

Via Electronic Mail

August 6, 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 to follow up on my letter of July 13 in which I expressed my client's opposition to the proposed expansion of the Hob Knob Inn at 124 Upper Main Street ("Expansion"). As mentioned previously I represent Jennifer Rako, Trustee of the Mary I. Greely 1990 Trust, which owns 9 Tilton Way in Edgartown, as well as John Greely, Grant Greely and Maggie Boris (collectively, the "Greelys," or the "Greely Family"), who are the beneficiaries of the Trust.

I am writing now to point out two very distinct reasons why the detriments of the proposed project exceed the benefits:

1. As far as we can determine, there is no precedent on the Vineyard for zoning approval of a 35 room inn in a residential district. Attached is a spreadsheet that includes most of the inns and hotels on the Vineyard, the number of rooms for each inn or hotel, and the applicable zoning district. Most inns in residential districts range from 3 to 18 rooms. With certain unique exceptions, all of the larger inns (20 rooms or more) are located in business districts.¹
2. The proposed Expansion is inconsistent with many of the MVC's DRI guidelines. As currently proposed the Expansion is inconsistent with the (i) Roads and Driveways Guidelines; (ii) the Parking Guidelines; (iii) the Noise Guidelines; and (iv) the Housing Policy Guidelines.

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.

¹ The notable exceptions are Edgartown Commons (35 rooms), the Harbor View (124 rooms) and the Winnetu, all of which are in residential districts. Edgartown Commons and the Harbor View are long established and likely grandfathered, and the Winnetu, while in a residential district, is in Katama with very few residential neighbors.

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 Expanded Hob Knob Would Be Considerably Larger Than Other Inns Located in a Residential Zoning District

The Hob Knob is located in Edgartown's R-5 Zoning District. **With very limited exceptions, only single and two family residential uses are allowed by right in the R-5 District.**² All commercial uses in the R-5 District require a special permit. This is plainly a zoning district that it intended to be predominately residential, with a limited mix of small scale commercial uses. The Bylaw in fact limits commercial special permits to "small-scale business and industry." " Zoning Bylaw Section 2.3.B.4.

The Hob Knob at 17 rooms is already considerably larger than most of the other inns in the Edgartown R-5 District:

Ashley Inn – 10 rooms
Lightkeepers Inn – 6 rooms
Edgartown Inn – 12 rooms

Only the 16 room The Richard is similar in size to the Hob Knob.

Attached as Exhibit A is a spreadsheet that includes most of the inns and hotels on the Vineyard. With the limited exceptions noted above, the only inn larger than the Hob Knob that is located in a residential district is the 18-room Narragansett in Oak Bluffs. Inns with 30 or more rooms are almost without exception located in Business Districts. For example, the Vineyard Square Hotel and Suites has 34 rooms, and is located in the B-1 Business District; the Edgar Hotel also has 34 units and is located in the B-II Zoning District

Simply put, a 35 room inn with an expanded spa, employee housing, and a pool does not, under any possible circumstances, belong in a residential district in Edgartown.

The Proposed Expansion is Inconsistent with Numerous DRI Guidelines

The Commission has gone to a great deal of effort to establish development guidelines. The proposed Expansion is incompatible with these guidelines in many respects, including the following:

Roads and Driveways

As proposed, the Expansion is incompatible with the MVC's own guidance on the construction of roads and driveways as outlined in Section 2A of the Site Design and Landscape

² The other allowed uses are boat storage on municipal land and up to four boarders in a single family residence.

Guidance. In particular, the Roads and Driveways guidelines provide that “In town, link rear parking lots so cars don’t have to re-enter the main road to go from one lot to the next.”³ The Expansion as outlined by Hob Knob does not comply with this guidance.

