



*The Commonwealth of Massachusetts*  
*Executive Office of Energy and Environmental Affairs*  
*100 Cambridge Street, Suite 900*  
*Boston, MA 02114*

Charles D. Baker  
GOVERNOR

Karyn E. Polito  
LIEUTENANT GOVERNOR

Matthew A. Beaton  
SECRETARY

Tel: (617) 626-1000  
Fax: (617) 626-1181  
<http://www.mass.gov/envir>

July 21, 2017

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS  
ON THE  
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME : East Chop Coastal Bank Repairs  
PROJECT MUNICIPALITY : Oak Bluffs  
PROJECT WATERSHED : Nantucket Sound  
EEA NUMBER : 15719  
PROJECT PROPONENT : Town of Oak Bluffs  
DATE NOTICED IN MONITOR : June 21, 2017

Pursuant to the Massachusetts Environmental Policy Act (MEPA, M.G.L. c. 30, ss. 61-62I) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **does not require** the preparation of an Environmental Impact Report (EIR).

Project Description

The project involves the stabilization of approximately 2,400 linear feet (lf) of bank located along East Chop Drive in Oak Bluffs. The coastline along the road has historically been engineered with coastline protection features to protect the public roadway and adjacent residences. Efforts to stabilize the bank include expanding the existing revetment seaward and landward to elevation 20 feet NGVD29 to account for wave run up and sea level rise (SLR). The elevation increase will increase the height of the revetment by 8-10 feet. The project is proposing to expand the revetment by 30,360 square feet (sf) for a total area of 77,650 sf.

The revetment will be constructed of angular armor stones at a slope of 1.5:1(horizontal:vertical). From the top of the revetment, fill will be placed at a 27 degree angle to be graded and planted with salt tolerant vegetation to stabilize the slope. The revetment will

include a 5' flat top to improve public access to the beach. A bike rack system and ADA accessible ramp are proposed on the southern portion of the bank to provide safe access to the proposed revetment and beach. Roadway improvements include constructing a 4-foot wide road shoulder on East Chop Drive for pedestrian and bicycle use and stormwater drainage improvements. Drainage outfall pipes within the existing bank have been damaged by bank erosion and will be replaced.

The project is being undertaken to preserve the public roadway and improve public access to the waterfront. Stormwater improvements and drainage outfall pipe reconstruction will decrease surface water runoff which has contributed to erosion of the bank.

### Project Site

The project area is an approximately 6.5 acre area on the northeastern shoreline of Oak Bluffs on Nantucket Sound. East Chop Drive is a public roadway which offers uninterrupted coastal views and is a popular pedestrian, bicycle and touring route. The project extends along East Chop Drive from approximately Munroe Ave to Arlington Ave. Increased erosion rates on the bank have undermined the roadway; the seaward travel lane of the road has been closed to traffic since 2012. Coastal engineering projects in the project area date back to 1890 and have included revetment construction, slope improvement, groin construction, timber bulkhead construction and repairs. Existing conditions include a 47,000 sf revetment along the shoreline and eroded bank with vegetation in some locations. Discarded bituminous pavement and other debris are also present.

The project is not located within the Natural Heritage and Endangered Species Program (NHESP) mapped *Estimated or Priority Habitat of Rare Species* according to the 13<sup>th</sup> edition of the Massachusetts Natural Heritage Atlas. The seaward expansion of the proposed revetment is not located within mapped eel grass habitat.

### Jurisdiction and Permits

The project is undergoing MEPA review and requires an ENF pursuant to 301 CMR Section 11.03(3)(b)(1)(a), 11.03(3)(b)(1)(e) and 11.03(3)(b)(1)(f) because it requires a State Agency Action and involves alteration of Coastal Bank, new fill in a velocity zone and alteration of one half or more acres of wetlands. The project requires a c. 91 license from MassDEP.

The project will require an Order of Conditions from the Oak Bluffs Conservation Commission or, in the case of an appeal, a Superseding Order of Conditions (SOC) from MassDEP. The project will require an Individual Permit (IP) from the U.S. Army Corp of Engineers (ACOE).

