1. Board Of Health Packet

Documents:

BOHMIN20191219.PDF
272 POLPIS RD VARIANCE REQUEST.PDF
272 POLPIS PLAN.PDF
167 HUMMOCK POND RD BOH VARIANCE REQUEST APPLICATION 1-9-20.PDF
NANTUCKET MAT STEERING COMMITTEE DRAFT 2 (JAN 6).PDF
Called to order at 3:40 p.m.

Staff in attendance: R. Santamaria, Health Director; A. Crowley, Assistant Health Director; K. LaFavre, Health Inspector; T. Norton, Town Minutes Taker

Attending Members: Stephen Visco; Malcolm MacNab, MD, PHD; James Cooper; Helene Weld, RN; Rita Higgins, Select Board

Early: MacNab, 5:42

Agenda adopted by unanimous consent

I. ANNOUNCEMENTS

II. PUBLIC COMMENTS – ANY MEMBER OF THE PUBLIC MAY ADDRESS COMMISSIONERS AT THIS TIME

1. None

III. DIRECTOR’S REPORT

1. In the interest of saving time, he provided a written Report, which is an overview of inspections completed coming up on the Holiday season.

IV. APPROVAL OF MINUTES

1. November 21, 2019: Motion to Approve. (made by: MacNab) (seconded by: Cooper) Carried unanimously

V. PUBLIC HEARING

Regulation 51 Madaket Watershed

Sitting: Visco, MacNab, Cooper, Weld, Higgins

Documentation: Supporting documents and plans, staff recommendations.

Discussion: Motion to Open public hearing at 3:42 p.m. (made by: Cooper) (seconded by: Weld) Carried unanimously

Santamaria – Regulations mirror the Harbor Watershed District. The start of the regulations was delayed for the SMAST report, which was finally delivered in November. The hearing is to accept a date of last year, July 1, 2019, or postpone it.

Higgins – Seems there have been a number of setback variances in Madaket. I/A’s are large and wonders about seeing more variance requests.

Santamaria – We will see those because of the number of private wells. Town water is to be extended into other areas of Madaket. We allow setbacks consistent with Title 5. We have seen saltwater intrusion from wells into septic systems which makes I/A systems work harder; we would recommend connecting to Town water. We have seen three 100-year storms in the last five years, so flooding is something to be considered.

Leslie Forbes, Madaket Conservation Association (MCA) – The boundaries of where the regulations would apply references Broad Creek, which hasn’t been around for a long time; and it didn’t cover a lot of Madaket. The Madaket Harbor Watershed Protection District Zones A & B map should be on the Town website.
Santamaria – The idea was brought up when the regulation was written, the boundaries were done using landmarks. Broad Creek no longer exists. We are now using the GIS map; he will present that map.

Forbes – One member of MCA asked about how this would apply to shared septic systems. In one of the cases, the owner of one of five units decided to sell the unit; asked how this regulation impacts the other four owners.

MacNab – Someone asked him the same question.

Santamaria – As he understands it, at the transfer of one unit, the shared septic would be required to upgrade. The covenant should indicate how much of the cost each unit is responsible for. All five property owners have to pay to upgrade/repair the system.

Crowley – These are undersized lots where the nitrogen load has to be resolved.

Santamaria – Some of these condos are built on crawl spaces and built out to the max. Emily Molden, Nantucket Land Council (NLC) – The NLC supports this regulation. Cited other areas that need work to help improve the harbor water quality. Based upon the report, the requirement to an I/A, there is an allowed variance should sewer become available; doesn’t see that in the regulations.

MacNab – That variance applies to the whole Island.

Forbes – This regulation addresses two I/A systems: SeptiTech® and one other; when you go to the Massachusetts Alternative Septic System Test Center, they list more systems divided into general use and provisional use. On the Cape, other systems are acceptable.

Crowley – There are only five I/A systems that are nitrogen technology approved by the Massachusetts Department of Environmental Protection (MassDEP); those are the ones that must be used.

