



GA CROCKETT

July 26, 2022

Ms. Sarah Mellish, Chair
Zoning Board of Appeals
10 Central St.
Manchester-by-the-Sea, MA 01944

Dear Madam Chairperson,

I am writing in regard to the 40B project, Sanctuary by the Sea, being proposed by SLV School Street, LLC. First off, I would like to thank you and the Board for the incredible effort you have put forth in these months of review. That being said, there are so many problems with the proposed development. The three areas of the projects unsuitability I would like to point out fall into three main categories, safety, environmental impact, and constructability.

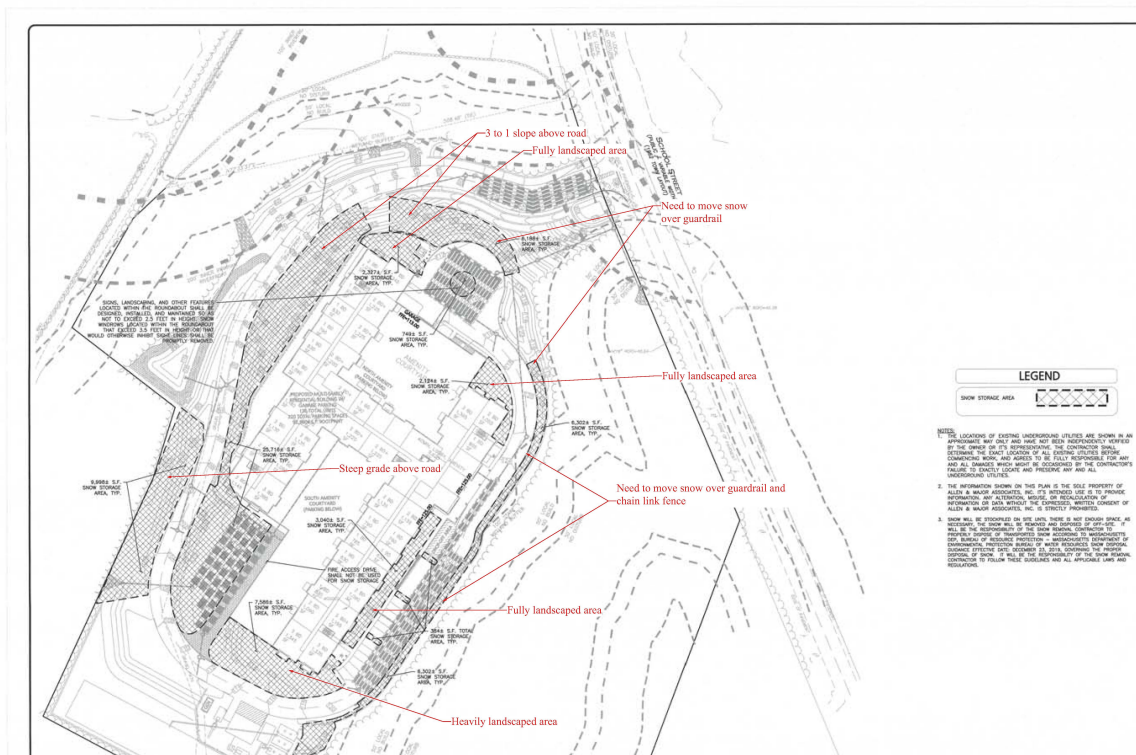
Safety

As pointed out in Chief Fitzgerald's letter of July 19, 2022, the single access up a very long and steep drive has been problematic from the beginning. Even Mr. Engler stated during the LIP process with the Select Board that the single access is less safe than having an alternative means of access. In the event of a serious accident on the access drive, life safety services would be prevented from accessing the building.



Now imagine this scenario in the winter time during a blizzard or an ice storm. It would not take much to have a multi car pile up on the steep and slippery drive. Even the issue of snow removal is problematic with such a steep and narrow drive. I reached out to John Filias of Jeffrey's Creek Land Contractors in June to see how he would handle a large snow event on this site and his response was: *"The only way to clear that site after repeated snow falls (like 2015) or a blizzard such as the April Fools storm would be with a commercial snowblower on a skid steer or wheel loader. This design is worse than I ever imagined - talk about stuffing 10 lbs of crap into a 5 lb bag!"* There simply is no way a traditional snow plow could push heavy snow up that steep grade particularly in the sections where the adjoining "shoulders" are either very steep or constrained by retaining walls. Clearing of the adjacent sidewalk after a heavy snow event would be equally problematic making pedestrian access all the more problematic. Even at the more level areas of the drive, in front of the entrance, there is no place to push the snow.

