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Martha's Vineyard Commission

DRI # 89-M3 Stop & Shop Expansion

MVC Staff Report – July 10, 2013

1. DESCRIPTION

- 1.1 Applicant:** Stop & Shop Supermarket Co.; Bill O'Brien (Agent – Viceroy Dev. Assoc.)
- 1.2 Project Location:** 18 Water Street (Map 7f Lot 6 -Stop & Shop and Midnight Farm) 0.37 acres; 14 Water Street (Map 7f Lot 8 – Chinese Restaurant) 0.128 acres; 15 Cromwell Lane (Map 7f Lot 7 – House) 0.17 acres. Total area is 0.67 acres (29,097 sf)
- 1.3 Proposal:** To consolidate three abutting properties downtown resulting in the expansion of the Stop & Shop Supermarket and the removal of all other uses on site. The current proposal is a 23,800 s.f. supermarket and a parking garage with 43 spaces.
- 1.4 Zoning:** B-1 Commercial.
- 1.5 Local Permits:** Building Permit; Renegotiate easements with Town in the municipal lot;
- 1.6 Surrounding Land Uses:** SSA Terminal; downtown businesses and residences.
- 1.7 Project History:** The house at 15 Cromwell Lane was built between 1810 and 1837. The Stop & Shop (originally A&P) front building and Restaurant building were built in 1950. The A&P back building (Midnight Farm) was built in the 1960's after demolition of a house built in 1810. In 1978 the restaurant (aka Harborlight) was reviewed by MVC.
- 1.8 Project Summary:**
- To consolidate three abutting properties downtown resulting in the expansion of the Stop & Shop Supermarket and the removal of all other uses on site includes an historic house.
 - The proposal is a 23,800 s.f. Stop & Shop Supermarket with the retail level one level above Water Street, above a 43-spaces parking garage at street level with Water St.
 - The proposal also proposes to reorganize the circulation and layout of the Town parking lot by cutting of the connection between Norton Lane (Extension) and Water Street and directing all traffic from Main Street via Norton Lane through the parking lot to the entry/exit on the far side of the parking lot.
 - The proposed reorganization of the Town parking lot also includes the elimination of the public restrooms partly in order to facilitate the access of Stop & Shop trucks.
 - The proposal reduces parking spots in the municipal lot from 65 to 64 but adds 43 new spots in the parking garage below the store for a new total of 107 parking spaces.
 - Existing Uses include: existing Stop & Shop grocery store (9,408 s.f.) and non-food store in the basement (4,162 s.f.); furniture store aka Midnight Farm (5,203 s.f.); Chinese restaurant (2,364 s.f.); house at 15 Cromwell Lane; (4,856 s.f.). Totaling 25,993 sf.
 - The total proposed sf is an approximately 23,800 sf store, 2,070 sf loading dock, and a 23,800 sf garage for a gross square foot total of about 49,670 sf.
 - The proposed supermarket (23,800 s.f.) is 2.5 times larger than the existing grocery store (9,408 s.f.) alone & 1.75 times larger than the grocery and basement store. The gross square footage (gsf) of the new store and garage is 49,670 sf or almost twice the gsf of the existing buildings (25,993 sf) and with a Floor Area Ratio (F.A.R.) of 1.7.

- (Note that a preliminary proposal was for a 28,093 g.s.f. store above a 43-space parking garage. It had a third floor in the back near Norton Lane with offices and work spaces, which has now been eliminated. Two earlier parking lot layouts kept Norton Lane open, and one kept the existing layout of the Town parking lot.)

2. ADMINISTRATIVE SUMMARY

- 2.1 DRI Referral:** Tisbury Building Inspector; February 13, 2013
- 2.2 DRI Triggers:** 3.1a (Development of 2,000 s.f. Commercial - Mandatory Review); 3.1g (Increase Intensity of Use); 3.1h (Parking 10 or more spots); 3.1J (High Traffic Generator); 4.2 (Demolition in a Commercial District).
- 2.3 Pre-Application Meeting with Staff:** February 4, 2013.
- 2.4 LUPC:** February 5, 2013; March 11, 2013; April 1, 2013; May 6, 2013.
- 2.5 Site Visits:** Tuesday July 9 at 5:00 p.m. & Thursday July 11 at 8:30 a.m.
- 2.6 Public Hearing:** July 11, 2013 at 7:00 p.m. at the Tisbury Senior Center.

