

**SBPF**  
**DEP APPEAL AND JANUARY 2015 PROJECT STATUS**  
**Key Questions**

**1. Why has SBPF been so diligent about protecting the Bluff? Why not just leave it alone?**

Each year, the historic neighborhood along Baxter Road is imperiled by the erosion of ‘Sconset Beach and Bluff – in some recent difficult storm years, up to 30 feet have been lost from the Bluff. Eight homes near Baxter Road have been moved or demolished and 12 more have been moved back to the roadway. According to a 2013 study by Windwalker Real Estate, erosion has already caused the loss of \$63 million in assessed value (approximately \$250,000 in annual tax revenue). Since that study was completed over a year ago, further impacts from erosion and estimates of losses from house values on the landward side of Baxter Road have pushed the estimated loss over \$100 million.

We believe that there is a thoughtful, sustainable way to protect this historic community, access to Sankaty light and the property of local homeowners.

**2. What was the result of the DEP appeal? What are you allowed to do going forward?**

The DEP appeal allows us to maintain the current geotube system installed on ‘Sconset Beach last winter. The DEP also approved the addition of the fourth level of geotubes in much of the area we requested in order to provide the full protection in the original design.

**3. Did the DEP decide in your favor due to lobbying efforts?**

The nearly 20 page DEP ruling highlighted the science and facts behind their decision. Though we made efforts to assure that all appropriate elected and regulatory officials were informed about the key facts of this issue, we are confident that the decision was based on an in depth analysis of the merits of our approach. Some of our communication efforts were aimed at correcting misinformation about our project being sent to public official by opponents.

**4. I understand that the ConCom has appealed your DEP approval. How will this impact the project going forward and what will you do about it.**

We are confident that the DEP decision is scientifically sound, unbiased and environmentally responsible and will not be overturned. If the Con Com pursues this litigation it is likely to take years and cost the Town hundreds of thousands of dollars in legal fees. In the end we fully expect that the court will support our project and that we will move forward in maintaining and improving the current geotube project, as approved by DEP.

**5. Will you abide by the sand mitigation requirements in the DEP decision?**

We have long voluntarily agreed that SBPF will undertake an aggressive sand mitigation program to assure that no beaches adjacent to ‘Sconset Beach are impacted by this project.

6. Won't a "hard armoring" project like this destroy the beach?

Coastal protection projects with sufficient sand mitigation are considered an appropriate way to limit erosion while protecting the existing and nearby beaches. We have agreed to a level of sand mitigation that is 1.5 times the typical amount for a project of this nature and are confident that doing so will protect the beach. Further, the DEP ruling requires that a beach be maintained in front of the geotubes. If the beach disappears, more sand mitigation (beach nourishment) will be required or DEP could determine that the geotubes need to be removed.

7. What will you do to protect 'Sconset Beach itself? Isn't it scientifically proven that a project like this will ruin that beach in an effort to preserve the bluff and homes above?

Access to the beach for normal recreational and passive activities has been fully maintained since this project began. Further, the project provides hefty sand mitigation in excess of the typical requirements and the DEP decision on the project requires that a beach be maintained in front of the geotubes. DEP has required quarterly surveys so that it can monitor the beach and determine if additional sand (beach nourishment) needs to be added or if the geotubes need to be removed.

8. I hear that the bottom two layers of geotubes are showing. How did this happen and what are you doing about it? Why wasn't it fixed sooner?

The project is designed so that sand is washed away during some winter storms. Occasionally therefore, as is the case now, the 2nd layer of geotube has been exposed. A new delivery of sand as part of the normal annual sand maintenance protocol is scheduled for mid-January, which will provide fresh cover for the geotubes. The system is working as designed, protecting the toe of the bluff and providing the full amount of sand mitigation as required.

9. What's the point of all this work if road runoff from Baxter Road is causing additional erosion?

Road water runoff from Baxter Road is a challenge that can and must be addressed immediately. We have previously petitioned the ConCom on this topic and are doing so again. The Town DPW which is legally responsible for preventing road runoff from harming private property has applied for a storm water management system that would redirect the runoff away from the face of the bluff. The proposal is consistent with normal storm water management practices that exist across Nantucket and we hope that the ConCom will approve the proposal. Even as we acknowledge the importance of dealing with surface water runoff, we must reiterate that the primary cause of erosion of the bluff is loss of the toe during storms, which then causes the upper bluff to slump down. Now that we have protected the toe, the impact of road runoff is more easily seen and must be effectively managed.

10. What do you propose to do about road runoff from Baxter? Who will pay for that work?

The proposal can be seen on the Town website at this link: <http://www.nantucket-ma.gov/documentcenter/view/7588>. The system consists of catch basins that would redirect road run off into underground infiltration basins designed to protect existing wetlands. Normally the Town is responsible for paying the costs of preventing road runoff from harming private property. To facilitate the effort to address this urgent problem SBPF has agreed to pay for the costs of engineering and permitting. We expect a discussion with the Town about who will pay for the installation of the project will take place after permitting has been secured.

11. Why has the Bluff not been vegetated yet and do you plan to do so?

We are eager to vegetate the bluff with appropriate materials, but the ConCom refused to allow us to do so in time for planting last spring. We have filed a stand-alone application for approval to vegetate that will be before the Con Com in late January for approval. Our objective is to vegetate the bluff this coming spring.