The project may seek State Financial Assistance. Because the project may be funded, in part, through State Financial Assistance, MEPA jurisdiction is broad in scope and extends to all aspects of the project that may cause Damage to the Environment, as defined in the MEPA Regulations.

### Environmental Impacts and Mitigation

The project will result in 6.2 acres of permanent impacts to coastal wetland resources including 34,500 sf of Land Under Ocean (LUO), 14,004 sf of Coastal Beach, 200,000 sf of Coastal Bank, and 30,000 sf of Land Subject to Coastal Storm Flowage (LSCSF). Measures to avoid, minimize and mitigate damage to the environment include implementing any TOY restrictions recommended for the protection for marine species and avoiding work within shellfish suitability areas. The project will prevent turbidity caused by erosion or failure of the bank.

### Review of the ENF

The ENF described existing and proposed conditions and contained detailed site plans and an alternatives analysis.

Due to the steep slope of the bank, alternatives were limited. Three alternatives in addition to the Preferred Alternative were analyzed. The Preferred Alternative was chosen based on its ability to ensure long-term stability of the bank while minimizing the amount of armor stone required. The following alternatives were considered:

**Alternative 1:** Alternative 1 included a No-Build option which consisted of continued erosion of the bank which may lead to the complete failure of the road and endanger the private residences on East Chop Drive. It would not meet project goals and therefore was dismissed.

**Alternative 2:** This alternative included holding the existing revetment toe location and rebuilding the revetment at a 1.5:1 slope extending upward to meet a 27 degree vegetated fill bank. This option was dismissed because although it would reduce impacts to LUO, the height of the top of the revetment would vary widely and would require a considerable amount more armor stone than the Preferred Alternative.

**Alternative 3:** This alternative involved reinforcing the coastal bank with a steel sheet pile wall or concrete seawall. This option was dismissed because it would be the most costly alternative and is not consistent with existing shore protection measures on Martha's Vineyard.

### *Wetlands and Waterways*

The project will result in permanent impacts to coastal wetland resources. The project will increase the footprint of the revetment by 65%. Approximately 2.96 acres of the proposed impacts include the upper portion of the slope area that will be regraded and re-planted. Project design was based on soil boring investigation and geotechnical engineering recommendations.

The Town is proposing to plant the upper slope with beach grass and *rosa rugosa*. Comments from CZM recommend a wider diversity of salt-tolerant plants to stabilize the proposed upper slope with extensive root systems including switchgrass, salt meadow cordgrass and little bluestem. CZM also recommends the incorporation of shrubs on the upper portion of the bank including northern bayberry, bearberry and marsh elder. At the site visit on July 5,

2017, State Agencies recommended the beneficial reuse of vegetation (beach grass and *rosa regosa*) removed from the slope if possible. Comments from CZM and the Martha's Vineyard Commission recommend removal of the bituminous pavement and other debris during construction.

Comments from MassDEP indicate that additional details should be included in the NOI regarding the location and size of existing structures as well as the proposed increase in area to be impacted by the new revetment in order to ensure that the project is consistent with the Wetlands Protection Act Regulations and provisions at 310 CMR 10.24(7)(c)(2) which allows for the maintenance, repair or improvement (but not substantial enlargement except when necessary to reduce or eliminate a tidal restriction) of structures which existed on November 1, 1987. The NOI should discuss and quantify the volume of sediment provided by the Coastal Bank to down shore sources, and should include a proposal to offset potential loss through additional shore armoring at the project site. MassDEP is requesting that the NOI include additional information of how the proposed project will meet provisions of the WPA Regulations at 310 CMR 10.30(3)(a) which require that coastal engineering structure or modification thereto shall be designed and constructed so as to minimize, using best available measures, adverse effects on adjacent or nearby coastal beaches due to changes in wave action.

### *Construction*

The project may be constructed in a single phase or several phases depending on availability of project funding. Construction access will be from two access routes off of East Chop Drive on each end of the project site. Temporary construction impacts will occur within the proposed project footprint.

