
THE LAW OFFICES OF BELLO & MORTON, LLC

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October 11, 2023

Wareham Zoning Board of Appeals
54 Maron Road
Wareham, MA 02571

Re: 38-23 Forrest Divine - Variance(s) - 303 & 305 Plymouth Ave- Supplemental
Information

Dear Members of the Board of Appeals:

I wanted to forward along additional photographs to the Board as evidence for the requested Variances.

Attached are sets of photographs to show the flooding that just occurred recently with the rain on the site. The seasonal cottage and the grass and beach surrounding the area flood with significant rain as the pond water rises. I show this as additional evidence of the topography of the lot rising to the level of needing the variance for this site.

Second, there are two additional photos of the seasonal cottage I wanted to submit to show that the property does have full kitchen minus as stove as well as a dining area. The issue is the Merger would not occur in this case because there is a single-family home (seasonal cottage) which has been there since the 1930s. My clients have been coming here every summer and prior to that their grandmother resided there during summers. I give this background and evidence to propose to the Board that this is a seasonal cottage unlike the building commissioner's assessment.

Third, are the photos of the lots directly beside the Mias' property. The property located at 301 Plymouth Ave has a substantial garage in front of the home. I show this for the Board to further consider the nature of neighborhood and the waterfront properties where it is appropriate to build the garage in front of the primary residence.

I look forward to discussing this tonight.

Respectfully submitted,



JILIAN A. MORTON, ESQ.

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