

Paul H. Foley, AICP
DRI Coordinator/ Planner
Martha's Vineyard Commission

Dear Commissioners:

There have been questions on the overall design process for the North Bluff Seawall project as well as: why the ConCom?

As a long term member of the Conservation Commission, I wish to start with the history. Our commission, over 10 years ago, began to concern itself with the impacts global warming, sea level rise and increased storm activity would have on our town. Oak Bluffs is geographically very fortunate, the only island town where the sea is visible and often accessible from border to border - this can fairly be called our economic engine. Thus, when I received a call in 2008 to report that the seawall had fallen down at Pay Beach, the caller muttered - you did tell us this might happen.

At this time, there was no other town board or committee involved in protecting the actual shoreline resource - we stepped into this void. In any case, permitting work on this resource was our responsibility; we also act as natural resource advisory to the Board of Selectmen. This was a natural role for the Conservation Commission, as the work is science based, utilizing our area of expertise. Further, this work is highly regulated, by various state and federal permitting agencies - we are at the 'bottom of the food chain' of these regulatory agencies, answering directly to the DEP and CZM, as well as to Fisheries, Army Corps, Chapter 91 . . . to name a few.

Thus we had a steep learning curve. Needing coastal science expertise, we started by looking for the the best engineers involved in coastal processes we could find; after an exhaustive RFQ process we hired CLE in Marion, MA, who presented an extensive list of successful coastal protection projects, many in MA. Through them we have sub-contracted other engineering firms, specialists in particular areas of concern.

We researched our regulatory path. We hosted many open meetings with representatives of the various state agencies, to determine what they could allow us to do, what they considered the best solution to our concerns. The third component is equally as important - identifying and obtaining funding. We discovered that only those projects that were 'shovel ready' would be seriously considered for funding. This means a well engineered project, fully permitted.

In the past 8 years we have worked on our long term climate change adaptation planning: to protect the entire coastline of Oak Bluffs as best we could, within the framework of the best available coastal science, obtaining state permitting and funding . We have worked diligently to be seen as a highly credible local agency. We have also aggressively searched for funding; the cost of protecting the infrastructure is beyond our town's resources, or the resources of any small town.

Which brings us to the North Bluff Project, part of our overall coastal protection plan. The state rates the coastal banks: the north bluff deteriorated from a D at the start of our planning, to a complete F for failed after hurricane Sandy. Thus, under the demand of crisis management, this project became a priority. Further deterioration and slumping

of this narrow coastal bank will seriously endanger the road it holds up, a major, heavily travelled connector.

We wanted to rebuild while we could still permit it easily, under the 'rebuild' scenario.

There are three overall permitting strategies for coastal resource work -

- 1 - Rebuild, take the basis of what is grandfathered and shore it up
- 2 - Adapt - save the resources, but within the framework of new regulations (all soft solutions.) The Pay Beach repair was done under this scenario; the coastal bank was restored, the seawall was not rebuilt (a soft engineering choice.)
- 3 - Retreat - let nature take its course and leave it be.

Six years ago we identified the North Bluff as a priority project, and began a design process to rebuild the failed sea wall to meet projected environmental stresses; it will be four feet higher, anticipating sea level rise and increased storm activity. Five years ago, with a well vetted, openly permitted design in hand, we intensified our search for funding. We were awarded three major funding grants, including over \$2 million from FEMA; our original design was planned for the approx. \$7- 8 million we anticipated.

Concurrently we pursued plans to renourish and improve the beaches. Oak Bluffs has a rare and special tourist attraction in Massachusetts: an extensive public 'urban' beach system. Due to the changing environmental stresses, there is no longer any sand in the system, which means they will not be renourished naturally, but must be dependent upon periodic infusions of trucked in sand to be what tourists and residents expect. These are called 'engineered beaches', and require extensive permitting. We plan to nourish them below mean high water, the line we are held to now, to restore them to the long deep beaches residents remember from years ago. North Bluff beach is a priority area in this process. Years ago it was wide and long; many residents fondly remember swimming lessons there - our plan is to restore this.

Two years ago began our long and on occasion rancorous dialogue with FEMA. The bottom line: we cannot count on any significant funding from that source. This adversity created the opportunity to rethink the whole project. Coastal science is constantly evolving, and we had new, better solutions to review. The new design is stronger and more durable, less extensive in its footprint, and less invasive in the construction process. The main point which won us over: it is far more suited to withstand the stresses of climate change. The redesign process spanned close to a year, was fully reviewed at open posted meetings, and presented at a selectman's meeting by a superb power point report, before it was rebid.

Our fear is that if we are not able to proceed with this project as it is designed, permitted and fully funded, which offers seawall protection for the North Bluff for many years to come, as well as improved pedestrian/tourist access and accommodation, we will lose the opportunity to rebuild.

The specter of 'Retreat' might become an option.

Sincerely,

Joan Hughes
Chairman Oak Bluffs Conservation Commission