The project must comply with MassDEP's Solid Waste and Air Pollution Control regulations, pursuant to M.G.L. c.40, s.54. Should oil and/or hazardous materials be identified during construction activities the Proponent should notify MassDEP in accordance with the Massachusetts Contingency Plan (310 CMR 40.00). All construction activities should be undertaken in compliance with the conditions of all State and local permits. Comments from the Massachusetts Board of Underwater Archeological Resources (BUAR) indicate that this project is not likely to affect any submerged cultural resources. However, the BUAR notes the area may be generally archaeologically sensitive. If any unknown archeological resources are encountered during the course of the project, the Proponent should limit adverse impacts and contact BUAR immediately.

### Conclusion

The ENF has sufficiently defined the nature and general elements of the project for the purposes of MEPA review and demonstrated that the project's environmental impacts will be avoided, minimized and/or mitigated to the extent practicable. Based on review of the ENF and comments received, and in consultation with State Agencies, I hereby determine that no further MEPA review is required.

July 21, 2017  
Date

  
Matthew A. Beaton

Comments received:

- 06/29/2017 Board of Underwater Archaeological Resources (BUAR)
- 07/06/2017 Office of Coastal Zone Management (CZM)
- 07/07/2017 Martha's Vineyard Commission (MVC)
- 07/11/2017 Massachusetts Department of Environmental Protection – Southeast Regional Office (MassDEP-SERO)
- 07/11/2017 Division of Marine Fisheries (DMF)



Matthew Beaton, Secretary  
EOEA, Attn: MEPA Office  
Erin Flaherty, EOEA No. 15719  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Re: 15719 East Chop Coastal Bank Repairs, Town of Oak Bluffs

July 7, 2017

Dear Secretary Beaton,

The Martha's Vineyard Commission, as the Regional Planning Agency, is pleased to submit staff comments regarding 15719 East Chop Coastal Bank Repairs, Oak Bluffs, following the site visit on July 5.

Overall, the information presented in the ENF appears to be well prepared and adequate, without the further need of an EIR.

### **Project**

The project proposes repairs to approximately 2,400 feet of coastal bank, a shared use path for pedestrian and bicycle access, and an ADA accessible ramp system down to the shoreline.

### **Potential Mitigation of asphalt debris and road runoff impacts**

As discussed during the July 5 site visit, there exists opportunity in conjunction with the project to mitigate some impacts of asphalt debris falling out of the bluff, by removal; and to mitigate some impacts of road runoff by including some basic road runoff treatment in the catch basins.

- The primary purpose of the stormwater modification work is to regulate the velocity and distribution of flow, in order to protect the bank. Because work is proposed to modify the catch basins at the top of the bluff, it seems prudent to add in some basic road runoff treatment to remove heavy metals and VOCs. Nitrogen is not an issue for the receiving waters of Vineyard Sound, but removal of heavy metals and VOCs would be desirable.
- Large slabs and cobble-sized pieces of asphalt rest near the bottom of the bluff, at the top of the old revetment; presumably lost from the roadway above. It seems that removal could be accommodated fairly expeditiously during the course of ramp construction. Removal would be desirable.

Asphalt debris, site visit July 5, 2017



**Consistency with the Martha's Vineyard Commission's Island Plan**

Consistency with The Martha's Vineyard Commission's *Island Plan* appears to be adequately presented in the ENF. The project appears to be consistent with the *Island Plan*, particularly regarding economic development, adequacy of infrastructure, open space impacts, and compatibility with adjacent land uses.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Jo-Ann Taylor".

Jo-Ann Taylor  
MEPA Review Coordinator for the Martha's Vineyard Commission

cc: Town of Oak Bluffs – Liz Durkee  
CLE Engineering

**From:** [Logan, John \(FWE\)](#)  
**To:** [Flaherty, Erin \(EEA\)](#)  
**Cc:** [Potti, Pooja \(FWE\)](#)  
**Subject:** Town of Oak Bluffs, East Chop Coastal Bank Repairs Project, EEA#15719  
**Date:** Tuesday, July 11, 2017 1:42:07 PM

---

Secretary Matthew A. Beaton  
Executive Office of Energy and Environmental Affairs (EEA)  
Attn: MEPA Office  
Erin Flaherty, EEA No. 15719  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Dear Secretary Beaton:

The Division of Marine Fisheries (MarineFisheries) has reviewed the Environmental Notification Form by the Town of Oak Bluffs for the East Chop Coastal Bank Repairs Project on East Chop Drive in the Town of Oak Bluffs. The project site borders Nantucket Sound. Proposed work includes repairs to an existing revetment along approximately 2,400 linear feet of shoreline. The preferred alternative would result in a 65% increase in the revetment footprint due to proposed landward and seaward expansions. Fill and plantings with salt tolerant vegetation are proposed over the landward sections of revetment. The project was reviewed with respect to potential impacts to marine fisheries resources and habitat.

