

## PROPOSAL FOR BRINGING BAXTER ROAD GEOTUBE PROJECT INTO COMPLIANCE

Consistent with the Town’s coastal resiliency efforts and as is identified in the Baxter Road Long Term Planning study, developing a long-term neighborhood adaptation strategy for the Baxter Road area is critical. Based on the results of that study and in order to demonstrate that it will be a good steward of the currently constructed project, SBPF submits this proposal to bring its pilot geotube project into compliance with the compensatory sand requirements of the Order of Conditions for the project. If this proposal is acceptable to the Conservation Commission, SBPF requests that the Commission adopt it as an amendment to the Commission’s September 2, 2021, Enforcement Order (in lieu of the removal order) so that the project can come back into compliance. SBPF understands that maintaining the project in compliance with the currently effective Order is the right next step in working with the Town toward adapting this neighborhood to the challenges presented by climate change and sea level rise.

SBPF proposes that the Enforcement Order be amended to include a four-year sand make-up plan. The current sand “backlog” is equal to 47,471 cubic yards (cy) of sand. This volume is calculated by adding the cumulative sand backlog identified in the 2020 Annual Sand Report (26,637 cy), plus the “2021 Sand Year” requirement of 20,834 cy, which was due on or before March 30, 2021 (and was not included in the 2020 Annual Sand Report for the 2020 Year).

The “2022 Sand Year” (April 1, 2021-March 30, 2022), which we are in now, carries a requirement of 20,834 cy of sand beyond the backlog. SBPF has committed to the Town Administration that it will deliver this volume prior to the end of the current 2022 Sand Year (March 30, 2022). Deliveries of this current year’s sand began in November 2021. SBPF is managing the sand delivery and re-covering process so that the geotubes are re-covered after storms in compliance with the Order of Conditions.

To address the backlog, SBPF proposes to add 25% of the sand backlog ( $47,471 \times 25\% = 11,868$  cy) to the otherwise required volume of sand to be delivered during each of the subsequent four Sand Years, so that the total amount of sand delivered during each upcoming sand year would be as detailed below.

Make-up Year 1 (sand year ending March 30, 2023):	32,702 cy (20,834 cy + 11,868 cy)
Make-up Year 2 (sand year ending March 30, 2024):	32,702 cy (20,834 cy + 11,868 cy)
Make-up Year 3 (sand year ending March 30, 2025):	32,702 cy (20,834 cy + 11,868 cy)
Make-up Year 4 (sand year ending March 30, 2026):	32,702 cy (20,834 cy + 11,868 cy)

32,702 cubic yards of sand placed on 945 linear feet of project equates to 34.6 cubic yards per linear foot. In order not to overload the template, it may be necessary to deposit compensatory sand at the ends of the geotubes, as is contemplated in the Order of Conditions. The makeup sand will comply with the requirements of the Order of Conditions and shall be placed along with the sand for the current sand year in the location(s) and manner required in the Order of Conditions. Specifically, sand will be placed on the template as specified in the Order of Conditions until the template is filled. If the template is unable to accept additional sand, the surplus will be placed at the northern and southern ends of the project near the toe of the bluff for 300 ft alongshore as is allowed in the Order of Conditions.

As an additional step demonstrating better project oversight and transparency, SBPF and the Town have prepared an Operations and Maintenance (O&M) Manual that details the operation and maintenance of

the existing pilot project. SBPF and the Town intend that this manual identifies clearly delineated roles and responsibilities for all aspects of the project in order to facilitate greater oversight by the Conservation Commission and the Select Board, and a greater level of transparency for the general public. An O&M Manual also will be prepared for any future Notice of Intent or application for an amendment to the existing Order of Conditions.

Quarterly reports for the project through 2026 will contain information on (1) the regular 20,834 cy required sand volume and (2) the additional 11,868 cy “backlog” sand volume and its placement. Spot checks and reviews will be undertaken by the Natural Resources Department to ensure this compliance proposal operates as outlined.