# **CHAPTER 2: ALTERNATIVES**

## 2.1 INTRODUCTION

The National Environmental Policy Act (NEPA) requires federal agencies to consider and fully evaluate a range of reasonable alternatives that address the purpose of and need for the action. Reasonable action alternatives must be economically and technically feasible and demonstrate common sense. The Council on Environmental Quality (CEQ) regulations (40 CFR 1502.14) also require that federal agencies analyze a "no action" alternative; this alternative evaluates future conditions under existing management plans or practices and allows the public to evaluate what would happen if no project were implemented.

The Massachusetts Environmental Policy Act (MEPA) (301 CMR 11.06 and 11.07) requires that the action proponent present a reasonably complete and stand-alone description and analysis of the project and its alternatives. Alternatives include (1) all feasible alternatives; (2) the alternative of not undertaking the project (no action) for the purpose of establishing a baseline in relation to which the alternatives can be described, analyzed, and potential environmental impacts and mitigation measures can be assessed; (3) an analysis of the feasible alternatives in light of the project objectives and the mission of participating agencies; (4) an analysis of the principal differences among the feasible alternatives under consideration, particularly regarding potential environmental impacts; and (5) a brief discussion of any alternatives no longer under consideration including the reasons for no longer considering these alternatives.

Alternatives may originate from the proponent agency, local government officials, or members of the public. Alternatives may also be developed in response to comments from coordinating or cooperating agencies. With the exception of the no action alternative, alternatives must meet, to a large degree, the stated purpose and objectives for taking action and should not conflict with federal, state, or local laws, regulations, and policies or constraints identified during scoping.

This chapter provides a description of the alternatives being considered for the restoration of the Herring River estuary, including the no action alternative. The project alternatives include adaptive management strategies for varying degrees of tidal exchange, as well as infrastructure and flood mitigation elements. The design and construction elements of each of these alternatives are described in this chapter, and are analyzed in "Chapter 4: Environmental Consequences."

## 2.2 ALTERNATIVES DEVELOPMENT PROCESS

The Herring River Restoration Committee (HRRC) applied a systematic approach, as required by NEPA and MEPA, to the development of alternatives and mitigation strategies. This section provides a summary of the alternatives development process and the draft alternatives, which evolved through public input and multiple meetings with the HRRC.

Hydrodynamic modeling has been central to developing a range of potential restoration alternatives. Modeling has allowed for evaluation of specific questions about potential changes to surface water elevations, salinity levels, flow velocities, sediment transport, and potential impacts to low-lying properties within the Herring River estuary under a range of restoration scenarios. The hydrodynamic model (provided in appendix B) also applied guidance provided by the U.S. Army Corps of Engineers (USACE) (USACE 2009, 2011) for projecting additional impacts resulting from

various degrees of sea level rise over the next 50 years. A more detailed discussion of sea level rise is provided in section 4.10.5.

A range of preliminary alternatives, described in sections 2.2.1 and 2.2.2, were initially considered and screened for their ability to meet the project purpose and objectives for technical, logistical, and financial feasibility, and for their ability to avoid significant adverse impacts. This screening eventually resulted in three action alternatives, which were found to meet the purpose and objectives, to be feasible, and would result in clear differences in environmental outcomes. Thus, these alternatives constitute a reasonable range of alternatives for NEPA evaluation. These action alternatives are summarized in table 2-5 at the end of this chapter, and discussed in detail in sections 2.5 and 2.6.

Other alternatives or infrastructure options were dismissed from further consideration because they would not meet the purpose and need for action, are not feasible, or do not provide a substantial difference in environmental outcomes. These alternatives and the rationale for dismissal are described in detail in section 2.7.

#### 2.2.1 Preliminary Alternatives – Conceptual Restoration Plan

The project team identified several preliminary project alternatives in early models and other studies (Roman 1987; Spaulding and Grilli 2001). Additional alternatives were formulated by the Herring River Technical Committee (HRTC) and studied in subsequent modeling efforts (Spaulding and Grilli 2005). The following range of preliminary alternatives was examined in the Conceptual Restoration Plan (CRP) (HRTC 2007):

- No Action: Retain existing tide gates and manage tides under existing conditions.
- Open existing culverts to their maximum (18-feet wide) extent.
- Build a replacement structure with an opening width of 100–130 feet, fitted with sluice gates to manage tides. Sub-options included:
  - Cast-in-place culverts.
  - Pre-cast arch spans.
  - A two-span bridge structure.
  - A trestle bridge structure.
- Build a bridge with no tide control at Chequessett Neck, and establish tide control structures at strategic upstream locations.

#### 2.2.2 NEPA/MEPA ALTERNATIVES DEVELOPMENT

Several additional project alternatives were introduced during public scoping in July 2008 (Federal Register notice August 21, 2008; MEPA #14272), which formally started the NEPA/MEPA processes. With feedback from state and federal agencies, including a draft EIR scope from MEPA (certificate dated November 7, 2008; notice in Environmental Monitor, November 22, 2008) and detailed comments from the Cape Cod Commission (CCC), the HRRC refined the project alternatives and impact topics. The MEPA certificate called for the *Herring River Restoration Environmental Impact Statement / Environmental Impact Report* (EIS/EIR) to evaluate the following:

- No Action—Existing tide gates would remain in place and tide levels would be managed under existing conditions.
- Modified Tide Gate Control at Chequessett Neck Road—Existing dike would be replaced with a new structure with an opening 100–130 feet wide consisting of culverts, arch spans, or a bridge. The structure would be fitted with sluice gates to allow full tide control and management.
- Open Bridge with Upstream Tide Gate Controls—An open bridge span would be constructed at the site of the Chequessett Neck Road Dike. The bridge would not have any tide control. Tide control would be established at upstream locations with several smaller structures to regulate the limit of tidal flooding.
- Hybrid of Modified Tide Gate Control at Chequessett Neck Road with Upstream Tide Gate Controls—A combination of controlling tides near the mouth of the river and at upstream locations.

The HRRC then conducted a two-day alternatives development workshop in September 2009. At this workshop, the HRRC reviewed the results of the hydrodynamic modeling, reviewed and refined the Statement of Purpose and Need for Taking Action, and reviewed NEPA and the National Park Service (NPS) NEPA guidance (or Director's Order 12 Handbook guidance) for alternatives development. The HRRC examined possible locations within the estuary where actions might be needed to achieve tidal restoration.

Based on the hydrologic modeling available at that time, the HRRC evaluated how different openings at Chequessett Neck Road would affect water surface elevations and salinity levels upstream of the dike. The HRRC developed a draft matrix to evaluate the many combinations of actions that could be used to achieve the project objectives.

After the two-day workshop, the HRRC continued alternatives development at subsequent meetings through 2009 and 2010. The alternatives matrix was revised by the HRRC to include only the options that are feasible for implementation and that address the purpose and objectives of the restoration effort. The draft alternatives and tidal flow diagrams were then presented to the Technical Working Group (TWG) (an advisory group made up of representatives of key federal, state, and regional regulatory agencies) for review and comment in 2010.

In the summer of 2010, the HRRC conducted informal public outreach to present the draft alternatives to the public. The Friends of Herring River sponsored a public meeting to present three proposed action alternatives:

• A single point of tide control at Chequessett Neck Road

- Full tide flow at Chequessett Neck Road with upstream tide controls at Mill Creek and Pole Dike Creek
- Multiple points of tide control within the estuary

These distilled the action alternatives into two broad options for tidal restoration through most of the Herring River flood plain, with specific options for Mill Creek. This has resulted in the three alternative restoration scenarios described in section 2.3.

## 2.2.3 ALTERNATIVES REFINEMENT FOR THE EIS/EIR

After refinement of the 2010 draft alternatives, additional hydrodynamic modeling was conducted to develop an understanding of the range of tidal influences, salinities, and sediment transport that could be expected under the range of proposed options. Initial modeling results were used to establish the range of tidal influences that could be expected and a lower and upper point of restoration potential. These benchmarks identified the range of desired high tide conditions as lying between 4.8 feet (the lowest mean high spring tide elevation in the Lower Herring River which would fulfill the minimum project objectives) and 7.5 feet (the highest coastal storm driven tide in the Lower Herring River possible with a 165-foot-wide culvert at Chequessett Neck). These modeled tidal elevations were used to develop the three action alternatives described in this chapter.

In June 2011, the HRRC conducted a three-day Value Analysis/Choosing by Advantages workshop to compare and rank the benefits, impacts, and costs of the action alternatives (Kirk Associates 2011). Factors such as water quality improvements, acres of salt marsh and fish habitat restored, and private property impacts were used to compare the alternatives for the Herring River Restoration Project (HRRP).

The Value Analysis/Choosing by Advantages process revealed that the greatest level of tidal restoration combined with the greatest level of low-lying property protection would be the most advantageous alternative for achieving the project objectives. The combination of these components is represented by alternative D (section 2.5.3), and is identified as the preferred alternative in this final EIS/EIR.

## 2.2.4 ADDITIONAL ALTERNATIVES REFINEMENT FOR THE FINAL EIS/EIR

Since publication and release of the draft EIS/EIR in 2012, the HRRC has continued design and planning work on several key project components, including design of the proposed new Chequessett Neck Road Dike and development of design options for the Mill Creek Dike. In response to agency and public comment several other aspects of the project have been clarified and incorporated into the descriptions of the alternatives. These address options for preventing tidal flow impacts to High Toss Road and building a tide control structure at the Pole Dike Creek Road culvert. They are each discussed in the remainder of this chapter.

## 2.3 OVERVIEW OF THE ALTERNATIVES

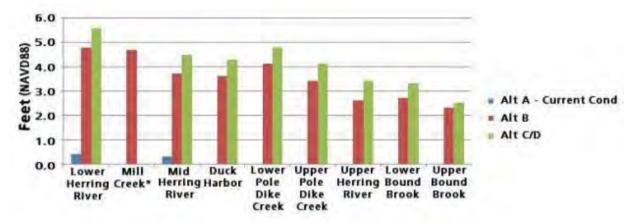
Three action alternatives have been developed for the restoration of the Herring River:

- Alternative B: New tide control structure at Chequessett Neck No dike at Mill Creek.
- Alternative C: New Tide Control Structure at Chequessett Neck Dike at Mill Creek that excludes tidal flow

• Alternative D: New Tide Control Structure at Chequessett Neck – Dike at Mill Creek that partially restores tidal flow

These three alternatives are intended to represent a range of desirable end points to be achieved through incremental restoration of tidal exchange and adaptive management. The alternatives are distinguished primarily by the long-term configuration of a new dike and tide control structure at Chequessett Neck Road and the resulting degree of tidal exchange. These alternatives represent the "bookends" of the minimum and maximum tidal exchange restoration necessary to meet project objectives, where alternative B achieves the minimally acceptable tidal restoration with the least impacts, and alternative D achieves the maximum practicable tidal restoration possible with more impacts, given the limitations of present day land use in the Herring River flood plain.

Figure 2-1 provides a representative comparison of the anticipated tidal exchange levels for the different alternatives. Predicted water surface elevations during mean high spring tide are shown for the no action alternative (current conditions) and for each of the action alternatives, as predicted by the hydrodynamic model. Implementation of any of the action alternatives does not necessarily imply that these exact water surface elevations would be achieved. Instead, they describe possible end points of incremental tidal restoration, while recognizing that, based on the results of adaptive management, the final degree of tidal exchange may lie somewhere between the "bookend" conditions identified in the action alternatives.



\*Note: High tide in Mill Creek equivalent under alternatives B and D; no tidal exchange in Mill Creek under alternative C.

FIGURE 2-1: MODELED MEAN HIGH SPRING TIDE ELEVATIONS OF THE HERRING RIVER RESTORATION
ALTERNATIVES

# 2.3.1 DESCRIPTION OF MAJOR PROJECT COMPONENTS

The Herring River flood plain is a large and complex area that has been impacted by more than 150 years of human manipulation, the most substantial being the construction of the Chequessett Neck Road Dike at the mouth of the river in 1909. Just as the current degraded state of the river is the combined effect of many alterations occurring over many years, restoration of the river will also require multiple, combined actions to return it to a more fully functioning natural system. Existing alterations and obstructions in the flood plain include more than 5 miles of roadway, an abandoned railroad embankment, several tidally restrictive culverts and berms, channelized stream reaches, and acres of invasive, non-native vegetation. There are multiple options for addressing each of these issues. The major components and focus areas of the Herring River project fall into three categories: (1) actions to construct or retrofit tide control structures in order to incrementally restore and

control tidal exchange; (2) modifications to existing roads and low-lying structures to prevent adverse impacts resulting from restored tidal flow; and (3) other measures implemented within the project area to maximize the effects of restored tidal flow and enhance estuarine habitats. The project elements in the first category are discussed below. Other project elements are addressed in "Section 2.6 Elements Common to All Action Alternatives."

# Chequessett Neck Road Dike

Reconstruction of the dike to allow greater tidal exchange is the primary element of the restoration project. In the draft EIS/EIR this structure was described generically as a new dike, retrofitted with a set of culverts increased from 18 feet to 165 feet wide and a height of 10 feet with adjustable tide gates. In 2013 HRRC and Friends of Herring River completed a study to evaluate possible structural alternatives to replace the existing culvert structure. Three culvert replacement concepts were evaluated to determine the option best suited to restore upstream water surface elevations and salinity concentrations:

- Three-sided pre-cast concrete box culvert
- Four-sided pre-cast concrete box culvert
- Pre-stressed box beam bridge

To evaluate these options, criteria were developed based on environmental, aesthetic, constructability, and cost factors. After initial review by the HRRC, the design concepts and rating criteria were reviewed by additional town of Wellfleet officials, including representatives from the Board of Selectmen, public safety departments, public works, natural resource boards, and the town manager.

Based on this study, the box beam bridge/dike structure equipped with adjustable and removable tide gates was selected as the most advantageous design concept. A concurrent hydraulic study evaluated alternative gate types/configurations and operating scenarios to determine the optimal number/type of gates to be constructed with the proposed structure. Wave generation and scour analyses were also completed to evaluate potential wave conditions at the structure and anticipated velocities under extreme storm/tidal conditions and gate operation configurations.

