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February 17, 2026

**By Email**

Peter Okun, Subcommittee Chair  
Cape Cod Commission  
3225 Main Street  
Barnstable, MA 02630  
Attn: Alex Peterson, Esq., Legal & Regulatory Specialist

RE: The Pier Hotel, Provincetown  
CCC Project File No. 23025

Dear Subcommittee Chair Okun, Subcommittee Members, and Alex:

This correspondence is submitted on behalf of the Applicant and in response to Subcommittee questions raised at the January 29, 2026, public hearing for the Provincetown Pier Hotel redevelopment project (the "Project"). Responses and/or clarifications are set forth below:

**Additional Bicycle Racks**

The Applicant appreciates the Subcommittee's recommendation to add more bicycle racks to the Project. In response, the Project now proposes an additional bicycle rack within the property beside the right of way underneath the 227-229 building, and to convert a previously proposed rack to alternate design that accommodates additional bicycle storage. The net result is an approximately 62% increase in the number of bicycle parking spaces, for a total of 52 proposed bicycle spaces. These new spaces are shown on the attached revised site plan attached as **Exhibit A**.

**Impervious Calculations for Stormwater Report Purposes**

As indicated at the January public hearing, the Project team very conservatively calculated the Project's impervious areas, using a "bird's eye view" approach, for the purposes of designing and analyzing the Project's stormwater system. This included not taking credit for the green roof areas proposed on the 227R building and considering pervious surfaces as impervious for the purpose of the stormwater design. The following chart provides the additional details requested by one of the Subcommittee members.

Contributing Zone	Stormwater Analysis		Actual Proposed Surface Type
	Area	Description used in stormwater report	
A) 227R Roof system	7,442 sq.ft.	impervious	1,090 sq.ft. roof garden (pervious) 6,352 sq.ft. impervious <i>NET: 15% of area is permeable</i>
B) Courtyard System	886 sq.ft. 176 sq.ft.	impervious green space	886 sq.ft. permeable pavers (pervious surface) Same <i>NET: 100% of area is a permeable surface</i>
C) 227-229 Roof system	9,226 sq.ft. 880 sq.ft.	impervious green space	same same
D) Alleyway System	2,685 sq.ft.	impervious	2,685 sq.ft. permeable pavers  <i>NET: 100% permeable surface</i>

The above chart illustrates that approximately 4,661 square feet of proposed pervious/permeable surfaces were conservatively considered as impervious for the purposes of designing the stormwater management system.<sup>1</sup> Accordingly, not only will the proposed system be a tremendous improvement over the existing conditions, which is devoid of treatment and where untreated runoff spills into the harbor, but the above chart confirms that the Project has been conservatively designed with excess capacity to accommodate the anticipated stormwater flows.

Pier Construction / Pile Driving Effect on Whales

As in initial matter, we note that neither the Massachusetts Division of Marine Fisheries (DMF), nor the Massachusetts Natural Heritage Program (NHESP) identified any potential impacts on marine mammals, including whales, through their review of the Project during the Order of Conditions and MEPA processes. Notwithstanding, experts on the Project team considered this comment and prepared the following response.

All sound is an energy wave through media, whether the media is air or water. Pile driving creates an energy wave that propagates through the water and is typically called underwater sound. Sound waves dissipate with distance as they spread out in all three dimensions. The farther away from the sound source, the weaker the sound wave. Sound energy is a function of distance, water depth, and boundary conditions, and as the distance and depth increase, the sound wave becomes weaker (i.e., quieter).

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<sup>1</sup> When these pervious surfaces are incorporated into the “bird’s eye view” impervious area calculation for the Site, the proposed impervious coverage is reduced from 20,239 sf to 15,578 sf, around 3,000 sf less than the existing 18,571 sf of impervious coverage noted in the Staff Report. Moreover, the proposed overall at-grade impervious coverage is just 5,646 sf, significantly less than the existing overall at-grade impervious coverage of 14,985 sf.

For the Project, the most seaward piles are located at approximately elevation -5.5 feet NAVD88. Mean low water is approximately el. -5.1 feet NAVD88 and mean high water is approximately el. + 4.2 feet NAVD88. Therefore, the proposed pile driving will occur in approximately 0.4 feet to 9.7 feet of water, depending on the tide cycle. All piles further landward will be in shallower water. At mean high water, the initial underwater sound wave amplitude (vertical height) for the most seaward piles can only be approximately 9.7 feet. As this wave travels seaward, it spreads horizontally and as it moves into deeper water that initial amplitude will expand. However, since the initial energy (from the impact source) is established at the source and it spreads vertically, the energy decreases with depth (i.e., the sound dissipates). At a line drawn from Great Point to Mayflower Heights, a distance of approximately 1.25 miles (6,600 feet) from the site, the deepest waters are approximately 65 feet at mean low water. Additionally, the offshore breakwater and pier and docks that partially front the site will block and/or diffuse sound waves, further weakening sound waves offshore.

Put simply, any noise from the pile driving starts small because the water below the pier is quite shallow. By the time the sound travels where deeper water exists and where whales might be, it has spread out, lost strength with distance and depth, and has been blocked or broken up by the existing breakwater, pier, and docks in front of the site. Accordingly, the Project team is of the opinion that the underwater sound from the proposed pier pile driving will not adversely affect whales in the area and that is further supported by the lack of comment on this topic from DMF and NHESP.

#### Fire Protection During Construction

The Project general contractor has not been selected yet. However, the Applicant will select a highly qualified and professional contractor with experience in downtown environments to oversee this Project. Further, it is noted that the RPP does not regulate construction related impacts, as those are handled by the municipalities. Here, the Applicant is committed to working closely with the Town of Provincetown during the construction period to minimize and mitigate impacts. Indeed, there is already a condition in the Provincetown Planning Board decision that the Applicant prepare a Construction Mitigation Plan for the Town's review and approval.

On behalf of the Applicant and Project team, we thank the Subcommittee for its comments and review and look forward to the next hearing on February 26, 2026.

With best regards, I remain,

Very truly yours,

A handwritten signature in blue ink that reads "Eliza Cox" followed by a circled "T" in parentheses, likely indicating a title or role.

Eliza Cox

Attachment: Bike Rack Sketch Plan

Cc: Project Applicant  
Thaddeus Soule, Town Planner

