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Admitted in: MA

Via Electronic Mail

July 14, 2020

Douglas Sederholm, Chair
Martha's Vineyard Commission
33 New York Avenue
Oak Bluffs, MA 02557

RE: DRI #697 Hob Knob Inn Expansion, 124/128 Upper Main Street, Edgartown

Dear Chair Sederholm:

I am writing on behalf of Jennifer Rako, Trustee of the Mary I. Greely 1990 Trust, which owns 9 Tilton Way in Edgartown. I am also writing on behalf of John Greely, Grant Greely and Maggie Boris (collectively, the "Greelys," or the "Greely Family"), who are the beneficiaries of the Trust. For the reasons set out below, the Trust and the Greely Family strongly oppose the proposed expansion of the Hob Knob Inn at 124 Upper Main Street.

I understand that the Commission normally expects all written materials to be submitted on the Friday prior to the public hearing. My clients only became aware of the July 9 hearing on or about July 6 or 7, and did not receive the official notice until July 10, the day after the hearing. I was retained yesterday on July 13. While I will appear at the hearing on July 16 to express my clients' concerns, I write to you so that you will have our comments in advance of the hearing.

Background/History

9 Tilton Way is a 3 bedroom residence that directly abuts 124 Upper Main Street. The home at 9 Tilton Way has been owned and lived in by my clients and their mother since 1986. My clients' father was the late Rev. John A. Greely, rector at St. Andrew's Church in Edgartown. My clients lived in the rectory at 14 Pease's Point Way until 1985 when their mother purchased the back lot at 9 Tilton Way and built the current house.

The Proposed Inn Expansion is Entirely Incompatible with Abutting Single Family Homes

My clients are staunchly opposed to the expansion of the existing 17-room inn to a 35 room inn with four rooms for employee housing, a pool and an expanded spa. We especially oppose the expansion of 124 Upper Main into 15 guest rooms and 4 units of employee housing. The reasons for this opposition include:

- 124 Main Street is located in a residential zoning district. Most of the land in this district is used for residential purposes, and a 39 room inn with associated employee housing, a pool and a spa is entirely out of character with the existing residential uses.
- The roadway infrastructure is inadequate to support the existing mix of residential and commercial uses, much less a more than doubling of what is already a large and busy inn. Tilton Way is very narrow, cannot accommodate existing traffic, and is certainly not going to be able to accommodate the increase in guest traffic, deliveries, trash pickup, Uber pick-ups and drop offs and all other traffic activities associated with a 37 room Inn.
- There has been no consideration of the impact of the Inn expansion on my clients' property. My clients have owned their house for 34 years and at all times abutted a single-family home at 124 Upper Main Street. The project as proposed places all of the parking, garbage pickup, deliveries, and general sources of noise, fumes, and nuisance right next to my clients' house – which sits only a few feet from the property line. The existing parking lot at 128 Upper Main Street will be relocated to 124 Upper Main, and will be replaced with an outdoor pool area where the 35 visiting families are welcome to gather and enjoy themselves.
- The proposed project does not comply with Edgartown Zoning requirements. The MVC staff reports admits this:

The Edgartown Zoning Bylaw parking requirements for this use are unclear. Though the applicant does not meet the parking requirements . . .

Actually the Edgartown Bylaw requirements are quite clear. For hotels and inns subject that require a condition use permit (as the proposed expansion requires), one parking space is required for each guest unit, and one additional space is required for every 8 units. The math adds up to 39 (for 39 units) plus 4 or 5, for a minimum of 43 parking spaces. The applicant provides 21 spaces and promises to “manage parking.” The Edgartown Zoning Board of Appeals has the authority to reduce the number of required spaces, but only:

where an applicant demonstrates that the lesser parking provision is necessary for the reasonable development of the parcel and that such lesser provision of parking will not cause substantial detriment to the area.

It defies any sort of logic to expect that the applicant will be able to demonstrate that less than 50% of the required parking spaces will not cause a substantial detriment in the predominately residential area.

- The fact that there are a few scattered grandfathered businesses in the area does not transform this historic residential neighborhood into a commercial district. The

Commission at the first meeting seemed quite interested in having *more* commercial traffic by opening up the spa to public use – which of course would require more parking, because island residents are not going to leave their cars on the mainland.

The existing location of an inn in this single-family neighborhood is the exception to the rule. Expanding that inn onto a second lot and more than doubling the number of dwelling units is not essential or appropriate at this location. The property is blocks away from any business zoning district. No mitigation is proposed. This development will adversely affect my clients and their property more than anyone else, and because of circumstances peculiar to the location on a very narrow street in a historic single-family neighborhood, the effect is likely to be greater than is ordinarily associated with a 35-room hotel use.

I noted above the inability of the proposed project to comply with the Edgartown Zoning Bylaw. There are many other ways that this proposed commercial development is inconsistent with the zoning bylaws, but we will save those arguments for the special permit hearing.

In conclusion, this commercial development will severely and negatively impact the existing residential zoning district by significantly increasing congestion, noise, commercial deliveries, trash pickup and all of the other commercial activity that goes hand in hand with operation of a 35 room inn. Small scattered inns in a historic residential neighborhood are workable because they are scattered, and because zoning laws and planning principles dictate that they be small. The creation of a single 35-room inn with 3 seasonal staff apartments, one full-time staff apartment, a spa, a pool, and a gym, but parking for less than one-half of the staff and guests is *entirely* inappropriate.

I will attend the MVC public hearing on Thursday July 16. Please send me the information necessary (Zoom invitation or otherwise) necessary to participate in that meeting.

Sincerely yours,

Daniel J. Bailey

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DJB/smg

cc: John Greely
Grant Greely
Maggie Boris
Jennifer Rako