

Through the Westport's Select Board, we requested and received a 30 day extension to the public comment period from the ACOE so that we could conduct a number of outreach efforts to inform our position and advocacy on this project. As noted above, we engaged an outside consultant to perform a comprehensive technical review of the proposal as well as other existing related reports and data. This technical review notes that the current models and data are too coarse in nature to accurately predict the localized effects of rubble removal, however, the macro analysis performed indicates that removal would likely have little impact on overall river hydrology and flushing. Given the vastly increased price tag, \$3-4M versus the original estimate of \$1M, and the uncertainty of the project's benefits, we believe that obtaining results of further study will be necessary to justify the expenditure of such a large sum of tax dollars, 35% of which would have to come from local (non-federal) sources. WRWA believes that rubble removal is directionally correct from an ecological standpoint and will likely produce improvements related to oyster habitat, salinity and flushing in areas immediately north and south of the bridge. In order to provide a solid basis for moving ahead with this project, we are recommending a delay to the Select Board's decision on how to proceed in order to investigate several technical questions and properly quantify the project's effects on the River.

The present MEP study and model upon which the above mentioned Technical Memorandum is based, used only two tide gauges in the East Branch, one at the Route 88 Fontaine Bridge and one at the Head. To better understand the tidal action in the area of Hix Bridge, we are proposing the use of several tide gauges up and down the East Branch. Fortunately, this dovetails with our planned phase two activities for the salt marsh study so additional costs here are minimal. This data can then be used to refine the MEP hydrological model. We are also proposing a more focused hydrological study using the ACOE's detailed bathymetry in and around Hix Bridge in conjunction with the MEP model to understand the project's impact on localized tidal flow and oyster habitat. In addition, we will likely perform surveys of the area including the scour holes to better understand their present condition. We need to explore the possibility that the deep areas which are proposed sites for rubble relocation may have unquantified value as habitat and spawning ground.

While it is unsatisfying to have taken this long and not have a ready proposal in hand, WRWA remains committed to fully investigating the potential benefits of this project and advocating for a sensible approach that will result in measurable ecological improvements.