3. PLANNING CONCERNS

3.1 Some Key Issues

- **Transportation:** What will the traffic impact be of doubling the size of the store and adding 43 parking spaces on the already congested area, notably Water Street and the Five Corners intersection? How should the circulation work in and out of the town and Stop & Shop parking areas as well as the truck dock? Can the traffic impact be offset by making improvements to the larger area?
- **Building Design:** Does the building design harmonize with the scale and character of the area. Does it reinforce pedestrian activity on Water Street as well as Norton and Cromwell?
- **Use of Public Property:** Part of the building is on public property, namely the ramp leading to the upper entrance and an extension of the building above this. The current proposal includes the reconfiguration of the Town parking lot, landscape buffering (to screen the blank walls of the lower level) on public property, and demolition of the public comfort station. Is it appropriate that public property be used to accommodate a private company's expansion or can all needed elements be incorporated on private land? There may be an issue about the fact that the main (upper) entrance to the building is not on a public mapped street, but is through a parking lot.
- **Historic Preservation:** Should the project design around the historic house at 15 Cromwell Lane, move it, or demolish it?
- **Stormwater:** The site is partly in a flood zone and what pervious surfaces exist will be built over. How will the stormwater be handled?
- **Economic Impacts:** Does the project reinforce or undermine the Main Street business district? How can this project best catalyze improvements to the area?
- **Construction Process:** What impacts from the construction process (e.g. traffic, staging, noise, dust etc.) are anticipated and how will they be minimized and mitigated?

3.2 **Environment**

- **Open Space:** Currently, 12,068 s.f. (42%) of the property is open space. The proposal would eliminate virtually all of this. The Applicant stated at LUPC that their intention is to “max out” the property.
- **Vegetation:** A residential yard behind 15 Cromwell Lane and a small yard behind the Chinese Restaurant would be built over.
- **Landscaping:** There is no proposed landscaping on the property, other than 6 planters on Water Street. The proposed reconfiguration of the Town Parking Lot eliminates about a dozen trees and the vegetated areas that presently break up the parking areas. The current layout respects the MVC Site Design and Landscape Policy (section 2B) but the new one does not, namely:
 - *It is preferable to divide a large lot into several smaller parking areas and to break parking lots up with rows or islands of trees within the parking area.*
 - *At least one new tree should be planted within the parking area for every eight parking spaces, selected and located so that, after 20 years of growth, they will provide a high shade-producing canopy that covers 75% of the lot, cooling the lot and mitigating the impact of the asphalt*
- **Habitat:** This is not an NHESP designated habitat.
- **Archeology:**
 - The Public Archeology Lab (PAL) carried out a historical/ architectural analysis of the house and property at 15 Cromwell Lane (also see Historic Preservation below)
 - In addition to recommending that the building be preserved, PAL recommended that if any ground-disturbing activities are proposed for the parcel, the MVC consult with the Massachusetts Historical Commission (MHC) to develop an appropriate scope of work for archaeological investigations which would likely consist of an intensive archaeological survey.
 - MVC asked MHC to develop an appropriate scope of work as called for by PAL.
 - The MHC (in a fax dated July 10, 2013) recommends that an intensive (locational) survey (950 CMR 70) be conducted for the 15 Cromwell Lane property to locate and identify any significant archaeological resources. The letter states that MHC feels due to favorable environmental characteristics the site could be highly archaeologically sensitive. A State Archaeologist’s permit application should be submitted to the MHC by a qualified professional archaeologist consultant.
- **Lighting:** The applicant says that lighting will be determined by code requirements; it is unclear whether this means that it will be limited to that required by code.
- **Signage:** The Stop & Shop corporate sign will be located above the Norton Lane and Water Street entrances. Plans show a billboard for advertisements and notices on the Norton Lane façade adjacent to the Water Street entrance. The mural will be relocated to the Crowell Lane façade.
- **Noise:** To be clarified. A concern is the impact of air conditioning of the store and mechanical ventilation from the parking garage.
- **Energy/Sustainability:** The proposal would be LEED (Leadership in Energy & Environmental Design) Certified and will meet the Massachusetts “Stretch Energy

Code” as required by Tisbury zoning. There is no intention to install solar panels on the roof.

