



November 18, 2014

Ed DeWitt
Executive Director

Maeve Vallely Bartlett, Secretary
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Alex Strysky, EEA# 15273
100 Cambridge Street, Suite 900
Boston, MA 02108

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**RE: Town of Eastham Water System
Expanded Environmental Notification Form, EEA # 15273**

Dear Secretary Bartlett:

The Association to Preserve Cape Cod (APCC) submits the following comments regarding the Expanded Environmental Notification Form (ENF) for the project known as the Town of Eastham Water System, EEA # 15273.

Founded in 1968, APCC is the largest regional non-profit environmental organization on Cape Cod. Representing more than 5,000 members, APCC's mission is to promote policies and programs that foster the preservation of the natural resources of Cape Cod. APCC focuses its efforts on the protection of groundwater, surface water, and wetland resources, preservation of open space, the promotion of responsible, planned growth and the achievement of an environmental ethic.

For many years, APCC has actively supported efforts to establish a municipal water supply in the town of Eastham. Town residents and businesses currently rely on individual private wells or non-municipal community wells for drinking water, and on-site septic systems for wastewater disposal. The close proximity between water supply wells and septic systems has resulted in increasingly degraded drinking water quality throughout the town. In one region of town, residents must also contend with groundwater that has become contaminated from the town's closed landfill.

At Eastham's 2014 spring town meeting, residents approved a plan to provide municipal water service to approximately one third of the town. The new water supply system will involve construction of two well fields, a water storage tank and approximately 45 miles of distribution piping. The two well fields have already been permitted by the Massachusetts Department of Environmental Protection (DEP).

APCC commends the town on its proposal to construct the water system almost entirely on previously disturbed land, existing roadway areas and rights of way. According to the

3010 Main Street | P.O. Box 398 | Barnstable, MA 02630-0398
Tel: 508-362-4226 | info@apcc.org | www.apcc.org

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ENF, construction on currently undisturbed area is limited to .46 acres out of an estimated 21.8 total acres for the entire project.

According to the ENF, the plan includes a built-in capability to expand water service to the whole town if it is determined at some point in the future that there is a need for the expansion. APCC recommends that the Environmental Impact Report explore adoption by the town of a more thorough monitoring program for private wells in order to make a proper and timely assessment of the potential need for such an expansion.

The ENF states that anticipated water withdrawals will only reach 25 percent of the pumping rate permitted by DEP, and hydrogeologic evaluations show that water withdrawals at the two pumping sites will not adversely impact surface water bodies or wetlands. As a precaution, the town proposes to monitor water levels at Hatches Creek to determine whether pumping activity at the District G well field needs to be adjusted during periods of low water. APCC supports this prudent approach.

The ENF also describes measures the town proposes to take in order to ensure protection of nearby wetlands and other water resources during the construction phase of the water supply system. In APCC's review of the ENF, these protective measures appear to be adequate for protecting water resources.

APCC supports the town's request to the Secretary to allow submission of a single Environmental Impact Report (EIR) instead of a draft EIR and final EIR. However, the EIR should provide information that will resolve any outstanding questions regarding potential impacts to rare species.

In 2010, the state's Natural Heritage and Endangered Species Program (NHESP) concluded in the New Source Permit review for the well sites that the well site project would not result in a prohibitive take of state-listed rare species. Portions of the water system project proposed in the current ENF are also located in areas mapped as Priority Habitat. At the time of the ENF filing, the rare species type or types was unknown by the town. The town has requested further consultation with NHESP.

Although construction of the water supply system will take place mostly on previously disturbed land or within the footprint of existing roads, APCC would like to see final clarification in the EIR regarding the rare species in question and a satisfactory determination that the project will not adversely impact state listed species. In the event that further consultation with NHESP determines that state listed species may be impacted, the EIR should describe appropriate mitigation that is to be adopted in order to fully comply with Massachusetts Endangered Species Act regulations.

APCC thanks the Secretary for the opportunity to provide comments on this important project.

Sincerely,



Ed DeWitt
Executive Director

cc: Cape Cod Commission
Town of Eastham