Based on the information provided, MarineFisheries has no recommendation for sequencing, timing, or methods that would avoid or minimize impact at this time.

Questions regarding this review may be directed to John Logan in our New Bedford office at (508) 990-2860 ext. 141.

---

John Logan, Ph.D.  
MA Division of Marine Fisheries  
1213 Purchase Street  
New Bedford, MA 02740  
(508) 990-2860 x141  
<http://www.mass.gov/eea/agencies/dfg/dmf/>  
[https://www.researchgate.net/profile/John\\_Logan](https://www.researchgate.net/profile/John_Logan)



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

Charles D. Baker  
Governor

Karyn E. Polito  
Lieutenant Governor

Matthew A. Beaton  
Secretary

Martin Suuberg  
Commissioner

July 11, 2017

Mathew A. Beaton,  
Secretary of Environment and Energy  
Executive Office of Environmental Affairs  
ATTN: MEPA Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: ENF Review EOEEA # 15719.  
OAK BLUFFS. East Chop Coastal Bank  
Repairs at East Chop Drive

Dear Secretary Beaton,

The Southeast Regional Office of the Department of Environmental Protection (MassDEP) has reviewed the Environmental Notification Form (ENF) for the East Chop Coastal Bank Repairs Project, located at East Chop Drive, Oak Bluffs, Massachusetts (EOEEA #15719). The Project Proponent provides the following information for the Project:

The proposed project will consist of extensive repairs to existing engineered coastal bank area including the existing stone revetment along approximately 2,400 linear feet of East Chop Drive. The project will protect the existing coastal bank and infrastructure located along East Chop Drive and restore/enhance public access areas. The existing stone jetty on the southeast end of the project site will remain. Raising the elevation of the reconstructed revetment above the existing 100 year flood elevation is critical to the long-term viability/protection of the existing coastal bank and public roadway. In order to ensure a long-term repair, the proposed revetment will extend both landward and seaward beyond the existing revetment with an overall revetment footprint increase of 65%, which provides adequate base for raising the existing revetment approximately 8-10' in height, to +20' NGVD29 (5.7' above the 100 year flood elevation). This height has been established to account for wave run-up and 2' of future sea level rise (See Exhibit H). A 1.5H:1V stone revetment slope made up of angular armor stones is proposed, with well-graded fill extending up from the edge of the flat revetment bench at a 27 degree maximum slope, to be planted with salt tolerant vegetation (Beach grass and Rosa Rugosa). The design revetment and upper slope have been designed based on the soil boring investigations performed at the project site and in coordination with geotechnical engineering recommendations provided by JCK Underground for the project site (See Exhibit G). The existing East Chop Drive drainage outfalls will also be re-built, as the drain pipes that discharge into Nantucket Sound have been damaged from the extensive erosion on the coastal bank.

### *Bureau of Water Resources Comments*

Waterways Comments. The Waterways Program has reviewed the ENF and has determined that proposed activity will require the filing of a Chapter 91 License Application. The project proponent should be aware that the Chapter 91 Application requires that plans show both the existing and the proposed

revetment footprints. The Waterways Program finds that the proposed work would be classified as a water-dependent use project pursuant to the Waterways Regulations at 310 CMR 9.12(2)(a)11.

The Waterways Program has also reviewed the Department of Public Works (DPW) Contracts, which show stone work in the area of the project scope. Many, if not all, of these contracts historically were assigned individual Chapter 91 License Numbers. The Department, by convention, accepts these DPW Contracts as authorization under Chapter 91. The Waterways Program recommends that the proponent consolidate the DPW Contract scopes, where possible, into one License application. Consolidation will allow efficient review and authorization of maintenance or changes for an unlimited term, as long as the footprint remains unchanged after authorization.

