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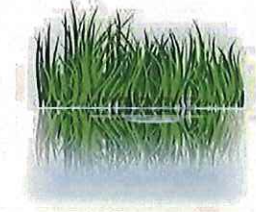
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Lagoon Pond Association
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"Dedicated to improving the quality of the waters and the environment surrounding Lagoon Pond".

January 22, 2018

Mr. Ewell Hopkins, Chairperson
Oak Bluffs Planning Board
56 School Street
Oak Bluffs, Massachusetts 02557

Re: Lagoon Ridge Development

Dear Mr. Hopkins and Planning Board Members:

I am writing this letter to you as the president of the Lagoon Pond Association (LPA). I am hoping to make it clear that the LPA is adamantly opposed to issuing a Special Permit for the development of over 32 acres at the site of the Lagoon Ridge Development. The development is in the watershed of the Lagoon Pond and its groundwater recharge area on forested land. The project is being developed in a manner that will produce large amounts of nitrogen from septic and run-off sources that will flow directly into the waters of the Lagoon.

As you know, the Lagoon Pond has been the subject of intensive scientific studies which have deemed the pond to be severely impaired due to the nitrogen loading that already exists. The East Arm section of the pond is already greatly diminished, and this zone directly abuts the area where the new nitrogen from the proposed Lagoon Ridge Development will flow. Considerable time and money have been spent studying nitrogen loading in the Lagoon, and the analysis of the collected data established a Total Maximum Daily Load (TMDL) of nitrogen for the pond. The 2015 Massachusetts Estuary Project (MEP) states that nitrogen loadings in the pond should be reduced by a total of 35% in order to achieve threshold levels. The study also states that it would be necessary to reduce present septic system loads alone by 50% in order to achieve the TMDL. Obviously, the addition of any new nitrogen can only be more detrimental to the pond's environment and cause the goal of reaching the TMDL to be extremely expensive to the Town.

In essence, it is counterintuitive to be adding new nitrogen to the pond when present day goals are a huge challenge. Without an extraordinary effort by the people of Oak Bluffs and Tisbury, restoring the pond's health from its present level of impairment will not be attainable.

The nitrogen problem in the ponds is not a new issue. The Town is aware of the dire state of the pond's health and has reportedly asked for \$350,000 to assist in the planning of the Comprehensive Wastewater Management Planning Project (CWMP). The CWMP recognizes the established nitrogen reduction goals and is beginning its plan as to how to reduce existing nitrogen loads. Any new nitrogen, such as the large amount from Lagoon Ridge will necessitate that the reduction burden be mitigated elsewhere in the Town and will likely come with associated costs and the possible intervention by the Massachusetts DEP if the Town is not properly addressing the TMDL. The Town is also spending additional money for wastewater solutions by studying and planning for enhancements to the sewer system.

Although my earlier statements have focused on the monetary cost of the effects of excess nitrogen, the Town understands the effects of nitrogen on its ponds, which include the health of the water's plant life, the development of algae on rocks and piers, drifting patches of algae; and the detrimental effect on shellfish and fin fish. These conditions directly affect our cherished body of water, the men and women who earn their livelihood from the waters of the pond, the families who live on its shores, the tourists who fish, boat, and swim and the children who learn to sail at the Sailing Camp Park. The towns of Tisbury and Oak Bluffs have been in discussions relating to the control of existing nitrogen loads and the Martha's Vineyard Commission is belatedly revamping its nitrogen loading standards. These efforts should not be undermined by the addition of a project that will clear acres of land, build three new roads and uses a septic system that dumps nitrogen into the fragile Lagoon. The fact that an innovative/alternative system is planned is of no consequence, because at this time, one extra drop of nitrogen in the Lagoon is too much.

In the event that the applicant produces a plan that has a zero net balance of nitrogen for the development acreage, we at LPA will review our position on this proposal. However; in the mean time as the Planning Board, you are tasked with planning for growth, but also have the obligation for the preservation of the Town's physical resources. By denying the Special Permit for this project, you will have taken the opportunity to protect the pond and the wellbeing of the residents. If Lagoon Ridge can produce a plan with a zero net balance of nitrogen; then this can be the "model" for all new future development on the island! The times have changed and we need to change with them.

Thank you for time and thoughtful consideration.

Doug Reece,
President, LPA

