



**Paul J. Diodati**  
*Director*

# *Commonwealth of Massachusetts*

## **Division of Marine Fisheries**

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*Secretary*

**Mary B. Griffin**  
*Commissioner*

February 12, 2013

Edgartown Conservation Commission  
Town Hall  
P.O. Box 1065  
Edgartown, MA 02539

Dear Commissioners:

The Division of Marine Fisheries (*Marine Fisheries*) owns the Leland Beach property which abuts the Schifter property downdrift to the east. We have been notified of actions being taken on this property by the Trustees of Reservations, who manage the property for us, and have not received any notices from the proponent. Despite improper notice we have prepared the following letter outlining our concerns, in recognition of the timeliness of this issue.

The Division of Marine Fisheries is responsible for managing the Commonwealth's commercial and recreational fisheries. As part of that responsibility, we own properties and support projects that preserve or maintain fishing access. At Wasque Point and Leland Beach our goal is to provide a natural landscape for fishing access along the eastern shoreline of Chappaquiddick including the unique rip that occurs immediately offshore of Wasque Beach.

The Wasque Point area of Martha's Vineyard is on the southeastern corner of the island. It is a highly exposed region of the island with dynamic sediment movement. This sediment movement is clearly connected to the Katama Breach on Norton Point Beach, and erosion on Wasque Point is known to accelerate when the Katama Breach is open; a routine geomorphological cycle well documented forty years ago by Ogden (1974). While impressive, the erosion rate in this area is not unprecedented or surprising. Woods Hole Group has estimated that the erosion could continue for another five to ten years, with the bluff losing another 100-200 feet (Woods Hole Group 2012), imperiling the Schifter home which is now about 70 feet from the bluff edge.

The bluff fronting the Schifter property is currently armored with a biodegradable erosion control structure of coir sand envelopes. The envelopes were permitted as a temporary emergency measure to minimize bluff erosion during relocation of the house and other buildings on the property. Two months after the envelopes were in place, the proponents filed an NOI to move the property. Since the emergency order is expiring, the proponents are now seeking to extend the permit to maintain the envelopes indefinitely by continually replacing any degrading envelopes while they seek the necessary permits to move the buildings.

*Marine Fisheries* does not support the use of structures on coastal bluffs due to the potential for impact on adjacent properties and the alteration of natural sediment dynamics. There is already evidence of scalloping on the updrift side of the structure. Impounding the bluff will prevent sediment reaching the narrow beach. Downdrift sediment starvation is to be mitigated by depositing sand on the eastern end of the envelopes, however the monitoring and maintenance plan lacks detail regarding how much sand will be needed, where it will come from, how it will be deposited, and how various time of year restrictions

might affect the activities. The envelopes have already been decomposing, creating a debris issue along the eastern shoreline of Martha's Vineyard. The cleanup plan in place does not address how debris too heavy for a person to move will be handled.

*Marine Fisheries* does not recommend continued manipulation of this shoreline. We recommend removing the envelopes for the following reasons:

- Anthropogenic shoreline modifications have a long history of unintended consequences, including adverse impacts to wildlife habitat and increased bluff erosion (Coyle & Dethier 2010, O'Connell 2010).
- Erosion on the surrounding properties is anticipated to continue for many years. The maintenance needs for the envelopes and the potential impact on our downdrift property will accelerate.
- Despite an emergency order, the proponent's urgency is questionable since very little progress in moving the home has been made. Severe coastal erosion has been occurring for more than a year in this region and efforts to relocate infrastructure could have been initiated earlier.
- There is evidence of widespread debris from decomposing envelopes and we are concerned that future debris deposits may require heavy equipment for removal from public beaches.

If the Conservation Commission determines that the coir envelopes should be maintained during the building move, *Marine Fisheries* recommends the following conditions to reduce impact to bordering shoreline and public access:

- A deadline for the removal of the envelopes should be identified. We would recommend no more than an additional six months. This provides almost a year of erosion control on the bluff, opening it back up before the next season of storms and more active sediment movement.
- The project should minimize the need for the envelopes by identifying priority structures to move while the envelopes are in place.
- The monitoring and maintenance plan should include more detail regarding the volume, source, method of placement, and timing of beach disposal activities to provide downdrift sand.

Questions regarding this review may be directed to Kathryn Ford in our New Bedford office at (508) 990-2860 extension 145.

Sincerely,



Paul J. Diodati  
Director

cc:

Chris Kennedy, Trustees of Reservations  
Steve McKenna, CZM  
Caruso, Feeney, Logan, Petitpas, Skomal

PD/KF/sd

#### References

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