Wetlands Comments. The MassDEP SERO Wetlands Program has reviewed the ENF for the East Chop Drive Revetment Project and offers the following comments. The ENF indicates that the proposed project will require a new Order of Conditions under the Wetlands Protection Act and that the Notice of Intent (NOI) has not yet been filed. The NOI should include detailed information on the location and size of the existing structures as well as the proposed increase in area to be impacted by the new revetment. The Wetlands Protection Act Regulations (310 CMR 10.24(7) (c) 2.) allow for the maintenance, repair and improvement (but not substantial enlargement except when necessary to reduce or eliminate a tidal restriction) of structures which existed on November 1, 1987. The NOI should demonstrate the extent of the enlargement of the revetment versus the existing structure. The Regulations (310 CMR 10.30 (3) (a)) require that a coastal engineering structure or modification thereto shall be designed and constructed so as to minimize, using best available measures, adverse effects on adjacent or nearby coastal beaches due to changes in wave action. The NOI should include the measures proposed to be utilized to minimize any adverse effects.

It appears from the information provided in the ENF that the eroding Coastal Bank is providing sediment to adjacent and downdrift Coastal Beaches. The ENF does not describe any measures, such as beach nourishment, that might be implemented to offset the loss of this sediment source. The NOI should discuss and quantify the volume of sediment provided by the Coastal Bank, and should include a proposal to offset this loss.

The Wetlands & Waterways Program believes that any additional issues can be addressed through the Licensing and permitting process, once the required Chapter 91 Waterways License and Notice of Intent applications are filed for this project.

#### ***Bureau of Waste Site Cleanup Comments***

Based upon the information provided, the Bureau of Waste Site Cleanup (BWSC) searched its databases for disposal sites and release notifications that have occurred at or might impact the proposed project area. A disposal site is a location where there has been a release to the environment of oil and/or hazardous material that is regulated under M.G.L. c. 21E, and the Massachusetts Contingency Plan [MCP – 310 CMR 40.0000].

Release Tracking Number (RTN) 4-26145, 48 Brewster Avenue, Oak Bluffs, is located approximately 1000 feet west of the proposed project area. The RTN was assigned in response to a kerosene overfill at an aboveground storage tank at a residential property. Continued response actions are necessary to achieve a permanent solution under the MCP. It is unlikely that the release will impact the proposed MEPA project area.

There are no other listed MCP disposal sites located at or in the vicinity of the site that might impact the proposed project. Interested parties may view a map showing the location of BWSC disposal sites using the MassGIS data viewer (Oliver) at: [http://maps.massgis.state.ma.us/map\\_ol/oliver.php](http://maps.massgis.state.ma.us/map_ol/oliver.php) Under "Available Data Layers" select "Regulated Areas", and then "DEP Tier Classified 21E Sites". The compliance status and report submittals for specific MCP disposal sites may be viewed using the BWSC Waste Sites/Reportable Release Lookup at: <http://public.dep.state.ma.us/SearchableSites2/Search.aspx>

*The Project Proponent is advised that if oil and/or hazardous material are identified during the implementation of this project, notification pursuant to the Massachusetts Contingency Plan (310 CMR 40.0000) must be made to MassDEP, if necessary. A Licensed Site Professional (LSP) should be retained to determine if notification is required and, if need be, to render appropriate opinions. The LSP may evaluate whether risk reduction measures are necessary if contamination is present. The BWSC may be contacted for guidance if questions arise regarding cleanup.*

#### ***Bureau of Air and Waste Comments***

Air Quality. Construction and operation activities shall not cause or contribute to a condition of air pollution due to dust, odor or noise. To determine the appropriate requirements please refer to:

310 CMR 7.09 Dust, Odor, Construction, and Demolition

310 CMR 7.10 Noise

Construction-Related Measures. MassDEP requests that the Proponent use construction equipment with engines manufactured to Tier 4 federal emission standards, which are the most stringent emission standards currently available for off-road engines. If a piece of equipment is not available in the Tier 4 configuration, then the Proponent should use construction equipment that has been retrofitted with the best available after-engine emission control technology, such as oxidation catalysts or diesel particulate filters, to reduce exhaust emissions. The Proponent should provide a list of the engines, their emission tiers, and, if applicable, the best available control technology installed on each piece in the subsequent environmental filing.

