

**MEMORANDUM IN SUPPORT OF APPLICATION
FOR APPEAL OF BUILDING COMMISSIONER’S DECISION**

To: Dennis Zoning Board of Appeals

From: Michael Kennefick
Moriarty Bielan & Malloy LLC

Re: Application for Appeal of Building Commissioner’s Decision
568 E Main Street, W. Dennis, MA

Date: October 5, 2023

Dear Honorable Members of the Zoning Board of Appeals:

This Memorandum is submitted to the Town of Dennis (“Town”) Zoning Board of Appeals (“Board”) on behalf of our client, Susan Kantor, as Trustee of the Kantor Realty Trust (“Kantor”), in support of her application for Appeal of Building Commissioner’s Decision pursuant to the Town of Dennis Zoning Bylaws (the “Bylaw”) relating to property located at 568E Main Street, W. Dennis, MA (“Property”).

Specifically, Kantor seeks a determination from the Board finding that the shed relocation on the Property is not a violation of Bylaw §2.3.3.6.a.v.

BACKGROUND

This appeal stems from Kantor’s initial effort to construct a new 12’x16’ shed on the southwest corner of her Property, and subsequent decision to instead simply relocate the existing 8’x12’ shed as well as the rinsing station on the Property to that area.

Kantor filed a series of applications with the Conservation Commission, which ultimately resulted in her being permitted to construct a new, larger shed on her Property, as shown in the approved plan entitled “The Kantor Residence” prepared by Philip L. Cheney and dated February 23, 2023. **See Exhibit 1.**

As this Board is aware, Kantor's subsequent application to this Board to construct the new, larger shed on her Property was withdrawn during the hearing on the petition on March 27, 2023.

On April 6, 2023, Kantor's attorney Marian Rose, and Kantor's landscape architect, Philip Cheney met in person with Paul Fowler, during which Fowler recommended two alternative locations for the shed: on the northeast corner of the lot which is in front of the main door to the house (in the area that runs along the Bass River bulkhead seawall), or directly behind the rear of the house, which is the south side of the property.

Kantor then met with the Conservation Agent, on June 5, 2023, to discuss the recommended relocation areas. The Agent stated that the Commission would likely not consider any application to locate the existing shed, as it would be substantially closer to the resource area than originally approved.

One week later, on June 12, 2023, Kantor met with Commissioner Fowler and explained that the Conservation Agent advised against seeking to relocate the shed closer to the resource area. Kantor also explained that the second location suggested by Commissioner Fowler wasn't a viable option either, as the septic system is located there and a structure is not permitted to be located on a septic system. Further Kantor stated to Fowler that this is the only area on Kantor's property where a vehicle can back up to turn around and drive out to Main Street. It is next to impossible to drive out the long, narrow 500' driveway in reverse and back out onto Main Street with no visibility to on-coming traffic at a three-way intersection. During the conversation, Commissioner Fowler recommended that in that case, Kantor should simply move the existing shed to the area where the larger, proposed shed was going to go.

The next day, on June 13, 2023, Kantor informed Attorney Marian Rose of the conversation with Commissioner Fowler and Kantor requested her landscape architect to prepare a new plan showing the existing shed in the area where the larger shed was intended to be constructed. See June 13, 2023 plan, prepared by Philip L. Cheney and entitled "The Kantor Residence, attached as **Exhibit 2**. Kantor then wrote to the Conservation Agent, on June 19, 2023, explaining that her petition to the Board had been withdrawn, and "formally requesting Conservation's approval of the June 13, 2023 plan." **See Exhibit 3**.

The Conservation Agent acknowledged that the new shed wouldn't be constructed and approved of the alternative plan to relocate the existing shed, writing, on July 6, 2023:

"Your letter now indicates that you would like to relocate your existing shed (which would decrease the overall approved shed size) as well as relocate the rinsing station to be adjacent to the shed (further from the resource areas).

As these proposed changes will not have any additional adverse impacts to any wetland resources or their associated buffer zones, the revised plan is approved. The plan entitled "The Kantor Residence" prepared by Philip L. Cheney, and dated June 13, 2023, will now be incorporated into the project file as a new Plan of Record." **See Exhibit 4**.

