



June 6, 2019

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Executive Director

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Secretary Kathleen A. Theoharides
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
EEA# 16037; MEPA Analyst: Erin Flaherty
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: EEA# 16037, Proposed Shorefront Protection, 1440 Chequessett Neck Road, Wellfleet

Dear Secretary Theoharides:

The Association to Preserve Cape Cod (APCC), in response to the Environmental Notification Form filed for the above captioned project and, pursuant to the Massachusetts Environmental Policy Act (MEPA), MGL c. 30 § 61-621, and more specifically, 301 CMR § 11.00, respectfully submits the following comments.

Established in 1968, APCC is the region's leading nonprofit environmental advocacy and education organization, working for the adoption of laws, policies and programs that protect, preserve and restore Cape Cod's natural resources.

APCC has serious concerns about the negative environmental impact of the proposed shorefront protection project at this site in Wellfleet. APCC's comments are as follows:

- APCC is concerned about significant direct and indirect impacts that the proposed shorefront protection project—particularly the proposed revetment—will have on the environment and natural resources in this critical natural landscape and environmentally sensitive location. Substantial focus under MEPA must concentrate on the location of

this project within Mass Wildlife's National Heritage and Endangered Species Program (NHESP) mapped priority habitat for rare species, BIOMap2 Core Habitat and BioMap2 Critical Landscape.¹

These designations underscore that this project is located within an area considered to be among the most viable habitats for rare and other species and exemplary natural communities in the Commonwealth of Massachusetts. Additionally, as identified in the Wellfleet Conservation Commission's December 21, 2018 findings in the Order of Conditions for the proposed project, the sand that is accreting north and south of the property has maintained beach habitat for piping plovers, a state and federally listed threatened species, and the area offshore of the property is mapped shellfish habitat.²

- Consideration must also be given to the concerns raised by the United States Department of the Interior (Interior) about this proposed project. In its December 3, 2018 letter to the Wellfleet Conservation Commission, Interior concluded that significant adverse impacts will occur to the stability of the coastal bank and that adverse effects from the installation of the proposed project will occur to the coastal beach and to nearby marine and coastal resources.³
- Consideration must be given to the impact that the proposed project may have on commercial activities such as shellfish farming and the continued commercial viability of Wellfleet Harbor. The land directly south of the property is a thin strip of barrier beach consisting of constantly eroding dunes that depend on wind and wave action to bring in new sand to replenish it. APCC has significant concerns that interruption of the natural sand flow and increased erosion caused by the proposed armoring of the beach at this property would compromise the fragile barrier beach and the protection it provides to Wellfleet Harbor.

The testimony provided at the Wellfleet Conservation Commission's hearing for the proposed project by Mark Borelli, Ph.D., coastal geologist for the Center for Coastal Studies, supports APCC's above-stated concern. In Dr. Borelli's expert assessment, acceleration of erosion at this location would have even greater negative impacts to the system because the project site is located in a nodal zone. He concluded that the project will likely have an impact on the onshore/offshore sediment transport because it will alter the way the natural bluff responds to waves.⁴

¹ [Massgis.maps.arcgis.com/home/webmap/viewer.html?layers=a953ef7fe074ef2b2a8fb49118c51c7](https://massgis.maps.arcgis.com/home/webmap/viewer.html?layers=a953ef7fe074ef2b2a8fb49118c51c7).

² Wellfleet Conservation Commission's Order of Conditions issued 12/21/18, Findings par. 17.

³ Wellfleet Conservation Commission's Order of Conditions issued 12/21/18, Findings par. 18.

⁴ Wellfleet Conservation Commission's Order of Conditions issued 12/21/18, Findings par. 10.



Furthermore, Gregory Berman, PG, GISP, coastal processes specialist for Woods Hole Sea Grant and Barnstable County's Cape Cod Cooperative Extension, testified at the hearing that the project as proposed will disrupt sand and sediment transfer and lead to scouring on the ends.⁵

- Consideration must be given to the impact of sea level rise and shoreline change in the area of this proposed project.⁶ In the report released by the Massachusetts Shoreline Change Project, it is noted that "[a]ttempting to halt the natural process of erosion with seawalls and other hard structures, however, simply shifts the problem, subjecting downdrift property owners to similar or greater loss."⁷ This statement is directly relevant to the proposed project. There is the real concern that as sea levels continue to rise, the erosion of the beach as a result of sea level rise in this vulnerable location will be further exacerbated by the adverse impacts of the project, particularly the proposed revetment. The environmental damage to neighboring areas by the proposed project must be considered and avoided to comply with MEPA.⁸
- Finally, consideration must be given to likely beach erosion impacts the proposed project may have on access to public trust land in the area of the proposed project.

Based on the above-stated reasons, APCC is deeply concerned that the proposed armoring project at this site will likely result in significant environmental impacts that cannot be satisfactorily mitigated. APCC requests the Secretary MA consider these concerns in the review of this project.

Sincerely,



Andrew Gottlieb
Executive Director



Don Keeran
Assistant Director

⁵ Wellfleet Conservation Commission's Order of Conditions issued 12/21/18, Findings par. 11, 12, 13.

⁶ See Report of the Massachusetts Erosion Commission, Vol. 1 Findings and Recommendations.

⁷ <https://www.mass.gov/files/documents/2016/12/v1/cec-final-report-dec2015-v1.pdf>.

⁸ <https://www.mass.gov/service-details/massachusetts-shoreline-change-project>.

⁸ 301 CMR § 11.01(1)(a).