A structural evaluation was completed to address applicable items required for review by the Massachusetts Department of Transportation (MassDOT) under the Load and Resistance Factor Design (LRFD) Bridge Manual, including a type study to review existing data, assess alternative replacement structure configurations and identify the most appropriate structure type for the site conditions and required operations. Evaluations completed to date in support of the 25 percent complete design drawings were submitted to MassDOT in July 2014 and are included in appendix K

The proposed new Chequessett Neck Road Dike, which will function both as a pedestrian and automobile bridge and as a tide control structure, or dike, will have a final crest height similar to the existing dike (approximately 12 feet NAVD88, compared to the present 11.3 feet). Thus, the new dike is not proposed to serve as a designated flood control structure, as certified and recognized by Federal Emergency Management Agency (FEMA). This is because, according to new Flood Insurance Rate Maps released by FEMA and approved by both Truro and Wellfleet in July 2014, storm tides resulting from the coastal storm surge would enter the Herring River flood plain at multiple locations, in addition to over-topping the dike. Elevating the dike above the storm surge elevation would therefore not prevent flooding in the estuary during a storm surge. See section 4.1.2

for a more detailed discussion of how new FEMA Flood Insurance Rate Maps affect the Herring River Project.

The new dike will also include enhanced parking, pedestrian access, and viewing platforms, improved stormwater management, and improved aesthetics from burial of overhead utilities. Most importantly, the new structure also contains a total opening width of 165 feet spanned by a series of adjustable and removable tide gates. As will be described in the project's adaptive management plan (summarized in appendix C), these gates will be managed during implementation to achieve the ecological and socioeconomic objectives of the project, with a target of reaching the tidal range and extent of tidally-influenced area described in the preferred alternative (alternative D).

Details of the new dike design, including development and evaluation of design options, new geotechnical analyses, and scour/wave analyses can be found in appendix K, "25% Engineering Design Report Herring River Tidal Restoration Project." Structural components and the construction process for the new dike are identical under all of the action alternatives presented in the EIS/EIR.

To support and inform additional design work and permitting for the Chequessett Neck Road Dike, a Phase 1B Cultural Resources Assessment was conducted in the spring of 2015. Based on this and additional natural resource information and input from the NPS and other stakeholders, future design plans will identify the most appropriate construction staging and laydown areas and may include a new canoe/kayak portage and access point on the Griffin Island side of the new structure. Potential locations for these areas' access points are shown on Plan Sheet CS-101 (sheet 3 of 19 in the included plan set) in appendix K.

Impacts relating to construction of the new Chequessett Neck Road Dike, including additional information on construction staging, access, and traffic control, are summarized in section 4.11 and in draft Section 61 findings in appendix N. Details concerning construction sequencing, traffic management, dewatering, erosion/sediment control, dust and noise management, and other topics will be developed as engineering design progresses through 2015 and presented in federal, state, and local permitting plans, expected for submittal in 2016.

#### Mill Creek Dike

Mill Creek is the sub-basin most affected by increased tidal influence, and has a number of privately owned structures that could be more vulnerable to flooding without protective measures. The approach to flood protection in the Mill Creek sub-basin is a primary distinction between the action alternatives. As further described in section 2.5, alternatives C and D (the preferred alternative) require construction of a secondary dike to prevent or limit tidal exchange in Mill Creek, while alternative B does not.

Preliminary concept design plans for the Mill Creek Dike were included in the draft EIS/EIR. These plans depict the general layout, dimension, and volume of an earthen berm dike and tide gate structure capable of allowing controlled, bi-directional tidal exchange between the Herring River and Mill Creek (LBG 2010).

In 2013 the HRRC and Friends of Herring River undertook a study to determine and evaluate several design options for the Mill Creek Dike. In addition to an earthen berm, the new study included conceptual design and analysis of several other types of structures, including a cast-in-place concrete wall, a concrete I-wall, and a single sheet pile wall. Each of these options was evaluated based on environmental, constructability, aesthetic, sustainability, and cost factors and reviewed by the

HRRC, town of Wellfleet officials, and representatives of the Chequessett Yacht Country Club (CYCC).

After evaluation, only the earthen berm and single sheet pile wall designs were retained for further consideration. All other options provided no additional advantages over these two types and were more expensive to construct. This conceptual design and evaluation process, including a geotechnical assessment, is described in detail in appendix L: "Technical Memorandum, Mill Creek Dike Structural Alternatives Analysis."

Either of the Mill Creek Dike concepts would be constructed with a crest height of 9.5 feet. This is based on a maximum, storm-of-record high tide on the downstream side of 7.5 feet, thereby providing two feet of freeboard against an extreme storm event. Both designs also provide means for increasing crest height, if warranted by future conditions. Both dike designs contain five culverts or openings, each five feet wide, for a 25 foot wide opening in total, and with adjustable combination flap-slide gates. Under alternative D, these gates would be gradually and incrementally opened in a similar manner to the Chequessett Neck Road tide gates. Under alternative C, the gates would remain closed during incoming (i.e., flooding) tides, but would open automatically during ebbing tides to allow freshwater drainage. No tidal restoration would occur in the Mill Creek sub-basin under this scenario.

Selection of a final design option for the Mill Creek Dike is currently under review by the HRRC. The selection of either an earthen berm or single sheet pile wall dike option will be based on further structural and engineering evaluation, aesthetics, cost, and input from affected landowners. In either case, both short-term and long-term environmental and wetland impacts are predicted to be equal to or less than the impacts predicted in the draft EIS/EIR, based on the preliminary concept plan available at that time. These impacts are reviewed in detail in section 4.11.

In addition to the type of dike, several options are also being considered for the layout of either dike design concept. The most logical and convenient layout for the dike would utilize portions of the historic Mill Creek Dike embankment and locate a small portion of it on property currently owned by the CYCC. If Cape Cod National Seashore funds and constructs the new Mill Creek Dike, implementation of this option may require a reconfiguration of the NPS boundary and acquisition of land rights for it to be constructed in this location. An access easement would also be necessary for a construction and maintenance access route involving current CYCC or other privately-owned property.

Because landowner issues have not yet been worked out, an alternate design option is being evaluated that would confine the entire dike and construction/maintenance access route on lands within current NPS ownership. This would entail a slight modification to the layout of the dike and additional grading along the wetland-upland border; however, the size of the overall footprint and area of wetland impact would not be increased (see sheets CS-101 and CS-102 in appendix L).

Information concerning construction impacts, staging, and access route options are compared in section 4.11. Additional details and design plans for the Mill Creek Dike will be presented in local, state, and federal permit applications, expected for submittal in 2016.

#### Tide Control at Pole Dike Creek Road

The draft EIS/EIR indicated that a new tide control structure may be necessary at the Pole Dike Creek Road crossing in order to prevent impacts to privately owned structures in the Upper Pole Dike Creek sub-basin. After consultation with potentially affected property owners since the release

of the draft EIS/EIR, the HRRC decided to propose this third tide control structure as part of the preferred alternative. This structure would be comprised of one or more adjustable tide gates, similar to those used at the Chequessett Neck Road Dike and Mill Creek Dike, installed on a new, and likely larger, culvert under Pole Dike Creek Road. Pole Dike Creek Road itself would be elevated to avoid tidal flow impacts to both the roadway and areas upstream. The tide gate(s) would be managed in a manner similar to those at Mill Creek, where tidal flow will be monitored carefully and high tide elevations limited by the lowest elevation of sensitive structures which cannot be relocated, elevated, or otherwise protected from harm. As implementation planning proceeds, the project proponents will consult with potentially affected property owners to identify ways to avoid or mitigate adverse effects while restoring as much tidal influence to the Upper Pole Dike Creek sub-basin as possible.

Because elevation and regrading of Pole Dike Creek Road is required whether a tide gate is installed on this culvert or not, the increased impacts of installing the tide gate are expected to be minimal compared to the impacts of road reconstruction (see sections 2.6 and 4.10.6 for more details on proposed road work). Detailed information about all impacts resulting from a new culvert and tide gate at Pole Dike Creek Road will be discussed in local, state, and federal permitting applications, expected to be submitted in 2016.

# 2.4 ALTERNATIVE A: NO ACTION – RETAIN EXISTING TIDE CONTROL STRUCTURE AT CHEQUESSETT NECK

NEPA and MEPA regulations require measuring all alternatives against a future condition without the project. In this case, no action means that the existing 18-foot-wide structure composed of two flap gates and an adjustable tide gate would remain in place (shown in figure 2-2), and no tidal restoration would occur. Although no changes to infrastructure would occur, it is important to emphasize that "no action" is not a steady state from an environmental perspective.

#### 2.5 ACTION ALTERNATIVES

The three action alternatives are differentiated primarily by the extent of restored tidal range throughout the estuary. The following section contains a narrative description of the project elements unique to each action alternative.

# 2.5.1 ALTERNATIVE B: NEW TIDE CONTROL STRUCTURE AT CHEQUESSETT NECK - NO DIKE AT MILL CREEK

# Chequessett Neck Road Dike

Following the "bookend" concept described in section 2.3, alternative B provides the lowest high tide water surface elevations needed to achieve the project objectives. Under this alternative, a box beam bridge/dike structure with a total opening width of 165 feet spanned by a series of adjustable and removable tide gates would be installed at the location of the Chequessett Neck Road Dike to allow passage of Wellfleet Harbor tides (an element common to all alternatives—see previous section 2.3). The tide gates would be opened gradually according to guidelines set forth in the Adaptive Management Plan with an objective to ultimately reach a mean high spring tide of 4.8 feet and a maximum coastal storm driven tide of 6.0 feet in the Lower Herring River (figure 2-3). These elevations reflect the maximum restoration possible without the need to install a secondary tide control structure at Mill Creek to protect private properties and are based on the feasibility of addressing flood impacts within the Mill Creek sub-basin. Hydrodynamic modeling has demonstrated that a vertical tide gate opening of approximately 3 feet across the 165-foot culvert

structure would result in this tidal regime. Tides in the upstream sub-basins would be lower because of natural tide attenuation.

This alternative would provide a uniform degree of restoration in all sub-basins and would not require the construction or cost of a dike at Mill Creek. Flood proofing actions undertaken throughout the estuary would be designed to accommodate coastal storm driven tidal flooding up to 5.9 feet within the Mill Creek sub-basin and up to 5.3 feet in the Upper Pole Dike Creek sub-basin (table 2-1). The exact final maximum high tide elevations would be determined through the adaptive management process, but would not exceed these elevations.

TABLE 2-1: ACRES OF RESTORED HABITAT, ALTERNATIVE B

Sub-basin	Tidal Creeks	Intertidal Accretion Zone	Intertidal Marsh	Transitional Zone	Total Acres Restored
Lower Herring River	33.0	0.0	117.3	2.4	152.7
Mill Creek* (option 1)	5.5	0.0	59.0	2.5	67.0
Mill Creek* (option 2)	5.5	5.5	42.8	2.6	56.4
Middle Herring River	10.5	1.7	72.9	1.4	86.5
Duck Harbor	6.0	32.8	41.8	24.7	105.3
Lower Pole Dike Creek	7.8	26.8	69.6	0.9	105.1
Upper Pole Dike Creek	17.8	16.4	77.5	17.1	128.8
Upper Herring River	17.2	39.6	40.1	22.4	119.3
Lower Bound Brook	4.3	10.8	51.1	6.3	72.5
Upper Bound Brook	4.8	0.0	35.7	21.0	61.5
Total (Option 1)	106.9	128.1	565.0	98.7	898.7
Total (Option 2)	106.9	133.6	548.8	98.8	881.1

Tidal Creeks: Sub-tidal habitat below modeled extent of Mean Low Water

Intertidal Accretion Zone: Subsided former marsh below modeled extent of Mean Low Water, expect to transition into Intertidal Marsh

Intertidal Marsh: Areas between modeled high extent of Mean Low and Mean High Spring Tides, includes Mud Flats, Low Salt Marsh, High Salt Marsh, and Brackish Marsh

Transition Zone: Areas above modeled highest extent of Mean High Spring tides, includes Brackish, Freshwater Marsh, and Wetland-Upland Border

\*Mill Creek: Option 1 (relocation) and Option 2 (elevation) for affected portions of CYCC