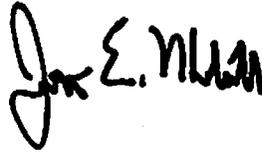
Massachusetts Idling Regulation. MassDEP requests that the proponent state specifically in the subsequent environmental filing how it plans to prohibit the excessive idling during the construction period. Typical methods of reducing idling include driver training, periodic inspections by site supervisors, and posting signage. In addition, to ensure compliance with this regulation once the Project is occupied, MassDEP requests that the Proponent establish permanent signage limiting idling to five minutes or less at the completed project.

#### ***Proposed s.61 Findings***

The "Certificate of the Secretary of Energy and Environmental Affairs on the Environmental Notification Form" may indicate that this Project requires further MEPA review and the preparation of an Environmental Impact Report. Pursuant to MEPA Regulations 301 CMR 11.12(5)(d), the Proponent will prepare Proposed Section 61 Findings to be included in the EIR in a separate chapter updating and summarizing proposed mitigation measures. In accordance with 301 CMR 11.07(6)(k), this chapter should also include separate updated draft Section 61 Findings for each State agency that will issue permits for the Project. The draft Section 61 Findings should contain clear commitments to implement mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation.

The MassDEP Southeast Regional Office appreciates the opportunity to comment on this proposed Project. If you have any questions regarding these comments, please contact George Zoto at (508) 946-2820.

Very truly yours,

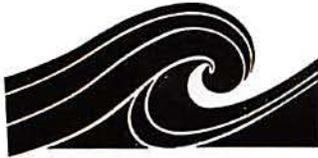
A handwritten signature in black ink, appearing to read "Jon E. Hobill". The signature is written in a cursive, somewhat stylized font.

Jonathan E. Hobill,  
Regional Engineer,  
Bureau of Water Resources

JH/GZ

Cc: DEP/SERO

ATTN: Millie Garcia-Serrano, Regional Director  
David Johnston, Deputy Regional Director, BWR  
Maria Pinaud, Deputy Regional Director, BAW  
Gerard Martin, Deputy Regional Director, BWSC  
Jennifer Viveiros, Deputy Regional Director, ADMIN  
Jim Mahala, Chief, Wetlands and Waterways, BWR  
David Hill, Wetlands and Waterways, BWR  
Carlos Fragata, Wetlands and Waterways  
Greg DeCesare, Wetlands and Waterways  
Allen Hemberger, Site Management, BWSC



**THE COMMONWEALTH OF MASSACHUSETTS**  
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS  
OFFICE OF COASTAL ZONE MANAGEMENT  
251 Causeway Street, Suite 800, Boston, MA 02114-2136  
(617) 626-1200 FAX: (617) 626-1240

## MEMORANDUM

TO: Matthew A. Beaton, Secretary, EEA  
ATTN: Erin Flaherty, MEPA Unit  
FROM: Bruce Carlisle, Director, CZM  
DATE: July 6, 2017  
RE: EEA-15719 – East Chop Coastal Bank Repairs, Oak Bluffs

The Massachusetts Office of Coastal Zone Management (CZM) has completed its review of the above-referenced Environmental Notification Form (ENF), noticed in the *Environmental Monitor* June 21, 2017, and offers the following comments.

### Project Description

The project involves the repair and reconstruction to portions of an existing stone revetment along approximately 2,400 linear feet of East Chop Drive. The existing stone revetment and coastal bank protect East Chop Drive and other infrastructure located along this public roadway. Work includes raising the elevation of the reconstructed revetment above the existing 100 year flood elevation, and expanding the overall dimensions of the existing revetment footprint by approximately 6.2 acres. The proposed revetment will increase in elevation 8 – 10 feet, to an elevation of 20 NGVD29. This is 5.7' above the 100 year flood elevation as mapped by the Federal Emergency Management Agency to accommodate wave run-up and 2' of future sea level rise. The revetment will be constructed with angular armor stones, with a slope of 1.5H:1V. The portion of the bank above the revetment will be regraded and planted with salt tolerant vegetation.

