



September 12, 2018

Secretary Matthew Beaton
Executive Office of Environmental Affairs
100 Cambridge St., Suite 900
Boston, MA 02114

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Executive Director

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RE: Proposed MEPA Special Review Procedure for Marine Aquaculture Permitting

Dear Secretary Beaton:

The Association to Preserve Cape Cod (APCC) writes to you in support of the Division of Marine Fisheries (DMF) request that you initiate a Special Review Procedure (SRP) through the Massachusetts Environmental Policy Act and its regulations to facilitate the development of a state-wide Massachusetts Aquaculture Permitting Plan (MAPP) for marine aquaculture and shellfish propagation and restoration projects.

The MAPP will assist in the development of updated guidance for aquaculture project proponents and local and state resource managers. Establishment of the MAPP stands to be particularly useful on Cape Cod, where a number of towns are exploring, or are already utilizing, aquaculture to assist in water quality restoration efforts in nitrogen-impaired embayments in a manner consistent with the Cape Cod Area Wide Water Quality Management Plan (208 Plan) and Massachusetts Department of Environmental Protection watershed permits.

We believe the opportunity exists for the creation of a coordinated and expedited review through the development of the proposed MAPP that will benefit the permitting process for non-traditional nutrient removal strategies involving aquaculture. APCC supports DMF's recommendation that you waive the requirement to submit an Environmental Notification Form to initiate the MAPP SRP process.

We also support the creation of a Citizens Advisory Committee (CAC) to assist with development of the environmental and public use standards for the MAPP SRC. APCC respectfully requests that representation on the CAC include the Cape Cod Commission, Cape Cod Cooperative Extension/Sea Grant, at least one Cape Cod municipality currently pursuing aquaculture to address nitrogen reduction goals consistent with the 208 Plan, and the Association to Preserve Cape Cod. All of the above possess unique expertise and perspectives that would be relevant and beneficial to the purposes of the MAPP SRC.

Thank you for this opportunity to comment.

Sincerely,

A blue ink handwritten signature of Andrew Gottlieb.

Andrew Gottlieb
Assistant Director

cc: Kristin Senatori, Executive Director, Cape Cod Commission
Michael Maguire, Director, Cape Cod Cooperative Extension Service

482 Main Street | Dennis, MA 02638

Tel: 508-619-3185 | info@apcc.org | www.apcc.org

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