The proposed Expansion would create three separate parking lots (one at 128 Upper Main St. and two at 124 Upper Main St.) in order to squeeze additional parking into an urban neighborhood. The result is that all three parking areas spill out directly onto Tilton Way, a sleepy residential street that is not designed to handle this volume of traffic. With customers and deliveries coming at all hours of the day and night it is inevitable that the Expansion would lead to an increase in traffic in the neighborhood and have a negative effect on the surrounding properties.

Parking Impacts

Similarly, the Expansion is incompatible with the MVC’s own guidance on the provision of parking as outlined in Section 2B of the Site Design and Landscape Guidance. The language of 2B states that “Parking can be located and designed to be functional while minimizing its visibility. The number of required on-site parking spaces may be reduced when on-street parking is available or when there is an opportunity to share parking lots with abutters”.⁴ The guidelines further state “parking for more than three vehicles should be located behind or beside the building.” The parking proposed by Hob Knob is clearly insufficient for the number of hotel rooms proposed and the design is incompatible with the MVC’s design guidelines. Nor is the parking design consistent with DRI Guidelines, which encourage parking behind buildings rather than in front of buildings. Attached as Exhibit B are drawings from the MVC guidelines – these drawings demonstrate that parking in front of a development – as proposed here – is plainly discouraged.

The effects of this insufficient parking on the surrounding neighborhood are all too predictable. Guests will attempt to find parking in the neighborhood, which will lead to disputes with neighbors. Traffic will back up near the entrance to Upper Main St., as the increased volume of traffic overwhelms a sleepy side street. And almost all of the parking will be visible from public streets.

Noise Impacts

The proposed pool will be detrimental to the MVC’s guidance on noise levels in the Built Environment. Section 6.2 advises that “[f]or potentially noisy activities, such as ... recreational facilities..., especially when located close to residential areas,” restrictions such as “wall construction”, “amplified sound” restrictions, and “time of day” restrictions should be used to limit the impacts on abutters.⁵ In particular, the guidance provides that “[t]he strictness of the measures should be increased as the distance to abutters decreases.”

³ MVC Site Design and Landscape Policy for DRI Review, Section 2A

⁴ MVC Site Design and Landscape Policy for DRI Review, Section 2B

⁵ MVC Built Environment Policy for DRI Review, Section 6.2

The proposed Expansion includes a new pool facility directly adjacent to abutting residential properties. This new pool will generate noise when in use and will be disruptive to neighbors who have long enjoyed the relative peace and quiet of a residential neighborhood. We have similar concerns about noise from deliveries and waste pickup. The Expansion, as proposed, does not appear to address concerns about noise using any of the mitigation measures suggested in the DRI guidance.

Housing Impacts

Hob Knob's proposed Expansion, by converting a single family residence into a commercial lodging facility, will remove valuable housing from Edgartown at the exact time that more housing units are needed. Indeed the DRI staff review outlines that the Expansion is expected to eliminate housing units. Nor does the proposal from Hob Knob indicate how it will attempt to mitigate this negative impact on Martha's Vineyard.

Unfortunately it is quite likely that Hob Knob will simply try to sidestep the issue by agreeing to pay a mitigation fee. This misses a vital point; once this residential housing is removed from the market it is unlikely to return. While a simple monetary fee seems is a convenient way to pretend that housing scarcity does not exist on the island, this is far from true. Allowing yet another residential property to be converted to a commercial use, and yet another neighborhood to be further commercialized, does nothing to create additional housing on Martha's Vineyard.

The proposed commercial expansion will severely impact the surrounding residential neighborhood and is clearly inconsistent with the MVC's DRI policies. The increased traffic and parking congestion, noise levels, and the loss of valuable housing stock all demonstrate that the Expansion is not suited to this area. While there are inns and commercial businesses located in Edgartown's residential districts, they are generally low-intensity and are spread out to mitigate their impacts. Allowing Hob Knob to introduce a high intensity commercial hotel to this neighborhood is neither beneficial nor appropriate.

