



August 2, 2022

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Martha's Vineyard Commission
P.O. Box 1447
Oak Bluffs, MA 02557

Dear Commissioners:

Tisbury Waterways, Inc. (TWI) appreciates the opportunity to submit this letter regarding the modification proposed by Safe Harbor Marina on Lagoon Pond Road.

TWI is a citizens' non-profit organization focused on matters involving the quality and improvement of waterways in the Town of Tisbury, including Vineyard Haven Harbor, Lagoon Pond, and Lake Tashmoo.

We write you today not to voice an opinion "for" or "against" the Safe Harbor proposal but, instead, to raise a number of issues that we hope your board will research further and factor into your ultimate decision.

Members of our organization have reviewed the documentation regarding the proposed Safe Harbor Marina development and we remain unclear as to what will be the **actual impact** of this project on both the **vehicle traffic** on Lagoon Pond Road and the **boat traffic** in the lagoon itself and on the frequency of bridge openings to traverse the channel under the drawbridge. We propose that the MVC require the company to provide an additional third-party study/forecast of vehicle and boat traffic (if these haven't been done already) so the public can evaluate more intelligently the consequences of the expansion and consider possible mitigation steps if necessary.

The information that the company has provided in the documents we reviewed suggests a major increase in business and customer/employee activity which will occur on a narrow roadway that is prone to flooding during rainstorms and within an already impaired watershed and waterway. It would be helpful to understand: (1) how many additional vehicles/day will be using Lagoon Pond Road and Five Corners during the season? (2) how many additional boats will be coming through the lagoon and using the marina during the season? We make this request for a study based on the

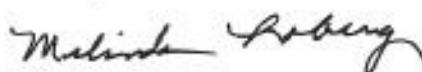
following data, included in the Safe Harbors proposal. The boat storage increases from 50 to 90, and the parking spaces increase from 20 to 31. Also, the length of boats that can be stored increases from 30 feet to 35 feet. While power boats are the primary focus of this marina, the larger ones have required a drawbridge opening to reach the harbor. While the company does not appear to be adding additional slips to the 56 they have, the number of slips that will be used for "valet" service will increase from 6 to 16, which indicates there would be a lot more take-in & take-out operations during the boating season. The fuel tank capacity will likewise increase from 1,000 gallons to 6,000 gallons. The reports state that 10-15 customers have used the marina during a typical summer day, but we wonder what increase in customer traffic we can reasonably expect with the major changes they are proposing. Are there adequate parking, bathroom facilities and pump out sewer flow for the traffic expected?

The MVC documents raise additional questions about a drainage plan for the site, and we assume the company will be responding to that. As you know, the West Arm is the most impaired part of the Lagoon and the disappearance of a once-productive scallop fishery is strong evidence. Improved water quality is the prerequisite for any positive change in the fishery. We encourage the MVC to consider putting requirements on Safe Harbor Marina that would mitigate further damage but, more importantly, lead to a healthier waterway. These strategies might include requirements that Safe Harbor Marina:

- adopt the most effective methods to reduce nitrogen discharge and storm water run-off into the Lagoon;
- lead/participate in a private-public partnership with government partners to design, permit and fund the dredging of a channel from the marina to the wider and deeper waterways of the Lagoon.

TWI appreciates the diligent review process that the Town of Tisbury and the MVC are undertaking with this important project. We hope our suggestions in this letter will help you to make a more informed decision.

Sincerely,



Melinda Loberg, President
Tisbury Waterways, Inc.