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Andrew Gottlieb
Executive Director

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

**RE: Cape Cod Canal Pipeline Relocation Project Environmental Notification Form
(EEA #16947)**

Dear Secretary Tepper:

The Association to Preserve Cape Cod has reviewed the Cape Cod Canal Pipeline Relocation Project Environmental Notification Form (EEA #16947) and submits the following comments.

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.

According to APCC's review of the ENF, the project is anticipated to result in the following environmental impacts:

- Land clearing and forest removal for the project has been proposed, with a significant amount occurring in the Article 97-protected Upper Cape Water Supply Reserve on Joint Base Cape Cod, as well as sections within the town of Bourne's permanently protected Cape Cod Land Bank conservation lands/Article 97 lands on the other side of the Cape Cod Canal.
- Much of the clearcutting appears to be within mapped Priority Habitat for state-listed endangered or threatened species or species of special concern, and, in the case of the clearing within the Upper Cape Water Supply Reserve, the clearing will also be above the sole source aquifer that serves as the Upper Cape region's drinking water supply.

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- Although the project proponent proposes to route sections of the pipeline in tandem with the Eversource right-of-way on Joint Base Cape Cod, the pipeline route will run parallel with and adjacent to the Eversource ROW, essentially widening the existing cuts through the pine barren forest located there.
- Portions of the project will impact the Herring River Watershed Area of Critical Environmental Concern.
- Approximately 22,630 square feet of bordering vegetated wetlands will be impacted by the pipeline project, with 12,685 acres being permanently impacted.

In the Draft Environmental Impact Report, APCC recommends that the project proponent should confirm the total acres to be disturbed and/or clearcut within permanently protected conservation/Article 97 lands as currently proposed in the project plan. Additionally, APCC recommends the project proponent should continue to study options that would avoid or further reduce the amount of land impacted within these protected areas. For land that continues to be impacted, the project applicant should describe appropriate mitigation in the DEIR to offset those impacts.

APCC recommends that the DEIR provide further discussion about impacts to state-listed rare species, including consideration of alternatives that would avoid or reduce impacts. We also recommend that the DEIR should provide updates on discussions between the project proponent and the state's Natural Heritage and Endangered Species Program regarding appropriate mitigation for any impacts to state-listed rare species or habitat that may occur.

For all project activity within the Upper Cape Water Supply Reserve on Joint Base Cape Cod, APCC recommends that the DEIR explain in detail what measures the project proponent is proposing to ensure that all potential impacts to groundwater resources are avoided.

APCC recommends that the project proponent continue to study options in the DEIR that will minimize and, to the extent possible, avoid impacts to bordering vegetated wetlands, particularly for those areas identified in the ENF as having permanent impacts.

APCC will continue to follow this project proposal and looks forward to reviewing more detailed project information in the DEIR. APCC anticipates providing additional comments to MEPA as the project moves forward and as new issue areas may arise.

Sincerely,



Andrew Gottlieb
Executive Director