The following month, on July 20, 2023, Commissioner Fowler arrived at the Property, unannounced, to conduct a site visit. By that time, the shed and the rinsing station had been relocated as shown on the June 13, 2023 plan and in accordance with Commissioner Fowler's earlier recommendation. While there, Commissioner Fowler opened the doors of the shed and saw bicycles, paddles, outdoor chairs, cornhole boards and cooler. During a conversation with Larry Demers, Kantor's contractor, and Mr. Demer's co-worker, Commissioner Fowler stated to them that the new locations of the shed and rinsing station were "fine" with him as well as the 6' solid vinyl fence and 12' arborvitaes (which Kantor installed in March 2023) which provided screening of the shed and rinsing station to abutters.

The following day, Commissioner Fowler called Kantor and told her that she had to remove the shed from the Property, without any explanation. Several weeks later, on September 5, 2023, Fowler served Kantor with the Violation Notice that is the subject of this appeal. **Exhibit 5**.

In June 2023 Kantor re-shingled the shed to match the new shingles on the house, hardly something a homeowner would undertake to an abandoned shed. The shed was never removed from the property and Kantor uses the shed for storing two 70 lb. electric bikes and outdoor furniture cushions and covers, kayak paddles and boating equipment.

Kantor seeks a determination from the Board that the relocation of the shed on the Property is not in violation of the Bylaw because the shed was preexisting and was therefore not "erected" in violation of §2.3.3.6.a.v.¹ and also because the shed was never "abandoned" as asserted in the Violation Notice.

I. BYLAW §2.3.3.6.A.V. HAS NOT BEEN VIOLATED BECAUSE THE SHED WAS NOT "ERECTED"

Section 2.3.3.6 of the Bylaw addresses Accessory Structures. Subsection (a)(v) states that: "A single accessory building with a footprint of 200 square feet or less, and a building height of no more than 15 feet [...] Shall not be *erected* without a Zoning Compliance Certificate from the Building Department and is subject to all fees in accordance with the Building Department Fee Schedule." **See Exhibit 6.**

The term "erected" is not defined within the Bylaw. Turning to the dictionary definition, "to erect" is defined as "to set up (as a building, structure, or framework); to rear; to build". (Oxford English Dictionary).

¹ The Applicant has submitted an Application for a Shed Permit with the Building Department pursuant to the instructions in the Violation Notice in addition to filing this appeal. The deadline for a determination regarding the Shed Permit does not occur until after the deadline for submission of this Application. The Applicant recognizes that the Shed Permit determination may impact this Application and will respond accordingly.

Here, the shed has been on the Property since long before Kantor's purchase in October of 2019. The shed can be seen on aerial photographs, found through the Online GIS Mapping system linked to the Town's website, of the Property dating back to at least 2012 and likely earlier. As shown in the photographs, appended hereto as **Exhibit 7**, this shed was an existing structure, not a new one. Furthermore, as shown in the attached photographs, the shed has been used for the storage of Kantor's bicycles, paddles, outdoor chairs, cornhole boards, a cooler and other items. Kantor also grows flowers in the shed's window boxes – hardly an act of abandonment.

The Violation Notice's assertion that the decades-old, existing shed requires a Zoning Compliance Certificate (Shed Permit) fails to consider the triggering language used in the cited Zoning provision and does not constitute a violation of Section 2.3.3.6.a.v., or any other provision in the Town's Zoning Bylaws. In short, the Bylaw doesn't apply because the shed has not been "erected," i.e., newly constructed but, instead, has been on the property for well over a decade before simply being moved. The Violation Notice, on this basis alone, should be reversed.

II. THE SHED WAS NEVER "ABANDONED" AS ASSERTED IN THE VIOLATION NOTICE

Commissioner Fowler's Violation Notice dated September 5, 2023 is based upon his assertion that the existing shed has been abandoned – a determination he made solely upon his interpretation of the plan dated February 23, 2023 that Kantor filed with the Conservation Commission, which filing was superseded by a more current plan dated June 13, 2023 that Kantor filed with the Conservation Commission that shows the existing shed located where the new shed was previously planned to be located (which was approved by Conservation on July 6, 2023, two months before the date of the Violation Notice.) Commissioner Fowler made no reference to the June 13, 2023 plan that was approved by Conservation in his Violation Notice and based his assertion on an outdated, superseded plan. The Violation Notice specifies: "Existing shed on the property at 568E Main Street West Dennis, was *designated abandoned* with Conservation filing and no zoning compliance Certificate (shed) application has been made for a new shed or new shed location." The determination is baseless, and unlawful, for several reasons:

First, the shed hasn't been "abandoned" as that term applies in the zoning context. The Zoning Bylaw does not specifically define abandonment but, in a separate section (§2.4.1.1) discussing nonconforming uses, treats nonconformities as losing their protected status when they are "(i) abandoned, or (ii) discontinued for a period of two (2) years or more."

