



**PESCE ENGINEERING & ASSOCIATES, INC.**

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March 15, 2022

Attorney Geoghan Coogan  
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Subject: **Responses to Initial MVC Staff Questions – DRI 720**  
Proposed Workforce Housing & Green House Project  
490 Edgartown–Vineyard Haven Rd., Edgartown, MA

Dear Geoghan,

The following are our draft responses for your review and comment regarding the subject initial staff questions included in the Martha's Vineyard Commission's memo to you, dated March 3, 2022:

**Question 1.**

*Written proposal for how wastewater will be handled, including possible alternatives and associated analysis, and any input from the town.*

**Response**

The preferred method of wastewater treatment is by connection to the municipal sewer system. We have had several discussions with the Edgartown Waste Water Commission, and have performed an engineering evaluation of some of the sewer infrastructure, including pump station evaluations at both the Morgan Woods and the Vineyard Golf Club stations. When we discussed the possibility of this sewer connection with the Mass. DEP, they advised the WWC to prepare a comprehensive Wastewater Management Plan (CWMP) before allowing our future connection. This is in process, and may take 1-2 years to complete.

Therefore, the project team is now evaluating on-site septic system options for the project (following the Title 5 permitting path). This would require some relief from the Edgartown Board of Health (BOH) Regulations. We have met with the BOH and discussed the relief needed to allow the proposed number of bedrooms on the parcel. We are proposing using an advanced denitrifying septic system (such as the NitROE® treatment system) for wastewater treatment, and will be continuing the design and permitting efforts with the BOH.

Please note that for this wastewater approach, the site will be broken up into 2 different parcels under separate ownership. One parcel will be owned by the MV Hospital for the Workforce Housing, and the other by Navigator Homes of Martha's Vineyard, Inc. for the Green House homes (skilled nursing residences).

Also, as a back-up position, the MV Hospital has asked us to conduct a hydrologic study for a possible future Groundwater Discharge Permit option.

**Question 2**

*What is the status of state permitting regarding the portion of the site within NHESP habitat?.*

**Response**

We made an initial “Request for State Listed Species Information” to the Mass. Division of Fisheries & Wildlife in early 2020. Attached is the letter response from the Division indicating that the rare species of concern is the Imperial Moth.

The original design layout showed only a portion of the project intruding into the mapped priority habitat of rare or endangered species (less than 2 acres). The revised site layout will increase disturbance of the mapped habitat area (approx. 5 acres). After the revised draft site design is completed (site layout, draft septic design, and grading & drainage analysis), we will schedule an initial pre-application meeting with NHESP staff.

**Question 3**

*Describe how the updated layout (with the workforce units south of the main campus) will affect the environmental report and other materials developed so far.*

**Response**

As noted above, this revised site design will intrude more into the mapped endangered species habitat area. This may result in providing mitigation, and or, the designation of lot area under a conservation restriction, as part of the MESA Conservation & Management Permit process.

The grading and drainage design will involve (as before) balancing the proposed earthwork cut & fill to maximum extent possible, in order to eliminate the need to import fill material. No other wetlands, floodplain, groundwater or other sensitive areas exist on the site. The same erosion and sediment control measures originally intended (though implementing a construction period Stormwater Pollution Prevention Plan - SWPPP) will be required for the revised building and site layout.

No other impacts are anticipated by the change in site design with the WFH units located south of the main Green House homes campus.

**Question 4**

*Confirm whether the floorplans, elevations, and renderings dated 9/22/21 are the most up to date.*

**Response**

Yes, these are the most up to date plans, with one exception; 3 of the Green House homes will be 13 bedrooms each, rather than 14 bedrooms (4 @ 13 BR + 1 @14 BR = a total of 66 bedrooms). The floor plans will likely remain the same in all 5 Green House homes, with the 1 empty bedroom area constructed for storage only.

**Question 5**

*Provide or indicate where we can find the in-depth analyses of planning concerns that are mentioned in the Sept. 28 cover letter to the planning board.*

**Response**

Materials in support of each planning concern were filed with the application to the Edgartown Planning Board and can be found on their website. Those documents will be electronically submitted to the MVC as well.

**Question 6**

*Describe the proposed energy sources (all-electric, propane, solar, etc.).*

**Response**

The proposed energy source for all uses is electricity - electric heat pumps (heat & AC), electric hot water, and electric cooking appliances. However, the architectural design team is also evaluating the use of propane for the Green House® homes for cooking & laundry uses. This will be evaluated and decided at a later date.

I hope this helps with answering some of these initial questions.

Sincerely,



Edward L. Pesce, P.E., LEED® AP  
Principal

Attachment: MESA Species Request response letter (dated April 22, 2020)

cc:

Ed Olivier, Martha's Vineyard Hosp.  
Renee Lohman, Navigator Homes of MV, Inc.