And speaking of snow, the snow storage plan presented by the applicant is laughable. They are showing snow storage on the 3:1 slope north and west of the building as well as in heavily landscaped areas. Along the east side of the building, they are showing snow storage on the other side of the guard rail, retaining wall, and 42" high chain link fence. How are they going to get it there?



Snow Storage Plan 1

In terms of pedestrian safety, aside from the winter conditions mentioned previously, there is the issue of getting across School Street. Will there be a painted crosswalk and

or a pedestrian light across School Street? And on which side of the access drive will it be? If it is on the south side of the access drive, pedestrians will have to cross the drive as well as School Street. Another safety concern is the lack of fall protection at the top of the three retaining walls north of the building. These walls are 15, 13, and 12 feet high. While the applicant has ringed the retaining walls close to the building with 42-inch-high chain link fencing to prevent falls, there is no provision for fall prevention to the north walls which are readily accessible from the building.

Environmental Concerns

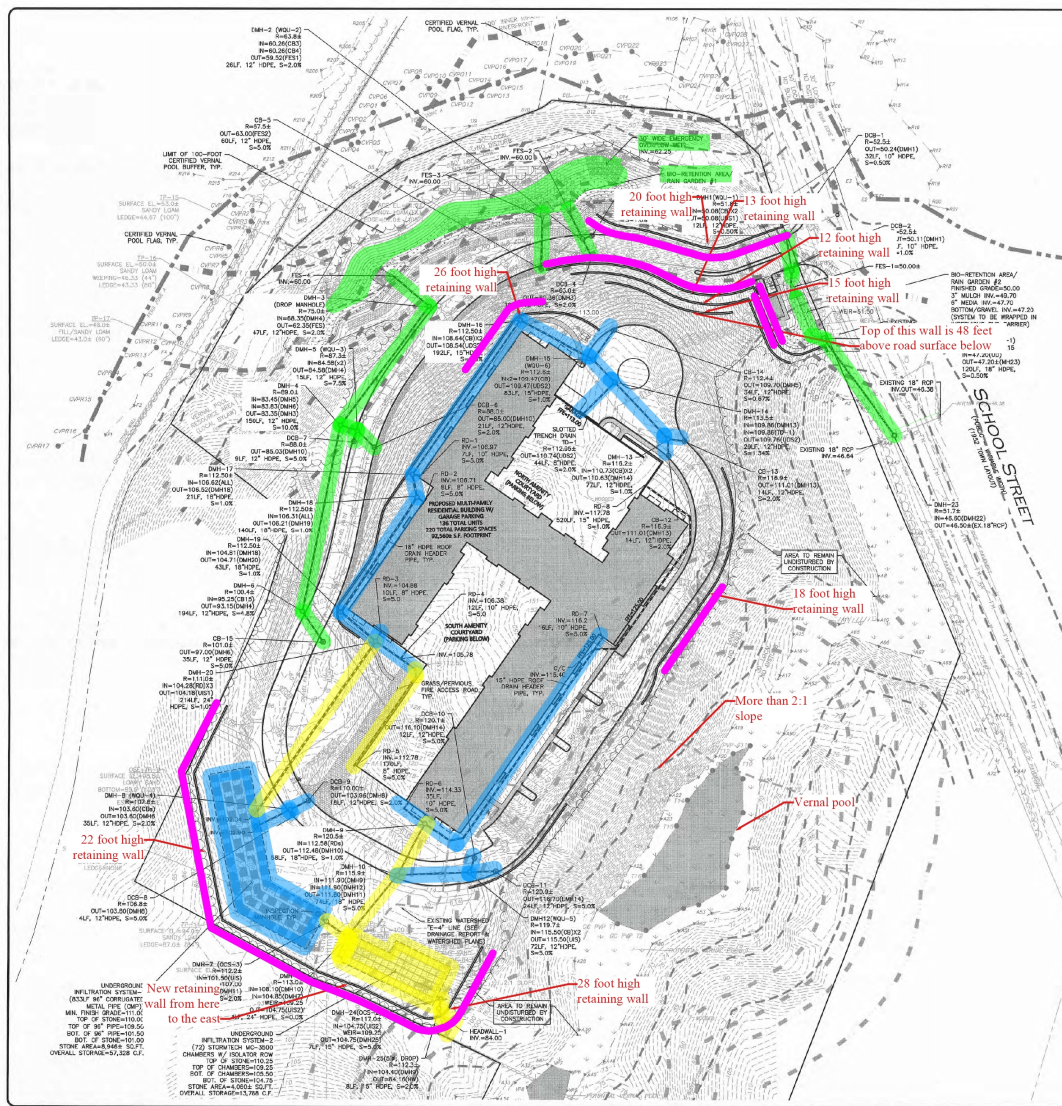
Much has been made about the environmental impact this proposed project would have, not only on the site but also on the adjacent conservation properties and Saw Mill Brook. I do not want to belabor what has been discussed in great detail, but there are a couple of points I would like to raise. At one of the ZBA hearings, SLV's wetland specialist said there would be no impact to the vernal pools on the site and immediately north of the site because they had designed the project to protect the vernal pools. In fact, the applicant did not know of the vernal pools to the east of the building in the A series wetland until the peer review during the LIP process. The vernal pool to the north was certified just last summer. The vernal pool to the east is at the bottom of a slope that is over 50% grade. I do not see how blasting 50 feet of ledge from the top of the hill is not going to impact that vernal pool. Gravity is a powerful force. The blasting guidelines which were submitted to the Board recommends building earthen berms between the blasting area and the vernal pools to protect them. That is going to be very difficult given the over 2 to 1 slope above the vernal pool. Even building and removing the berm, were it possible, risks the chance of contaminating the vernal pool.