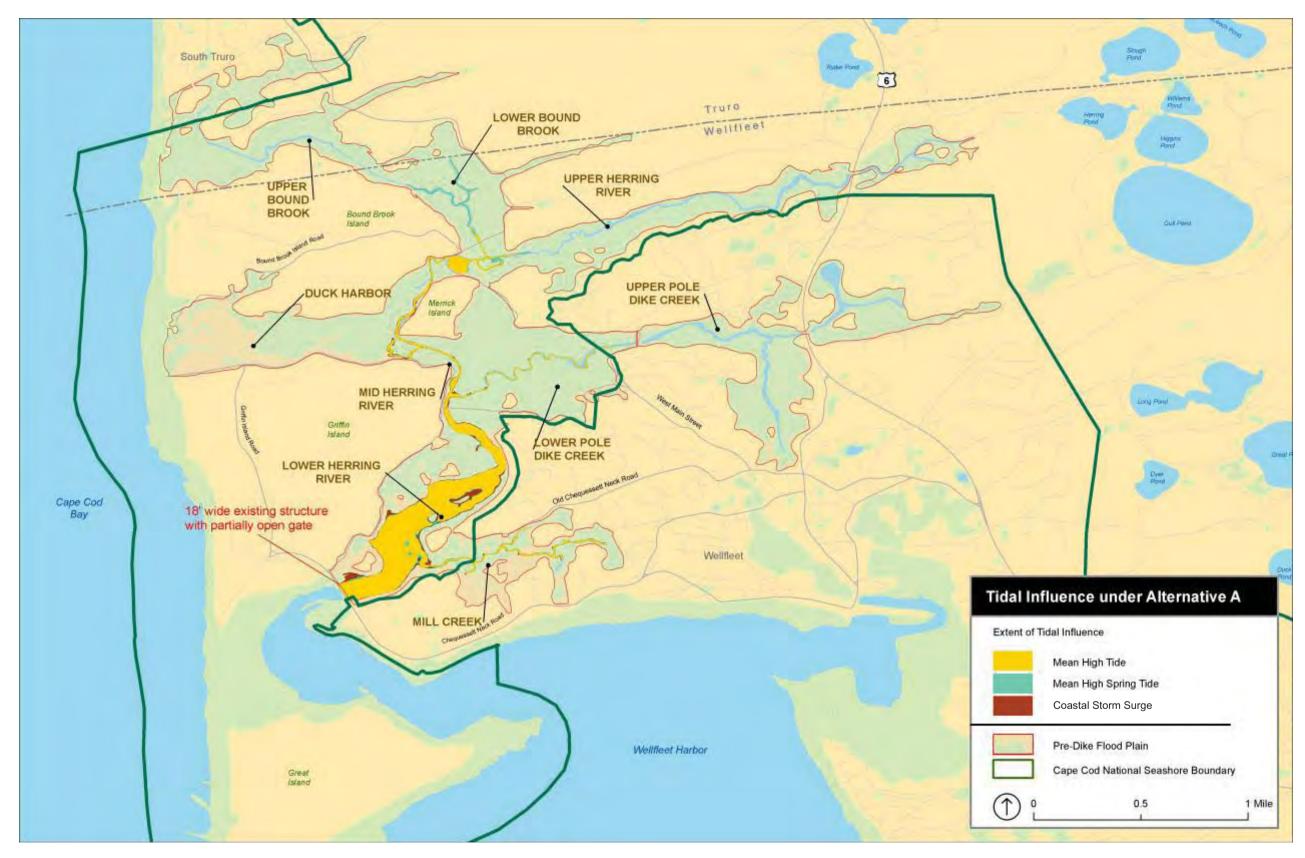


FIGURE 2-2: ALTERNATIVE A: NO ACTION – RETAIN EXISTING TIDE CONTROL STRUCTURE AT CHEQUESSETT NECK

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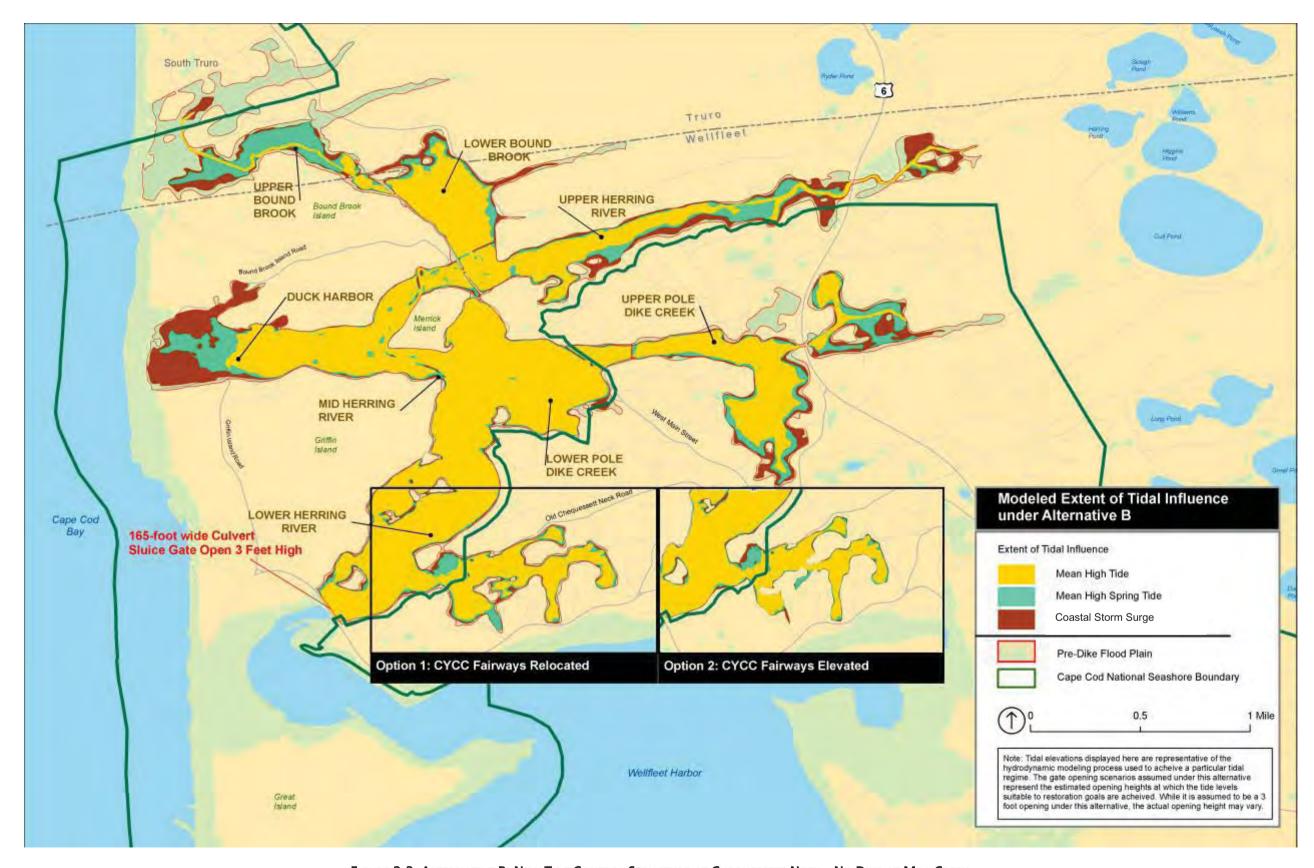


FIGURE 2-3: ALTERNATIVE B: NEW TIDE CONTROL STRUCTURE AT CHEQUESSETT NECK – NO DIKE AT MILL CREEK

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Alternative B would require flood proofing measures for the Chequessett Yacht and Country Club (CYCC) golf course and other low-lying properties throughout the Herring River flood plain. Also, alternative B would forego the ability to pursue higher inundation levels in the estuary as part of an adaptive management process. This alternative would limit the total area of tidal wetland habitat that could be realized with tidal restoration.

#### Mill Creek Sub-basin

Under alternative B, the Mill Creek sub-basin would be left open to the Herring River, thereby subjecting the sub-basin to a limited tide regime controlled at Chequessett Neck Road Dike. However, the tide gates at Chequessett Neck Road Dike would remain partly closed to limit mean high water spring tides to a maximum of 4.8 feet and coastal storm events to a maximum of 6.0 feet in the Lower Herring River. This would equate to a maximum mean high water spring tide elevation of 4.7 feet and a maximum coastal storm event elevation of 5.9 feet in Mill Creek. As a result, this alternative would not require the construction or cost of a dike at Mill Creek if flood protection measures are in place.

# Chequessett Yacht and Country Club

Hydrodynamic modeling has shown that several areas of the CYCC golf course would be affected by inundation levels proposed under alternative B. There are two options for addressing the impacts to the CYCC:

- Relocate the affected portions of the facility to upland locations currently owned by the CYCC. This would involve clearing, grading, and planting of new golf holes and a practice area. Approximately 30 acres of long-term upland disturbance would be generated under this option. One fairway would not be able to be relocated because of its proximity to the clubhouse and would require filling and regrading.
- Elevate the affected portions of the facility by providing necessary quantities of fill, regrading, and replanting the areas. Initial design concept plans for this effort include approximately 150,000 cubic yards of fill and 32 acres of disturbance for grading and site preparation. Portions of five low-lying golf holes would be reconstructed to a minimum elevation of 6.7 feet, which is 2 feet above the mean spring tide in Mill Creek (table 2-1).

# 2.5.2 ALTERNATIVE C: NEW TIDE CONTROL STRUCTURE AT CHEQUESSETT NECK - DIKE AT MILL CREEK THAT EXCLUDES TIDAL FLOW

# Chequessett Neck Road Dike

Like the other action alternatives, tide gates at a rebuilt Chequessett Neck Road Dike would be opened gradually and according to guidelines set forth in the Adaptive Management Plan. The objective for alternative C would be to fully open the gates (maximum opening is 10 feet) to allow mean high water spring tides up to 5.6 feet and coastal storm driven tides up to 7.5 feet in the Lower Herring River (figure 2-4). Following the "bookend" concept described in section 2.3, alternative C provides the highest practicable high tide water surface elevations possible, given the constraints of current land use in the flood plain; however, a tidal exclusion dike would be constructed at the mouth of Mill Creek in order to avoid flood impacts to low-lying private properties within this subbasin. Tides in the upstream sub-basins would be lower because of natural tide attenuation. Flood prevention actions undertaken throughout the remainder of the Herring River estuary would be

designed to accommodate flooding up to these maximum tidal elevations. Restored acreages from new tidal inundation are shown in table 2-2.

TABLE 2-2: ACRES OF RESTORED HABITAT, ALTERNATIVE C

Sub-basin	Tidal Creeks	Intertidal Accretion Zone	Intertidal Marsh	Transitional Zone	Total Acres Restored
Lower Herring River	33.0	0	130.0	2.4	165.4
Mill Creek	5.5	0	5.2	0.1	10.8
Middle Herring River	10.5	9.6	67.0	0.9	88.0
Duck Harbor	6.0	35.1	66.6	13.5	121.2
Lower Pole Dike Creek	7.8	42.7	55.2	0.9	106.6
Upper Pole Dike Creek	17.8	41.9	67.5	12.6	139.8
Upper Herring River	17.2	56.8	40.0	19.7	133.7
Lower Bound Brook	4.3	55.8	11.6	4.8	76.5
Upper Bound Brook	4.8	7.3	44.5	14.3	70.9
Total	106.9	249.2	487.6	69.0	912.7

Tidal Creeks: Sub-tidal habitat below modeled extent of Mean Low Water

Intertidal Accretion Zone: Subsided former marsh below modeled extent of Mean Low Water, expect to transition into Intertidal Marsh

Intertidal Marsh: Areas between modeled high extent of Mean Low and Mean High Spring Tides, includes Mud Flats, Low Salt Marsh, High Salt Marsh, and Brackish Marsh

Transition Zone: Areas above modeled highest extent of Mean High Spring tides, includes Brackish, Freshwater Marsh, and Wetland-Upland Border

#### Mill Creek Sub-basin

In contrast to alternative B, under alternative C, a new dike at the mouth of Mill Creek would need to be constructed to *eliminate* tidal influence to the sub-basin. Based on the results of hydrodynamic modeling the minimum recommended crest height of this dike is 2 feet above the projected coastal storm surge elevation, or 9.5 feet (based on the modeled prediction of the coastal storm elevation of 7.5 feet in the Lower Herring River). Construction of this structure could require up to approximately 2,900 cubic yards of fill and could permanently impact up to 12,500 square feet of wetland In addition, a construction work area encompassing up to approximately 105,000 square feet (2.4 acres) of vegetated wetlands would likely be required for dewatering and other associated work and would be impacted temporarily. The exact quantification of impacts resulting from the Mill Creek Dike will be presented in detail in local, state, and federal permitting applications and will depend on whether an earthen berm or single sheet pile water design is selected and whether the dike layout and access route in solely on NPS land or involves multiple landowners (see section 2.3 and appendix L).

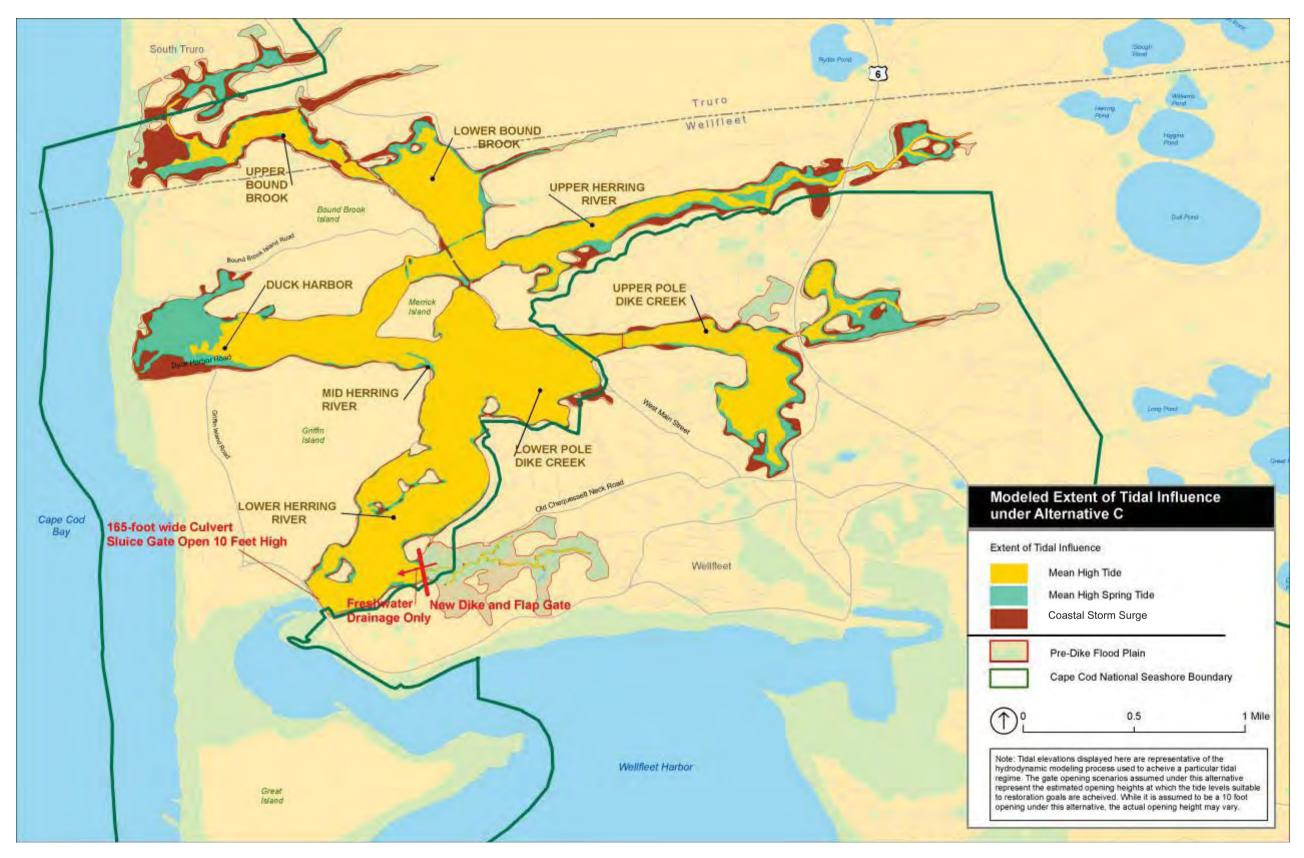


FIGURE 2-4: ALTERNATIVE C: NEW TIDE CONTROL STRUCTURE AT CHEQUESSETT NECK – DIKE AT MILL CREEK THAT EXCLUDES TIDAL FLOW

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A one-way, flapper-style tide gate would need to be installed within the dike to allow freshwater to drain from the basin toward the Herring River while blocking seawater from passing upstream of the dike. Given the generally flat land surface of the flood plain and naturally occurring high water table, mechanical pumping may be necessary at times to facilitate freshwater drainage.

