



Andrew Gottlieb
Executive Director

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Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
Purvi Patel, EEA No. 16640
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Cape Cod Gateway Airport Master Plan Projects Draft Environmental Impact Report

Bob Ciolek

Dear Secretary Tepper:

Tom Cohn

The Association to Preserve Cape Cod (APCC) has reviewed the Draft Environmental Impact Report (DEIR) for the Cape Cod Gateway Airport project (EEA # 16640) and submits the following comments.

John Cumbler

Jamie Demas

Joshua Goldberg

Founded in 1968, APCC is the Cape region's leading nonprofit environmental advocacy and education organization, working for the adoption of laws, policies and programs that protect, preserve and restore Cape Cod's natural resources. APCC focuses our efforts on the protection of groundwater, surface water, and wetland resources, preservation of open space, the promotion of responsible, planned growth and the achievement of an environmental ethic.

Meredith Harris

DeeDee Holt

Pat Hughes

Molly Karlson

APCC has focused our comments for this DEIR on the areas of wetland impacts, groundwater protection, and carbon sequestration mitigation related to proposed tree clearing.

Eliza McClennen

Rick O'Connor

Kris Ramsay

Dottie Smith

Wetland Impacts

Charles Sumner

APCC is extremely concerned about the proposed significant impacts to Upper Gate Pond, which, according to MassGIS, is mapped by the Natural Heritage and Endangered Species Program as BioMap Core Habitat (Rare Species Core) and Critical Natural Landscape. According to the DEIR, a new Taxiway D would directly and permanently adversely impact Upper Gate Pond and its surrounding wetland buffer.

Wetland impacts include:

- Approximately 12,700 sf of Land Under Water (nearly a third of an acre) in the pond to be permanently filled.
- Approximately 4,600 sf of Bordering Vegetated Wetlands to be permanently filled.
- 3.78 acres of 200-ft. wetland buffer to be impacted by the construction of 1.13 acres of additional pavement.
- 0.1 acre of bordering vegetated wetland to be impacted by .01 acre of additional pavement.
- 1.85 acres of 100-ft. wetland buffer to be impacted by .52 acres of additional pavement.

The project applicant's preferred alternative includes either an engineered slope or a retaining wall that will be constructed within Upper Gate Pond to "minimize impacts" to the pond. A vegetated earthen berm would be constructed along the top of the pond slope in an attempt to prevent stormwater runoff from causing erosion. Given that the taxiway will fill in part of the pond and destroy portions of the 100 and 200 ft. wetland buffer, it is difficult to envision that the taxiway's extremely close proximity to what remains of the wetland after construction will not lead to increased stormwater impacts to the pond.

The DEIR states that there is the potential for up to 5,200 cubic yards of unconsolidated organic materials along the pond bottom to be excavated in order to provide suitable base material for the taxiway slope. Polycyclic aromatic hydrocarbons and lead are contaminants known to be present in Upper Gate Pond sediments, likely as a result of airport stormwater runoff. APCC recalls from airport projects in the previous decade, which required study of Upper Gate Pond and Lewis Pond, that the airport's environmental consultants determined it would be unwise to dredge the pond bottom in an attempt to remove contaminated sediments because it would release and distribute contaminants and further degrade pond water quality. APCC also questions whether releasing contaminants into the water body may impact groundwater.

The project applicant has proposed, in very general, non-specific terms, possible mitigation for the wetland impacts that includes potential wetland replication on airport property (with limitations on what is acceptable to FAA guidelines) and/or on a property or properties elsewhere in the town of Barnstable. The DEIR states that the mitigation "will be designed in the subsequent permitting phases of the project." Given the scarcity of detailed information regarding any specific proposed mitigation actions, it is APCC's position that the mitigation measures described in Section 7 of the DEIR are inadequate in relation to the substantial impacts created by the work proposed in and adjacent to Upper Gate Pond and its wetland buffer. It is impossible for the public to adequately review and comment on the

appropriateness of the mitigation for these significant wetland impacts if the mitigation plan is not provided in the MEPA review process.

Lastly, the applicant in the DEIR states, “Based on the proposed avoidance, minimization, and mitigation, in Section 6.1.5., there are no significant impacts on wetlands and surface water beyond the existing condition as a result of the Proposed Action.” APCC completely rejects the suggestion that the impacts to Upper Gate Pond will not be significant.

Groundwater Protection

APCC would like to see more assurances in the next EIR filing that the airport project construction and operation will not adversely impact the underlying aquifer, which is a source of public drinking water. It has been well-documented that the airport is a source of PFAS contamination in groundwater that has impacted public drinking water supplies. The airport has taken steps to address PFAS contamination from the airport, including capping contaminated soil areas and conducting groundwater monitoring. To ensure continued remediation of existing PFAS contamination and to prevent additional contamination in the future, MassDEP should require, and the applicant should commit to, expanded sampling and monitoring of the airport property for the presence of PFAS and other contaminants, including within the proposed project area.

Additionally, the project's future EIR filing should provide more detail about proposed stormwater management, and should describe where and how LID and green infrastructure will be utilized, and where and how conventional stormwater treatment will be used. Where conventional stormwater treatment is proposed, the applicant should explain in detail why more modern LID and green infrastructure approaches are not feasible.

Tree Removal Mitigation

The DEIR states that approximately 1.54 acres of forested upland areas and approximately 3.37 acres of shrub-scrub upland areas will be impacted for the construction of the airport project. The tree clearing will result in a loss of carbon sequestration estimated as equal to an increase of 6.52 metric tons of carbon per year, or 195 metric tons over a 30-year period. As proposed mitigation for this loss, the applicant claims that the carbon sequestration loss will be “offset” by the airport’s existing forested areas north of the airfield.

APCC maintains that the above proposal is not appropriate mitigation for lost carbon sequestration. The existing forest is not adding new sequestration benefits lost by the planned tree cutting. No new sequestration value will be gained by maintaining the status quo of the remaining forested area. Existing forest does not replace the loss of cleared trees; it still results in a carbon sequestration deficit. The applicant should commit, at a minimum, to replacing the

number of trees that will be lost. Ideally, the sequestration value of new tree plantings should be calculated to confirm that an equal carbon sequestration value will be preserved by the replacements. A sapling will not provide the same current level of environmental benefit as a mature tree.

Conclusion

Based on the information provided in the DEIR, APCC must conclude that the objectionable loss of wetlands and critical habitat due to the filling of Upper Gate Pond and destruction of wetland buffer, combined with the absence of meaningful mitigation for the carbon sequestration loss due to tree removal, provide no path for the project, as currently proposed, to proceed and still be environmentally acceptable.

Thank you for the opportunity to provide comments on this proposed project.

Sincerely,



Andrew Gottlieb
Executive Director