



April 19, 2016

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Holly Johnson, EEA No. 15501
100 Cambridge Street, Suite 900
Boston MA 02114

Re: EEA No. 15501 Parkers River Tidal Restoration

Dear Secretary Beaton,

On behalf of the Association to Preserve Cape Cod (APCC), I am writing to express our support for the Parkers River Tidal Restoration Project's request for a waiver of the Environmental Impact Review (EIR) requirements for this important restoration project.

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

Restoration of Cape Cod's coastal resources is a major focus of APCC's goals for Cape Cod. In 2015 we established the Cape Cod Restoration Coordination Center to assist towns with restoration projects by providing coordination, project management, technical assistance, outreach, and other services to promote the implementation of holistic, cost-effective and ecologically effective restoration projects. The Parkers River restoration project has been identified as a high priority project that will improve natural tidal flow to the river and salt marsh system by replacing an undersized 18-foot-long bridge with a 30-foot span.

APCC's salt marsh monitoring program conducted in partnership with the Massachusetts Department of Ecological Restoration provided two years (2010-2011) of pre-restoration salt marsh monitoring data, including annual vegetation sampling, biweekly salinity sampling and monthly nekton surveys. This pre-restoration data indicates that restricted tidal flow is impacting salt marsh health through reduced flushing and salinity. The new bridge will allow optimal tidal exchange, which will improve habitat for commercially important fish and shellfish species, provide migratory fish such as river herring with easier access to spawning grounds through reduction in flow velocity, improve the health of the salt marsh, and help address water quality issues related to excess nutrients. The restoration will also improve the resiliency of the coastal zone to act as a buffer against storm surges and will help protect property by allowing floodwaters from storms to retreat more quickly. This project will benefit the environment and

economy of the town of Yarmouth and the region, and enjoys broad support on the local, regional, and state levels.

The purpose of an EIR is to maximize environmental protection and consider a full range of alternatives to ensure cost effective environmental protection. APCC supports the request for a waiver of the EIR requirement under 301 CMR 11.11. The Town and its partners have spent many years developing ecologically sound, feasible and cost-effective plans and building public support for this project. A thorough analysis of alternatives has been completed, and an alternative with limited negative impacts on neighboring properties, traffic flow during the construction period, and surrounding wetland areas has been identified. Most impacts are expected to be only temporary, limited to the period of construction, with more permanent impacts restricted to the zone immediately under or adjacent to the new structure. These projected impacts on coastal wetlands (land under the sea, coastal banks, land containing shellfish, and land subject to coastal storm flowage) will be negligible when compared to the improvements to salt marsh, fish and shellfish habitat in the area upstream of the bridge. Other required local, state and federal permits will provide thorough regulatory review and opportunities for additional public input. Requiring an EIR would not provide more environmental protection but would result in greater costs for the town and other agencies as well as delayed implementation. Such a delay could put the whole project at risk as it could result in a loss of existing funding awards. This project, as proposed, maximizes environmental protection, promotes fisheries, adds flood protection and restores a river to a more natural state.

We urge you to approve the request for a waiver of the EIR requirement and to support this significant restoration project. Please feel free to contact me at (508) 619-3185 if you have any questions.

Sincerely,



Edward DeWitt
Executive Director