# Chequessett Yacht and Country Club

Because a dike would eliminate tidal influence from the Mill Creek sub-basin, no additional flood protection measures would be required for CYCC or other Mill Creek properties.

# 2.5.3 ALTERNATIVE D: NEW TIDE CONTROL STRUCTURE AT CHEQUESSETT NECK - DIKE AT MILL CREEK THAT PARTIALLY RESTORES TIDAL FLOW

### Chequessett Neck Road Dike

Like the other action alternatives, tide gates at a rebuilt Chequessett Neck Road Dike would be opened gradually according to guidelines set forth in the Adaptive Management Plan. The objective for alternative D is to fully open the gates (maximum opening is 10 feet) to allow mean high water spring tides up to 5.6 feet and coastal storm driven tides up to 7.5 feet in the Lower Herring River (figure 2-5). Following the "bookend" concept described in section 2.3, alternative D provides the highest practicable high tide water surface elevations possible, given the constraints of current land use in the flood plain (table 2-3). Tides in the upstream sub-basins would be lower because of natural tide attenuation. In most of the project area, measures to prevent tidally forced flooding of low-lying roads and the very few privately owned structures located outside of the Mill Creek and Upper Pole Dike sub-basin, will be based on these maximum water surface elevations. In Mill Creek and Upper Pole Dike creek, where most privately owned low lying structures are located, maximum water levels will be regulated by secondary water control structures and will be lower compared to the other areas.

#### Mill Creek Sub-basin

Similar to alternative C, a new dike at the mouth of Mill Creek would need to be constructed under alternative D. However, under alternative D, the one-way flapper style tide gate would be replaced with five two-way slide/flap combination tide gates, each 5 feet wide, which would be managed to partially restore tidal flow to the sub-basin. Mean high spring tides would be limited to 4.7 feet and coastal storm driven events to a maximum of 5.9 feet in Mill Creek. In contrast to alternative C, alternative D would require the same flood prevention measures and related costs for Mill Creek as specified under alternative B (e.g., golf course and private property impact prevention). In addition, alternative D will include the cost of Mill Creek Dike construction.

# Chequessett Yacht and Country Club

As described for alternative B, two options for protecting the CYCC golf course would be possible under alternative D: (Option 1) relocating portions of multiple low-lying golf holes to upland areas currently owned by the CYCC or (Option 2) elevating the affected areas in place by filling and regrading.

TABLE 2-3: ACRES OF RESTORED HABITAT, ALTERNATIVE D

Sub-basin	Tidal Creeks	Intertidal Accretion Zone	Intertidal Marsh	Transitional Zone	Total Acres Restored
Lower Herring River	33.0	0	130.0	2.4	165.4
Mill Creek* (option 1)	5.5	5.2	52.1	3.2	66.0
Mill Creek* (option 2)	5.5	5.6	44.2	2.4	57.7
Middle Herring River	10.5	9.6	67.0	0.9	88
Duck Harbor	6.0	35.1	66.6	13.5	121.2
Lower Pole Dike Creek	7.8	42.7	55.2	0.9	106.6
Upper Pole Dike Creek	17.8	41.9	67.5	12.6	139.8
Upper Herring River	17.2	53.0	40.0	19.7	129.9
Lower Bound Brook	4.3	55.8	11.6	4.8	76.5
Upper Bound Brook	4.8	7.3	44.5	14.3	70.9
Total (Option 1)	106.9	250.6	534.5	72.3	964.3
Total (Option 2)	106.9	251.0	526.6	71.5	956.0

Tidal Creeks: Sub-tidal habitat below modeled extent of Mean Low Water

Intertidal Accretion Zone: Subsided former marsh below modeled extent of Mean Low Water, expect to transition into Intertidal Marsh

Intertidal Marsh: Areas between modeled high extent of Mean Low and Mean High Spring Tides, includes Mud Flats, Low Salt Marsh, High Salt Marsh, and Brackish Marsh

Transition Zone: Areas above modeled highest extent of Mean High Spring tides, includes Brackish, Freshwater Marsh, and Wetland-Upland Border

\*Mill Creek: Option 1 (relocation) and Option 2 (elevation) for affected portions of CYCC

## 2.6 ELEMENTS COMMON TO ALL ACTION ALTERNATIVES

#### 2.6.1 INCREMENTAL TIDAL RESTORATION AND ADAPTIVE MANAGEMENT

Since the early planning stages of the HRRP, reintroduction of tidal influence has been understood as a long-term, phased process that would occur over several years. The key to restoration, and an element common to all action alternatives, is the construction of a new dike at Chequessett Neck Road with adjustable tide gates. Gradual opening of adjustable tide gates would incrementally increase the tidal range in the river. The primary reason to implement the project in this manner is to allow monitoring of the system so that unexpected and/or undesirable responses could be detected and appropriate response actions taken. In addition, the complexity of the proposed project also dictates use of an adaptive management approach. Among these are a large and divergent group of stakeholders, multiple and overlapping objectives, and the need for phased and recurrent decisions through an extended period of time.

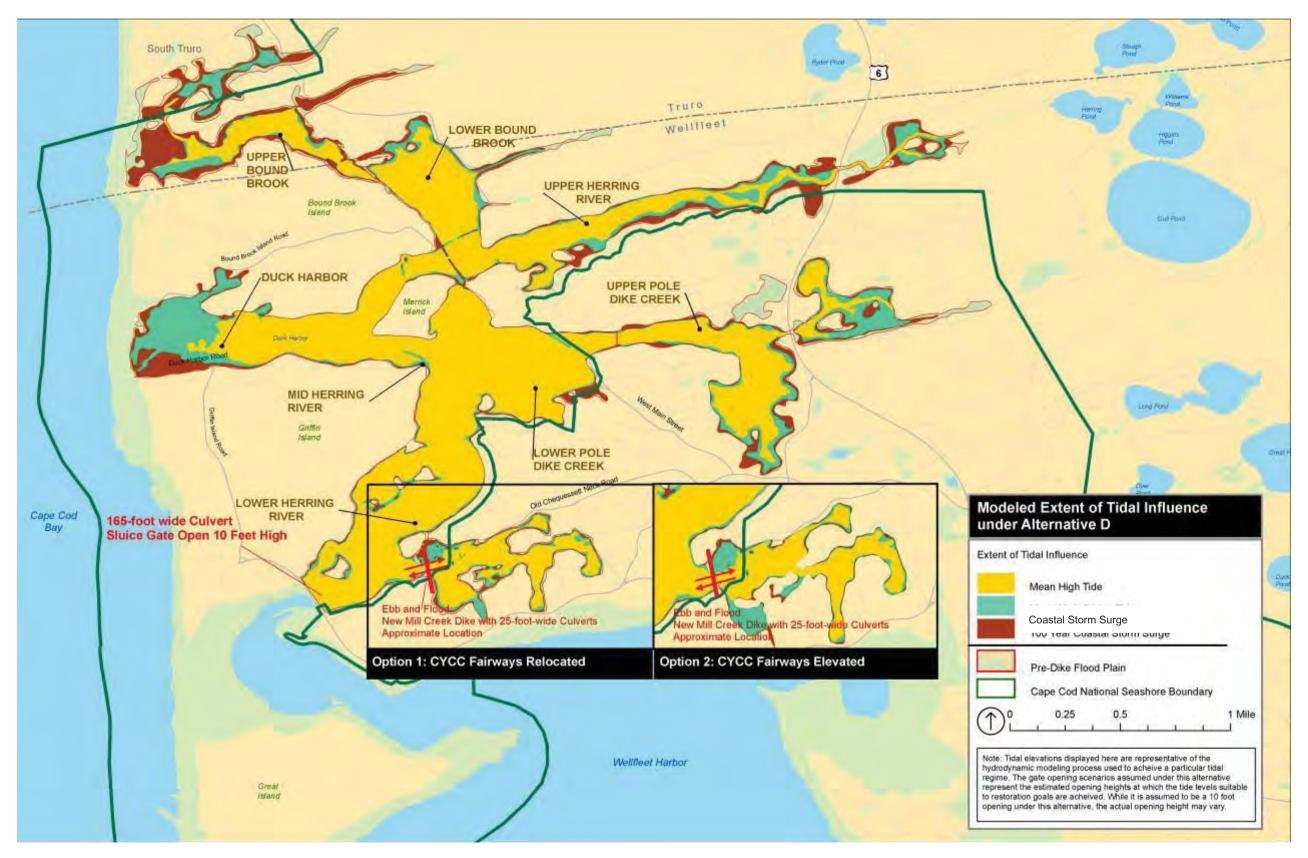
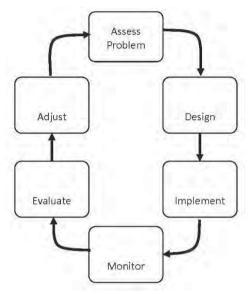


FIGURE 2-5: ALTERNATIVE D: NEW TIDE CONTROL STRUCTURE AT CHEQUESSETT NECK – DIKE AT MILL CREEK THAT PARTIALLY RESTORES TIDAL FLOW

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2.6

Adaptive management is a formal, iterative process where (1) a problem is assessed, (2) potential management actions are designed and implemented, (3) actions and resource responses are monitored over time, (4) data are evaluated, and (5) actions are adjusted as necessary to better achieve desired management outcomes (DOI 2009) (figure 2-6). Details of this process and its application to the Herring River project are described in "Appendix C: Overview of the Adaptive Management Process for the Herring River Restoration Project."



Source: Williams et al. 2007

FIGURE 2-6: GENERAL ADAPTIVE MANAGEMENT PROCESS DIAGRAM

### 2.6.2 MONITORING

Field monitoring is frequently used in ecological restoration to measure the success of restorative activities. When part of an adaptive management process, field monitoring needs to be carefully designed to measure progress toward objectives and assumptions built into conceptual models. In contrast to standard ecological monitoring and other data gathering efforts, monitoring for adaptive management is not carried out primarily for scientific interest. Instead, adaptive management monitoring studies are designed and carried out to specifically support management decision-making and assessment. Adaptive management monitoring could be a subset of a broader monitoring program, but adaptive management monitoring activities must be specifically tied to project objectives and be cost/time-efficient and sustainable for the duration of the adaptive management plan.

## 2.6.3 VEGETATION MANAGEMENT

The increased tidal exchange between the Herring River estuary and Cape Cod Bay would be achieved in incremental steps over a number of years and would change many characteristics of the flood plain. One of the most important, noticeable, and desirable changes would be to the composition of plant communities. There would be a transition from one set of plant community types to another as changes occur to environmental parameters, such as tidal range, frequency and duration of tidal flooding, soil saturation, and, most notably, salinity. Predominantly shrubland and woodland plant communities exist on areas of the river flood plain that were once vegetated with salt-marsh plants including salt meadow grass (*Spartina patens*), smooth cordgrass (*S. alterniflora*),

black grass (*Juncus gerardii*), and spike grass (*Distichlis spicata*). Most woody plants will not tolerate flooding with salt water, however gradually these impacts occur, and flooding will likely result in many acres of standing dead trees and shrubs covering a large portion of the flood plain.

# Vegetation Management Objectives

Management of flood plain vegetation, specifically the removal of shrubs and trees before salt water reaches them, would have the following objectives:

- Encourage re-establishment of tidal marsh.
- Remove woody debris that might impede fish passage.
- Remove large trees that will eventually die, topple and leave holes on the wetland surface where mosquitoes might breed.

# Vegetation Management Options

Potential techniques for dealing with woody vegetation include cutting, chipping, burning, and targeted herbicide application. A combination of these techniques will be part of a flexible approach to vegetation management.

The vegetation management activities would consist of primary and secondary management techniques. Primary management is cutting of the vegetation. This would be accomplished with tools such as hand-held loppers, chain saws, mowers, brush hogs, or larger, wheeled or treaded machines that cut and chip.

Secondary management is the processing and removal of the biomass that has been cut. This would be accomplished by a number of techniques including the use of cut hardwood (i.e., as firewood), removal of wood chips, and burning brush and branches. Woody vegetation with diameters of three or more inches could be used for biofuel, either as chips or logs, or chipped and left on the marsh surface. Natural decomposition of dead woody material as a management technique would be considered in some areas of the restored Herring River flood plain. Appropriate options for smaller diameter cut woody vegetation would be developed. Access, substrate type, and other factors would need to be considered to determine the most appropriate vegetation management techniques for specific areas and conditions.

Vegetation management actions would be of the same type and would be implemented in an identical manner under each of the action alternatives; however the spatial extent and timing of when actions would be taken might vary (see "Appendix C: Overview of the Adaptive Management Process for the Herring River Restoration Project" for a more complete discussion).

## 2.6.4 RESTORATION OF TIDAL CHANNEL AND MARSH SURFACE ELEVATION

Although reintroduction of tidal exchange and salinity is the primary component and main driver for restoration of the Herring River flood plain, several other actions would likely be necessary to reverse other previous direct and indirect alterations of the system's topography, bathymetry, and drainage capacity. Diking and drainage have caused subsidence of the former salt marsh by up to 3 feet in some locations, reaches of the river have been channelized and straightened, mosquito ditches have been created, and spoil berms have been left along creek banks (HRTC 2007). After tidal restoration is initiated, these factors could limit or delay progress toward meeting the project

objectives by inhibiting circulation of salt water, preventing recolonization of tidal marsh vegetation, ponding fresh water, and expanding nuisance mosquito breeding habitat.

Several supplementary habitat management actions would be considered to address these issues. These actions and the conditions under which they would be employed are described and analyzed in detail in the project's adaptive management plan. In summary, these potential actions include, but are not limited to the following:

- Dredging of accumulated sediment to establish a natural bottom of the Herring River channel at the appropriate depth and maximize ebb tide drainage.
- Creation of small channels and ditches to improve tidal circulation.
- Restoring natural channel sinuosity.
- Removing lateral ditch dredge spoil berms and other anthropogenic material on the marsh surface to facilitate drainage of ponded water.
- Applying thin layers of dredged material to build up subsided marsh surfaces.
- Through the adaptive management process, the project could potentially involve the beneficial re-use of dredged material to enhance the sediment supply and promote marsh accretion within the flood plain.

