SQUIBNOCKET FARM, INC.
279 Great Plains Road
West Tisbury, MA

April 1, 2016

Martha's Vineyard Commission
Attn: Paul Foley, DRI Coordinator
P.O. Box 1447
Oak Bluffs, MA 02557

RE: DRI 338 – Squibnocket Beach Causeway, Chilmark

Dear Commissioners,

Thank you for hearing and thoughtfully evaluating our proposal to secure long-term access to Squibnocket Ridge. I am writing this letter to reiterate the need for a long-term solution and the evolution of our access proposal. In 2010, DEP had denied our attempts to extend the existing revetment system and we implemented the recommended "soft" solution at a cost of approximately $40,000. As you know, the "soft" solution was completely destroyed by Super Storm Sandy and we began internal discussions about potential solutions. In late 2012, we engaged the team of experts that you met on March 24th to help us design and permit an access solution that would provide access to Squibnocket Ridge for the next 50 years. After several months of research, our experts presented us with the following alternatives: do nothing (repair the revetment as needed), implement another "soft" solution, or elevate the roadway. For the reasons presented to the Commission on March 24th, we also believe that elevating the roadway is the only viable solution.

As you are well aware, we have been working in various public forums on our proposal to secure access to Squibnocket Ridge since early 2013. Throughout this process, our access proposal has evolved based on public input, sometimes in ways that benefit our goal of securing long-term access and in other ways that challenge our goal. For example, the Town was able to acquire abutting parcels of land which enables our causeway to be located farther from the shoreline, further protecting it from coastal erosion. Conversely, the Town has asked our engineers to design a causeway that overwashes several times per year. As your staff noted in the comments to the ENF, a structure in a coastal environment would typically be designed above the predicted overwash from wave action as reported by FEMA. The purpose of doing so is to protect the structure from predicted wave action and enhance its longevity. In order to accommodate the Town, we have proposed an elevation for the causeway deck at El. 13, which is below the FEMA flood predictions for coastal wave action—regardless of whether one looks to the FIRM maps currently in effect or the FIRM maps that will be in effect as of July 2016.

You have been asked by abutters and other stakeholders to consider lowering the causeway deck by an additional 2-3 feet. Many of these same stakeholders cite concerns about the longevity of the causeway without realizing that a lower causeway will face more direct wave action and be

even more greatly affected by sea level rise. We are already suggesting an elevation for the causeway deck below the recommendation from MVC staff and our engineers. It would be imprudent to further reduce the elevation of the causeway deck, especially in light of recent reports that global sea level rise may occur even more rapidly than previously anticipated.[1]

Additionally, many stakeholders cite a genuine concern about the impact the causeway may have on their views. While any change to the landscape will inevitably change views, our team has been mindful of the impacts in choosing materials and placing vegetative screening. Since the Commissioners were not permitted access to any abutting properties to view the scale mock-ups placed in early March, it is hard to evaluate the potential view impacts from abutting properties beyond the graphics produced by our expert team. Those graphics, unlike others that have been presented to the Commission, are accurate, reliable, and show minimal to no impact on views.

We have been willing to work with abutters directly on materials and vegetative screening. In 2013, our attorneys spoke with an attorney who represented many of the abutters, Mike Giaimo of Robinson & Cole, and in that conversation, our attorneys offered to make renderings from different views in an effort to address mitigation to view impacts. Neither Mike nor his clients have yet to respond to the offer.

While we do not wish to attack any stakeholders, we must respond to the renderings produced by Doug Liman. We note that the rendering he presents as the "2016 proposal" is misleading in several respects. First, Mr. Liman's 2016 rendering is basically identical to his 2014 rendering, even though the causeway has, since its original conception, been moved approximately 100 feet landward and narrowed from two lanes to one lane. As in the 2014 rendering, Mr. Liman's 2016 rendering continues to misrepresent the materials to be used in causeway construction. The causeway will be constructed tastefully of stained concrete, steel covered in a neutral colored epoxy coating, and timber. Mr. Liman depicts a concrete and steel monolith befitting an interstate highway. This is an upsetting image, but not an accurate one.

Finally, our experts are working to evaluate the impacts to archaeological and wetland resources by lowering the causeway. In the span of a week, they have yet to identify a means of lowering the causeway deck which will not involve cuts to areas where cultural resources have been identified by MHC. The revised shadow study necessary to evaluate the impacts to the underlying wetland vegetation have not been completed. What we do know is that lowering the causeway will present engineering and permitting challenges and negatively affect the longevity of the structure.

Best Regards,

Warren Spector
President of Squibnocket Farm, Inc.

[1] See the NY Times article: Climate Model Predicts West Antarctic Ice Sheet Could Melt Rapidly by Justin Gillis dated March 30, 2016 available: http://nyti.ms/1SxxwIu.