

# Opinion

natural beach, as the sediment from the borrow site is an extremely close match in terms of grain size and color. The constructed beach slope will be similar to the existing, measured beach slope. Piping Plovers and Least terns, which are the only nesting species along the beach (and are only in 2 locations), are known to nest where sandy material is deposited. These shorebirds will benefit from the creation of over 80 acres of additional habitat. While sea turtles do not nest in our area, it is well established that they will heavily and successfully nest a nourished beach — further demonstrating that nourished beaches support wildlife habitat.

5) Construction will require modest amounts of equipment and will only directly inconvenience a limited area for 2-4 days.

Beach nourishment projects are typically 24-hour operations; however, the contractor will move along as the beach is built, so any particular area will only be directly inconvenienced for two to four days. Mr. LaFarge misrepresents the amount of equipment required: the project will require modest lighting (one stand containing 4 lights) and bulldozers. There will be one 30-inch wide pipeline (with only about a half-mile section in use at a given time) coming ashore and this will be raised off the bottom by approximately one foot. The contractors have safety measures in place to avoid accidents and fuel spills (federal laws govern much of this). While renourishment will be required every few years, only about half the volume of sand is needed so the construction period will be much shorter.

6) The project is proposed to protect what exists, not to spur new development.

While Mr. LaFarge indicates the project will lead to dense development, SBPF's proposal simply calls for protecting the beauty and three-century history of what currently exists; we are not proposing, and do not anticipate, any additional development. Well-designed beach nourishment projects have repeatedly shown that they protect upland areas during storms.

7) Assessment of impacts to the biological, physical, economic and social environment indicates that beach nourishment is warranted.

In regards to Mr. LaFarge's comments

about the Essential Fish Habitat (EFH) assessment, the impacts to affected biological, physical, economic, and social environment have been addressed in the Expanded EFH assessment submitted to the US Army Corps of Engineers by SBPF. The assessment shows that the erosion of the Sankaty bluff will initially affect 30-40 homes, followed by Baxter Road, water and sewer utilities, and the town's sewer beds; and therefore it is in the town's long-term social and economic interests to support a solution to the erosion; that beach nourishment is the most environmentally protective (both physical and biological) means for addressing the erosion of the bluff; and that this project, with mitigation, can be completed with no long-term adverse effect to waters of the United States (the area over which the Corps holds jurisdiction).

8) The borrow site has enough sand for the initial project and a subsequent renourishment.

The existing borrow site has sufficient sediment for the first and second projects. Additional investigations will ultimately be performed to locate the additional sand sources that will be required for subsequent renourishments.

9) Mitigation will result in no net change in habitat type. A pilot mitigation project will be undertaken to demonstrate effectiveness of proposed mitigation strategies.

As sand from the beach nourishment project naturally moves offshore, the project will result in an unavoidable conversion of some 5 percent of 'Sconset's hard-bottom, cobble habitat to a sandy habitat. The mitigation site will convert sand habitat back to hard bottom. The result will be no net change in habitat type, contrary to Mr. LaFarge's assertion. SBPF has recently received a map from six local fishermen with intimate knowledge of the marine habitat in the area which suggests three potential locations for mitigation. SBPF is presently collecting site-specific information on these areas to select an area characterized by sand that can be converted to hard bottom. SBPF is also working with the fishermen to ensure that the design and location of the proposed mitigation sites both replicates the low relief rock cobble that will be impacted by the project and diversifies the available habitat by utiliz-

ing a variety of substrate types (e.g., railroad ties, reefballs) in addition to cobble. The revised mitigation plan will be submitted to the Conservation Commission and state and federal regulatory personnel in coming weeks. The plan includes a small-scale, "pilot" testing of the mitigation strategy to demonstrate its efficacy prior to implementation of the beach nourishment project and full-scale mitigation plan.

10) The project will not destabilize the shoals.

We have taken great care to ensure that we are not mining offshore shoals. The average depth of the borrow area is 41 feet and the closest point of the borrow area is over a quarter of a mile away from the crest of Bass Rip Shoal. State-of-the-art modeling has shown that there will be no adverse impacts to the shoreline or the shoals. The modeling also conservatively assumed complete dredging of the borrow area, whereas the initial nourishment will remove less than half of this volume. Thus, even a conservative assessment determined there would be no negative impacts.

11) We can choose to manage erosion so that it does not damage properties.

While Mr. LaFarge suggests we cannot control erosion, beach nourishment is not about stopping the natural processes of sand transportation and erosion; rather, it is about adding enough sand to the beach so that natural erosion can occur without damaging adjacent properties.

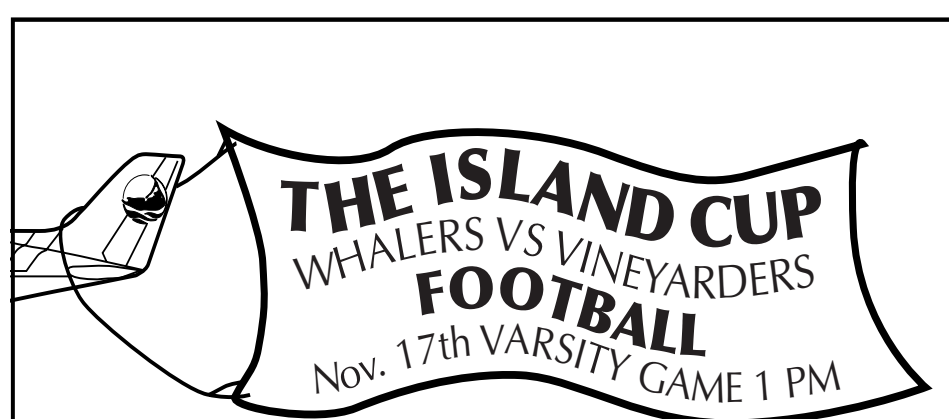
12) Previous erosion control efforts were very innovative: the terraces are required to be temporary and pervious yet still protected the bluff; the dewatering systems had mixed results.

The dewatering systems were very innovative and had mixed outcomes. The system at Codfish Park, after being upgraded in December 1999, operated coincidentally with significant accretion (approximately 120 feet); after it was turned off in 2002 when accretion buried its discharge pipe, erosion returned. The Codfish Park system, along with a system with similar capacity located north of Bayberry Lane, will be utilized as part of the beach nourishment project to slow erosion and lengthen the time between renourishments. The terraces are required by local regulations to be temporary and pervious; therefore, they are designed to withstand storms for only two days and fail during longer storms. While Mr. LaFarge questions the efficacy of the terraces given their required short design-life, terraced portions of the bank have retreated less than nearby unprotected sections of bank.

13) SBPF is planning to fund beach nourishment for the foreseeable future.

SBPF is planning to fund renourishments for the foreseeable future. In the event SBPF can no longer fund the project, the beach will simply return to the conditions we see today — with no required public cost or action. ■

— Jimmy Haslam



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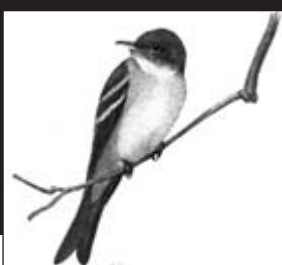
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