## 2.6.5 LOW-LYING ROAD CROSSINGS AND CULVERTS

High Toss Road

High Toss Road Culvert

The Herring River passes under High Toss Road, the second road that crosses the river, approximately one mile upstream from Chequessett Neck Road. The road is an earthen berm that was built across the salt marsh in the 19th century. The road is unpaved and infrequently traveled by vehicles, but can accommodate emergency vehicle access to Griffin Island. The river passes under the road at the western end through a 5-foot-diameter concrete culvert. Hydrodynamic modeling has shown that the culvert would cause a major restriction if tidal flow were increased at Chequessett Neck Road. The road would be overtopped daily by seawater under any restoration scenario and ebb tide drainage would be impeded by the causeway.

Complete removal of the tidal restriction at High Toss Road is a major component of the project under all action alternatives. Increased tidal exchange from a rebuilt Chequessett Neck Road Dike could be accommodated at High Toss Road by replacing the existing 5-foot-diameter concrete culvert with either a properly designed box culvert or an open channel. An open channel could include a small bridge spanning the river if pedestrian and/or vehicle access were continued. In either case, preliminary analysis suggests that a tidal channel approximately 30 feet wide would be needed for adequate tidal water conveyance.

Further hydrodynamic modeling and analysis would be conducted to more precisely size this culvert or open channel. Direct and indirect impacts would be the same under each action alternative.

#### High Toss Road Flooding

Under all of the action alternatives, High Toss Road would be flooded at high tides greater than approximately 3 feet. Although replacement of the culvert, as described previously, is the only action necessary to allow unrestricted tidal exchange through the causeway, additional measures would be needed to ensure adequate drainage and to address impacts to the road and causeway from increased tidal flow. Options considered to protect the road from tidal flow have ranged from elevating it above the level of predicted high tides to removing it entirely. Since release of the draft EIS/EIR, officials from NPS and the town of Wellfleet have determined that elevating and reinforcing the embankment to withstand daily tidal flow so that vehicle use could continue is not practical given the environmental impact, cost, and infrequent vehicle use. However, maintaining some form of pedestrian access is a public concern and options for providing this will be developed and reviewed in a public process and presented in local, state, and federal permit applications expected to be submitted in 2016.

# High Toss Road as Temporary Bypass

Earlier engineering analysis suggested that complete closure of Chequessett Neck Road would substantially reduce construction time and costs for rebuilding the dike. However, more recent engineering work completed as part of a 25 percent level design package (see appendix K) included a plan to avoid this by creating a traffic bypass at the Chequessett Neck Road Dike construction site. This bypass would have no additional impact beyond the footprint of the actual Chequessett Neck Road Dike construction zone and would obviate the need for road work along miles of overgrown road with several wetland crossings.

### Pole Dike, Bound Brook, and Old County Roads

Several segments of Pole Dike, Bound Brook Island, and Old County Roads, where they cross the main Herring River and tributary streams, are below 4 feet, making the roads vulnerable to high tide flooding under all action alternatives. To prevent this, the road surfaces would need to be elevated or relocated. Preliminary engineering analysis shows that approximately 4,175 linear feet of these roads could be affected by the highest tide of any given year. An additional 2,000 feet would be impacted by coastal storm surge. To prevent this and maintain safe travel along these roads they should be elevated to a minimum grade of 5.5 feet, 1 to 3 feet above the current grade, to prevent overtopping from storm driven tides in the Herring River (see appendix H, CLE 2011). Elevating these roads would also require widening the road bases, which would impact over 6,000 square feet of adjacent wetlands. A second option for these road segments would be to relocate the alignment onto a nearby former railroad right-of-way. Preliminary engineering analysis shows this might be feasible with potentially less wetland impacts and lower costs. Additional engineering studies and traffic analyses are needed to fully evaluate both of these options (CLE 2011).

These low-lying road segments also include three culverts on the mainstem of the Herring River, Pole Dike Creek, and Bound Brook. Replacement, and potential enlargement, of culverts would also be considered during additional design phases for road surface elevation and regrading, as described previously. In the case of Pole Dike Road, adjustable tide gates would also be installed as part of the preferred alternative.

#### 2.6.6 LOW LYING PROPERTIES

Minimizing and mitigating impacts to low-lying properties is an important objective of the HRRP. Generally, these measures could include limiting water levels across entire sub-basins, elevating or

relocating driveways and landscaping, moving wells, building small berms or flood walls, and moving or elevating structures.

Within the boundary of Cape Cod National Seashore in the Lower Herring River basin, there are two private properties with buildings that would be flooded by restoring tidal flow to the main river basin. These properties are at very low elevations and would be affected early on in the restoration process. Unlike potentially affected structures in other basins, there are no tide control structures between them and the Chequessett Neck Road Dike that can minimize high tide levels. In cases where no flood mitigation measures are feasible and in the absence of a willing seller or negotiated exchanges, NPS would consider an eminent domain taking. At present, a voluntary exchange is being negotiated for one of these two properties.

#### 2.6.7 PUBLIC ACCESS AND RECREATION OPPORTUNITIES

As described in "Chapter 1: Purpose and Need," the Herring River estuary is included in the Seashore's natural zone, and is managed to protect natural processes with limited infrastructure. Given the Seashore's planning objective, it is anticipated that any development of public access points or visitor facilities would occur at the discretion of adjacent landowners or stakeholders, such as the Towns of Wellfleet and Truro, Wellfleet Conservation Trust, or the Friends of Herring River.

For example, the new Chequessett Neck Road Dike would be designed to include safe fishing access points, launch sites on the upstream and downstream sides of the new dike, and a safe portage route between those launch sites (see "Section 4.11, Potential Long-Term Use of Chequessett Neck Road Dike Staging Area and Adjacent Wetlands for Canoe/Kayak Access," for more detail). Launches for canoes or kayaks could also be provided at other points in the estuary. Walking trails could include access to the variety of habitats established by the restoration process. Over the long term, access to recreational shellfishing areas could also be considered once the shellfish resource is sustainable and capable of supporting harvest. The NPS would work with adjacent land managers by providing guidance on resource protection and interpretation.

# 2.7 ALTERNATIVES OR ALTERNATIVE ELEMENTS CONSIDERED BUT DISMISSED FROM CONSIDERATION

# 2.7.1 REPLACE DIKE WITH BRIDGE AND FULLY RESTORE THE ENTIRE ESTUARY (NO CONTROL STRUCTURES)

Comments received through public scoping meetings held over the summer of 2008 reflected interest in replacing the Chequessett Neck Road Dike with a bridge to facilitate canoe and kayak passage, improve access for anadromous fish, and aesthetics. The hydrodynamic model was used to simulate the effect of completely removing the road crossing at Chequessett Neck. A fully open connection between the Herring River and Wellfleet Harbor would be as close to the original, predike condition as could be achieved today, allowing maximal tidal circulation and sediment flux. However, because of the need for tide control at least through the foreseeable adaptive management timeframe, and possibly much longer, construction of a bridge at Chequessett Neck Road was not considered practicable and was dismissed from further consideration. However, accommodations for fish passage, recreational boating, and aesthetics will be considered in design plans for the new dike.

#### 2.7.2 FULLY OPEN THE EXISTING TIDE GATES

Earlier modeling studies (Roman 1987; Spaulding and Grilli 2001) evaluated the option of completely opening the existing three culverts in the Chequessett Neck Road Dike. The modeling showed that although this would result in a substantial increase in high tide heights and area of inundation upstream of the dike, the ebb tide drainage capacity of the dike would not increase, thereby increasing low tide heights. Opening the existing structure would actually decrease both the tidal range and flushing, while increasing the likelihood of harmful flooding. Because this outcome does not meet the project purpose and objectives, it has been dismissed from further consideration.

#### 2.7.3 REBUILD THE DIKE WITH A TIDAL OPENING LESS THAN 165 FEET

Consideration has been given to the idea of deliberately undersizing a new Chequessett Neck Road Dike to diminish the range of Wellfleet Harbor tides allowed to pass into the Herring River. The underlying concept for this is that a passive tide control system could be designed that would allow normal monthly spring tides to propagate upstream but would also filter out higher tides caused by periodic astronomical events, coastal storm surges, and the impacts of sea level rise.

While this approach is technically feasible and has been successfully used at other tidal restoration projects, applying it at the Herring River could impose unnecessary constraints on the ability to manage tidal flows and sediment processes in keeping with the project's long-term goals and objectives. Changes to tidal hydrology resulting from sea level rise and other factors are uncertain and it is impossible to predict changes in land use within the Herring River estuary.

Additional modeling studies prepared for this project (Spaulding and Grilli 2005; WHG 2012) simulated new tidal inlets within the dike ranging from 30 to 300 feet wide. Results show that inlet widths less than 100 feet could improve the overall tidal range with higher high tides and lower lows, but the extent of salt water inundation of the flood plain remains muted. Although this could reduce the need for mitigation of adverse impacts in some locations, it precludes the minimally acceptable tidal exchange necessary to meet the project's restoration objectives. Therefore, this option was dismissed from further consideration.

# 2.7.4 TIDAL POWER GENERATION AT THE NEW CHEQUESSETT NECK ROAD DIKE

During public scoping meetings in August and September 2008 several commenters advocated for inclusion of tidal power generation within a newly reconstructed Chequessett Neck Road Dike. These comments were also included in the MEPA certificate issued by the Massachusetts Executive Office of Energy and the Environment on November 7, 2008. This element would present a hazard to the key diadromous fish species targeted to benefit from the project and therefore is in direct conflict with the project objectives.

In addition, application of a basic equation for calculating potential kinetic energy from open flow channels (WHG 2009) to the Herring River shows that the relatively low flow volume and head differential at a new Chequessett Neck dike would be far too small to produce electricity at a scale that would justify the costs, complications, and increased environmental impact of a tidal power turbine. Therefore, this option was dismissed from further consideration.

# 2.7.5 UNRESTRICTED TIDE FLOW AT CHEQUESSETT NECK

The HRRC has considered a long-term outcome that would remove tide control from the Chequessett Neck Road Dike and allow full, unrestricted tidal exchange between the river and

Wellfleet Harbor. This alternative provides many ecological benefits, such as increased sediment deposition on the restored upstream tidal marsh during storm events, and has long-term operational advantages because after a period of incremental adjustments tide gates would no longer be needed and could be removed. Removal of tide gates would also ensure that the Herring River continues to flow freely into the foreseeable future since the mechanism for restricting tides would be eliminated. However, given the uncertainty about the impacts of tidal restoration and sea level rise and the relatively long period during which the incremental restoration and adaptive management process would occur, it was determined that a decision to allow removal of any tide control structures could be considered in the future, but was beyond the planning horizon of this EIS/EIR.

# 2.8 CONSTRUCTION METHODS, TIMEFRAME, AND RESOURCE PROTECTION MEASURES

Standard construction methods and equipment would be used to construct the infrastructure needed to implement the action alternatives. Earth-moving equipment, graders, cranes, dump trucks, cement trucks, and other equipment would be operated and staged in the project area. Fill, armor stones, and other construction materials would also be staged in preparation for use. To the extent possible, previously disturbed areas would be used to stage equipment and materials. For dike construction, the sites would be de-watered using coffer dams and pumps, or other common methods for dike construction. Information concerning construction impacts, staging, and access route options are provided in section 4.11.

Preliminary engineering guidance suggests construction of the new dike at Chequessett Neck Road Dike would be expected to take approximately 12-18 months to complete. Elevation or changes to low-lying roads would take approximately 6-12 months to complete. At Mill Creek, the new dike (under alternatives C and D) would take approximately 6-12 months. It is likely that individual construction elements would be phased in over time and would not occur concurrently. Elevation construction of some of the roads that are in the more upstream reaches of the flood plain could be delayed or phased with the later incremental dike openings. All low-lying roads do not need to be elevated at the start of the incremental tidal restoration.

# 2.9 HOW ALTERNATIVES MEET OBJECTIVES

As stated in the "Chapter 1: Purpose and Need," all action alternatives selected for analysis must meet all objectives to a large degree. The action alternatives must also address the stated purpose of taking action and resolve the need for action; therefore, the alternatives were individually assessed in light of how well they would meet the objectives for this plan and EIS/EIR (refer to "Chapter 1: Purpose and Need"). Alternatives that did not meet the objectives were not analyzed further (see section 2.7).

Table 2-4 compares how each of the alternatives described in this chapter would meet project objectives.

TABLE 2-4: COMPARISON OF HOW THE ALTERNATIVES MEET PROJECT OBJECTIVES

Objective	Alternative A: No Action – Retain Existing Tide Control Structure at Chequessett Neck	Action Alternatives: B, C, and D
To the extent practicable, given adjacent infrastructure and other social constraints, re-establish the pre-dike tidal range, salinity distribution, and sedimentation patterns of the 1,100-acre estuary.	Alternative A would not meet this objective because restoration would not be undertaken. The Chequessett Neck Road Dike would continue to limit tidal influence in the estuary. Seawater would not reach areas upstream of High Toss Road. The Herring River flood plain would remain largely a freshwater system isolated from marine waters and lack of sediment availability would allow land subsidence to continue. The lowest reaches of the Lower Herring River would continue to receive some influence from tidally driven seawater.	The action alternatives would largely meet this objective by re-establishing the hydrologic connection between Wellfleet Harbor and the Herring River. Construction of a new Chequessett Neck Road Dike would allow long-term management of mean high spring tidal inundation levels to between 4.8 and 5.6 feet in the Lower Herring River. Tidal marsh restoration would occur over approximately 800 to 900 acres. A range of salinity concentrations – seawater to brackish to freshwater – would occur throughout the restoration area. Of the action alternatives, alternative D would best meet this objective by reintroducing tidal exchange and restoration processes to the greatest area.
Improve estuarine water quality for resident and migratory animals including fish, shellfish, and waterbirds.	Alternative A would only minimally meet this objective because limited tidal flushing and long residence times would contribute to poor water quality in the project area. The Herring River is currently listed on the Massachusetts 303(d) list for impaired water quality. Oxygen depletion, fish kills, high metals concentration, and fecal coliform contamination have all been issues in the Herring River flood plain, and this condition would continue. However, existing shellfishing activities would continue.	Under all action alternatives, water quality in the Herring River would be greatly improved from present conditions. Tidal exchange would be restored to between 800 and 900 acres, and residence times would be reduced by a factor of 25. Regular tidal flushing would reduce nutrient concentration and bacteria counts, while changes in soil chemistry - from freshwater to saline – would eliminate metals contamination. Of the action alternatives, alternative D would best meet this objective by providing the greatest quantity of tidal exchange and water quality improvements.
Protect and enhance harvestable shellfish resources both within the estuary and in receiving waters of Wellfleet Bay.	Alternative A would not meet this objective because the Herring River estuary would remain degraded with diminished abundance and diversity of shellfish species. Fecal coliform contamination would persist, as would the 90-acre shellfish harvest closure.	Under all action alternatives, increased salinity and improved water quality would provide substantially more habitat for locally important shellfish species within the Herring River estuary. As populations increase, juveniles may spread to and establish in Wellfleet Harbor. Of the action alternatives, alternative D would be expected to best meet this objective by providing the greatest quantity of tidal exchange and potential for increased populations and migration of shellfish.

