

October 8, 2019

Mr. Michael Busby,  
Relationship Manager  
Massachusetts Housing Finance Agency  
One Beacon Street  
Boston, MA 02108

Dear Mr. Busby,

The Oak Bluffs Board of Selectmen has reviewed the Comprehensive Permit Site Approval Application for 3 Uncas Avenue in Oak Bluffs and offers the following comments with respect to the suitability of the site for the project outlined in the application. The mixed-use comprehensive permit project proposes to demolish an existing four-bedroom historic house with an abutting one-bedroom cottage to be replaced with a 3,750+/- square foot mixed use building. The proposed project includes eight residential studio condominiums at 425 square feet each. Two of the eight units will be designated for affordable housing. There is also proposed to be a 350 square foot commercial bank building with a drive through and a parking lot. The existing lot is 7,404 square feet located in the R-1 zoning district which requires a 10,000 square foot minimum lot size.

Generally speaking, the project is consistent with the Town's Housing Production Plan (HPP) and Comprehensive Master Plan (CMP) which encourage the creation of affordable housing opportunities, mixed-use development, increased density in areas where high density already exists, as well as the location of housing close to town and existing transportation networks. In examining the details of the proposal, however, critical concerns exist which may significantly impact the suitability of the site for the project as proposed.

First and foremost, the property selected is a historical site listed on the Massachusetts Cultural Resources Information System (MACRIS). In addition to its location in the Cottage City Historic District, the parcel is located in a District of Critical Planning Concern (DCPC) created under the Martha's Vineyard Commission (MVC) Act and subject to the regulations of the Martha's Vineyard Commission through the Copeland District Commission which regulates development within this DCPC. This parcel has recently been reviewed by the Copeland District Commission and denied permission to demolish the historic home. Where authority has not been granted under Chapter 40B to waive regulation pursuant to the MVC Act, the property may not be suitable for development as proposed.

The Board of Selectmen also has concerns regarding the appropriateness of the property for the project as proposed. The project is located in the residential zone close to the Town's central business district where traffic congestion and safety issues have already made life quite

difficult for area residents. While the Town may be prepared to entertain additional housing density from the current zoning to promote the creation of affordable housing, the inclusion of a commercial drive-in at that busy location with completely inadequate queuing geometry would be a vast mistake that would worsen congestion, create a public safety traffic hazard and be completely inconsistent with the historic village character of the area. The site is simply not appropriate for any drive-up use and would not work with the character and configuration of either the site or the neighborhood.

Another critical concern deals with the lack of sanitary facilities at the site. While the application states that the sewer line runs near the property, the property is not eligible for connection to Town sewer given the fact the Town's sewer treatment plant is beyond its maximum capacity for treatment. The application gives no indication of how it intends to meet the requirements of MA Title V in handling wastewater for the project. This issue should be resolved prior to any determination that the site is suitable for additional development.

Obviously, the application is grossly incomplete with respect to most details that could be reasonably expected, including even an analysis of what specific zoning waivers are required, which makes a detailed analysis at this early stage nearly impossible. However, based solely on the on the above-referenced concerns it would appear that this particular site is not well-matched for the scope of development proposed. For these reasons the Board does not find this is a suitable site for the development as proposed.

Sincerely,

Brian Packish,  
Chairman