It strains credulity to claim that either has occurred in this case. As explained above, the shed has been on the Property since at least 2012 and has been maintained and continuously used by Kantor since her purchase of the Property in 2019.

Kantor's applications to, at first, construct a larger, replacement shed and then, later, to relocate the existing shed are further demonstrative proof of the existing shed's consistent use on the Property. The fact that the Conservation Commission approved Kantor's application to construct the larger shed on her Property does not create a legal designation of abandonment, for zoning purposes, of the existing shed – such is not within the authority or jurisdiction of the

Conservation Commission. Furthermore, nothing in the Conservation Commission's file designates the existing shed as, or stipulates that the existing shed had been, "abandoned" as of any particular time. To the contrary, it was obviously contemplated that the existing shed would be removed from the Property in conjunction with the construction of the new, larger shed – a plan that Kantor elected not to follow through with.

Moreover, though the approvals from the Conservation Commission have no bearing whatsoever on the zoning determination before this Board, the Commission's administrative record, which Commissioner Fowler relies upon in asserting that the existing shed was "abandoned," wholly refutes and contradicts his claim that the existing shed was abandoned. As outlined above, Kantor returned to the Conservation Commission after deciding to relocate her existing shed instead of constructing the larger one on the Property, and the Agent provided written approval of her change in plans, indicating that the "the revised [June 13, 2023 showing the relocation of the exiting shed] plan is approved." **See Exhibit 4.** There can be no clearer proof, than this endorsement from the Conservation Agent allowing the existing shed to continue to be used in a new location, demonstrating that the existing shed had ever been considered or determined to be "abandoned" by the Commission.

The Building Commissioner's reliance on the Conservation Commission's administrative record is not only unsupported by that record, but is rebuffed by it. His Violation Notice, then, should be reversed.

CONCLUSION

Based on the foregoing, Kantor submits that she has shown sufficient evidence to support a determination that the shed on her Property is not in violation of Bylaw §2.3.3.6.a.v. Accordingly, she respectfully requests that this Board grant the Application, make a determination that the shed on the Property is not in violation of the cited Bylaw section, and issue an order reversing the Commissioner's Violation Notice.

Should this Board or any other Town Department require any additional information or have questions concerning this Application, please do not hesitate to contact me directly and I will provide the additional information and/or respond to any questions forthwith. Thank you for your attention to this matter.

Respectfully submitted,
SUSAN KANTOR

By her attorneys,

MORIARTY BIELAN & MALLOY LLC

A handwritten signature in blue ink, appearing to be 'MK', is written over a horizontal line.

Michael Kennefick (BBO No. 648004)
One Adams Place
859 Willard Street, Suite 440
Quincy, MA 02169
(781) 817-4900

cc: Client (*via email only*)

EXHIBIT 1

EXHIBIT 2

PLANT SCHEDULE

BOTANICAL NAME	COMMON NAME	SIZE
CONIFERS		
44 Thuja occidentalis 'Smaragd'	Emerald Green Arborvitae	7-8'
SHRUBS		
1 Hydrangea arborescens 'Innocent Ruby' TM	Innocent Ruby Hydrangea	3 gal
1 Hydrangea macrophylla 'Nikko Blue'	Nikko Blue Hydrangea	3 gal
1 Hydrangea paniculata 'Bobo'	Bobo Hydrangea	3 gal
1 Ilex crenata 'Slechts'	Steeds Japanese Holly	3-4'
1 Ilex grana 'Dense'	Blue Maid TM	5 gal
1 Syringa japonica 'SMNSJMPFR' TM	Double Play Red Spirea	3 gal
2 Syringa patula 'Miss Kim'	Miss Kim Lilac	5 gal
PERENNIALS		
4 Nepeta x faassenii 'Blue Wonder'	Blue Wonder Catmint	1 gal
GROUND COVERS		
130 Schizachyrium scoparium	Little Bluestem Grass	plugs
		18" o.c.