Don Bracken, Bracken Engineering – About provisional use, if a system is tested and it isn’t removing nitrogen as it should, under provisional use, it has failed.

Santamaria – The nitric system requires a couple of reactive barriers below the leach field as well as down grading; it has to be a certain distance from the leach field, which only works on large properties. In Madaket you see a lot of nitric systems because of the lack of space. Reviewed some of the other I/A systems. Space and cost are the two big factors.

Higgins – Asked about the aquaculture in conjunction with I/A systems.

Santamaria – There were five scenarios addressing Hither Creek aquaculture in conjunction with I/A systems in Madaket; it doesn’t bring it 100% down to the 0.45 ml per year requirement from the total maximum daily load (TMDL). There are many ways to approach this.

MacNab – Sewering is 100% reduction. Here we calculate oxygen level and water depths and have a whole thing about eel grass.

Molden – A lot of work that has been done is general mapping of eel grass but not the long-term health of the beds. There are different variables at play in Madaket than in the Harbor.

Forbes – This is a model. There is no cost benefit analysis that goes with it. If we have a budget with no end you can do what you want, but we do have to balance a budget. The idea of a multi-pronged approach with costs attached to each approach is of benefit. The SMAST Technical Memorandum commented that what is going on at the Landfill is working but requires more study. When talking in large terms of meeting TMDL in Madaket, we need to talk about all the efforts to bring that down. Noted that the compost piles at the Landfill are huge and probably contain a lot of nitrogen.

MacNab – He estimates Madaket residents have spent $5.6m while we debate sewer to Madaket and will spend more. That isn’t fair to them when they will be required to pay for the sewer to go in. It is illogical in his mind not to put sewer to Madaket, which provides 100% nitrogen reduction and reduction of other pollutants. This isn’t just Madaket, it is an Island-wide issue. If we don’t have a clean environment and clean water, the parking problem will cease to be an issue.
Forbes – Part of the multi-prong solution is put zoning in place to prevent density; the Madaket Area Plan is in place to protect the area.

Higgins – None of the other scenarios will reduce the TMDL as much as it needs to be; that isn’t encouraging. She’s concerned about flood maps, cost of coastal resiliency, and emergent contaminants. The Select Board has been looking to the BOH, but it’s time for this to go back to the Select Board.

Santamaria – So do we set a date or push it back or strike it completely. At any time, we can request more information/studies from the Select Board.

Cooper – If we agree on sewer in Madaket, what is the timeline before that starts.

Santamaria – For Shimmo, the planning was completed when the vote passed in Annual Town Meeting (ATM). From ATM to shovel in the ground was just under a year.

Cooper – We’re looking at a minimum of three years; the question is what do we do for those three years and how much money is going to be spent by residents who will each have a 10-year variance.

Santamaria – The State Revolving Fund has been beefed up over the past year. The Cape would get priority since they are behind the curve; Nantucket is ahead of the curve.

Visco – In the studies, he didn’t see any numbers for isotopes or human coliforms. He’d be more in favor of putting off implementation of the regulation until we see how people vote regarding sewer.

MacNab – Wastewater nitro reduction creates the greatest benefit to the harbors. With sewer, nitrogen and all that other stuff won’t go into the groundwater. However, if we implement it, it is an unfair burden on the residents of Madaket. The BOH should push the Select Board to move forward on sewer to Madaket.

Higgins – Without more discussion, the Select Board will have a lot of questions about the cost and what more does BOH need to know and is there a way to soften the blow to residents.

Cooper – Madaket will be sewered at some point in the future. There is no way to regulate it, so it never has to be sewered. Agrees with Mr. MacNab about moving forward.

Higgins – The study results don’t speak to how I/A will get the TMDL down to the target level.

Cooper – If we don’t do anything, asked if we can get the State to agree to allow tight tanks.