- **Waste Management:** Yet to be submitted.
- **Water Source:** On town water.
- **Wastewater:** The project will be connected to the Tisbury wastewater facility. The Tisbury Sewer Control Board has approved the increased flow. Nitrogen Loading: The site is in the Vineyard Haven Harbor watershed which flows into open water that is not nitrogen impaired.
- **Stormwater:**
 - Groundwater flow on the site is toward the east into Vineyard Haven Harbor.
 - Due to the site being in a flood zone and the increase in impervious surfaces, the stormwater plan should accommodate at least a 25-year storm. A stormwater plan was submitted and is being reviewed by MVC staff.
 - The Applicant should consider green infrastructure technologies to infiltrate, evapotranspire, capture, and re-use stormwater to maintain or restore natural hydrologies used to control stormwater.
 - The Applicant has submitted stormwater management plans that are under review.

3.3 Transportation

- **Transportation Summary:**
 - On March 10, 2013, the Applicant submitted a Transportation Impact and Access Study (TIAS) prepared by VHB, based on the scope approved by the LUPC on February 4, 2013.
 - The MVC retained the services of Keri Pyke of Howard/Stein-Hudson Engineers (HSH) who submitted a peer review on May 3, 2013.
 - VHB submitted a response to this peer review on June 27, 2013.
 - HSH’s comments on the VHB response will be submitted before the hearing.
 - MVC staff is currently taking traffic counts to check the volumes and queue length in the VHB report.
 - The Tisbury Planning Board recommended and LUPC discussed the possibility that a downtown transportation and parking study be undertaken before the Commission makes a decision on this application and before the Town agrees to modify public circulation routes and/or parking. This could look at: car, truck, pedestrian, bicycle movement and networks; the number, location, and management of parking of downtown parking (e.g. shoppers or employees, cost), enforcement); and the operation of the shuttle to the Park-and-Ride and other parking.
- **Access and Circulation:**
 - Stop & Shop proposes to completely rebuild the Town Parking Lot by cutting of the connection between Norton Lane (extension) and Water Street and directing all traffic from Main Street via Norton Lane through the parking lot to an entry/exit on the far side of the parking lot. This would facilitate getting trucks to the Stop & Shop truck dock, and the maneuvering of large Stop & Shop delivery trucks. The current proposal also calls for the elimination of the Town Comfort Station in order to facilitate the access of Stop & Shop trucks to their proposed loading dock.

- In a memo attached to their traffic study for Stop & Shop, VHB addressed the possibility of reversing the direction of Union Street, as suggested by the Tisbury Planning Board. They concluded that changing the direction of streets might improve circulation but that changing the direction of Norton Lane would appear to make more sense, and suggested that this would need a more comprehensive study to resolve.
- **Parking:**
 - Currently, the 65-space Town parking lot adjacent to the existing Stop & Shop, is used by Stop & Shop customers, the Tisbury Police Department, other businesses on Main Street and area, and as pick-up/drop-off for the Steamship Authority.
 - Parking Requirements: The B-1 District in Tisbury does not have any parking requirements. According to the VHB study, applying *ITE Parking Generation* standards to the net increase in floor space would generate a demand for between 28 and 77 additional parking spaces for a “typical” grocery store depending on day of the week and time of day.
 - The proposal has 43 parking spaces in a garage at the Water Street level.
 - Stop & Shop says the objective of their proposal to redesign the Town parking lot is to better integrate it with the store. Although this might be advantageous to Stop & Shop, it may be to the detriment of the lot’s role serving shoppers and visitors of Main Street, such as by reinforcing the popular misconception that this is actually Stop & Shop’s lot. One of the reasons the Planning Board suggested keeping Norton Lane extension open and treating it as a public street is to better demarcate the public parking lot.
 - Staff has raised concern that the additional Stop & Shop shoppers might tend to fill up the Town lot before parking underground, thereby reducing the availability of parking in the Town lot for other shoppers and visitors. The possibility of some form of reciprocity was raised, whereby non-Stop-&-Shop visitors would be allowed to use the new garage in exchange for the Stop-&-Shop customers using the Town lot. Stop & Shop has indicated that their parking will be for their customer parking exclusively, with periodic store personnel monitoring and towing of other vehicles if necessary.
- **Trip Generation:** Traffic and parking projections are based on the net increases from the existing to the proposed uses, namely an increase of 10,130 s.f. Note that this is based on standard practice of assuming that the former uses, (such as the Chinese restaurant) had average vehicular trip generation for this use category; since these uses actually had very low trip generation, the actual increase in trips will be greater than those modeled.
- **Trucks:** There would be one or two deliveries a day with Stop & Shop’s semi-trailers which have wheelbases of 40 feet. In addition, there are several dozen deliveries per day from other suppliers using medium sized or smaller trucks (number to be clarified). Stop & Shop cannot realistically control the delivery times of the other suppliers. VHB has submitted plans showing how trucks can manoeuver into and out of the truck dock with the proposed modification to the Town lot eliminating the comfort station. They

