



April 10, 2026

Andrew Gottlieb
Executive Director

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

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RE: Cape Cod Canal Bridges Program FEIR, EEA# 16695

Dear Secretary Tepper:

The Association to Preserve Cape Cod (APCC) has reviewed the Cape Cod Canal Bridges Program Final Environmental Impact Report (FEIR) and submits the following comments.

Robert Ciolek

Thomas A. Cohn

John Cumbler

Jamie Demas

Betsy Gladfelter

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.

Pat Hughes

Steve Hurley

The following comments build upon those that APCC submitted for the project's Draft Environmental Impact Report (DEIR).

Molly Karlson

Steven Koppel

Rick O'Connor

Patrick Otton

Kris Ramsay

Dottie Smith

Becca Solomont

Marcie Truesdale

Land Clearing: APCC is disappointed to see that the FEIR increases both the anticipated increased impervious area for new roadways and shared-use paths (SUP) (+1.72 acres) and tree clearing (+14.73 acres) compared to the DEIR. APCC urges the Massachusetts Department of Transportation (MassDOT) to work to further minimize the number of acres to be cleared, both permanently and temporarily, as the project moves forward. APCC appreciates the MassDOT's commitment in the FEIR to minimal use of landscaped turf areas and emphasis on naturalized landscaping through reforestation efforts using native species and native seed mixes. APCC underscores the importance of using native species whenever feasible to enhance landscape resilience and support the health of pollinators and local fauna.

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Open Space: The DEIR stated that more information would be provided in the FEIR regarding specific mitigation plans for impacts to the open space, park, or recreation land to be impacted either permanently or temporarily by the bridges project, including land under Article 97 protection. The FEIR describes an ongoing process through which MassDOT is evaluating the mitigation requirements for the proposed permanent impact to the BRA-owned Bourne Scenic Park to ensure compliance with Article 97, including evaluating the feasibility of expanding the BRA-owned recreation boundaries within the Cape Cod Canal Federal Navigation Project to mitigate for permanent impacts to BRA-owned property. APCC underscores the importance of replacing permanently impacted Article 97 lands with land of equal or greater size and quality, as required by the Public Lands Preservation Act and, further, seeking replacement land that is contiguous with other permanently protected land to maximize the quality of open space areas. Overall, APCC again stresses that impacts to protected open space and Article 97 lands should, first and foremost, be avoided whenever possible, and encourages MassDOT to continue to seek opportunities to reduce open space, park and recreational land impacts as this project moves forward.

APCC is pleased to see that, as revised since the DEIR, the Program will no longer require construction impacts to the Sandwich Road Conservation Area and will not impact the Buzzards Bay Water District Parcel located north of Scenic Highway or the Pleasure Point Conservation Restriction.

Rare Species: APCC appreciates the detailed discussion of efforts being made to minimize impacts on rare, threatened, and endangered species located in the vicinity of the project area. In addition, APCC commends MassDOT's ongoing coordination with the state's Natural Heritage and Endangered Species Program (NHESP) and commitment to undertake appropriate net benefit measures in consultation with NHESP, potentially including on- or off-site permanent habitat protection, management or restoration of state-listed species habitat, and conservation research designed to benefit the species affected by the project.

Stormwater: As in the DEIR, the FEIR calls for improvements to the treatment and quality of stormwater runoff by using low-impact green infrastructure, including rain gardens and infiltration basins that will comply with the Massachusetts Stormwater Management Standards. APCC again commends MassDOT for its commitment to using green infrastructure for stormwater management and continues to encourage final project planning to strive to exceed relevant stormwater treatment standards.

Wetlands: APCC appreciates the additional detail provided in the FEIR related to the preparation of a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the EPA's National Pollutant Discharge Elimination System General Permit for Discharges from Construction Activities. Regarding mitigation plans for impacts to wetland resource areas associated with Nightingale Pond, APCC appreciates MassDOT's plan to create a hydrological connection between the proposed resource area mitigation and Nightingale Pond to preserve and maximize the quality and function of the wetland resource areas.

APCC finds it unfortunate that the Build Alternative presented in the FEIR will impact a vernal pool in the Bourne South quadrant interchange approach (potential vernal pool [PVP] 13MA) and notes the pending submittal of a Request for Jurisdictional Determination to the U.S. Army Corps of Engineers (USACE) for that pool. APCC appreciates the confirmation in the FEIR that no other vernal pools identified within or near the Project Limits will be impacted by the project.

ACEC: APCC appreciates the confirmation in the FEIR that project planning will avoid impacts to wetland resource areas associated with the Herring River Watershed Area of Critical Environmental Concern.

Water Supply Protection: APCC continues to emphasize the importance of ensuring avoidance of impacts to the two water supply areas within the Plymouth/Carver Sole Source Aquifer in the Bourne North construction quadrant as well as the Cape Cod Sole Source Aquifer located south of the canal. APCC notes confirmation in the FEIR that all infiltration stormwater control measures (SCMs) will be located outside of Zone I, Zone II, and Interim Wellhead Protection Areas.

APCC appreciates the clarifications provided in the FEIR on the design and sizing of the proposed stormwater control measures (SCM) to demonstrate that they would function under future climate conditions.

Transportation Impacts: Similar to the DEIR, the FEIR states that, “the Build Alternative is not expected to induce significant new travel demand or development. Improvements are limited to the bridges and immediate interchanges, and population growth is projected to remain stagnant.” However, in the following paragraph, it states, “the Build Alternative will reduce total travel time and improve accessibility for vehicles, pedestrians, and cyclists. New connections will enhance access to local amenities, schools, and recreational facilities, supporting safer and more comfortable travel for all users.” APCC continues to find logical an assumption that increased bridge capacity combined with improved travel times will be an attractive incentive for more regionally-based tourism to come to the Cape, as well as for Cape residents to be more willing to travel off-Cape more often. APCC is therefore disappointed by the absence of additional discussion in the FEIR about utilizing planning for the bridges construction project to incorporate opportunities and incentives for reducing bridge traffic through public transit, rail, etc., as opposed to personal automobile use. We commend MassDOT for project plans to incorporate designated pedestrian and bicycle infrastructure that will connect the bridges to area roadways, but these measures alone will not significantly decrease vehicle trips traveling over the bridges.

Thank you for this opportunity to provide comments.

Sincerely,



Andrew Gottlieb
Executive Director

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