In regard to the vernal pool north of the site on Town land, the storm water run off from the majority of the access drive is directed to a rain garden immediately south of wetland and vernal pool just across the property line. As Steve Gang suggested in his memo of July 11, 2022, the applicant should be required to provide a professional estimate of the contaminates from the roadway which will reach the rain garden and eventually the adjacent wetlands, vernal pool, and Saw Mill Brook. Ironically, the more salt and sand used on the access drive to keep it safe will have the effect of polluting the rain garden and the water resources more.

Constructability

As Clifford Boehmer of Davis Square Architects said in his peer review, this project lacks "slack." That basically means there is no room to adjust if things do not go according to plan. One of the things the engineering plans do not show on their plans is where the bottom of the retaining walls land relative to their indicated tops. Because the developer has chosen to use a modular system for their retaining walls, the face has to have a slope or cant. This ratio will vary between different proprietary systems. Without knowing which system will be used, it is hard to quantify the horizontal projection of the wall at its base. Another factor in these systems is that they are typically reinforced with a geo grid which is a strong perforated composite fabric which is placed every few courses back into the hill side. Essentially this means one has to dig/blast a much larger excavation behind the wall. It is not knowing what is in that excavation that leads to

potential problems. And with no slack it is hard to adjust. On the attached Grading Plan from Allen & Majors, I have indicated in magenta lines off sets from the tops of portions of the highest retaining walls. Each magenta line represents the base of the wall immediately uphill from it. These are just rough estimates of how far from the tops of the walls the edge of the excavation for the walls' base would be. In the case of the retaining wall south of the building enclosing the infiltration system there, it seems very possible the structure may well cross the property line. But even if it does not, it would be difficult to build this wall without access to the neighbor's property. And pity the poor neighbor who has to look at a 22-foot-tall retaining wall on their lot line! In addition, the limit of work line indicated on the plan should be expanded to accommodate the reality of building these walls. On the plan, the green highlight represents all the storm water being directed to the raingarden to the north and to the culvert under School Street. The blue highlight represents the storm water being directed to the infiltration system south of the building. The yellow highlight represents the change from the previous drainage plan of 3-23-22. And again, the magenta lines represent the edge of the retaining walls' base.



Grading Plan

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Grading Plan 1

In closing I would like to mention that I have spent 20 some years doing construction administration for several architectural firms. I also did a two year stint with a commercial general contractor. My experiences include schools, high rises, lab spaces, big box stores, multi-family, retail, and single-family homes. I know this is a tough call for the Board, but to me the bottom line is whether this project represents a betterment or a detriment to the Town. To me it is the latter. Thank you for your time and attention.

Respectfully yours,

A handwritten signature in black ink that reads "Gregory A. Crockett". The signature is written in a cursive, flowing style with a large initial 'G'.

Gregory A. Crockett
7 Tucks point Road
Manchester-by-the Sea, MA 01944