Santamaria – We can ask the State to look into it; the chances of approval is very slim because I/A systems can be installed. Madaket as a whole isn’t an area of active erosion. The State considers tight tanks as a very last resort.

Higgins – Right now, if someone puts in an I/A system, the have a 10-year variance against hooking to sewer.

Visco – We can always extend the 10-year variance.

Weld – Given the reality of the 3-year timeframe of getting sewer to Madaket, it is probably going to be closer to 5 years.

Motion to Close the public Hearing at 4:34 p.m. (made by: Weld) (seconded by: Cooper) Carried Unanimously

MacNab – Thinks we should implement the regulation now and have staff explore ways to amend the regulation and extend financial assistance to the involved residents and the BOH urge Select Board to get behind the sewer to Madaket.

Higgins – It could take months to get the cost information and present to the Select Board. If at that time, they might say at that time they don’t want to sewer; her concern is what would happen.

Santamaria – If the regulation implementation date is changed, we need to reopen the public hearing with 3-weeks’ notice.

Motion to Implement Regulation 51 Madaket Watershed in three months, April 16, 2020, with the caveat that all the cost analysis information be presented before that. (made by: MacNab) (seconded by: Cooper)
Vote Carried unanimously

VI. BOH UPDATES & DISCUSSIONS

1. Genetic Mice Update – New Steering Committee Members
Discussion MacNab – The BOH nominated a steering committee, which has met only once without a chairman and they are mixed up about the roles and responsibility. To get it organized, the Select Board nominated Ms. Higgins to the committee. Listed others on the committee. He is scheduling a January 9th meeting; the BOH should review and approve the charter. The Steering Committee’s February 7th meeting will be to become familiar with the charter.

2. Waste Hauler Regulations
Discussion Santamaria – He is working with BOH and Department of Public Works (DPW). Once Town Counsel approves the regulations, we can schedule a special meeting to vote on them.
Rob McNeil, Director DPW – MassDEP sent a model for regulations. He has spoken to Island haulers. Reviewed the proposed regulations. With these regulations in place, Nantucket would be eligible for MassDEP grants to support our programs. Clarified the Hauler Fees per business entity and per independent truck. Explained the definitions for business haulers, independent contractors, different types of waste. Right now, 75% Island waste is hauled to us and 25% is dropped off; there are benefits to using commercial haulers, namely traffic coming into the facility and back up on Madaket Road.

VII. BOH APPLICATIONS REVIEW

1. Variance request: 24 Wanoma Way (92.4-212) - Local Reg 66.01 A.1 new construction leach pit
Sitting Visco, MacNab, Cooper, Weld, Higgins
Documentation Supporting documents and plans, staff recommendations.
Discussion Don Bracken, Bracken Engineering – With Steven Cohen, Cohen & Cohen Law P.C for the applicant. Explained what led to this request. The system was approved for 4 bedrooms; the house is a 6-room house with additional 3 rooms in the basement but still only 4 bedrooms. Asking to keep the leach pit where it is as the rest of the system is upgraded.
Crowley – The biggest issue is this is new construction, so compliance is required just like if it were a vacant lot. Most variances are granted for failed systems, which are being repaired. If they can't comply, granting the variance opens the doors for every lot that has reached maximum buildout and wants to further expand. The Building Department issued a permit to do something the Health Department never saw. The Building Inspector did a framing inspection and noted the work was beyond the scope that was approved and told them they had to go to the Health Department. The work was stopped at the framing point. Recommend not granting the variance.
Higgins – Asked if the Building Department came out for or against denial.
Crowley – He doesn’t know but they stopped work at the framing stage.
Cooper – Asked when the Health Department issued the cease and desist.
Crowley – The moment they came to us, which was at the framing point. The cease and desist was issued because they did not have a compliant septic.
Cohen – Feels Mr. Crowley’s information is slightly correct but more negative than it actually is.