said at LUPC that it would also be possible to get into the truck dock if the comfort station were retained.

- **Traffic Operations:** A critical issue is what the impact of doubling the size of the store on traffic in the area, notably on Water Street and on the Five Corners intersection, which is presently operating close to if not beyond its capacity. VHB says that the proposal would only have a minimal impact on traffic operations. They originally came to this conclusion based on traffic modeling (Synchro) that, as the HSH peer review pointed out was unable to show the change at Five Corners since it produced an error message both before and after. VHB used other software (VISSIM) to better model this intersection, and again concluded that traffic operations after construction would be similar or even better than today. There is some question as to the accuracy of the model. The modeling was based on seasonal adjustment factors to estimate summer population; MVC staff is now taking summer counts that will allow verifying these volumes. Also, the model says that today, the maximum queue length on Beach Road is about 500 feet, whereas experience indicates that it is often backed up to the old tanks (about 2,000 to 2,500 feet) and sometimes as far as or even beyond the drawbridge (about 5,000 feet).
- **Crash Data:** According to the VHB study, the only intersection with a notable crash frequency was Five Corners, which averaged 5.67 crashes per year, of which 76% were property damage only. This is five times greater than an average unsignalized intersection. VHB said it is likely due to the unorthodox layout of the intersection, confusion over who has the right of way, and the impact associated heavy ferry traffic conditions leading to and after ferry arrivals.
- **Public Transit, Bicycle and Pedestrian:**
 - The proposal is located across the street from the Island's main year-round ferry terminal. At the end of Water Street is a major terminus for 7 bus routes which provides good transit access to the area, but could be impacted by traffic congestion at Five Corners or on Water Street.
 - The Tisbury Planning Board and the MVC have been working on an integrated plan to improve on-road and especially off-road bicycle facilities in the area including upgrading Cromwell Lane into a primarily bicycle/pedestrian route.
 - There is already intense pedestrian activity on Water Street and along Norton Lane. Cromwell Lane is planned to become more of a pedestrian street. The current proposal maintains the present narrow sidewalk on Water Street in front of the current Chinese restaurant. Staff and the Tisbury Planning Board recommend that the Water Street sidewalk be at least 10 feet wide and incorporate trees, and that there also be a sidewalk at least 8 feet wide besides the building along Norton Lane, both of which should include street trees.
 - With the proposed reconfiguration of the Town parking lot, traffic coming down Norton Lane would no longer continue straight down to Water Street but would be moved to the edges of the lot near the police station; although this would reduce conflicts for people walking from the Town Parking Lot to the Stop & Shop, it would increase conflicts for people walking to Main Street.

- **Probable Impacts:** VHB suggests that the project will have few impacts. Staff has raised concern that the traffic impacts risk being greater than estimated by VHB and could lead to increased congestion at this critical entryway to the Island and at Five Corners, one of the Island’s most problematic intersections. This could not only negatively impact traffic on the Beach Street / State Road corridor, it could impact access to the ferry terminal.
- **Possible Mitigation:** VHB has suggested that since they concluded that the project would have minimal traffic impacts, there is no need for substantial mitigation. They proposed:
 - Travel Demand Management focused mainly on employees. Also providing information about alternative means of transportation to customers and providing bike racks.
 - Updating the signage and striping on Water Street.
 - Pedestrian enhancements adjacent to the site.

Staff had raised the possibility that in addition to minimizing the direct impact of the store on traffic, Stop & Shop could help offset the increased traffic impact of the store to downtown in two ways:

- By assisting the Town in evaluating the possibility of reorganizing the circulation pattern of the immediate area including the possible change in direction of Union Street or Norton Lane,
- By contributing to upgrading the frequency and promotion of the shuttle service from the Park and Ride to downtown and the ferry, to reduce the number of people driving downtown for work, shopping, or to pick up and drop off at the ferry.

