

12 May 2023

Martha's Vineyard Commission
33 New York Avenue
Oak Bluffs, MA 02322

RE: MVC DRI #718
7 Arlington Avenue, Oak Bluffs

Dear Commissioners,

I write in connection with the above-referenced DRI # 718 and to support the reconsideration by the Commission of its decision to deny the project at 7 Arlington Avenue in Oak Bluffs as proposed by applicants, my clients, Lisa Kim and Eunu Chun. As you know, I am the architect for the Project and have made prior submissions to the Commission with respect to it. During the course of the Commission's prior review of and proceedings with respect to the Project, the Applicants made material and substantial revisions to the Project in an effort to address concerns that were raised.

As highlighted below, since the Commission's decision denied the project, and the ensuing litigation, the applicants have endeavored to further modify the project to address matters raised by the decision. As a result, we believe that the Project as currently proposed satisfactorily addresses the concerns the Commission raised, and the considerations presented by version 14 of the DRI checklist. We also respectfully submit that the project is more in keeping with the considerations and standards set forth in the Guidelines than two other DRI projects in the same neighborhood, 19 Mill Square and 9 Beecher Park, which were decided under the same version of the DRI checklist and were approved.

1. Prior Review and Revisions to the Project:

The Oak Bluffs Historical Commission (OBHC) reviewed the original Project on 08 June 2022. The consensus of the OBHC at that time was that the Project was too large and that the existing structure was preferably preserved.

Since the OBHC's review, the Project has been revised several times. These revisions were made as a result of full MVC Commission and LUPC reviews. Based on matters raised by the Commission and comments from neighbors, the Project was substantially and materially revised. The revisions included matters from massing to trim details—all with an eye to replicating as closely as possible the form, massing, and look of the existing structure. Changes included a substantial reduction in overall footprint and square footage from an originally proposed 4,255 s.f. to a currently proposed 3,556 s.f. Roof lines were redesigned and minimized to more closely reflect the scale and design of the existing structure. The structure was moved further off the property line on the lot to minimize impact on neighboring properties. Recent changes include reducing mass and scale of the back portion of the house, eliminating the finished basement area (an additional 860 square feet eliminated from the proposal), and the reduction of window in the

tower's west elevation. In short, the Project which the OBHC and the Commission originally reviewed has been changed materially and has been revised to address the concerns and comments of the OBHC and the Commission.

2. Carbon Footprint:

During the course of the Commission's proceedings on the original Project, concerns were raised regarding the possible differences in the carbon footprint of a renovation when compared to a demolition and reconstruction. It is my opinion that a renovation would likely entail an as great, if not a greater carbon footprint than a demolition and reconstruction. This is due to the fact that significant structural issues compromise the existing structure. Accordingly, even a renovation would require, among other things, a new foundation, a reframing of virtually the entire structure, and the introduction of new structural supports to bring the building up to code and create a building that is storm resilient.

In terms of carbon footprint, there would be virtually no difference between the work involved in a rehabilitation and that involved in a demolition and reconstruction. One significant difference, however, is the finished product of a demolition and reconstruction, a building that would be designed to be sustainable, energy efficient and storm resilient. Additionally, it would be less environmentally impactful than the result of a rehabilitation. It would be more time consuming, difficult and costly to bring a renovated building which could never be as up-to-date in terms of energy efficiency and more of an environmental impact as is new construction would require.

3. Other Considerations:

The existing building is not in an historic district. Due to this, any renovation or reconstruction must comply with modern building codes. Bringing the existing structure up to current building code would require meeting all structural, egress and insulation codes. This in turn would require sistering all structural elements, allowing larger cavities for insulation and strengthening every stud, floor joist and rafter to meet required wind and loading requirements. This, in turn, would require the substantial alteration of interior hallways, doorways, staircases, resulting in lost headroom, stair and hallway width, overall square footage, and a substantial reduction in the liveability of an already antiquated structure.

One of the Applicants' primary goals is to create a home that is comfortable and accessible for their elderly parents, and that will allow the Applicants themselves to enjoy the home as they advance in age. It is virtually impossible to achieve this goal through a renovation of the existing house, which was not designed with accessibility in mind, and which, in fact, presents obstacles to accessibility in a myriad of ways. As the Commission itself has recognized, over the life of a home it is likely that at least some residents will have limited mobility, at least for periods of time, or will at least have visitors with limited mobility. Narrow stairways and narrow interior doors and hallways decrease a home's accessibility and "visitability". Eliminating barriers to access also allows people to remain in their homes.

As the Commission proclaims on its website, it encourages that all homes, whether or not designed for residents who currently have mobility impairments, should be designed in such a way that they can be lived in or visited by people who have limited mobility. The Project will achieve this goal and result in a more accessible and user-friendly home. As noted above, this goal cannot be achieved through a renovation of the existing, relatively inaccessible structure.

5. **Historic Review:**

As is established by the record in this matter, the existing structure was once part of a larger structure, the Palmer Villa House. The Palmer Villa House was located about a half mile from 7 Arlington Avenue, the location of the existing structure. In the early 1900s, the structure was severed from the Palmer Villa House and moved a half mile to its current location. At that time, or sometime shortly after, virtually all of the ornate and distinctive architectural details of the original building were removed. In connection with its prior proceedings on the Project, the MVC retained a consultant, Eric Dray, to research and report on the historical significance of the existing building. Mr. Dray's overall assessment was that the historical significance of the structure was lost when the building was moved to its current location when most, if not all, of the historical elements were stripped from the building. Mr. Dray concluded that as a result "the house has lost all of the ornamental trim...and the primary reference to the Second Empire style, the mansard roofed turret, was replaced by a larger, astylistic corner tower with a shallow hip roof." Mr. Dray does note that the structure in its current location "does provide a north terminus to a distinct row of late 19th century cottages." However, it is one of those 19th century cottages, 19 Mill Square, that the MVC approved for demolition, and which has been demolished and rebuilt. The current Project is on a much larger lot, proposes a substantially smaller home, in a much less visible location than both 19 Mill Square and 9 Beecher Park, another structure the MVC approved for demolition and reconstruction.

An independent historical survey done by Epsilon Associates summarized the building in a similar way stating: "Unfortunately, any historical significance (of) 7 Arlington is overshadowed by its loss of architectural integrity...The cottage retains some discernable elements of its original form...but the elements have been significantly modified and stripped of important ornamental trim."

I respectfully suggest that under the MVC Guidelines applicable to the Project, with same guidelines that also applied to 19 Mill Square and 9 Beecher Park; the MVC should approve this project as revised.

Sincerely,



William C. Sullivan AIA