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Executive Director

June 26, 2023

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Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs
Attention: Nicholas Moreno, MEPA Analyst
MEPA Office
100 Cambridge St., Suite 900
Boston, MA 02114

RE: Cape Cod Bridges Program Environmental Notification Form, EEA #16695

Dear Secretary Tepper:

The Association to Preserve Cape Cod (APCC) has reviewed the Cape Cod Bridges Program Environmental Notification Form (ENF) and submits the following written comments.

Founded in 1968, APCC is the leading nonprofit environmental advocacy and education organization for Cape Cod, working for the adoption of laws, policies and programs that protect, preserve and restore the Cape's natural resources.

The Cape Cod Bridges Program proposes to replace the existing Bourne and Sagamore bridges, reconfigure highway approaches north and south of the Cape Cod Canal to align with the new bridges, and construct new accessible pedestrian and bicycle connections to the local roadway network associated with the two bridges. In conducting this important project, it is vital that the various project alternatives under consideration be carefully studied to identify and understand potential impacts to local and regional environmental resources and to ultimately refine the preferred alternatives to avoid any adverse impacts and, when avoidance is not possible, to minimize impacts to the greatest extent possible and provide appropriate mitigation.

Impacts to Wetlands and Rare Species Habitat

According to the ENF, there are multiple wetland and water resources within the greater project study area in addition to the Cape Cod Canal itself that should be considered in the project planning, including Nightingale Pond in the Bourne Program Study Area, located approximately 100 feet east of Route 25.

This part of the study area also includes several freshwater wetland areas located north of the canal within the Route 25 exit ramps and Belmont Circle that have the potential to be impacted by the project. For example, MassDOT has indicated that it is evaluating potential design changes to Belmont Circle that could result in impacts to



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bordering vegetated wetlands. In addition, the 100-year floodplain extends beyond the banks of Cape Cod Canal west of the Bourne Bridge and extends north of the canal from Nightingale Pond to Bourne Pond, including portions of Route 6, Belmont Circle, and Main Street in Buzzards Bay. The 100-year floodplain also extends up to 750-feet south of Cape Cod Canal. All of these wetland resources are within the project study area.

Priority and estimated habitat for state-designated rare species is mapped within the Sagamore Program Study Area to the east and west of Route 6 south of the Cape Cod Canal, which includes portions of the Upper Cape Water Supply Reserve at Joint Base Cape Cod and the Shawme-Crowell State Forest. The Bourne Program Study Area includes mapped rare species habitat approximately 1,700 feet south of the Bourne Rotary to the east of Route 28. The state's Natural Heritage and Endangered Species Program (NHESP) has identified 13 rare species within the project study area and has indicated that the project has the potential to result in a take of one or more of the identified rare species.

The ENF states that MassDOT identified highway interchange approach network alternatives that include three alternatives for Bourne North, two alternatives for Bourne South, two alternatives for Sagamore North, and three alternatives for Sagamore South. These alternatives will be further evaluated to identify the preferred alternatives for each replacement bridge crossing and will be presented in the Draft Environmental Impact Report (DEIR). APCC recommends that the identification of the preferred alternatives in the DEIR be accompanied by a more comprehensive analysis than what was provided in the ENF regarding how these alternatives will affect the wetlands, wetland buffers, and rare species habitats described above. The analysis should include a detailed discussion of how the alternatives will be designed to avoid impacts to environmental resources and how any unavoidable impacts will be minimized and mitigated.

APCC also recommends that the DEIR provide more detailed analysis of potential impacts to Article 97 lands from project alternatives considered for the Sagamore south crossing interchanges, including Article 97 land associated with the Upper Cape Water Supply Reserve, Shawme-Crowell State Forest and DCR-owned land. Refinements to the alternatives should be considered that would avoid impacts to these Article 97 lands, which, according the ENF, would also result in a take of state-listed species.

Stormwater Management

According to the ENF, the project will include stormwater management that conforms to MassDEP's Stormwater Management Standards to improve upon existing conditions. Improvements will include drainage systems to the new bridges and roadways, retrofitting the existing closed drainage system with new deep sump catch basins, and incorporating green infrastructure, low impact development and best management practices. APCC strongly encourages the use of green infrastructure to meet stormwater management requirements and recommends that the DEIR provide more detailed information about the stormwater management plan for the project.

