



December 19, 2012

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Cape Cod Commission
PO Box 226
Barnstable, MA 02630

Attention: Elizabeth Enos

RE: Greenwood Meadows, Sandwich
Development of Regional Impact

Dear Cape Cod Commission:

The Association to Preserve Cape Cod (APCC), Cape Cod's nonprofit environmental advocacy and education organization, submits the following comments regarding the proposed Greenwood Meadows Development of Regional Impact (DRI) in Sandwich.

Upon review of the Sandwich map of agricultural soils from APCC's 2011 study, "Agricultural Land Use on Cape Cod: Looking to the Future," and in consulting with the Cape Cod Conservation District, it appears that the site for the proposed Greenwood Meadows project is located on land that contains prime agricultural soils, which have been identified by USDA and the state as being the most ideal for agricultural activity.

In at least two instances, the Regional Policy Plan's Minimum Performance Standards (MPS) specifically address proposed development on land that contains agricultural soils:

LU3.2 Impacts to Agricultural Lands

Development unrelated to agricultural operations shall be designed so as to avoid or minimize development on lands capable of sustained agricultural production as evidenced by soils, recent agricultural use, and/or surrounding agricultural use.

OS1.3 Open Space Requirements

Protection of Farmland

In the design of developments, and in the consideration of on-site or off-site open space, agricultural soils and agricultural uses shall be protected. In suitable locations and where conflicts with sensitive habitats and/or state

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law do not arise, conservation restrictions may reserve the right to farm.

APCC points out the above MPS in order to ensure that appropriate protections of prime agricultural soils are taken into consideration during review of this DRI, as required by the Regional Policy Plan.

In addition, it is APCC's understanding that the project applicant is working with the state's Natural Heritage and Endangered Species Program on the development of a Conservation and Management Permit to address probable impacts to 10 state-listed species. APCC calls on the Cape Cod Commission to ensure that all applicable Regional Policy Plan MPS are met regarding impacts to rare species and rare species habitat, and that Regional Policy Plan requirements for open space protection are also satisfied.

APCC thanks the Cape Cod Commission for this opportunity to provide written comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ed DeWitt', with a stylized flourish extending to the right.

Ed DeWitt
Executive Director