



MARTHA'S VINEYARD
HOSPITAL

One Hospital Rd, PO Box 1477, Oak Bluffs, MA 02557

August 2, 2022

Mr. Alex Elvin
DRI Coordinator
Martha's Vineyard Commission
Via email

Re: DRI 720 Martha's Vineyard Hospital – Navigator Homes

Dear Alex:

As you are aware, the complexity of our proposed project requires review by several State and local agencies. I am writing today to update you on feedback that we have received from the Mass. Natural Heritage and Endangered Species Program (NHESP) of the MA Division of Fisheries & Wildlife and the implications for our proposed project.

Background: We applied to NHESP in March 2020 to request the name of the State-Listed species on our site. At that time, we were informed that the species of concern is the Imperial Moth, which is listed with a State "Threatened" species status. We began the review process in May by requesting an informal review meeting with NHESP Staff (a normal requirement of the application process). In June and July, we met with the NHESP Biologist to review our project and discuss changes/revisions to our site plan that have been requested by NHESP. The biologist assigned to our project is Mr. Jesse Leddick, who is also the Chief of Regulatory Review. We have drafted changes based on the information provided below and submitted these to Mr. Leddick last week.

NHESP Findings:

- The site layout showed the large workforce housing buildings (A, B, & C) in a configuration that extended further to the south of the property. This created a large portion of undisturbed habitat along the east & west sides of the community. Mr. Leddick explained that this "fragmented" the habitat.



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- Mr. Leddick explained that the actual mapped habitat boundary can sometimes change and that the Imperial Moth favors pitch pine tree habitat. We were therefore asked to extend/increase the mapped habitat on our property to include the locations of visible pitch pine clusters determined from aerial photography.

Implications to the site layout: As a result of this feedback, we have made the following changes to our proposed site plan:

- We were asked to relocate the proposed larger workforce housing apartment buildings so as to not fragment the moth habitat. To accommodate this change, we shifted/sited the apartment buildings along the perimeter of the loop road inside of which the five Green House[®] home buildings are sited. In order to provide some separation from the main roadway loop, we have also created a 20'-wide landscaped buffer between the loop road and the WFH parking area. Additionally, we moved stormwater Bioretention Area #1, and the associated subsurface infiltration system. This has resulted in an overall smaller incursion of the developed area into the south end of the property.
- Our original plan included a ground-mounted solar array at the southern end of the property, in an area that was not mapped as moth habitat. Following Mr. Leddick's guidance to include all areas containing pitch pine, this area is now included within the mapped habitat. Therefore, the ground-mounted solar array is no longer permissible. However, the revised orientation of the larger workforce housing apartment buildings makes them more conducive to a roof mounted array and we are proceeding with architectural changes to accommodate this feature.

Nest Steps: Mr. Leddick reviewed our initial revised building & parking layout, and provided us positive feedback on the changes. Consequently, we advanced the grading design in order to determine the extent of habitat alteration and submitted the attached plans for final review. After receiving final comments (expected this week), we will complete any required final changes and file a MESA Project Review Checklist form with the required attachments. This will trigger the formal review process with NHESP which will provide us the formal habitat



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determination for our project. Based on our previous meetings, we do not believe there will be any other significant site design changes.

The updated drawing set is attached.

We are providing this update as soon as was feasible, given the availability of NHESP staff.

Please do not hesitate to contact me or Geoghan Coogan if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edward J. Olivier'. The signature is written in a cursive style.

Edward J. Olivier
Senior Advisor