



February 23, 2012

Richard K. Sullivan, Jr., Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Letter of Support for South Cape Cod and Islands No Discharge Area

Dear Secretary Sullivan:

On behalf of the Association to Preserve Cape Cod (APCC), I am pleased to provide this letter expressing our support and comments concerning the proposed South Cape Cod and Islands No Discharge Area for boat sewage (NDA). APCC is the Cape Cod's largest environmental organization with members in every town on Cape Cod. For over 40 years, our mission has focused on protecting Cape Cod's water and environmental resources.

Together with other partners, APCC led the designation of Cape Cod Bay as a No Discharge Area, and supported designation of Pleasant Bay and the waters of the Outer Cape. The coastal waters of South Cape Cod and the Islands are one of the last and largest remaining areas of Massachusetts waters not already protected by such a designation. Indeed, this void is the largest remaining unprotected area of the northeastern U.S. coast. This designation is long overdue.

Clean coastal waters are critically important for the Cape and Islands coastal economy and environment that includes regionally important resources including shellfish beds, fish, wildlife, eelgrass beds, rare species, swimming beaches and aquaculture. The Cape and Islands are an important tourist destination for the Commonwealth. Vessel sewage even when treated contains high concentrations of nitrogen and harmful bacteria. NDA designation will protect these important resources by prohibiting the discharge of all boating sources of sewage, whether treated or untreated.

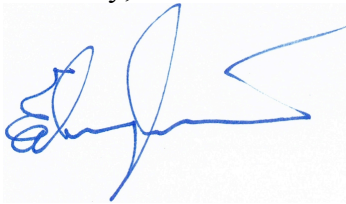
Closing this large remaining gap in protection is particularly urgent. At a time when most towns on Cape Cod have poor estuarine water quality and are wrestling with the cost of wastewater management, we feel it is important for boat owners and operators to help clean up our coastal waters by eliminating all discharges of boat sewage.

Regarding the boundaries of the proposed NDA, we understand that the two narrow open corridors described in the application are temporary and are intended to allow time for Steamship Authority vessels to be refitted to use fresh water to allow pumped sewage to be accepted by sewage treatment plants. We urge CZM and EPA to set the earliest possible deadline for closure of these remaining corridors, thus completing the circle of protection around Cape Cod and the Islands.

APCC has concerns, originally voiced by the Steamship Authority, that without visible enforcement and boater education, there might be confusion about the purpose of these temporary corridors. Notices must be carefully crafted so that boaters do not incorrectly assume that it is okay to discharge any effluent in these corridors. These temporary corridors are for treated effluent only. The Steamship Authority should continue to measure and monitor any discharge and these results should be publicly and easily available. Finally, we suggest that monitoring be conducted to document pumpout use and that boater outreach be provided to encourage boaters to use pumpouts.

We strongly urge the Commonwealth and the U.S. EPA to designate this area as a No Discharge Area.

Sincerely,



Ed Dewitt
Executive Director

cc: Bruce Carlisle, Director, Massachusetts Coastal Zone Management Agency
Todd Callaghan, No Discharge Area Coordinator, MA CZM
Steven P. McKenna, Cape & Islands Regional Coordinator, MA CZM
Ann Rodney, No Discharge Area Coordinator, EPA Region 1
Mel Cote, Manager, Ocean and Coastal Protection Unit, EPA Region 1

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