The issue was a combination of lack of understanding of the complicated scenario and failure of the Building Department to act as the stopping point for issuing a permit. When they framed out the building, they framed out a room with a closet, which the inspector felt was more of a bedroom than finishing basement space. The contractor was under the impression he had a valid building permit and the work could be finished out. Explained there are two wells on the property and only one is the potable water well. Hopes the Board finds a net benefit. The building permit was for three separate, finished room with no bedrooms; there is no bathroom in the basement.
Cooper – Asked if when they get the permit, are they supposed to bring it to the Health Department.
Crowley – Any Building Permit that impact the septic should come to us.
Santamaria – When the Building Department sees that the permit impacts septic, the Building Department wont issue the permit until they come to the Health Department.
Cooper – Asked if the contractor stopped when he received the cease and desist.
Cohen – He kept building because he thought it could be corrected with a simple variance. He did not do the right thing.
Santamaria – When we denied the signature on the building permit, they should have stopped but didn’t. When we found out work had continued, we issued the cease and desist.
Crowley – He sent the letter May 2; the cease and desist went out July 29th.
Cohen – There is no change in the location of the leach pit, which is in the road layout; there is no change to its distance from the wells. We will voluntarily do an I/A upgrade with keeping the current leach pit.
Visco – If the plan had been properly reviewed, the permit would have been denied.
Crowley – Upgrading to an I/A system won’t make the system compliant. The regulations require the system be made compliant. There are more people and more effluent and the system will eventually fail.
Santamaria – Noted that the contractor knew what he was doing was wrong; whether or not the homeowner knew is unknown.
Cohen – Argued that the contractor stopped when he realized what was wrong. Stated it is unlikely that other building permits would be issued under a similar scenario.
Visco – Asked if the egress window was on the original plan.
Bracken – That was under a different permit.
Cohen – Argued that since the work was done under a valid building permit, the BOH should work with them and grant the variance. It started off correctly but proceeded to a mess; there were mistakes all along by different people along the way.
Cooper – Another I/A system wouldn’t fit in there.
Crowley – New construction requires that the septic system complies; this proposal does not comply and can’t be made to comply. If you grant the variance, you will allow over development of a property; many more will come before you. Eventually an I/A will have to go in there; one way or another it is going to happen.
Visco – The elevation is high and water flow is toward the ocean.

Action
Motion to Deny the variance. (made by: Cooper) (seconded by: Weld)

Vote
Carried unanimously

2. Update: 272 Polpis – more information regarding well location
Sitings
Visco, Cooper, Weld, Higgins
Documentation
Supporting documents and plans, staff recommendations.
Discussion
Santamaria – The applicant has asked this be continued.
Action
Continued at applicant’s request.
Vote
N/A

3. Request for Loan: Mailloux, 13 Hawthorne Lane (56-264) - connect to municipal sewer
Sitings
Visco, Cooper, Weld, Higgins
Documentation
Supporting documents and plans, staff recommendations.
Discussion
None
Action
Motion to Approve. (made by: Cooper) (seconded by: Weld)

Vote
Carried

4. Waiver Request: Westmoor Club - 105 CMR 590 food code waiver of a floor drain
Sitings
Visco, Cooper, Weld, Higgins
Documentation
Supporting documents and plans, staff recommendations.
Discussion  Santamaria – They are asking to expand the food preparation area into a space without the drain. We do not recommend approval. Consensus agrees the drain should go in.

Action  Motion to Deny. (made by: Weld) (seconded by: Cooper)

Vote  Carried unanimously

VIII. BOARD MEMBER UPDATES AND CONCERNS
1. Cooper – We’ve been backing up on the Madaket regulations for years. We need to move on it.

IX. ADDITIONAL DOCUMENTS USED
1. Draft BOH Minutes November 21, 2019

X. ADJOURN
Adjourned by unanimous consent at 5:46 p.m.

Submitted by:
Terry L. Norton
BOARD OF HEALTH REGULATION
VARIANCE REQUEST
$20 per request

I am requesting:  (Check one.)