2.9

Objective	Alternative A: No Action – Retain Existing Tide Control Structure at Chequessett Neck	Action Alternatives: B, C, and D
Restore the connection with the marine environment to recover the estuary's functions as 1) a nursery for marine animals and 2) a source of organic matter for export to near-shore waters.	Alternative A would not meet this objective because Herring River estuarine system would remain degraded with restricted access for and low abundance of locally important fish and shellfish species. The Chequessett Neck Road Dike would remain a hindrance to migratory fish passage, suitable habitat for juvenile fishes would be limited, and sediment and nutrients would remain trapped behind the dike.	Under all action alternatives, restored estuarine waters and formation of new tidal channels would provide substantially more habitat and access to upstream spawning and nursery habitats for both resident and transient fish species and shellfish, increasing their abundance. Although the new Chequessett Neck Road Dike would still present an impediment to sediment transport, nutrients and fine particles would move with the tides, both upstream into the sub-basins and downstream into Wellfleet Harbor. Of the action alternatives, alternative D would best meet this objective by providing the greatest quantity habitat and quantity of tidal exchange.
Remove physical impediments to migratory fish passage to restore once-abundant river herring and eel runs.	Alternative A would not meet this objective because Herring River estuarine system would remain degraded with restricted access for and low abundance of locally important anadromous and catadromous species. The Chequessett Neck Road Dike would remain a hindrance to migratory fish passage.	Under all action alternatives, restored estuarine waters and formation of new tidal channels would provide substantially more habitat and access to upstream spawning and nursery habitats for locally important anadromous and catadromous species, increasing their abundance. All action alternatives would include a new Chequessett Neck Road Dike that would provide adequate passage for herring and eels.
Re-establish native estuarine vegetative cover in place of the invasive non-native plants, freshwater wetland plants, and upland plants that have colonized most parts of the degraded flood plain.	Alternative A would not meet this objective because degraded freshwater wetland conditions would persist in over 1,000 acres of former salt marsh habitats due to tidal restriction. <i>Phragmites</i> and other nonnative vegetation would persist and have the opportunity to spread in the project area.	Under all action alternatives, over the long term, extensive restoration of salt marsh vegetative communities would occur. Approximately 800 to 900 acres would be regularly inundated at a frequency to support growth of native, salt-tolerant wetland plants. However, conditions in upstream reaches of sub-basins would likely support transitional habitats and a border of persistent freshwater species. Of the action alternatives, alternative D would best meet this objective by providing the greatest acreage of vegetation change.
Restore normal sediment accumulation on the wetland surface to counter subsidence and to allow the Herring River marshes to accrete in the face of sea level rise.	Alternative A would not meet this objective because tidal flows would continue to be restricted, limiting upstream sediment transport. Channel width, depth, and capacity would remain restricted. Insufficient delivery of sediment to marsh surfaces, pore space collapse, and decomposition of organic matter would cause continued subsidence of the marsh surface. Normal tides would continue to mobilize sediment over approximately 56 acres.	Under all action alternatives, the larger tide gate opening would support accretion of sediment on the marsh over decades. The degree and rate of sediment mobilization would be determined by the amount of tidal influence and rate of incremental opening of the tide gates. Normal tides would mobilize sediment on between 144 and 156 acres, most of which would be deposited in upstream reaches. Of the action alternatives, C and D would best meet this objective by providing the greatest area of sediment mobilization.

Objective	Alternative A: No Action – Retain Existing Tide Control Structure at Chequessett Neck	Action Alternatives: B, C, and D
Re-establish the natural control of nuisance mosquitoes by restoring tidal range and flushing, water quality, and predatory fish access.	Alternative A would not meet this objective because the absence of tidal flushing and predatory fish would persist. The Herring River would remain a productive mosquito habitat, particularly between High Toss Road and Route 6. The dominant mosquito species is <i>Ochlerotatus cantator</i> .	Under all action alternatives, a shift in species is expected as salinity is increased, with a long-term decline of freshwater and generalist species such as <i>O. cantator</i> and <i>O. canadensis</i> , with replacement by salt marsh mosquito species such as <i>O. solicitans</i> in the lower marsh. Because of the greater success in controlling this species, a decrease in the mosquito nuisance is expected. Of the action alternatives, alternative D would best meet this objective because 890 acres would be subject to saltwater influence.
Restore the expansive marshes and tidal waters that were once a principal maritime focus of both Native Americans and European settlers of outer Cape Cod in a manner that preserves the area's important cultural resources.	Alternative A would only minimally meet this objective because the 100-year old Chequessett Neck Road Dike would remain in place, with further degradation of the historic tidal marsh, absence of historically important aquatic species, and limited access for fishing and other recreational activities. Existing salt marsh areas in Lower Herring River would remain.  However, there would be no impacts to cultural resources or archeological resources because existing conditions would be maintained.	Under all action alternatives, this objective would be partially met because tidal salt marsh would be restored, fish and shellfish populations would increase, and the open habitat type of the salt marsh would support greater access for fishing and recreation.  However, there would be a potential for adverse effects to archeological resources in the area of potential effect (APE) from construction or other ground-disturbance.  Higher tides would not affect archeological resources because inundation would be gradual. Erosion from increased tidal flows could affect transportation corridors across river channels, but these impacts would be mitigated by culvert replacement and other measures. Upland alteration to protect the CYCC golf course from flooding could result in disturbance of 5 to 30 acres of potentially sensitive cultural resources.
Minimize adverse impacts to surrounding land uses, such as domestic residences, lowlying roads, wells, septic systems, and private property, including the CYCC.	Alternative A would best meet this objective because tidal inundation levels and flood risk to adjacent landowners would not change. Properties in the project area would rely on the continued operation of the Chequessett Neck Road Dike for protection from tidal impacts.	The action alternatives would meet this objective because of improved water management and control at the Chequessett Neck Road Dike and because affected properties would receive site-specific flood proofing measures. Under alternatives B and D, flood protection and drainage on the CYCC golf course would be improved by filling and elevating 8.3 acres of wetland or relocating vulnerable portions of the course. Between 7,400 and 9,400 feet of low-lying paved roadways would be improved and elevated above the flood plain. Of the action alternatives, alternative C would result in fewer impacts and flood mitigation requirements to surrounding land uses.

2.9

Objective	Alternative A: No Action – Retain Existing Tide Control Structure at Chequessett Neck	Action Alternatives: B, C, and D
Provide a highly visible example of the values of estuarine habitat restoration and a rich and long-term opportunity to educate the public about the dependency of productive salt marshes on unaltered tidal exchange.	Alternative A would not meet this objective because restoration of the Herring River would not be undertaken.	The action alternatives would meet this objective by restoring tidal exchange over most of the historic marsh plain.
Restore the aesthetic appeal and accessibility of the open herbaceous marsh in place of existing scrub/shrub invasive species.	Alternative A would only minimally meet this objective because the current vegetative cover of forest and shrubs would persist over much of the Herring River flood plain. However, the aesthetic qualities of the existing marshes and woodlands would remain.	Over the long term, the action alternatives would result in improved aesthetic appeal by eliminating woody species, and opening the vista of the marsh plain. Intertidal habitats would vary by basin, but would be mostly open water, broad meadows, and salt water marshes. Wooded areas within the flood plain would decrease, reducing obstructions to viewscapes. Of the action alternatives, alternative D would best meet this objective because up to 890 acres would be returned to native habitat.
Improve finfishing and shellfishing opportunities.	Alternative A would only minimally meet this objective because recreational and commercial shellfish harvest would remain permanently closed over 90-acres immediately downstream of the Chequessett Neck Road Dike due to fecal coliform contamination. The finfish population in the Herring River would remain depauperate. However, current shellfishing and finfishing opportunities would continue.	The action alternatives would meet this objective because shellfish and finfish populations are expected to increase as habitat and water quality improve. Decreased fecal coliform levels would allow the closed area downstream of the Chequessett Neck Road Dike to be reopened to shellfish harvest; other areas of Wellfleet Harbor that are only conditionally opened could be opened year-round. Of the action alternatives, alternative D would best meet this objective by restoring the largest area and providing the greatest tidal exchange.
Enhance opportunities for canoeing, kayaking, and wildlife viewing over a diversity of restored wetland and open-water habitats.	Alternative A would only minimally meet this objective because public access points would remain unaffected and the physical character of the estuary would be unchanged. However, current recreational canoeing, kayaking, and wildlife viewing opportunities would continue.	The action alternatives would meet this objective because after restoration, there would be improvements to recreational shellfishing, finfishing, wildlife viewing, boating, and visual aesthetics. There would be no net loss in public access. The more open character of the estuary would support improved access and abilities to view native wildlife. Of the action alternatives, alternative D would best meet this objective by restoring the largest area of open-water habitats.

### 2.10 CONSISTENCY WITH THE PURPOSES OF NEPA

As required under the CEQ regulations (40 CFR 1502.2(d)), an EIS must include a section stating how each alternative analyzed in detail would or would not achieve the requirements of sections 101(b) and 102(1) of NEPA and other environmental laws and policies. In the NPS, this requirement is met by (1) disclosing how each alternative, one of which is identified as the environmentally preferable, meets the criteria set forth in section 101(b) of NEPA; and (2) any inconsistencies between the alternatives analyzed in detail and other environmental laws and policies.

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.

Alternative A would not restore environmental conditions in the estuary, which is degraded due to diking, draining, and tidal restriction. This degraded environmental condition is expressed in the form of reduced salinity penetration, degraded water and sediment quality, closed shellfish beds, reduced distribution of salt marsh vegetation, obstructed fish migration, and lost habitat for diverse estuarine species. While current environmental laws provide some protection from additional environmental harm, without restoration future generations would inherit a substantially degraded estuarine environment. Alternative A, therefore, does not achieve criterion 1 to any great degree. Under each action alternative, environmental conditions would be substantially improved once the adaptive management process is complete. The majority of the Herring River flood plain would become tidally influenced, which would reverse the impacts of diking and draining. Penetration of saline water into the estuary would approximate pre-dike conditions. Increased flushing would improve water and sediment quality, allowing for the reopening of some shellfish beds in Wellfleet Harbor. The distribution of salt marsh vegetation would resemble pre-dike conditions, and substantial habitat for estuarine species would be restored. Future generations would inherit a substantially restored estuarine environment. Each of the action alternatives, therefore, achieve criterion 1 to a large degree, with alternative D achieving the most because the extent of tidal restoration is greatest.

2. Ensure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings.

Alternative A would retain the estuary's current scenic condition, which is shaped by upland and freshwater marsh vegetation, and which does provide a small measure of esthetic and cultural value. However, in most regards alternative A does not achieve criterion 2 due to poor water and sediment quality, degraded habitats, and closure of some shellfish beds. For all action alternatives, improved water quality, sediment quality, and salinity penetration would make the estuary more productive in terms of salt marsh vegetation; these improved habitat conditions would increase productivity for estuarine fish and shellfish species. Esthetic conditions would be improved for many residents and visitors as wooded areas give way to open views of the estuary. Potentially reduced mosquito hatches could also improve the estuary in an esthetic sense. The reopening of shellfish beds and increased shellfish productivity would enhance the role of the estuary for that culturally important aspect of the local economy. Each of the action alternatives, therefore, achieves criterion 2 to a large degree, with alternative D achieving criterion 2 the most because it would provide the greatest extent of restoration.

3. Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.

While alternative A provides for a range of beneficial uses of the Herring River estuary, it does so by perpetuating degraded conditions that are themselves the unintended consequences of past diking, draining, and tidal restriction in the estuary and thus, does not achieve the goal of criterion 3. Each of the action alternatives would improve the condition and function of the estuary such that a wide range of sustainable, beneficial uses could be enjoyed over the long term without environmental degradation. These beneficial uses include recreational and commercial shellfishing, recreational finfishing, boating, and wildlife viewing. While the action alternatives would also result in increased flood risk for some private properties and low-lying road segments, beneficial use by residents is not precluded. The action alternatives would, therefore, achieve criterion 3 to a large degree. Of the action alternatives, alternative D would achieve criterion 3 the most because it would have the largest area of restoration over the long term and therefore provide the greatest benefit in terms of potential sustainable uses.

4. Preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice.

Alternative A achieves criterion 4 to a small degree because it would not disturb cultural or historic resources; however, degraded environmental conditions would be perpetuated. Each of the action alternatives would restore tidal exchange and estuarine processes while mitigating impacts to cultural and historic resources that could result from higher tide levels, and therefore, achieve the goals of criterion 4 to a much larger degree, with alternative D achieving the most because it would provide the largest area of restoration over the long term.

5. Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities.

Alternative A does not achieve criterion 5 to any great degree because the current degraded condition of the Herring River estuary provides fewer amenities and contributes less to the standard of living of local residents than the estuary provided prior to diking, and less than it would provide after restoration. Each of the action alternatives would improve water quality and wetland function, increase aquatic life, reduce nuisance mosquitos, improve commercial and recreational shellfishing, improve landscape esthetics, and enhance recreation opportunities. The potential for tidal or storm surge waters to reach abutting properties would increase, but the NPS and HRRC are working with potentially affected property owners to develop site-specific flood mitigation measures for their property and structures. The action alternatives, therefore, achieve criterion 5 to a large degree because they would provide a broad range of amenities for the residents and visitors, and permit high standard of living for the resident population.