The ENF states that the proposed Route 25 ramp connection on the Bourne Bridge crossing would be within five feet of Nightingale Pond, and proposed routing of the shared use path over wetlands could



create indirect shading impacts to approximately 2,000 sf of wetlands. APCC recommends that the DEIR provide more specific information about how the proposed Route 25 northbound onramp connection will impact Nightingale Pond and its wetland buffer and how the shared use path may affect wetlands, particularly with regard to stormwater runoff. APCC is concerned about the potential for stormwater runoff impacts from the very close proximity of the project elements to these wetland resource areas.

Traffic Congestion

MassDOT's planned improvements to the roadway interchange systems connecting to the new bridges is intended to "address future traffic volumes, accommodate multi-modal connections, and construct facilities in compliance with roadway geometric and structural standards." APCC recommends that the DEIR include an analysis of the proposed interchange system preferred alternatives that examines the potential influence these improvements may have on unintended and undesirable secondary development within the region that would ultimately add to, instead of alleviate, traffic congestion.

The ENF points out that induced travel demand in the region could occur from new trips prompted by improvements to existing travel patterns, such as less congestion or higher design speeds. In response to this possibility, MassDOT assessed the potential for latent visitor demand trips within the context of typical seasonal vacation trips. MassDOT concluded that, "in general, seasonal trips to Cape Cod are long distance in nature, where visitors travel from mainland Massachusetts, New England, and beyond, and involve stays of multiple days" and the project would therefore not encourage additional visitor vehicle trips. However, not all visitors come to the Cape for an extended vacation stay. APCC questions whether MassDOT took into account the potential for the bridge project to encourage an increase in weekend day trips to the Cape from Boston and other short distance locations during the summer months that would result in larger numbers of vehicles crossing the bridges. APCC recommends that MassDOT consider this potential scenario and address it in the DEIR.

Multi-Modal Connections and Other Transportation Alternatives

APCC recommends the DEIR provide a discussion of the proposed multi-modal connections that includes an assessment of the number of automobile trips that are anticipated to be replaced by use of the multi-modal pathways. APCC also encourages the project to explore the adoption of programs that actively promote use of multi-modal alternatives that would help reduce traffic congestion on the bridges and surrounding roadways, which in turn would provide the additional benefit of helping to reduce automobile-generated carbon emissions. Providing viable options that reduce carbon emissions through the use of alternative modes of transportation should be an important component of the bridge replacements and interchange improvements. This project provides the ideal opportunity to rethink canal region transportation with the goal of incorporating meaningful climate change mitigation features.

It would also be beneficial for the DEIR to include discussion of possible types of investments in electrification of the Cape's transportation system that the Commonwealth can make to offset any potential increases in future traffic coming to Cape Cod, including, but not limited to, additional EV charging stations and investments that support electrification of Cape Cod Regional Transit Authority vehicles. Such investments would not be limited to the immediate canal bridges corridor.



The ENF describes the multi-modal path routing for the Bourne Bridge north crossing as likely being “fairly circuitous to provide the length necessary to allow the path to descend from the bridge structure elevation to the elevation of the path termini.” APCC recommends that the DEIR should describe the infrastructure anticipated for the preferred path alternative that would be necessary to achieve the desired elevation. Will it require elevated ramps and overpasses? If so, how will this alter existing regional visual character? It also appears from conceptual plans in the ENF that the proposed multi-modal path's location on the west side of Route 25 is within a DEP-mapped wetland area. The DEIR should further specify the proposed location of the path and its relationship to the wetland area. If the path does impact the wetland or wetland buffer, the DEIR should explain how this impact could be avoided, or if impossible, how it will be appropriately mitigated.

Project Visualizations

APCC recommends that the DEIR provide ground level visualizations of ramps, bridges, overpasses, etc. for the identified preferred alternatives from various key locations in order to gauge the visual impact of proposed changes to the bridge interchanges.

APCC appreciates the opportunity to provide comments on the Cape Cod Bridges Program ENF and looks forward to reviewing more detailed information about the project in the DEIR when it is released.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'A' followed by a long horizontal stroke.

Andrew Gottlieb
Executive Director