



MARTHA'S VINEYARD SHELLFISH GROUP

1976

November 2, 2022

RE: Safe Harbor Marina Modification DRI 258-M2

Dear Commissioners,

I am writing on the behalf of the Board of Directors of the Martha's Vineyard Shellfish Group to express our grave concerns over the proposed renovations to the Safe Harbor Marina. Despite the proposed improvements to the environmental sensitivity of the business, we do not feel it is enough to warrant the risk to the habitat and water quality of Lagoon Pond.

The Martha's Vineyard Shellfish Group (MVSG) is a non-profit organization which has been operating in the Lagoon since 1976. We grow 10's of millions of juvenile shellfish in two difference hatcheries on Lagoon Pond, in order to fulfill our mission to enhance shellfish resources for the entire Island community. Nearly all of the shellfish seed that the six island towns plant into the ponds, comes from our program. We also strive to protect and promote good surface water quality and viable shellfish habitat, which are necessary to support sustainable shellfish populations.

The West Arm suffers from fecal coliform levels which restrict shellfish harvest and nitrogen levels which are nearly off the charts. And yet, it is still a productive habitat for several shellfish species which perform services to the ecosystem that cannot be duplicated. We, as a community, must implement best management practices set by state and federal entities to responsibly manage wastewater, road runoff, and minimize the use of harmful substances, to allow it to rebound to the site of recreation and sustenance that it once was. This is something that the MVC and MVSG are currently partnered on.

According to their website, Safe Harbor is committed to environmental stewardship and local collaborations. We appreciate Safe Harbor's efforts to reduce the use of toxic, copper-based antifouling bottom paint, which is also highly toxic to shellfish. We hope this effort becomes a strong policy. This is just one step they have made in the right direction. There are myriad opportunities for Safe Harbor to not only mitigate the negative impacts of their profitable corporation, but also bring a net benefit to the Lagoon, which a portion of their profits depend on.

The proposed renovations would remove 6-10 slip boats, but will also allow the marina to host larger boats with greater horsepower. These powerful boats would drive through the delicate West Arm of



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Lagoon Pond, producing wake which erodes the banks of critically small amounts of marsh habitat, and depositing excessive, suffocating sediment onto shellfish beds. Increased boat activity will only jeopardize the delicate ecological balance which is held by a thread, leaving it desolate, and functionally unable to support life. Unless, that is, Safe Harbor participates the Lagoon Pond community in a meaningful, altruistic and earnest way.

We hope that you truly grasp the detriments of large, powerful boats in Lagoon Pond, and ensure that it is given a fair opportunity to recover from the decades of stress it has endured, for the benefit of industry and development.

With sincere gratitude,

A handwritten signature in black ink that reads "Emma Green-Beach". The signature is written in a cursive, flowing style.

Emma Green-Beach

Executive Director & Biologist