3.4 **Affordable Housing**

- The house at 15 Cromwell Lane has 3 bedrooms. Although the former Chinese restaurant appears to have a dwelling unit, the Tisbury Tax Records do not record any bedrooms in the building. This should be clarified with the Applicant and the Town.
- According to the MVC Affordable Housing Policy, the recommended monetary mitigation for a store of 23,800 sf would be \$38,600. The proposal includes a parking garage underneath the store. The footprint of the building is approximately 26,575 sf. If the MVC counted the total gross square footage of the proposal the affordable housing mitigation would be higher. They are prepared to make a financial mitigation offer in accordance with the MVC affordable housing policy.
- In addition, the MVC Affordable Housing Policy states that for any DRI greater than 2,000 square feet *“which displaces, either by demolition or change of use of, or both, dwelling unit(s) must replace said loss with newly created, year-round affordable replacement unit(s) of comparable size”*.
- The Applicant has housed staff in the past. The Applicant says that as of today they are committed to 10 year-round rental properties with approximately 25 bedrooms. They will also replace the three-bedrooms currently in the house at 15 Cromwell off site. They continue to investigate options and will revise as necessary.

3.5 Economic Impact

- The current assessed value for all three properties combined is \$3,530,300. The combined property taxes for all three properties in FY 2013 was \$38,960. The Applicant expects that the tax bill will increase when re-assessed.
- Keeping the store in the town center should help reinforce the economy of downtown Vineyard Haven compared to relocating the store in a more outlying area.
- The applicant was asked to address the projected impact on Martha's Vineyard's local economy including the following:
 - What will happen to employees during the construction of the new Stop & Shop?
 - Plans to hire Island contractors, sub-contractors, suppliers, trade industries (plumbers, electricians, etc.) and professional services and workers in the development of this project.
- The Applicant will pay the cost of tying into municipal water and sewer.
- The project should generate additional sales tax revenue for the Commonwealth.
- Stop & Shop is currently one of the larger employers in Tisbury. The applicant has not provided the current number of employees (year-round and seasonal, full and part time) but estimates that this proposal will generate 50 additional jobs. They estimate that project development will create 150 temporary jobs in construction and trades.
- It would be useful that the applicant work with the Town and the Martha's Vineyard Chamber of Commerce to discuss how this project best leverage downtown improvements and economic development as a welcoming gateway to the Main Street business district, to Vineyard Haven, and to Martha's Vineyard.

3.6 Building Design and Scenic Values

- **Streetscape:**
 - The store is in one of the most highly visible locations on Martha's Vineyard, immediately across from the Island's only year-round ferry terminal, the gateway to the Island. The present buildings along Water Street, namely the existing store and the former restaurant, are quite non-descript and in need of improvement.
 - The building's visibility is increased by the presence of the open parking lot beside of the building. Also, it will be highly from Main Street and for people walking or driving down Norton Lane or along Cromwell Lane (proposed to become a primarily pedestrian and bicycle way). Therefore, the architectural design of the building will have a significant regional impact.
 - The roof of the building will be highly visible from buildings higher up the hill. No roof plan has been submitted, but it would appear that it is basically a single flat roof. Stop & Shop has indicated that they do not intend to install solar panels or make a green roof. Staff suggested that the applicant add the proposed store to the 3-D (Sketch-Up) model of downtown Vineyard Haven that the MVC prepared several years ago in order to allow seeing the building in its context from any angle, but this hasn't been done yet.
 - In 2009, the MVC carried out an urban design study of downtown Tisbury that delineated a number of areas and identified the defining characteristics of the built form of each area. (The Stop & Shop project is in Sub-Area 2E, p 39-42.)

