

BENJAMIN HALL

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I represent the Haute Montagne Trust which owns the parcels to the southeast of the proposed project and reserve all rights accordingly.. The recent series of revisions to the project while pushing some of the development further from the edges of the property, add unacceptable amounts of additional Nitrogen to the watershed contrary to the provisions of the zoning bylaw, but also further retains duplex houses along the road frontage, and add large scale townhouses that are NOT in keeping with the ethos of Martha's Vineyard nor of the immediate neighborhood. There is little to no proposed screening of these large building and the assisted living houses while there remains a large swath of land where the proposed work force and assisted living housing could be sprinkled in housing structures more akin to the Vineyard while still keeping intact large areas of land along the edges not only buffering the neighboring properties but also providing long stretches of land to continue to accommodate the two endangered species found to have potential habitat on the site. The reason that the zoning bylaw requires public water supply with the connector terms "and/or" with the requirement of public wastewater treatment, while ambiguous, appears to try to allow the Zoning permit granting authorities (which includes the MVC) to look at the amount of wastewater generation, the amount of nitrogen and other nutrients disadvantageous to the environment, and to insist on municipal treatment where policy limits of the nutrient load exceeds that for on site treatment, or to require the project to be down sized to the point of equivalence between advanced on site treatment and municipal wastewater treatment. The MVC is being told that the proposed change to Nitroee wastewater treatment from the earlier proposal of municipal wastewater treatment still creates a 66.92kg/year excess beyond the nitrogen limits for the policy of the MVC. The MVC should not be engaging in the process of allowing applicants to pick and choose an undefined process to accept off site upgrades to individual systems as a means to try to fit this now square peg into the round hole of the bylaw. The only way permitted under the bylaw (reminding the MVC it is to determine if the MVC policies can be achieved and the bylaw implicit requirement both can be met) would be to require municipal wastewater treatment as a condition, and to permit the applicants to work with the Town of Edgartown to provide upgrades and more capacity to the existing wastewater system so as to allow for connections of the entire area around so as to include the proposal.

Thank you for the opportunity to comment.

Best, Ben

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