Area Calculations for 0-50' Buffer from Bulkhead

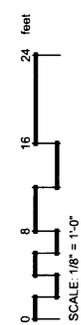
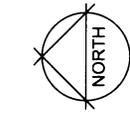
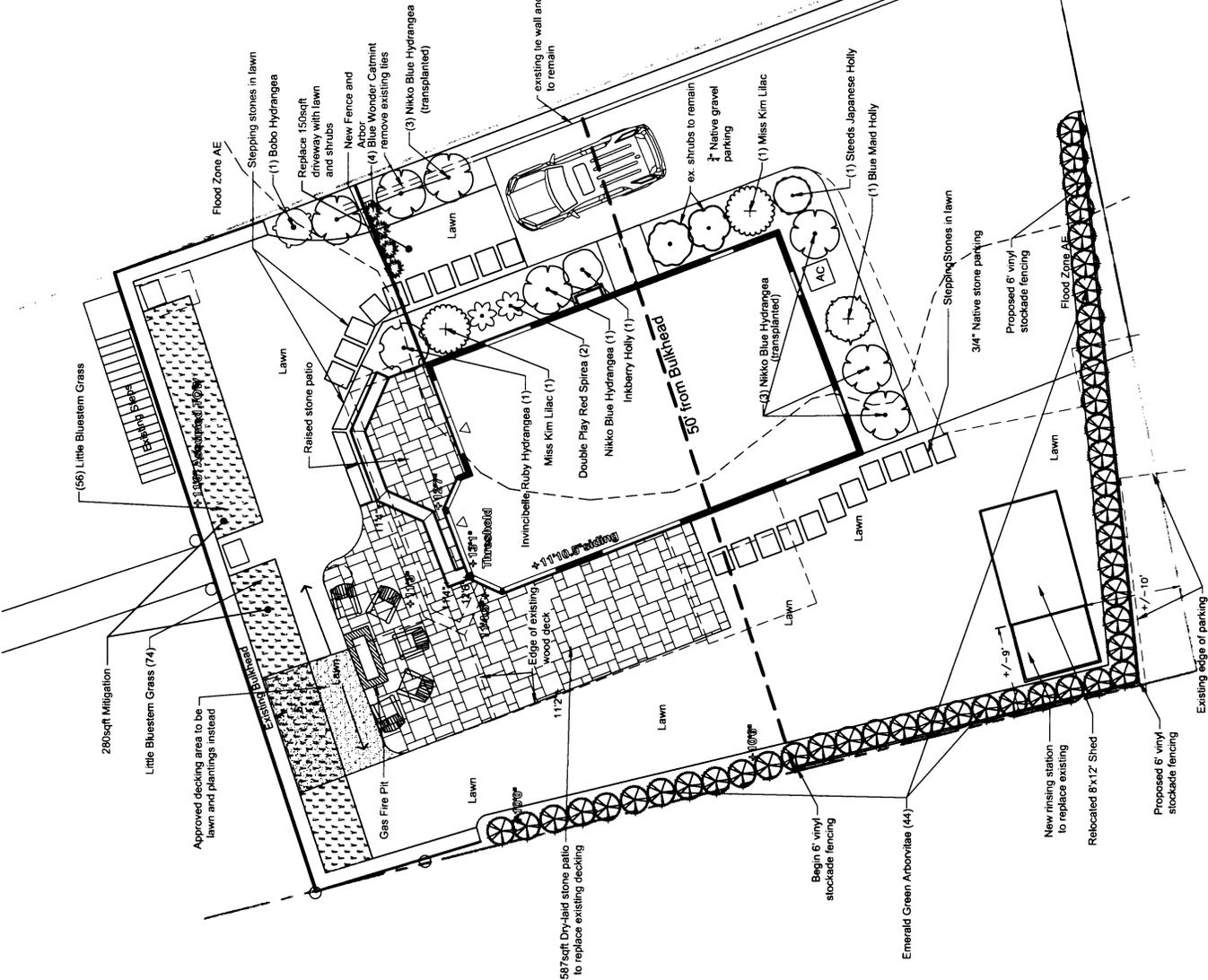
	existing/approved	proposed	change
Patio/decking	798sqft	757sqft	-41sqft
Shed/Rinsing	57sqft	32sqft	-25sqft
Driveway	280sqft	123sqft	-157sqft
Total:	1135sqft	912sqft	-223sqft