- The main traditional defining characteristics of buildings in the area are simple, large, two-and-a-half floor buildings (22-42 feet wide), with gabled roofs (slopes of 30-35 degrees, ridge heights of 28-35'), with vertically oriented double-hung windows (equal to about 25-35% of façade area), and clad in natural wood shingles with corner boards painted white.
- **Building Massing:**
 - The proposed building is a 113-foot wide and 240-foot long, relatively monolithic box-shaped volume with an essentially flat roof, with sloping gables on the west, north, and east facades.
 - The side façade facing the parking lot has a relatively monolithic treatment, with a gable end towards the upper end over the upper entrance.
- **Architectural Detailing:**
 - The design includes elements that echo traditional Vineyard Haven building forms such as a 2½ story volume on Water Street that projects slightly forward from the rest of the façade. There are false dormers on the third floor.
 - The building is clad in cedar shingles on all sides.
 - The ground floor abutting the sidewalk along the side of the building facing Norton Lane is almost all either solid wall, ventilation grills, and a large garage door that will presumably be open virtually all the time.
 - There is a large structure, on public property, supporting the ramp and stairs leading to the upper entrance. It might be possible to substantially reduce or eliminate the need for this structure by moving the upper entrance next to the truck dock, so it is closer to ground elevation there; any additional ramping could take place inside the store. The gable building projection that now extends onto public property could be pulled back to the property line.
 - It would be desirable that the truck dock doors be kept closed most of the time.
- **Historic Preservation:**
 - The applicant bought the house at 15 Cromwell Lane last year with a view to demolishing it to allow for expansion of the grocery store.
 - The Public Archeology Lab (PAL) carried out a historical/ architectural analysis of the house.
 - It shows that the House may have been built for Caleb Prouty between 1844 and 1851. There is some indication that it was built between 1810 and 1838, and remodeled between 1844 and 1851
 - PAL concluded that *"the house is eligible for individual listing in the National Register of Historic Places at the local level of significance. . . it stands as an excellent local example of a moderately high-style Greek Revival style residence in Tisbury, retaining both a well preserved exterior and almost pristine interior first floor."*
 - Michael Steinitz, Deputy State Historic Preservation Officer, indicated on April 29, 2013 that MHC staff concurs that the building is eligible for National Register listing.
 - PAL recommended that the building be preserved.
 - Staff has prepared a memo outlining options for dealing with the house.

- o The Applicant has written that it is their intention to find a suitable place for the house to be located to and they continue to actively investigate relocation options.
- **A.D.A. Accessibility:** Any new building would be required to be ADA accessible.

3.7 Municipal Services

- The Town Comfort Station now serves shoppers on Main Street and other visitors to the area. The proposal is to eliminate it in order to facilitate access to the Stop & Shop truck dock. This would save the Town about \$30,000 a year. Eliminating the public restrooms could pose an inconvenience to shoppers on Main Street, since the other nearest public restrooms are down at the ferry terminal. Stop & Shop is required to provide washrooms, which are presently located as far from Main Street as possible. If the Stop & Shop washroom was located at the upper entrance to the store and was clearly accessible to the general public, they would offer a better substitute for the Comfort Station and would provide a public benefit by being available year round with no cost to taxpayers.
- It is not anticipated that the proposed project would have a significant impact on municipal services (schools, police, or fire).

3.8 Local Impact/Abutters

- The larger building, increased traffic, and a truck ramp will impact vehicular and pedestrian circulation, and views.
- A concern is how the project might positively or negatively impact businesses on Main Street and the surrounding area. Since the Tisbury Business Association is now, apparently, defunct, there is no single entity to speak for this concern.

3.9 Construction Process

- The Applicant has submitted a description of the demolition and construction process that seeks to avoid peak summer months, describes staging for demolition and construction and where construction materials and equipment will be stored; and how noise, dust, and other impacts will be mitigated.

4. CORRESPONDENCE

4.1 State: The Massachusetts Historical Commission recommends that an intensive (locational) survey (950 CMR 70) be conducted for the 15 Cromwell Lane property

4.2 Town Officials The Tisbury Planning Board submitted an initial list of recommendations on the initial plans. On April 22, they submitted a second set of comments on the April 1 plans, suggesting how the proposal could be improved, namely:

- Prepare a computer model showing traffic flow downtown and how it might be improved.
- Work with VTA, Town, and SSA on upgrading the park-and-ride shuttle.
- Consider relocating the truck dock location.
- Provide wide sidewalks with trees along Water St. and Norton Lane.
- Revise the architectural design to harmonize with the area.
- Preserve the historic house.

4.3 Island Organizations:

4.4 Public: Chris Fried has submitted suggestions for the MVC to consider in their review. **Ted Jochsberger and Deborah Wells** have written in support. **J. Richard Spatafora and Catherine Kinney** have written in support. **Roberta Lee Scott** has written in support.