



September 25, 2015

Lisa Rhodes
MassDEP Division of Wetlands and Waterways
1 Winter Street
Boston, MA 02108

Ed DeWitt
Executive Director

BOARD OF DIRECTORS

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President

RE: Provincetown Municipal Airport Capital Improvements Project
Water Quality Certification Variance Request

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Dear Ms Rhodes:

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The Association to Preserve Cape Cod (APCC) is the Cape's leading nonprofit environmental advocacy and education organization. Founded in 1968 and today representing over 5,000 members across the region, APCC's mission is to preserve, protect and enhance the natural resources of Cape Cod. APCC recently received notice of a requested variance for a 401 Water Quality Certification application for proposed capital improvements at the Provincetown Municipal Airport and submits the following comments.

According to the DEP variance request notice, the project "will involve implementation of safety and security facility improvements including but not limited to West Taxiway system improvements, relocation of the East End Taxiway, installation of a perimeter fence, construction of the Automated Weather Observation Station (AWOS) Service Access Road and Improvement to the Medium Intensity Approach Light System with Flashers (MALSF). These improvements will require fill in bordering and isolated vegetated wetlands that are designated as Outstanding Resource Waters."

APCC closely followed and commented on this proposed project throughout the MEPA review process, and in our comments expressed ongoing concern about impacts the project would cause to sensitive resources, including wetland resources. APCC continues to express these same concerns.

In comments submitted for the Final Environmental Impact Report (FEIR), APCC stated that it was gratified to learn that the project applicant made a great effort in attempting to minimize impacts to natural resources, such as developing an alternative plan for the perimeter fence that will reduce the area of impacted wetlands. Yet the project as proposed in the FEIR will still result in significant impacts to the extremely sensitive natural resources found at this location.

As an environmental organization dedicated to protecting and preserving Cape Cod's natural resources, APCC must look beyond the intended public benefits of the airport project and give serious weight to how it will impact the delicate wetland and coastal dune ecosystem and rare species habitat that exist at this location. APCC remains concerned about the extent of alteration to wetlands that is being proposed for this project, and continues to worry that potential mitigation, including possible wetland replication, will be insufficient to address the impacts of such a high value resource area.

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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In our written comments submitted for the Draft Environmental Notification Form (DEIR) and the FEIR, APCC referred to reports by the Environmental Protection Agency and the Massachusetts DEP stating that historically, many wetland replication efforts are not successful. APCC also referenced the 1991 Buzzards Bay National Estuary Program's Wetlands Protection Action Plan, which stated, "Many scientists and managers are concerned with the use of wetlands replication as a routine management tool for two reasons. First, the wetlands replication projects have a high failure rate. In New England it is estimated that 50 percent of all replication efforts fail because of inadequate design or maintenance (Ed Reiner, EPA). Second, many functions performed by natural wetlands may not be performed by artificial or replicated wetlands. Although it may be possible to replicate the flood control, sediment trapping, and waterfowl values of some wetlands, scientists have identified at least 75 complex ecological relationships among soils, hydrology, water quality, vegetation, and wildlife, many of which takes centuries to develop."

A 2012 study from the University of California, Berkeley, found that restored wetlands do not recover their normal plant communities or soils for many decades, if ever. The study showed that restored wetlands are 25 percent less productive than natural wetlands, wetland restoration in colder climates such as New England recover even slower than in warmer climates, and smaller wetlands respond less to restoration than larger wetlands. And, in January of this year, the New England Center for Investigative Reporting conducted an in depth investigation on Massachusetts' policy for wetland replication as mitigation, pointing to decades of wetland construction failures.

APCC recognizes and supports the necessity for airport facilities to provide adequate safety and security, but we also recognize that the Provincetown Municipal Airport was built in a pre-existing environmentally sensitive area that should be protected. Before a variance is granted, APCC urges DEP and the project applicant to fully explore other available options that were not considered in the FEIR alternatives analysis that could result in avoiding, or assist in further reducing, impacts on wetland resources.

APCC believes that such alternatives do exist. For example, the FAA issued a December 13, 2004 Certalert memorandum, "Deer Hazard to Aircraft and Deer Fencing," determining that when chain link fencing is not feasible due to cost *or environmental impacts*, other types of fencing may be installed, including electric fencing. The memorandum refers to USDA testing of lower-impact fencing that can be 99 percent effective in stopping deer. The Certalert states, "In limited situations, the use of non-conductive, composite, frangible electric fence posts and fence conductors may allow the installation of electric fence closer to the aircraft movement area than would normally be allowed with standard chain link fencing material." If not considered previously, the above and other alternative methods should be investigated in an effort to provide the greatest level of environmental protection to this valuable resource area.

APCC thanks DEP for this opportunity to provide comments.

Sincerely,



Ed DeWitt
Executive Director



Don Keeran
Assistant Director