☐ A variance of a Local Board of Health Regulation

☐ A variance of a State Public Health Regulation (310 CMR 15, 105 CMR 590, etc...)

Please write an explanation of the variance requested (use separate paper if needed):

100' to a wetland

10' to property line

Requestor Name: TED KILL

Company Name: (if applicable) ISLAND SURVEYORS, LLC

Address: 272 POLARIS ROAD MAP: 25 PARCEL: 30

Phone No. 278-2720 Fax No.

Email: ACKSWEETY@HOTMAIL.COM

Requestor's Signature: [Signature] Date: 1/4/2020

Please be advised that the Health Department accepts variance requests up to one week before a scheduled Board of Health meeting. Applications received after this deadline will be placed at the subsequent scheduled meeting.

Received by: [Signature] Date: [Signature]

RECEIVED
I am requesting: (Check one.)

- [ ] A variance of a Local Board of Health Regulation
- [x] A variance of a State Public Health Regulation (310 CMR 15, 105 CMR 590, etc…)

Please write an explanation of the variance requested (use separate paper if needed):

Variance from local Board of Health Regulation section 56.02 and 64.04B1 to allow a septic system design flow of greater than 110 gallons per day per 10,000 square-feet of lot area. This request would propose the use of an advanced treatment system (I/A) and nitrogen loading aggregation plan.

Requestor Name: 167 Hummock Pond Rd LLC

Company Name: (if applicable) _______________________________________________________

Address: 167 Hummock Pond Road MAP: 65 PARCEL: 36

Phone No.  508-503-3500 Fax No.  508-967-0674

Email: dmulloy@sde-ldec.com

Requestor’s Signature: __________________________ Date: 1/9/20

Please be advised that the Health Department accepts variance requests up to one week before a scheduled Board of Health meeting. Applications received after this deadline will be placed at the subsequent scheduled meeting.

Received by: __________________________ Date: __________________________
January 9, 2020

Nantucket Board of Health
3 East Chestnut Street
Nantucket, MA 02554

Subject: Variance Request
167 Hummock Pond Road
Nantucket, Massachusetts
Tax Map 65 Parcel 36

Dear Members of the Board:

The owners of property at 167 Hummock Pond Road (known as 167 Raw) are seeking to obtain approvals to construct a commercial kitchen in the existing building on the property. Prior to filing for a building permit the owners must obtain the Boards approval for construction of a new septic system. The property is located within the Hummock Pond Road Watershed District Zone B. The proposed kitchen and existing one bedroom apartment will generate a calculated flow of 1,110 gallons per day (gpd). The existing lot area is approximately 12,600 sf.

The applicants will utilize an innovative/alternative (I/A) treatment system in conjunction with a nitrogen loading/aggregation plan to accommodate the proposed septic system flow. The applicants are asking the Board to grant a variance from the Town of Nantucket Board of Health Regulations Sections 56.02 and 64.04B1 to allow a flow greater than 110 gallons per day per 10,000 square-feet of lot area. This variance will allow the applicants to discuss purchasing restrictions on abutting properties of sufficient area as needed to allow the calculated flow rate and nitrogen loading. The calculations of the required lot area vary depending on how the use of treatment technologies is allowed. Treatment technologies provide a higher level of treatment than non I/A systems thereby dramatically reducing the amount of nitrogen discharged and the amount of land area needed in the aggregation plan. This property is also serviced by an on site drinking well which would be abandoned as part of this project in favor of connecting to the public water main in Hummock Pond Road.

This variance request is asking for relief relative to allowing a flow rate in excess of 110 gpd per 10,000 sf of lot area through the use if an I/A treatment system. If the variance is granted the applicant will then proceed with the system design and come back to the Board for approval of that system. Please call me at (508) 503-3500 or email me at (dmulloy@sde-ldec.com) with any questions. I will be attending your meeting on January 16 to discuss this request in greater detail.

