

# ECR

Environmental Consulting & Restoration, LLC



## PEER REVIEW

**TO:** Town of West Tisbury Conservation Commission

**FROM:** Stan Humphries @ ECR <sup>SMH</sup>

**DATE:** January 22, 2024

**LOCUS:** 245, 257 and 271 John Cottle Rd., West Tisbury

Environmental Consulting & Restoration, LLC (ECR) was requested by the Commission to review and comment on the revised shore protection project plan dated January 17, 2024. While the overall type of Coastal Bank shore protection is still being proposed, the Sourati Engineering Group has made several positive changes that agree with our evaluation/recommendations stated in our initial Memorandum dated August 7, 2023. These changes that will improve the proposed project include the following:

- The construction access has been relocated to the west side of the project area, eliminating the impact of the initially proposed 700 feet on the east side that was located in the NHESP mapped habitat;
- The length of the revetment has been reduced by 58 feet on the east end;
- The cover material on top of the fiber logs will be vegetated; and,
- An additional two rows of coir fiber logs will control bank erosion from overwash occurring above the revetment. One row of fiber logs has been removed from the east side of the project.

All of these changes meet our recommendation for an Alternative Analysis 6 which better address the minimizing adverse effects standard required for coastal engineering projects such as this. The initial construction access proposal will have had an adverse effect on the coastal dune and beach and presumed to have negative impacts in the future if it was used for annual nourishment. Relocation and potential reuse of the existing boulders for the revetment will result in reclaiming an area of beach that will exceed the lost area. In fact, the proposed annual nourishment should help sustain a high tide beach that will support foot passage along the revetment. While there is no proposed alteration of the 25-foot buffer zone, the Commission may want to discuss some area of lawn to be replanted with salt tolerant vegetation.

In summary, the approximate 16' buffer from cottage to the top of the bank is close enough to be considered in imminent danger and, therefore, the proposed shore protection project may be permissible under the local Wetlands Protection Bylaw Regulations Section IX (C.1) which states ... *Other coastal engineering projects may be permitted only upon a clear showing that no alternative exists to protect from imminent danger, a structure that had been substantially improved or built prior to the effective date of the Bylaw.* The project would also be permissible under the state Wetland Protection Regulations which is less stringent, lacking the term "imminent danger".

If the Commission has any questions for ECR, please contact me at ([Stan@ecrwetlands.com](mailto:Stan@ecrwetlands.com)) or phone (617) 543 – 1654.