Area Calculations for 50-100' Buffer from Bulkhead

	existing/approved	proposed	change
Patio/decking	31sqft	76sqft	+45sqft
Shed/Rinsing	57sqft	217sqft	+160sqft
Driveway	1340sqft	1329sqft	-11sqft
Total:	1428sqft	1622sqft	+194sqft

Total decrease in hardscape from existing/approved = 29sqft
 Current Mitigation proposed: 280sqft

2/27/2021 revision results in less coverage in the 0-50' buffer, relocating the shed to the 50-100' buffer.



The Kantor Residence

568E Main Street, West Dennis
 By: Philip L. Cheney 508-394-1373
 Scale: 1" = 1'-0" 1/21/2021
 Rev. 9/27/2021-moved shed/rinsing station
 Rev. 2/23/23 -shed location, hedge & fence
 6/13/2023-moved shed/rinsing station

EXHIBIT 3

Susan J. Kantor
568E Main Street
West Dennis, MA 02670

June 19, 2023

Ms. Erin Burnham
Conservation Agent
Town of Dennis Conservation Commission
685 Route 134
South Dennis, MA 02660

Re: Map 81 Parcel 13, SE16-2262 (568 House E, Main Street, West Dennis, MA)
FIELD CHANGE AND PERMIT EXTENSION REQUEST

Dear Erin,

The Dennis Zoning Board and Building Department did not approve a new 12' X 16' shed that was reflected on the Landscape Plan dated February 23, 2023 which Conservation had approved on March 3, 2023. Subsequently, Paul Fowler, Building Commissioner granted me approval to move my existing 10' X 12' shed to the back of my property which is further away from the 50' buffer zone than the shed is currently located. I would also like to move the existing rinsing station next to the shed, which is also further away from the 50' buffer zone than the rinsing station is currently located. The Landscape Plan dated February 23, 2023 which was previously approved by Conservation is enclosed for your reference along with the Revised Landscape Plan dated June 13, 2023 which reflects the new shed and rinsing station locations. I am formally requesting Conservation's approval of the June 13, 2023 Landscape Plan.

My Conservation permit expires July 27, 2023 and I am also formally requesting a one-year Conservation permit extension to July 26, 2024 to provide time to relocate the existing shed and rinsing station further away from the 50' buffer zone. Please notify me via email at susanjkantor@gmail.com of Dennis Conservation's decision to approve a one-year extension of my conservation permit to July 26, 2024, along with Conservation's decision to approve the June 13, 2023 Revised Landscape Plan.

I can be reached at 781 910-8106 if you have questions or if you wish to speak directly. I appreciate the Conservation Commission's consideration of my request for a permit extension and approval of the June 13, 2023 Revised Landscape Plan.

Sincerely,



Susan J. Kantor
Trustee Kantor Realty Trust

cc: Phil Cheney, Cheney Landscape Design

EXHIBIT 4



Town of Dennis
Conservation Commission

George Macdonald, Chairman
Erin Burnham, Conservation Agent

Tel: (508) 760-6123

July 6, 2023

Susan Kantor (via email)
568E Main Street
West Dennis, MA 02670

**Subject: 568E Main Street, West Dennis (Map 81, Parcel 13)
Plan Change Request for SE16-2262**

Dear Ms. Kantor,

This office received your letter, dated June 19, 2023, requesting that a revised plan be accepted to replace the previously approved permit plan for Order of Conditions SE16-2262. This permit granted approval for the reconstruction of an existing bulkhead and construct a new pier, ramp, and float system. An earlier plan revision was approved in 2016 that allowed for a reconfiguration of the proposed beach access steps. An Amended Order of Conditions, approved on March 5, 2021 approved landscaping changes landward of the bulkhead and construction of a larger shed. Previous administrative approvals granted permission to make changes to the patio, relocate the shed, and add privacy fencing.

Your letter now indicates that you would like to relocate your existing shed(which would decrease the overall approved shed size) as well as relocate the rinsing station to be adjacent to the shed (further from the resource areas).