Respectfully,

Daniel C. Mulloy, P.E.
Site Design Engineering, LLC.
DRAFT 2 (Jan 6) Charter of the Nantucket Steering Committee
for the management of
the Mice Against Ticks project on Nantucket
Approved by the Nantucket Board of Health date

This document provides guidelines for the operation of the Nantucket Steering Committee which oversees the Mice Against Ticks\(^1\) project on Nantucket.

INTRODUCTION
The Mice Against Ticks (MAT) project aims to fight tick-borne disease on islands like Nantucket and Martha’s Vineyard by reducing the number of infected ticks. Since most ticks become infected when they bite infected mice, the project aims to break the disease transmission cycle and reduce the number of infected ticks by releasing tick-borne disease resistant white-footed mice derived from the local population. The Mice Against Ticks Research Team plans to produce Lyme-resistant mice first followed by mice that either resist multiple tick-borne diseases and/or ticks.

The concept of the project was proposed by Dr. Kevin Esvelt and the research for the project is being conducted at the Media Lab at the Massachusetts Institute of Technology, the Whitehead Institute for Biomedical Research, the Dana-Farber Cancer Institute and Tufts University under the direction of Dr. Esvelt.

The Nantucket Steering Committee was established to ensure that project research would be guided by the community members who stand to be most affected by Mice Against Ticks. The Nantucket Steering Committee is made up of community representatives elected by the Nantucket Board of Health. The Board of Health have entrusted their representatives with overseeing the Mice Against Ticks project on Nantucket. Steering Committee members are expected to foster responsive, responsible, transparent and inclusive project guidance through regular public meetings and the oversight powers and responsibilities established in this document.

The Steering Committee reflects the skills and perspectives of its members and their knowledge of community values and interests as Nantucket residents and non-resident homeowners. The Steering Committee will work to channel the voice of the larger community as representatives and by facilitating communication between the Mice Against Ticks Research Team, the Board of Health, other government bodies, other geographic locations involved in the project and the

\(^1\) “Mice Against Ticks” is the title of the project used by the MAT Research Team. “Genetic Mice Project” has been used in previous Nantucket documents. Mice Against Ticks will be used in this document for consistency with the scientific team, the press and other geographic locations involved in the project (at this time, Martha’s Vineyard).
Nantucket community. However, the Steering Committee itself will not speak on behalf of all or any particular community member.

**MEMBERSHIP**

The Nantucket Steering Committee will be composed of six to twelve multi-background individuals chosen by the Board of Health. One member of the Steering Committee shall be a member of the Nantucket Select Board.

**ROLE & FUNCTION OF THE STEERING COMMITTEE**

The specific functions and responsibilities of the Steering Committee are detailed below:

1) **Facilitating Community Input.** The primary function of the Steering Committee will be to facilitate community involvement in project guidance in the following ways:
   a) **Public Events.** The Steering Committee will facilitate public meetings with the MAT Research Team.
   b) **Coordination with other Nantucket Boards and Commissions.** In addition to the Board of Health, the Steering Committee will be available for consultation to the Select Board, the Conservation Commission or any governmental or non-profit island entity regarding the project.

2) **Research & Development.** The Steering Committee will advise the MAT Research Team in order to help facilitate the incorporation of local values, perspectives and needs into project development. More specifically, the Steering Committee will help customize MAT biotechnology for Nantucket by voting on research options, such as mouse designs and release strategies to be used on Nantucket.

3) **Oversight & Monitoring.** The Steering Committee will review the Research Team’s results and plans at regularly scheduled Steering Committee meetings in order to:
   i) Provide general project supervision
   ii) Review study designs for mouse testing and field trials

To perform these duties, the Steering Committee may ask the research team for additional information at any time and consult outside experts.

4) **Go/no go approval.** Following the successful completion of regulatory review, the Steering Committee will vote to determine if the committee recommends that the Board of Health (or an appropriate Board/Committee) propose a Warrant for approval at a Town Meeting.

