



December 4, 2019

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**By Email: [Erin.Flaherty@state.ma.us](mailto:Erin.Flaherty@state.ma.us)**

Re: EEA# 16115 - Response to MA CZM Memorandum, dated 11/25/19

In response to the CZM Memorandum, by Lisa Berry Engler, Director, CZM in regards to the EEA-16115 – MV Shipyard Site Modifications, Tisbury dated November 25, 2019, Coastal Engineering Company, Inc. has prepared this letter to address CZM's comments and provide further project clarification.

Water Quality: Lagoon Pond is a Federal No Discharge Zone, so the discharge of waste water or other hazardous material will be strictly prohibited and is already enforced by the Town Harbormaster and Shellfish Constable (and other boaters who do not welcome neighboring discharges). The shipyard has a sample lease agreement in accordance with the CZM MA Clean Marina Guide and plans to review their rules and regulations with CZM to ensure all activities, cleaning supplies, bottom paints, etc. meet the highest standards possible to prevent the introduction of new pollutants into Lagoon Pond. The Shipyard already has a pumpout on the Vineyard Haven side of their property which slip holders and customers will be able to use to pump-out their boats. The shipyard will also offer a service to take boats and get them pumped out. Lease holders will be required to keep and maintain pumpout logs as well as have pumpout inspections completed monthly. The shipyard is also planning to contribute funds to a town project to implement a new public pumpout in Vineyard Haven as well.

Proposed Project Grading and Flooding Impacts: Refer to the Storm Water Management Report, Appendix A of the ENF Filing package for more specific information.

- 1.) The proposed re-grading and raising of the site is generally to minimize "nuisance flooding" which currently occurs almost monthly during high astronomical tides. The proposed re-grading will not speed up or divert flood waters from storm surges and coastal storms causing additional flooding of adjacent areas.
- 2.) The project includes one existing retaining wall to remain, and one new gravity retaining wall (8 feet long) which will have a reveal of less than one foot. The purpose of the retaining wall is to support the gravel parking space elevation and allow the slope to pitch toward the rain garden to allow rain water to flow into it. This proposed retaining wall will not divert flood water or rain runoff in any way that diverts increases flooding of adjacent areas during a coastal storm.

- 3.) The parking area has been designed to be partially reinforced gravel and partially paved with concrete bituminous pavement. The portion of the parking lot that is to be paved is to support the large boat lift that is used to haul vessels on the North side of their property and then launch them on the south side of the property. The boat lift machinery is too heavy to operate on true-grid reinforce gravel. (The machine has a capacity of 50,000 LBS and has a dead weight of 20,000 LBS). The proposed grading of the site will cause rain water to flow from the concrete pavement into the reinforced gravel parking spaces or into the proposed rain gardens. Therefore, all of the rain runoff on the site will percolate through the ground and be filtered before it flows into Lagoon Pond.

Please feel free to contact me anytime to discuss our comments as stated.

Respectfully,



Charlie A. Agro, Project Manager  
Coastal Engineering Co., Inc.

CAA/cad

cc: Martha's Vineyard Shipyard  
Jamy Madeja Esq., Buchanan & Associates  
Pamela Neubert, AECOM