As these proposed changes will not have any additional adverse impacts to any wetland resources or their associated buffer zones, the revised plan is approved. The plan entitled "The Kantor Residence", prepared by Philip L. Cheney, and dated June 13, 2023, will now be incorporated into the project file as a new Plan of Record.

Please note that any further, additional alterations to the approved plan must be approved by the Dennis Conservation Commission and/or the Department of Natural Resources office.

Please contact this office if you have any questions.

Sincerely,

Erin Burnham
Conservation Agent

EXHIBIT 5



Town of Dennis
Building Department

Paul Fowler
Building Commissioner

Tel: (508) 760-6163
Fax: (508) 394-6289

Ms. Susan Kantor Trustee
Kantor Realty Trust
9 Hunter Lane
Canton, MA 02021

September 5, 2023

568E Main Street, W. Dennis

Dear Trustee(s),

You are hereby notified that you are in violation of the Town of Dennis Zoning By-Law section(s) 2.3.3.6.v

Summary of Violation: 2.3.3.6.v. *Accessory Structures... Shall not be erected without a Zoning Compliance Certificate from the Building Department and is subject to all fees in accordance with the Building Department Fee Schedule.*

Nature of Violation: Existing shed on the property at 568E Main St. West Dennis, was designated abandoned with Conservation filing and no zoning compliance Certificate (shed) application has been made for a new shed or new shed location.

Action to Abate Violation:

1. Within 14 days from the date of this notice, remove shed, *or*
2. Apply to the Building Department for a Shed Permit (Zoning Compliance Certificate) and be issued a Shed Permit for an approved location.

And, if aggrieved by this notice and order; to show cause as to why you should not be required to abate the violation in this notice, you may file a Notice of Appeal (specifying the grounds thereof) with the Town Clerk of Dennis and the Town Planner, within thirty (30) days of the receipt of this order and in accordance with MGL 40A Section. 8. If, at the expiration of the time allowed, action to abate this violation has not commenced, further action as the law allows may be taken.

Paul Fowler
Building Commissioner
Town of Dennis

EXHIBIT 6

Footnotes for 2.3.2:

¹Any structure having frontage on more than one street (i.e. corner lot, etc.) shall be set back from all streets a distance equal to the front yard setback requirement for the district.

²Where the rear lot line of a lot in a GC-I or Industrial District abuts a residentially zoned district, the rear yard setback shall be fifty (50) feet and shall conform to the standards set forth in Section 2.2.4.

³Where a lot is abutted at its street frontage by two (2) lots, each with existing buildings, the front yard setback requirement shall be determined by computing the numerical average of the existing front yard setbacks of those two abutting lots.

Where a lot is abutted at its street frontage by two (2) lots, one (1) of which has an existing building, and one (1) of which is a vacant lot, the front yard setback requirement shall be determined by computing the numerical average of the existing front yard setback on the built-upon lot and the required front yard setback for the zoning district. In no case shall the setback requirement be greater than the front setback for the Zoning District.

⁴Building Coverage Only – the percentage of the lot area, exclusive of wetland area, covered by the area of a building or building(s), refer to §5.B for definition of building.

⁵ Maximum total site coverage in the QNCP RP District shall be calculated by adding the square footage of the footprint of all structures, pools, patios, decks, parking, driveways (including gravel dirt or seashell) pavement, including street access drive, and “hardscape” including retaining walls and landscaping walls, but excluding walks, and dividing the total square feet thereby obtained by the total lot area in square feet.

⁶ Except as modified in Section 4.6.6.1.3.3 relative to land in the Quivet Neck/Crowe’s Pasture Scenic Vista Overlay District.

2.3.3 Supplementary Requirements

2.3.3.1 (Reserved)

2.3.3.2 Dwelling unit – two shall contain not less than twelve hundred (1200) square feet gross floor area.

2.3.3.3 No building shall exceed thirty-five (35) feet in height, except that spires, water tanks, chimneys, flag poles, and other structures normally built above the ridge and not devoted to human occupancy may be erected to such heights that are necessary to accomplish the purpose they are normally intended to serve.

2.3.3.4 No fence, wall, hedge, shrubbery, or other obstruction shall block vision of a public or private way two and one-half (2½) feet above street grade on a corner lot within a triangular area formed by the intersecting street lines and a straight line which joins points on such street lines twenty (20) feet from their intersection.