Sincerely yours,

Daniel J. Bailey

Daniel J. Bailey

DJB/smg

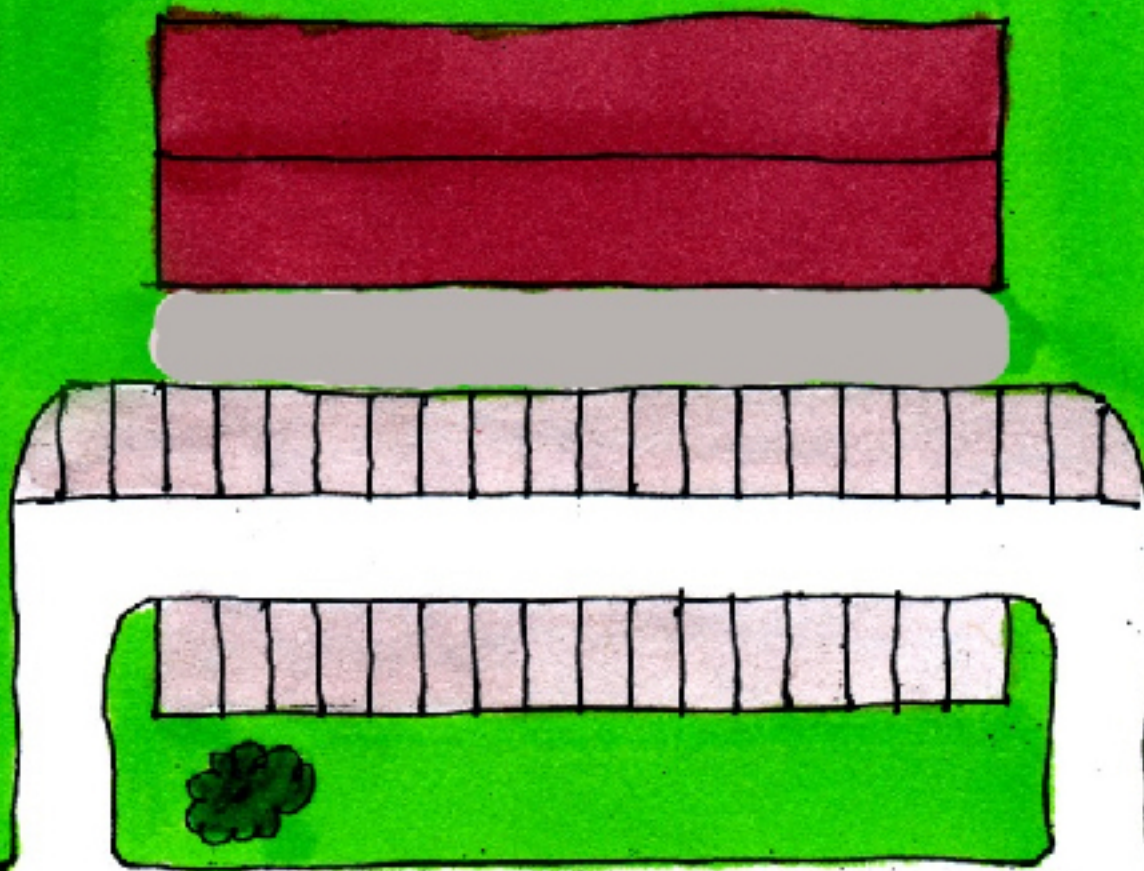
cc: John Greely
Grant Greely
Maggie Boris
Jennifer Rako

