



June 5, 2035

Andrew Gottlieb
Executive Director

Massachusetts Office of Coastal Zone Management
100 Cambridge Street, Suite 900
Boston, MA 02114
Attention: Deanna Moran

BOARD OF DIRECTORS

Steven Koppel
President

Elysse Magnotto-Cleary
Vice President

Taryn Wilson
Treasurer

Jack Looney
Clerk

John Carroll

Robert Ciolek

Thomas Cohn

John Cumbler

Jamie Demas

Meredith Harris

DeeDee Holt

Pat Hughes

Steve Hurley

Molly Karlson

Rick O'Connor

Kris Ramsay

Dottie Smith

Marcie Truesdale

RE: ResilientCoasts Draft Plan

Dear Ms. Moran:

The Association to Preserve Cape Cod (APCC) has reviewed the Massachusetts Office of Coastal Zone Management's ResilientCoasts Draft Plan and provides the following comments.

Founded in 1968, APCC is the Cape 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 focuses our efforts on the protection of groundwater, surface water, and wetland resources, preservation of open space, the promotion of responsible, planned growth and the achievement of an environmental ethic.

The ResilientCoasts Draft Plan establishes a comprehensive blueprint for promoting and increasing coastal resilience over a 50-year timespan to address the impacts of climate change. On the whole, the draft plan is commendable in presenting guidance and strategies for local, regional and state governments, as well as key stakeholder groups, that address our vulnerabilities to climate hazards in the coastal zone, including coastal erosion, storm surge and sea level rise. By proactively recognizing the need to act now rather than later, choosing the most effective and environmentally sound approaches to resilience, and investing the proper resources to achieve stated goals, the Commonwealth has the opportunity to avoid and minimize the worst impacts and to save taxpayer dollars.

APCC supports the goals identified in the draft plan, which include:

482 Main Street | Dennis, MA 02638
Tel: 508-619-3185 | info@apcc.org | www.apcc.org

- Improve human health and safety.
- Protect and enhance the value of natural and cultural resources.
- Increase resilience of built infrastructure.
- Strengthen the coastal economy.
- Advance equity and environmental justice.
- Support the capacity of coastal communities.

The draft plan would establish 15 districts across the state where appropriate district-scale resilience measures can be developed and implemented. It identifies areas where higher concentrations of vulnerability exist, which can help in prioritizing resources and effective actions. It also identifies seven key coastal typologies that represent the common coastal environments found in Massachusetts. These typologies are matched with a set of coastal resilience measures that are determined to be the most effective and suitable responses to threats facing those specific typologies. Lastly, the plan proposes 10 state-led coastal resilience strategies for state agency actions that are intended to ensure the plan is implemented with a “whole-of-government” approach.

APCC supports the framework of the plan, especially the goal of making sure that every relevant state agency is on the same page and acting in concert to address coastal resiliency. The state has a vital role to play in providing technical assistance to local communities and directing funding to priority areas. The state’s role can be greatly enhanced by making sure that coastal resilience is imbedded in a consistent manner in all relevant areas of state government, including regulations, policies, planning, funding investments and decision making.

APCC does, however, recommend that the plan retain a degree of flexibility in recognizing and addressing local resiliency issues as they emerge, since unique situations exist and a “one-size-fits-all” approach is not always the best solution.

The draft plan states that future phases of the ResilientCoasts plan “will focus on implementation efforts, including support for design, permitting, and construction of coastal resilience projects and carrying out state-led strategies and actions, including regulatory, policy, and funding mechanisms.” APCC recommends that implementation efforts should include support for expedited permitting of coastal restoration projects that enhance the function of, and reliance on, natural systems to increase resiliency. Current permitting requirements for such projects involve unnecessary regulatory burdens that delay project completion and add to project costs.

APCC also notes that the draft plan did not quantify the importance of the risks of climate

482 Main Street | Dennis, MA 02638

Tel: 508-619-3185 | info@apcc.org | www.apcc.org

change to natural resources to the same degree as it did for the built environment. Adverse impacts from climate change to natural resources in the coastal zone can be devastating to sensitive ecosystems that also have ramifications for the coastal human communities that depend on them. APCC recommends that the final plan include more emphasis on risks to natural resources.

Similarly, the draft plan includes salt marsh restoration among “Other Restoration.” The importance of salt marsh restoration should receive greater acknowledgement in the plan and should be included in a more prominent location. Greater emphasis should be placed on salt marsh restoration as an important means to increase coastal resiliency by improving the natural function of salt marshes as natural protection against storm surge and flooding, and to act as a buffer against sea level rise.

APCC thanks CZM for the opportunity to provide comments on this important coastal resiliency plan for Massachusetts.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew Gottlieb', with a long horizontal flourish extending to the right.

Andrew Gottlieb
Executive Director