Additionally, the Steering Committee will provide input on any “stopping rules” for the Mice Against Ticks project in collaboration with the Martha’s Vineyard Steering
Committee and the Data Safety Monitoring Board\textsuperscript{2}. These rules may pause or resume any or all aspects of the project that would affect Nantucket or other geographic areas within the purview of the Data Safety Monitoring Board and following a vote by the Steering Committee.

**RELATIONSHIPS & EXPECTATIONS**

**Board of Health**
The Steering Committee will function as an advisory board to the Board of Health. The Committee will present a project update to the Board of Health at least once-a-year or as requested by the Board.

**MAT Research Team**
The purpose of the relationship between the Steering Committee and the MAT Research Team is to ensure the provision and incorporation of community perspectives into project decision-making. To foster communication and enable project oversight, the Research Team agrees to the following requirements:

1) A senior member of the Research Team will provide a project update at all regularly scheduled Steering Committee meetings.

2) At any time, the Steering Committee may request scientific information from the Research Team, which must be supplied in a reasonable time frame. While the Research Team does not anticipate noncompliance due to confidentiality, the Research Team agrees to make any confidential information available to the Steering Committee through a Non-disclosure Agreement.

3) When the Research Team initiates federal and state regulatory review, the Steering Committee will revisit the Research Team’s expectations and likely impose reporting requirements, such as detailed reports on the regulatory review process and its findings.

**Martha’s Vineyard Steering Committee**
Where possible, the Nantucket Steering Committee will work with the Martha’s Vineyard Committee to ensure consistency between the two committees and their approach to project management.

**Data Safety Monitoring Board**
The Data and Safety Monitoring Board (DSMB) is a committee independent of the Nantucket and Martha’s Vineyard Steering Committees, the MAT Research Team or funding agencies with the authority to recommend termination of the project. A single DSMB will have oversight responsibility for both Nantucket and Martha’s Vineyard.

\textsuperscript{2} See below
The Nantucket and Martha’s Vineyard Steering Committees will collaborate with the MAT Research Team to appoint the DSMB’s Chair. The Chair will then appoint the other members. DSMB members may be compensated for their time.

Duties of the Data Safety Monitoring Board include:

1) Preventing harm to the environment, animals and humans
2) Defining the “stopping rules” in collaboration with the Nantucket and Martha’s Vineyard Steering Committees
3) Reviewing all study designs and providing feedback to the Steering Committees at regular intervals
4) Recommending discontinuing or altering the design of the project at pre-determined times or at any time in the interest of safety
5) Reviewing project compliance and progress at specified intervals and ad hoc if requested by either Steering Committee about any issue or potential issue
6) Recommending to the Steering Committees if the project should proceed on the islands of Nantucket and Martha’s Vineyard once the field trial has been completed
7) All reports issued by the DSMB will be made public

POLICIES & PROCEDURES
The Nantucket Steering Committee shall function under all regulations specified in Nantucket Town Rules, Massachusetts Open Meeting Laws and Conflict of Interest Laws.

PROJECT DECSION POINTS

<table>
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<tr>
<th>Laboratory phase – production of immune mice</th>
<th>Evaluation 1</th>
<th>Introduction to uninhabited island(s)</th>
<th>Evaluation 2</th>
<th>Introduction to Nantucket</th>
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Evaluations below represent the view of the Nantucket Steering Committee. The criteria for other communities may be different.

Evaluation 1
Project go/ no go recommendation by DSMB

If go, project continues if:

- Regulatory approval obtained for the next phase
- Approval for the use of a private island is obtained from the landowner/local government involved
- Nantucket Board of Health continues to express interest in the project
Evaluation 2

Project go/ no go recommendation by DSMB

If go, project continues if:

- Regulatory approval obtained for the next phase
- Nantucket Steering Committee votes to recommend that the Board of Health (or an appropriate Board/Committee) propose a Warrant for approval at a Town Meeting
- Town Meeting approves the project