EXHIBIT A

Name	Address	Town	District	# of Rooms
The Lightkeepers Inn	25 Simpson's Lane Edgartown, MA 02539	Edgartown	R-5 Residential (just over across the street)	6
The Sydney	22 Winter Street Edgartown, MA 02539	Edgartown	B-I Business	8
Edgartown Lodge	68 Winter St, Edgartown, MA	Edgartown	B-I Business	9
Ashley Inn	129 Main St Edgartown, MA 02539	Edgartown	R-5 Residential	10
Edgartown Inn	56 North Water St Edgartown, MA 02539	Edgartown	R-5 Residential (just over across the street)	12
The Christopher	24 S Water St Edgartown, MA 02539	Edgartown	B-I Business	15
Kelley House	23 Kelley St PO Box 37 Edgartown, MA 02539	Edgartown	B-I Business	16
The Richard	104 Main St, Edgartown, MA 02539	Edgartown	R-5 Residential	16
Hob Knob	128 Main St Edgartown, MA 02539	Edgartown	R-5 Residential	17
The Charlotte Inn	27 S Summer St, Edgartown, MA 02539	Edgartown	B-I Business	19
Edgar Hotel	227 Upper Main St Edgartown, MA 02539	Edgartown	B-II Business	34
Vineyard Square Hotel & Suites and Edgartown Residence Club	38 North Water St Edgartown, MA 02539	Edgartown	B-I Business	34
Edgartown Commons	20 Peases Point Way, Edgartown, MA 02539	Edgartown	R-5 Residential	35
The Harborside Inn	3 South Water St. Edgartown, MA 02539	Edgartown	B-I Business	90
Harbor View Hotel	131 N Water St, Edgartown, MA 02539	Edgartown	R-5 Residential	124
The Beach Plum Inn	50 Beach Plum Lane Menemsha, MA 02552	Menemsha	Ag/Residential IV	11
Kathleen's Kottage	59 Naushon Ave Oak Bluffs, MA 02557	Oak Bluffs	R-1 Residential	3
Martha's Vineyard Resort	117 New York Ave, Oak Bluffs, MA 02557	Oak Bluffs	R-2 Residential	5
Titticut Follies	37 Narragansett Ave, Oak Bluffs, MA 02557	Oak Bluffs	R-1 Residential	5
Beachfront Inn of Martha's Vineyard	65 Seaview Avenue Oak Bluffs, MA 02557	Oak Bluffs	R-1 Residential	6
Tivoli Inn	125 Circuit Ave Oak Bluffs, MA 02557	Oak Bluffs	R-1 Residential	6
Oak Bluffs Inn	64 Circuit Ave Oak Bluffs, MA 02557	Oak Bluffs	B-1 Business	10
Isabelle's Beach House	83 Seaview Ave Oak Bluffs, MA 02557	Oak Bluffs	R1 Residential (just over across the street)	12
The Attleboro House	42 Lake Ave, Oak Bluffs, MA 02557	Oak Bluffs	R-1 Residential	12
The Madison Inn	18 Kennebec Ave Oak Bluffs, MA 02557	Oak Bluffs	B-1 Business	16
Narragansett House	46 Narragansett Ave Oak Bluffs, MA 02557	Oak Bluffs	R-1 Residential	18
Dockside Inn	9 Circuit Ave Ext Oak Bluffs, MA 02557	Oak Bluffs	B-1 Business	21
Pequot Hotel	19 Pequot Ave, Oak Bluffs, MA 02557	Oak Bluffs	B-1 Business	32
Martha's Vineyard Surfside Hotel	7 Oak Bluffs Ave, Oak Bluffs, MA 02557	Oak Bluffs	B-1 Business	37
Summertime Hotel	70 Lake Ave Oak Bluffs, MA 02557	Oak Bluffs	B-1 Business	95
The Look Inn	25 Look Street, Vineyard Haven, MA	Tisbury	R-10 Residential	3
Nobnocket Boutique Inn	60 Mount Aldworth Rd Vineyard Haven, MA 02568	Tisbury	R-10 Residential	7
Lambert's Cove Inn, Farm & Restaurant	Lambert's Cove Road West Tisbury, MA 02575	Tisbury	RU Rural	15
Mansion House Inn, Health Club, Spa & Pool	9 Main Street Vineyard Haven, MA 02568	Tisbury	B1 Business	48

EXHIBIT B

Not Desirable



Desirable