6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

Alternative A partially achieves the goal of criterion 6 because it would not involve construction and, thus, would not use depletable resources; however, the existing degraded environmental conditions do not enhance the quality and quantity of locally important renewable resources such as shellfish and finfish. Each of the action alternatives would improve water quality and habitats for renewable shellfish and finfish resources. Construction of a new Chequessett Neck Road Dike (under all action alternatives), a new dike at Mill Creek (under alternatives C and D), changes to low-lying roads, and site specific flood mitigation measures would all consume depletable resources as part of the

construction processes, but mitigation measures, including recycling, would reduce this depletable resource use to the maximum extent practicable. The action alternatives, therefore, achieve criterion 6 to a large degree.

## 2.11 ENVIRONMENTALLY PREFERABLE ALTERNATIVE

In accordance with Director's Order 12, the NPS identifies the environmentally preferable alternative in its NEPA documents for public review and comment (section 4.5 E(9)). The environmentally preferable alternative is the alternative that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources. The environmentally preferable alternative is identified upon consideration and weighing by the Responsible Official of long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources. In some situations, such as when different alternatives impact different resources to different degrees, there may be more than one environmentally preferable alternative (43 CFR 46.30).

Alternative D was identified as the environmentally preferable alternative because tidal restoration would be maximized. Construction could result in temporary adverse impacts, but in the long-term alternative D would substantially improve the biological and physical environment. Compared with the other action alternatives, a larger portion of the flood plain would be subjected to tidal influence, increasing salinity penetration, improving water and sediment quality, increasing the distribution of salt marsh vegetation, eliminating obstacles to fish migration, and providing habitat for diverse estuarine species. Although there could be some low-lying areas impacted by periodic flooding, these impacts can be effectively mitigated on a site-specific basis. Therefore, alternative D is considered to best protect, preserve, and enhance historic, cultural, and natural resources.

# 2.12 NPS AND HRRC PREFERRED ALTERNATIVE

To identify the preferred alternative, each alternative was evaluated based on its ability to meet the plan objectives (see table 2-4) and their potential impacts on the environment (see "Chapter 4: Environmental Consequences" of this document). An initial screening of the alternatives was accomplished by the project team through the Value Analysis/Choosing by Advantages process held June 1–3, 2011 (Kirk Associates 2011). The Value Analysis/Choosing by Advantages process considered the advantages of the three proposed action alternatives, including the Mill Creek options for alternatives B and D. Each of the three alternatives was evaluated against three factors:

- Restore natural and cultural resources.
- Improve operational efficiency, reliability, and sustainability.
- Enhance and maintain socioeconomic benefits.

The HRRC evaluated the benefit or "importance of advantage" for each of the alternatives. Not considering the cost, alternative D, with Mill Creek Option 2 which includes installation of new tidal control structure at Chequessett Neck and a dike at Mill Creek that partially restores tidal flow, and elevates the fairways and practice area at the CYCC, would provide the greatest importance of advantage based on benefit points. Relative initial cost estimates for the alternatives were developed and the relative benefits and costs of the alternatives were graphed. This cost-benefit ratio also showed that alternative D with Mill Creek Option 2, elevation of the CYCC golf course, would offer the best value, with the highest benefit to cost ratio. Thus, in the Value Analysis/Choosing by Advantages process, alternative D with elevation of the CYCC golf course was identified as the preferred alternative.

## 2.13 SUMMARY AND IMPACTS OF THE ALTERNATIVES

The full range of impacts anticipated to result from implementation of the proposed alternatives is detailed in "Chapter 4: Environmental Consequences" of the EIS/EIR. A brief summary of these impacts is included in table 2-5.

TABLE 2-5: SUMMARY OF THE IMPACTS OF THE ALTERNATIVES

Resource	Alternative A: No Action – Retain Existing Tide Control Structure at Chequessett Neck	Alternative B: New Tide Control Structure at Chequessett Neck – No Dike at Mill Creek	Alternative C: New Tide Control Structure at Chequessett Neck – Dike at Mill Creek that Excludes Tidal Flow	Alternative D: New Tide Control Structure at Chequessett Neck – Dike at Mill Creek that Partially Restores Tidal Flow
Surface Waters	Road Dike would continue to limit tidal influence in the estuary. Seawater would not reach areas upstream of High Toss Road. The lowest reaches of the Lower Herring River	Dike would be managed in the long term to allow mean high spring tide of 4.8 feet and a maximum coastal storm driven tide of 6.0 feet in the Lower	The new Chequessett Neck Road Dike would be managed in the long term to allow mean high spring tide of 5.6 feet and a maximum coastal storm driven tide of 7.5 feet in the Lower Herring River. A new dike managed to exclude tides would be constructed at the mouth of Mill Creek. Salinity penetration would increase in all sub-basins beyond that achieved in alternative B, but no change would occur in Mill Creek.	The new Chequessett Neck Road Dike would be managed in the long term to allow mean high spring tide of 5.6 feet and a maximum coastal storm driven tide of 7.5 feet in the Lower Herring River. A new dike managed to control tides would be constructed at the mouth of Mill Creek. Salinity penetration would increase in all sub-basins to the same extent as alternative C, but salinity penetration in Mill Creek would be comparable to that of alternative B.
		Salinity ranges of specific sub- basins would be as follows:	Salinity ranges of specific sub- basins would be as follows:	Salinity ranges of specific sub-basins would be as follows:
	(0 parts per thousand (ppt) =	basins would be as follows:  (0 ppt = freshwater, ~35 ppt = seawater):  • Lower Herring River: 22-29 ppt  • Middle Herring River: 7-29 ppt  • Upper Herring River: 0-1 ppt  • Duck Harbor: 0-25 ppt  • Lower Pole Dike Creek: 15-30 ppt  • Upper Pole Dike Creek: 0-14 ppt  • Lower Bound Brook: 2-24 ppt  • Upper Bound Brook: 0-3 ppt  • Mill Creek: 0-30 ppt	basins would be as follows: (0 ppt = freshwater, ~35 ppt = seawater):  • Lower Herring River: 25-30 ppt  • Middle Herring River: 12-29 ppt  • Upper Herring River: 0-17 ppt  • Duck Harbor: 3-24 ppt  • Lower Pole Dike Creek: 17-30 ppt  • Upper Pole Dike Creek: 0-20 ppt  • Lower Bound Brook: 7-27 ppt  • Upper Bound Brook: 0-15 ppt  • Mill Creek: 0 ppt	(0 ppt = freshwater, ~35 ppt = seawater): • Lower Herring River: 25-30 ppt • Middle Herring River: 12-29 ppt • Upper Herring River: 0-17 ppt • Duck Harbor: 3-24 ppt • Lower Pole Dike Creek: 17-30 ppt • Upper Pole Dike Creek: 0-20 ppt

Resource	Alternative A: No Action – Retain Existing Tide Control Structure at Chequessett Neck	Structure at Chequessett Neck –	Alternative C: New Tide Control Structure at Chequessett Neck – Dike at Mill Creek that Excludes Tidal Flow	Alternative D: New Tide Control Structure at Chequessett Neck – Dike at Mill Creek that Partially Restores Tidal Flow
Water and Sediment Quality	continue to impact water and	would be greatly improved from present conditions. Tidal exchange would be restored to approximately 800 acres. Porewater and surface water pH would improve, leaching of iron	Water quality in the Herring River would be greatly improved from present conditions. Tidal exchange would be restored to approximately 830 acres. Porewater and surface water pH would improve, leaching of iron and aluminum, and fecal coliform concentration would be reduced. Summer dissolved oxygen concentrations would improve to levels safe for fish and invertebrates. No water quality improvements would occur to Mill Creek.	Water quality in the Herring River would be greatly improved from present conditions. Tidal exchange would be restored to 889 acres. Porewater and surface water pH would improve, leaching of iron and aluminum, and fecal coliform concentration would be reduced. Summer dissolved oxygen concentrations would improve to levels safe for fish and invertebrates.
	Residence time is an indicator of tidal flushing efficiency. A short residence time indicates good flushing. A long residence time indicates stagnant water and is associated with poor water quality. Residence Time under current conditions is approximately 200 days.		Residence time is an indicator of tidal flushing efficiency. A short residence time indicates good flushing. A long residence time indicates stagnant water and is associated with poor water quality. Residence time would be reduced to 6 days, but Mill Creek sub-basin would be excluded.	Residence time is an indicator of tidal flushing efficiency. A short residence time indicates good flushing. A long residence time indicates stagnant water and is associated with poor water quality. Residence Time would be reduced to 6 days.

Resource	Alternative A: No Action – Retain Existing Tide Control Structure at Chequessett Neck	Alternative B: New Tide Control Structure at Chequessett Neck – No Dike at Mill Creek	Alternative C: New Tide Control Structure at Chequessett Neck – Dike at Mill Creek that Excludes Tidal Flow	Alternative D: New Tide Control Structure at Chequessett Neck – Dike at Mill Creek that Partially Restores Tidal Flow
Sediment Transport	Tidal flows would continue to be restricted by the existing Chequessett Neck Road Dike, limiting upstream sediment transport. Channel width, depth, and capacity would remain restricted. Insufficient delivery of sediment to marsh surfaces, pore space collapse, and decomposition of organic matter would cause continued subsidence of the marsh surface.	Enlarging the dike opening would result in accretion of sediment on the marsh. The degree and rate of sediment mobilization would be determined by the amount of tidal influence and rate of incremental opening of the tide gates. Restoration of marsh surface elevations may proceed for decades.		Same as alternative B.
	The quantity of mobilized sediment is in part a function of the potential area of sediment mobilization (upstream and downstream of Chequessett Neck Road Dike). Normal tides and storm tides would be associated with the following acreages under current conditions:  Normal Tides: 56 acres Storm Tides: 154 acres	Road Dike). Normal tides and storm tides would be associated	The quantity of mobilized sediment is in part a function of the potential area of sediment mobilization (upstream and downstream of Chequessett Neck Road Dike). Normal tides and storm tides would be associated with the following acreages under alternative C:  Normal Tides: 156 acres  Storm Tides: 447 acres	The quantity of mobilized sediment is in part a function of the potential area of sediment mobilization (upstream and downstream of Chequessett Neck Road Dike).  Normal tides and storm tides would be associated with the following acreages under alternative D:  Normal Tides: 156 acres  Storm Tides: 447 acres
Soils	The soils would continue to evolve as they have since the dike was built, as there would be no predicted changes in soil chemistry, structure, or organic content. Soil conditions would continue to reflect past adverse impacts of tidal exclusion.	Tidal restoration would result in estuary-wide, beneficial changes to hydric soils by increasing pore space, soil pH, and organic content as these soils are subjected to tidal inundation. Various local changes in soil texture are also expected as soils are subjected to different erosional and/or depositional forces that alter the sand, silt, or clay content.	Same as alternative B.	Same as alternative B.

Resource	Alternative A: No Action – Retain Existing Tide Control Structure at Chequessett Neck	Structure at Chequessett Neck –	Alternative C: New Tide Control Structure at Chequessett Neck – Dike at Mill Creek that Excludes Tidal Flow	Alternative D: New Tide Control Structure at Chequessett Neck – Dike at Mill Creek that Partially Restores Tidal Flow
Wetland Habitats and Vegetation	<ul> <li>75 acres wet deciduous forest</li> <li>7 acres dry deciduous forest</li> <li>26 acres pine woodland</li> <li>231 acres dry deciduous woodland</li> <li>288 acres wet shrubland</li> <li>1 acre dry shrubland</li> <li>18 acres old field herbaceous mix</li> <li>172 acres freshwater marsh (non-tidal)</li> <li>36 acres brackish marsh (tidal)</li> <li>13 acres salt marsh (tidal)</li> <li>20 acres heathland</li> <li>1 acre dune grassland</li> <li>94 acres water</li> <li>24 acres developed</li> </ul>	restoration of salt marsh vegetative communities would occur.  The following cover type habitat conditions would undergo habitat change:  • 44 acres wet deciduous forest  • 2 acres dry deciduous forest  • 22 acres pine woodland  • 10 acres dry deciduous woodland  • 122 acres wet shrubland  • 2 acres old field herbaceous mix  • 127 acres freshwater marsh (tidal)  • 183 acres brackish marsh (tidal)  • 358 acres salt marsh (tidal)  • 11 acres heathland  • 1 acres dune grassland  • 86 acres water  • 12 acres developed  • 26 acres misc. non-tidal**	Over the long term, extensive restoration of salt marsh vegetative communities would occur.  The following cover type habitat conditions would undergo habitat change:  • 2 acres pine woodland  • 67 acres wet shrubland  • 99 acres freshwater marsh (tidal)  • 98 acres brackish marsh (tidal)  • 80 acres water  • 24 acres developed  • 57 acres misc. non-tidal**	Over the long term, extensive restoration of salt marsh vegetative communities would occur.  The following cover type habitat conditions would undergo habitat change:  • 2 acres pine woodland  • 67 acres wet shrubland  • 99 acres freshwater marsh (tidal)  • 98 acres brackish marsh (tidal)  • 86 acres water  • 12 acres developed  • 57 acres misc. non-tidal**

Resource	Alternative A: No Action – Retain Existing Tide Control Structure at Chequessett Neck	Alternative B: New Tide Control Structure at Chequessett Neck – No Dike at Mill Creek	Alternative C: New Tide Control Structure at Chequessett Neck – Dike at Mill Creek that Excludes Tidal Flow	
Aquatic Species	system would remain degraded with diminished abundance of resident estuarine fish, marine migrant species, and macroinvertebrate species in the estuary, and limited use of fresh water spawning grounds by anadromous/catadromous		Same as alternative B.	Same as alternative B.
		Total estuarine habitat would increase to 790-800 acres.	Total estuarine habitat would increase to 822 acres.	Total estuarine habitat would increase to 878-885 acres.
State-listed	Northern Harrier	Northern Harrier		Northern Harrier
Rare, Threatened, and Endangered Species	<ul> <li>96 acres nesting habitat in documented breeding area (freshwater marsh in Bound Brook sub-basin)</li> <li>251 acres of Foraging, roosting, and migratory habitat throughout project area (fresh, brackish, and salt marsh)</li> <li>659 acres unsuitable habitat</li> </ul>	<ul> <li>60 acres nesting habitat in documented breeding area (freshwater marsh in Bound Brook sub-basin)</li> <li>668 acres of foraging, roosting, and migratory habitat throughout project area (fresh, brackish, and salt marsh)</li> <li>278 acres unsuitable habitat</li> </ul>	Impacts associated with alternative C are not addressed for this resource here because, compared to the preferred alternative, it only excludes the Mill Creek subbasin from the project. Therefore, alternative C impacts are the same as, or only slightly less than, the preferred alternative.	documented breeding area (freshwater marsh in Bound Brook sub-basin)  • 782 acres of foraging, roosting, and migratory habitat throughout project area (fresh, brackish, and salt marsh)  • 175 acres unsuitable habitat
	American Bittern and Least Bittern		American Bittern and Least Bittern	
	<ul> <li>208 acres potential nesting habitat (83% fresh marsh; 17% brackish marsh)</li> <li>13 acres potential Foraging, roosting, and migratory habitat (salt marsh)</li> <li>785 acres unsuitable habitat</li> </ul>	<ul> <li>310 acres potential nesting habitat (40% fresh; 60% brackish)</li> <li>327 acres potential foraging, roosting, and migratory habitat (salt marsh)</li> <li>369 acres unsuitable habitat</li> </ul>	Impacts are the same as, or only slightly less than, alternative D.	<ul> <li>197 acres potential nesting habitat (50% fresh; 50% brackish)</li> <li>585 acres potential Foraging, roosting, and migratory habitat (salt marsh)</li> <li>224 acres unsuitable habitat</li> </ul>

