

Opinion

BROLL

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cess, SBPF proposes to prepare a portion of the mitigation a year prior to construction to demonstrate successful habitat colonization. In addition to this extensive program of impact avoidance and mitigation, SBPF will conduct detailed post-construction monitoring to demonstrate that real impacts are the same or less than that which was predicted; if impacts are greater, then additional mitigation will be required. SBPF has also proposed compensating fishermen for any lost revenue and to request a waiver from the federal 3-mile restriction on striped bass catch.

5) SBPF is committed to funding beach nourishment for the foreseeable future. SBPF will also provide financial assurances to be used in the event of adverse impacts.

SBPF is committed to funding renourishment activities for the foreseeable future. In the event SBPF can no longer fund renourishment, the beach will simply return to the conditions we experience today; no public cost or action will be required. Also, while we are confident there will be no unanticipated negative impacts from the project, SBPF will provide financial guarantees should adverse impacts occur.

6) Beach nourishment seeks to manage erosion, not to change sediment transport patterns.

While Mr. Starr states he sees "no protection from erosion," we can choose to manage erosion in an environmentally responsible way. Beach nourishment does not seek to stop the natural processes of sediment transport and erosion, rather to build a

wider beach so that natural erosion and sediment transport can occur without damaging properties. Beach nourishment is therefore considered the preferred shoreline protection method in Massachusetts' environmental policies; beach nourishment is also the Federal Emergency Management Agency's (FEMA's) preferred plan for coastal hazards management.

7) Long-term impacts to fishing and waterbird habitat will be minor.

Beach nourishment is the preferred shoreline erosion control practice because it does not alter natural sediment transport processes and the marine ecology dependent on it. This position is codified in the MA Wetlands Protection Act regulations which consider beach nourishment projects preferable to coastal structures. Scientific study supports this position. For example, a recent 7-year environmental study by the US Army Corps of Engineers of a beach nourishment project in New Jersey ten times the size of that proposed for Sconset concluded that the project had no long-term impact on the marine ecology of the area. Dredging and beach building techniques are well-proven and environmental protection strategies are employed throughout the process. We believe these facts run contrary to the assertion that the project will ruin the fishing habitat in the area.

Additionally, Mr. Starr's assertion that the project will ruin habitat for birds cannot be supported. While waterbirds migrate to the areas offshore Nantucket near the borrow site, extensive surveys have shown that the primary habitat areas for the birds are outside the borrow site. The project will have no impacts on the birds' preferred habitat areas, and construction will be occurring during the months when very limit-

ed numbers of waterbirds are present offshore, so overall impacts to waterbirds will be minor or negligible.

8) Construction will only be directly apparent in a given area for 2 to 4 days. The renourishment interval will eventually be every 5 to 7 years.

Mr. Starr incorrectly envisions a major disturbance to the beach. We've carefully considered project sequencing and operations to minimize disturbances to homeowners and vacationers in the area. We expect that construction of the project will only be directly apparent in a given area for 2 to 4 days, as the contractor will move along as the beach is being built. Most of the beach will be open during construction, as the contractors are used to working in tourist or resort areas and will only close off a small section of the beach at a time for safety considerations. The commencement of construction has been pushed back from June 1 to about July 15 to minimize summer disturbance. While the initial project will require nourishment after three years, thereafter nourishment will only be required every 5 to 7 years.

9) Many of the homeowners on the bluff have been on the island for generations.

We take great offense to the comment that our home is simply part of a portfolio. Quite the contrary, not only is this our home but we have celebrated many family milestones here over several generations. We have shared our homes and our love for this island with our children and grandchildren. We look forward to continuing to live in our home for many years to come.

Sincerely,

— Art Broll

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