outside the parcel as vernal pools; it was MECT who collected the necessary data and obtained the state certification of these vernal pools, carrying out extensive testing to determine exactly which species rely on them for breeding. These pools now constrain SLV's design. Under pressure, SLV's wetland scientists found additional vernal pools on the parcel itself. According to the Wetlands Protection Act, the applicant must show that these vernal pools will not be impacted by the development, and yet we continue to wait for that data.

Mr. Engler has finally shared a few renderings of the proposed apartment block itself, but they hardly capture the size and scope of this project. As a result, MECT hired architects who rendered the buildings, retaining walls and clear-cut areas, with comparisons to the existing conditions so that our community will know exactly what this development would really look like in all its glory: the block walls in unadorned splendor, and the "cathedral pines", oaks, maples, birches and beeches removed along with the ledge beneath them. We've submitted those very sobering images along with this letter, and they are also available on our website ([mect.org/whats-happening](http://mect.org/whats-happening)).

To ensure that our natural resources are protected, MECT has also hired hydrologists and geologists to conduct an initial hydrogeologic study of the area, and to further expose the project's deficiencies. For example, SLV did not originally recognize Sawmill Brook as a Cold-water Fishery Resource (a State level of protection) with native sea run brook trout; but MECT invited the Division of Fisheries and Wildlife to review this brook's significance. SLV can complain, but this is our dedication to the land, to the community that we serve, and the water they drink.

It may be hard for SLV to understand, but they are not simply proposing a building, they're annihilating a refuge; it is a place our citizens have counted on to connect with nature, and never was this more apparent than in the days of pandemic lock-down. It is ironic that SLV plans to tear down a place so peaceful it was once called a "cathedral" to replace it with an apartment block they have dubbed "The Sanctuary". Manchester Essex Conservation Trust has protected over 1500 acres of land and watershed since 1963 – and we will continue to pursue hard facts here on behalf of our public. We will continue proudly, with the guidance of our legal team and experts, to make sure that the ZBA has sufficient information to make sound decisions for Manchester-by-the-Sea, and to prepare for whatever comes next. We are optimistic that this project can be defeated. If you support our goals, please let the ZBA know that you oppose this project and ask them to do everything in their power to protect Shingle Place Hill.

Greg Crockett

Manchester-by-the-Sea, MA

MECT Board of Trustees