Resource	Alternative A: No Action – Retain Existing Tide Control Structure at Chequessett Neck	Alternative B: New Tide Control Structure at Chequessett Neck – No Dike at Mill Creek	Alternative C: New Tide Control Structure at Chequessett Neck – Dike at Mill Creek that Excludes Tidal Flow	Alternative D: New Tide Control Structure at Chequessett Neck – Dike at Mill Creek that Partially Restores Tidal Flow
	<ul> <li>Diamondback Terrapin</li> <li>84 acres habitat with limited availability (tidal barrier; salt and brackish marsh, water)</li> <li>922 acres unsuitable habitat</li> </ul>	Diamondback Terrapin  627 acres available habitat (salt and brackish marsh, water)  379 acres unsuitable habitat	<u>Diamondback Terrapin</u> Impacts are the same as, or only slightly less than, alternative D.	Diamondback Terrapin  769 acres available habitat (salt and brackish marsh, water)  237 acres unsuitable habitat
	Eastern Box Turtle  • 88 acres principal habitat (dry and wet deciduous forest, dry shrubland, dry dunes);  • 611 acres occasional habitat (dry deciduous woodland, heathland grass, old field, pine woodland, wet shrubland)  • 307 acres unsuitable habitat  • 3,870 acres immediately adjacent to project area within Cape Cod National		Eastern Box Turtle Impacts are the same as, or only slightly less than, alternative D.	<ul> <li>Eastern Box Turtle</li> <li>0 acres principal habitat</li> <li>123 acres occasional (misc. nontidal*, pine woodland, wet shrubland)</li> <li>883 acres unsuitable habitat</li> <li>3,870 acres immediately adjacent to project area within Cape Cod National Seashore</li> </ul>
	Water-Willow Stem Borer  386 acres of potential Decodon habitat (wet shrubland and wet deciduous forest) occurring within project area  620 acres unsuitable habitat  265 acres adjacent to project area	<ul> <li>Water-Willow Stem Borer</li> <li>171 acres of potential Decodon habitat (wet shrubland and wet deciduous forest) occurring within project area</li> <li>835 acres unsuitable habitat</li> <li>265 acres adjacent to project area</li> </ul>	Water-Willow Stem Borer Impacts are the same as, or only slightly less than, alternative D.	Water-Willow Stem Borer     131 acres of potential Decodon habitat (wet shrubland and wet deciduous forest) occurring within project area     875 acres unsuitable habitat     265 acres adjacent to project area

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Federally listed Threatened and Endangered Species		<ul> <li>Rufa Red Knot</li> <li>358 acres of potential red knot habitat (salt marsh [tidal]).</li> <li>648 acres of unsuitable habitat</li> </ul>	Rufa Red Knot Impacts are the same as, or only slightly less than, alternative D.	<ul> <li>Rufa Red Knot</li> <li>585 acres of potential red knot habitat (salt marsh [tidal]).</li> <li>421 acres of unsuitable habitat</li> </ul>
	<ul> <li>Northern Long-eared Bat</li> <li>339 acres of potential NLEB habitat (wet deciduous forest, dry deciduous forest, pine woodland, dry deciduous woodland).</li> <li>667 acres of unsuitable habitat</li> <li>Potential habitat for NLEB is widespread in upland areas of Cape Cod.</li> </ul>	<ul> <li>Northern Long-eared Bat</li> <li>78 acres of potential NLEB habitat (wet deciduous forest, dry deciduous forest, pine woodland, dry deciduous woodland).</li> <li>978 acres of unsuitable habitat</li> <li>Potential habitat for NLEB is widespread in upland areas of Cape Cod.</li> </ul>	Northern Long-eared Bat Impacts are the same as, or only slightly less than, alternative D.	<ul> <li>Northern Long-eared Bat</li> <li>2 acres of potential NLEB habitat (wet deciduous forest, dry deciduous forest, pine woodland, dry deciduous woodland).</li> <li>1,004 acres of unsuitable habitat</li> <li>Potential habitat for NLEB is widespread in upland areas of Cape Cod.</li> </ul>
Terrestrial Wildlife	Birds Salt marsh species would remain limited to 13 acres in Lower Herring River. For other wetland species, 264 acres of freshwater/brackish habitat would remain available. For upland and other bird species, 723 acres of woodland, shrubland, and heathland habitat would remain in the project area.	habitat would be restored in Lower Herring River, Mill Creek, Middle Herring River, and Lower Pole Dike Creek. For other wetland species, 407 acres of freshwater/brackish habitat would be restored or enhanced in the upper sub-basins. For upland and other bird species, woodland, shrubland, and heathland habitat would be limited to the estuary	For salt marsh species, 346 acres of habitat would be restored in Lower Herring River, Middle Herring River, and Lower Pole Dike Creek. For other wetland species, 484 acres of freshwater/brackish habitat would be restored or enhanced in the upper sub-basins. For upland and other bird species, woodland, shrubland, and heathland habitat would be limited to the estuary periphery and the uppermost sub-basin, but these species would utilize	habitat would be restored in Lower Herring River, Mill Creek, Middle

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	Mammals  Mammals would remain  widespread throughout the 1000+ acre project area.		Mammals  Most species would relocate to the estuary periphery and to the upper extents of the 830-acre area affected by mean high spring tide. No change would occur in Mill Creek.	
	Reptiles and Amphibians Reptiles and amphibians would remain widespread throughout the 1000+ acre project area.		Reptiles and Amphibians Most species would relocate to the estuary periphery and to the upper extents of the 830-acre area affected by mean high spring tide. No change would occur in Mill Creek.	Reptiles and Amphibians Most species would relocate to the estuary periphery and to the upper extents of the 800-acre area affected by mean high spring tide.
Cultural Resources	No impacts to cultural resources or archeological resources would occur as a result of the no-action alternative, as existing conditions would be maintained.	There is a potential for adverse effects to archeological resources in the APE from construction or other ground-disturbance. Additional archeological assessment would occur prior to construction. Higher tides would not impact archeological resources because any inundation would be gradual. Erosion from increased tidal flows could impact transportation corridors across river channels, but these impacts would be mitigated by culvert replacement and other erosion control measures. Depending on the golf course flood proofing option implemented, either 5 or 30 acres (approximately) of sensitive uplands could be disturbed.	Same as alternative B, but with approximately 30 additional acres under tidal exchange; no tidal influence or disturbance in Mill Creek.	Same as alternative B, but with approximately 90 additional acres of tidal exchange, including in Mill Creek.  Depending on the golf course flood proofing option implemented, either 5 or 30 acres (approximately) of sensitive uplands could be disturbed.

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Socioeconomics Nuisance Mosquitoes	The Herring River would remain a productive mosquito habitat, particularly between High Toss Road and Route 6. The dominant mosquito species is <i>Ochlerotatus cantator.</i>	A shift in species is expected as salinity is increased, with a long-term decline of freshwater and generalist species such as <i>O. cantator</i> and <i>O. canadensis</i> , with replacement by salt marsh mosquito species such as <i>O. solicitans</i> in the lower marsh.  Because of the greater success in controlling this species, a decrease in the mosquito nuisance is expected.  These impacts are expected in 801 restored acres.	The same species shift is expected as in alternative B.  These impacts are expected in 830 restored acres. No changes would occur in Mill Creek.	The same species shift is expected as in alternative B.  These impacts are expected in 890 restored acres.
Shellfishing	Recreational and commercial shellfish harvest would remain permanently closed immediately downstream of the Chequessett Neck Road Dike, due to fecal coliform contamination.			Same as alternative B.
Finfishing	No improvement to recreational or commercial finfishing would occur. Ongoing estuary degradation and obstructed access would contribute to continued regional population declines of estuary-dependent fisheries.	Improvements to habitat and water quality in the estuary and Wellfleet Harbor would benefit populations of finfish and commercial finfishing industries. Restoring connectivity with Wellfleet Harbor for the full range of fish species formerly found in the estuary would provide a corresponding improvement to the recreational fishery.	Same as alternative B.	Same as alternative B.

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Low-lying Properties	would rely on the continued operation of the Chequessett Neck Road Dike for protection from tidal impacts. Certain properties may need to obtain flood insurance if the Chequessett Neck Road Dike is not upgraded to comply with FEMA design guidelines.	Increased tidal exchange would result in beneficial and adverse impacts to low-lying properties. Beneficial impacts would include transition to open marsh and water vistas, potentially increasing property values. Adverse impacts could include flooding of low-lying structures and cultivated vegetation. Flood proofing measures would mitigate flood impacts. Compared to the other action alternatives, this alternative has the least impact in terms of the number of properties affected and the degree of impact.	would have more impact in terms of the number of properties affected and the degree of impact than alternative B, but less than alternative D, because there would be no change in Mill Creek.	alternatives B and C.
Low-lying Roads	alternative. None of the roads have serious flooding issues.	A number of paved and unpaved road segments would be subject to periodic flooding. These road segments could be raised or realigned to be protected from flooding, or could be closed during periodic inundation.  The maximum length of affected roads would be Paved: 7,394 feet Sand/fire roads: 10,332 feet	road segments would be subject to periodic flooding. These road segments could be raised or realigned to be protected from flooding, or could be closed during periodic inundation.  The maximum length of affected roads would be Paved: 8,694 feet	A number of paved and unpaved road segments would be subject to periodic flooding. These road segments could be raised or realigned to be protected from flooding, or could be closed during periodic inundation.  The maximum length of affected roads would be Paved: 9,397 feet Sand/fire roads: 10,727 feet

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Viewscapes	The current natural features and landscape character, and therefore viewscapes, would not change.	Long-term viewscape benefits would result from expanding intertidal habitat and open vistas. Intertidal habitats would vary by basin, but would be mostly open water, broad salt meadows, and salt water marshes. More native wildlife may also be observed. Wooded areas within the flood plain would decrease, reducing obstructions to viewscapes. In the short term, some dead or dying vegetation could reduce the quality of the viewscape until the transition is complete.	Same as alternative B, except that slightly more wooded area in the upper sub-basins would be removed, and Mill Creek sub-basin would be unaffected.	Same as alternative B, except that slightly more wooded area in the upper sub-basins would be removed.
Recreational Experience and Public Access	Public access points would remain unaffected and the physical character of the estuary would be unchanged.	Some low-lying access points could be impacted in the short term, but in the long term these could be replaced with better access points. After restoration, there would be improvements to recreational shellfishing, finfishing, wildlife viewing, boating, and visual aesthetics. There would be no net loss in public access.	Same as alternative B, except that no change would occur in Mill Creek.	Same as alternative B.
Regional Economic Conditions	expenditures. Current regional	Regional economic conditions would benefit from engineering, construction, and related spending that would support jobs and increase economic activity.	Same as alternative B.	Same as alternative B.

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Construction Impacts Chequessett Neck Road Dike	No construction would occur.	The Chequessett Neck Road Dike would be reconstructed, temporarily impacting approximately 103,200 square feet (2.4 acres) comprised of the current dike footprint and adjacent inter- and sub-tidal wetland areas.	Same as alternative B.	Same as alternative B.
Mill Creek Dike	No construction would occur.	No construction would occur.	This structure would require approximately 2,900 cubic yards of fill and would permanently impact 12,500 square feet of wetland. In addition, a work area of approximately 105,000 square feet (2.4 acres) of wetlands would be impacted temporarily for dewatering and other associated work.	
High Toss Road		If the road is reconstructed above high tide line, there would be a permanent loss of approximately 13,000 square feet of vegetated wetland. Alternatively, if High Toss Road were removed, approximately 12,000 square feet of additional wetland area would be restored.	Same as alternative B.	Same as alternative B.
Pole Dike/ Bound Brook Island Roads		Elevating the roads above the maximum coastal storm driven tidal elevation would fill approximately 4,000 square feet of adjacent wetlands. Elevating the roads above annual high water (AHW) would fill approximately 2,300 square feet.	Same as alternative B.	Same as alternative B.

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CYCC Golf Course Flood Proofing		Two options exist for flood proofing low-lying golf holes: Option 1 (relocation) and Option 2 (elevation). Under the relocation option, most of the low-lying golf holes would be relocated to an approximately 30-acre adjacent upland area. One hole would be elevated in its current location, resulting in a wetland loss of about 89,000 square feet. For the elevation option, approximately 360,000 square feet (8.3 acres) of wetland would be filled and elevated above the high tide line. Most of this wetland is now a developed part of the golf course. Fill may be generated from an approximately 5-acre borrow area on adjacent uplands for both options. The upland area is highly sensitive for pre-contact archeological resources.	No flood proofing measures are required.	Same as alternative B.
Residential Flood Proofing		Several low-lying residential properties could be impacted by restored tides, requiring actions such as constructing a small berm or wall to protect a residential parcel, adding fill to a low driveway or lawn, or relocating a well. Some of these actions may have limited wetland impacts.	No flood proofing measures are required in Mill Creek. In other areas, impacts would be similar to alternative B.	Same as alternative B.

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Secondary Restoration Actions / Minor Road Improvements		vegetation management,	Same as alternative B, except that no restoration would occur in Mill Creek.	Same as alternative B.

Chapter 2: Alternatives