2.3.3.5 No structure other than a ramp, roadway, drive, walk, stairway, seawall, dock or boathouse shall be located within fifty (50) feet of the top of the bank of any river or stream having a year-round running flow of water, of any lake or pond containing one thousand (1000) square feet or more of water eleven (11) months of the year, coastal bank, or mean high water.

2.3.3.6 Accessory Structures

- a. A single accessory building with a footprint of 200 square feet or less, and a building height of no more than 15 feet:

- i. Shall not be located forward of the front face of the principal structure whose front face is seventy-five (75) feet or less from the street line. For corner lots the front face shall be determined by the street from which the property gains its street address;
 - ii. Shall not be placed less than seventy-five (75) feet from the street line when the front face of the principal structure is more than 75 feet from the street line.
 - iii. May be located within other setback areas in accordance with Section 2.3.2 provided no portion of the accessory building is located within two (2) feet of any lot line, and subject to appropriate screening requirements as determined by the Building Commissioner;
 - iv. Shall not be included in calculating: (a) maximum total site coverage under Section 2.3.2 (Intensity of Use Schedule); and (b) floor space under Section 2.4.1.2.D (Non-Conforming Conditions); and
 - v. Shall not be erected without a Zoning Compliance Certificate from the Building Department and is subject to all fees in accordance with the Building Department Fee Schedule.
- b. All other accessory structures:
- i. Shall be located in conformance with the required setbacks as found in Section 2.3.2 of this by-law;
 - ii. Shall be included in calculating (a) maximum total site coverage under Section 2.3.2 (Intensity of Use Schedule); and (b) floor space under Section 2.4.1.2.D (Non-Conforming Conditions);
 - iii. Shall not be placed forward of any face of the principal structure which is seventy-five (75) feet or less from the street line; and
 - iv. Shall not be placed less than seventy-five (75) feet from the street line when the principal structure is more than 75 feet from the street line.

2.3.3.7 In order to comply with the minimum square foot requirement, a lot must be a closed plot of land having a definite area and perimeter and having a shape number not exceeding the numerical value of 22, except that a lot may have a shape number larger than 22 provided that the site intended for building, is contained within a portion of said lot, which said portion meets the zoning requirements of the area in which it is located and has a shape number not exceeding 22. Ninety (90) percent of the required zoning area of such lot shall be contiguous upland.

2.3.3.8 Any panhandle lot shall have at least fifty (50) feet of frontage on a street or way. The panhandle portion of the lot shall be no less than thirty-five (35) feet in width, except such a width of 20 feet if shown on a plan endorsed by the Planning Board, prior to May 4, 1999 shall be exempt from this provision. Panhandle lots shall only be allowed for residential uses.

2.3.3.9 No more than two (2) panhandle portions of any two lots governed by Section 2.3.3.8 may be contiguous at the street line. Any panhandle lot existing prior to the adoption of this amendment, May 4, 1999, shall be exempt from this provision.

2.3.3.10 An animal kennel shall not be located within 100 feet of a lot line. The 100-foot setback shall apply to the kennel's principal building(s), accessory building(s), runs and exercise yards.

2.3.3.11 No construction or site preparation work shall be done on any land including the removal of living trees of greater than four (4) inch caliper, measured six (6) inches above grade or the removal of greater than ten percent (10%) of existing vegetation until all necessary permits and approvals have been obtained.

EXHIBIT 7



- Places of Interest - F
- Fire Station
- Police Station
- Town Hall
- COA
- Town Hall Ann
- Public Library
- School
- Community He
- Ice Rink
- Places of Interest
- Beach
- Beach (Fresh)
- Beach (Way Tr)
- Landmark
- Golf
- Museum
- Recreation
- Parcels w/Aerials
- MA Highways
- Interstate
- US Highway
- Numbered Ro.



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134 ft

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- Places of Interest - F
- Fire Station
- Police Station
- Town Hall
- COA
- Town Hall Ann
- Public Library
- School
- Community He
- Ice Rink
- Places of Interest
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- Beach (Fresh)
- Beach (Way T)
- Landmark
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- Museum
- Recreation
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- US Highway
- Numbered Ro.



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270

540 ft

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