

October 5, 2022

MV Commissioners
PO Box 1447
Oak Bluffs, MA 02557

Re: Safe Harbors Marina Project

Dear Commissioners,

While I am a Lagoon Pond Association board member, these remarks are solely my own and do not represent those of any organization. I am a biologist writing to voice my opposition to the Safe Harbors Marina (SHM). My opposition is based on the following four points surmised from the documents the MVC and SHM provided on the MVC's website as of October 5:

- 1) The West Arm ecosystem is fragile and in poor health. In recent years its Water Quality Index has been only 26.5 out of 100 points (2020 MVC Sampling Report). This extremely poor water quality has closed shellfishing in the area near Mud Creek; and low water quality threatens habitat where shellfish and fish spawn.
- 2) The potential negative impact of the boating traffic in the West Arm is unknown and difficult to assess. There is no baseline data currently available for comparison of increasing the *average* monthly high season boat traffic from 327 trips thru the West Arm to 591 trips (= # valet-serviced boats X 2 trips X 30 days). This large increase in traffic for each month from May through October is based on SHM's estimate of the average number of valet-serviced boats increasing from 5.45 to 9.85 per day from May 1 to Oct 31;
- 3) Although shifting 10 of the 47 boats stored in water to racks will be less detrimental to the pond's health than keeping the number at 47, there appears to be no guarantee that 37 will become a permanent in-water cap or whether there will be a maximum boat size planned to limit impacts to the habitat while in the water;
- 4) Conditions for the marina's approval that relate to SHM's donations of money and time in collaborations (e.g., storm-water management systems, dredging, salt marsh enhancement) to improve the West Arm's Water Quality Index are insufficiently detailed in the document "9/15/2022 DRI 258 -M2: Safe Harbor Marinas Racks Written Record Memo".

I recognize that SHM has not and will not be the only point source responsible for water quality of the West Arm and their plans include mitigation for run-off from their site. SHM's marina practices, financial contributions to benefit island community services, and their responsive communications to concerns about this expansion indicate their interest in being a responsible community member. However, SHM's expansion will almost double its boating trips in the West Arm, the unhealthiest, fragile section of an impaired Lagoon Pond, which the Towns are mandated to clean up. We do not know whether or not the benefit to the Pond of removing 10 boats stored in water will be outweighed by a detrimental impact of the increased activities on the watershed from the marina expansion. This is a large unknown for Lagoon Pond which must

be healthy to provide the ecosystem services that benefit the island economy and community as well as biodiversity. Therefore, I am unable to support the marina's expansion without knowing more about SHM's specific commitments to invest in collaborative projects that would assure the SHM's expansion, if approved, would ultimately have a measurable positive effect on the Pond's health.

Thank you for the opportunity to voice my concerns about this SHM project. These deliberations provide an opportunity for different stakeholders of Lagoon Pond to come together and move its health in a positive direction and improve its resilience.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'M EA'.

Maria E. Abate, PhD
43 Carole Ave.
Oak Bluffs