

From: Curtis Rising
Sent: Monday, February 26, 2024 1:34 PM
To: Gail Hunter <HunterG@manchester.ma.us>
Subject: [EXTERNAL] - Fwd: Input to the MBTA Zoning Task Force

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Gail Hunter - Please convey this to the MBTA Zoning Task Force.

At the bottom of this note is an amended version of my previous note to the MBTA Zoning Task Force from 01/24/2024. I include it so that I can refer to it directly in today's note. All quotations below are from the article in The Cricket on 02/16/2024, "As Deadlines Approach, MBTA Task Force Moves Forward."

1) In my first point below, I argue that there should be a balance between the development on the North and South sides of the Manchester railroad tracks (please see below for the details). From The Cricket article: "The real reason we are not targeting three-acre (and larger) lots is because we know exactly what will happen," said Smith earlier in the meeting. 'Forty-five units,' said Task Force member Sarah Mellish, answering exactly what Smith's comment about would happen." In order to add at least 559 units to this small town, we are going to have to find some larger lots and, yes, add many units to them. With the constraints that we have downtown and in other already-dense areas (climate change will worsen the situation), where are we going to find the many lots equivalent to 3 acres with 45 units? To focus on this one example of just one 3-acre lot, where are seven and a half .4-acre lots in Manchester that are open enough to allow for 6 units each? Where are the many smaller lots needed? Please identify these lots as part of the proposal.

2) My second point below is that we need to add the layer of environmental and other development prohibitions over any proposal. This has to be factored in before anything is proposed. I noticed that the Task Force does not include a member of the Conservation Commission. I am worried that your proposal is not reflecting **current and future Massachusetts Wetlands Protection Act realities, Riverfront Area prohibitions and the specific town conservation rules that are enforced.** To pick one example, let's look at the 1-D area (Powder House/Elm Street). The Riverfront prohibitions for the 1-D area are significant. Also, it was noted in The Cricket article, **"But a zoning change would be needed for the 1-D area, where the density is quite low."** We cannot define density as simply the proportion of building to land. In the 1-D area, there is a 24-unit apartment building, a 5-unit apartment building and various commercial properties; all of which require a great deal of parking. If you look at 1-D and subtract necessary parking as well as zones that can't legally be built on, what land is left to develop?

3) My third point below questioned why the Task Force is excluding the General District, a 94.8 acre area. From The Cricket: "One option (Option 7) that Innes provided would be to rezone only the general district downtown and the Manchester Athletic Club and medical building in the Limited Commercial District. The problem with this plan is that it rezones 97.7 acres and allows for 1,351 units in the LCD, both far exceeding the

needed numbers." Why couldn't we rezone a portion of the General District or Option 7, enough to satisfy the MBTA requirements, or cap development at a percentage that satisfies the MBTA requirements? What is the logic of saying that an option provides too much so none of it should be considered? How many other towns are excluding their entire General Districts from their proposals?

Please address these issues and questions.

Thank You,
Curtis Rising
16 Friend Street
Manchester, MA

Amended note from 01/24/2024:

Gail Hunter - Please convey this message to the MBTA zoning task force and anyone else, as appropriate.

First, I want to thank the task force for its efforts. I apologize that I have not been able to attend or participate in this project so far, as I have had a health issue. I wanted to send three observations about the current MBTA Zoning project.

1) In looking at the map currently posted on thecricket.com ("MBTA Zoning Task Force narrows its scope"), I see a yellow circle of half-mile radius with the center point at the train station. There is a village half of the circle, (generally) North of the tracks. There is an ocean half of the circle, (generally) South of the tracks. The North side of the tracks is a very small, already-dense village with high climate vulnerability and limited parking. South of the tracks, there is a sparsely-settled district with large lots. The exceptions to this are that North of the tracks there are some larger lots in the Spy Rock Hill area and that South of the tracks there are some smaller lots on Tappan Street. Currently, the task force's narrowing effort has led to all of the potential rezoning being on the North side of the tracks. I would challenge the task force and our town to ensure that, as we propose changes to our town in order to meet the MBTA's requirements, that there is a balance and not a complete imbalance between housing development efforts in the two halves of this half-mile circle. The current proposal is not fair and looks bias to me. If the assumption is that larger, sometimes multi-acre, single-family estates cannot be divided or developed, we need to look at the roots and implications of this assumption. Are we protecting estates and land that have the most housing potential at the expense of the village? I understand that some of the rezoning may happen outside of the circle but I think that we will regret it if the housing development efforts inside the circle are not more equally distributed across the tracks.

2) We should add a layer to the mapping and publicizing of rezoning proposals, how we display housing potential going forward. Having served on the Conservation Commission, I know the Massachusetts Wetlands Protection Act, the Riverfront Area prohibitions and the specific town conservation rules that are enforced. The town would have a better sense of the suitability of the specific districts, the viability of the rezoning

proposals and the overall level of housing potential if the wetlands and other environmental policy layers were mapped over the rezoning proposals, and if the proposals were not entirely defined by property lines. Because this rezoning and development would be long-term, mapping these environmental protections needs to be dynamic and include climate trends, sea level rise projections and other environmental change data. Our decision making needs to fully account for significant future changes to this coastal town.

3) I would like to understand the rationale for excluding the entire General District, a 94.8 acre area. Wouldn't this district or part of it provide some MBTA-aligned housing opportunities? As an example, #8 of the task force's "Guiding Principles for Selecting Districts" is "Consider residential use above first floor commercial uses." It seems that not including the General District, or at least some of it, limits the town's options.

Again, thank you for your work. I hope to attend upcoming meetings.

Best,
Curtis Rising
16 Friend Street
Manchester, MA