A 4' wide road shoulder is proposed as part of the project to accommodate safe walking and parking area along the seaward edge of East Chop Drive. A bike rack and ADA accessible ramp will be located on the southern end of the project area to provide safe access down to the top of the revetment and to the coastal beach.

### Project Comments

The proposed plan for revegetating the coastal bank above the revetment is to use beach grass and *rosa rugosa*. Although beach grass is good for initial stabilization, it needs blowing sand input to thrive longer term. Therefore CZM recommends that a wider diversity of salt-tolerant plants with extensive root systems be included in the revegetation plan. On banks, switchgrass, saltmeadow cordgrass, and little bluestem have fast-growing fibrous root systems. Some shrubs may be appropriate on the upper portions of the bank, including northern bayberry, bearberry, and marsh elder. For additional recommendations regarding erosion control vegetation please see CZM's [StormSmart Properties Fact Sheet #3: Planting Vegetation to Reduce Erosion and Storm Damage](http://www.mass.gov/eea/agencies/czm/program-areas/stormsmart-coasts/stormsmart-properties/fs-3-vegetation.html), available online: <http://www.mass.gov/eea/agencies/czm/program-areas/stormsmart-coasts/stormsmart-properties/fs-3-vegetation.html>.

CZM noticed the presence of a lot of bituminous pavement and other debris on the face of the eroding bank. CZM recommends that the applicant remove as much of this as possible during construction.



**Federal Consistency**

The proposed project may be subject to CZM federal consistency review. For further information on this process, please contact, Robert Boeri, Project Review Coordinator, at 617-626-1050 or visit the CZM web site at [www.state.ma.us/czm/fcr.htm](http://www.state.ma.us/czm/fcr.htm).

BKC/sm/rh

cc: Stephen McKenna, CZM Cape & Islands Regional Coordinator  
Michael Count, CLE Engineering  
Elizabeth Durkee, Oak Bluffs Conservation Agent  
Jim Mahalla, MassDEP, Southeast Regional Office



The COMMONWEALTH OF MASSACHUSETTS  
BOARD OF UNDERWATER ARCHAEOLOGICAL RESOURCES  
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS  
251 Causeway Street, Suite 800, Boston, MA 02114-2136  
Tel. (617) 626-1141 Fax (617) 626-1240 Web Site: [www.mass.gov/eea/agencies/czm/buar/](http://www.mass.gov/eea/agencies/czm/buar/)

June 28, 2017

Secretary Matthew A. Beaton  
Executive Office of Energy and Environmental Affairs  
Attention: Erin Flaherty, MEPA Unit  
100 Cambridge St., Suite 900  
Boston, MA 02114

RECEIVED  
JUN 29 2017  
MEPA

RE: East Chop Coastal Bank, East Chop Drive, Nantucket Sound, Oak Bluffs (EEA #15719)

Dear Secretary Beaton,

The staff of the Massachusetts Board of Underwater Archaeological Resources has reviewed the above referenced project's ENF (#15719) and supporting materials and supporting materials provided by the CLE Engineering, Inc., on behalf of the Town of Oak Bluffs. We offer the following comments.

The Board has conducted a preliminary review of its files and secondary literature sources to identify known and potential submerged cultural resources in the proposed project area. No record of any underwater archaeological resources was found. Based on the results of this review and as the limited nature of the proposed project, the Board expects that this project is unlikely to impact submerged cultural resources.

However, the Board notes the area may be generally archaeologically sensitive. Therefore, should heretofore-unknown submerged cultural resources be encountered during the course of the project, the Board expects that the project's sponsor will take steps to limit adverse affects and notify the Board, as well as other appropriate agencies, immediately in accordance with the Board's *Policy Guidance for the Discovery of Unanticipated Archaeological Resources*.

The Board appreciates the opportunity to provide these comments as part of the review process. Should you have any questions regarding this letter, please do not hesitate to contact me at the address above, by email at [victor.mastone@state.ma.us](mailto:victor.mastone@state.ma.us), or by telephone at (617) 626-1141.

Sincerely,

A handwritten signature in blue ink, appearing to read "Victor T. Mastone".

Victor T. Mastone  
Director

/vtm