



Ed DeWitt
Executive Director

February 8, 2012

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Richard K. Sullivan, Jr., Secretary
Executive Office of Energy and Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Attention: William Gage, EEA # 13789

Subject: Provincetown Municipal Airport Capital Improvements Plan,
EEA # 13789

Dear Secretary Sullivan:

Kristin Andres

Sandy Bayne

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Jonathan Moore

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Jean A. Young

The Association to Preserve Cape Cod (APCC), Cape Cod's leading nonprofit environmental advocacy and education organization, submits the following comments regarding the Final Environmental Impact Report (FEIR) for the proposed Provincetown Municipal Airport Capital Improvements Plan, EEA # 13789.

The Provincetown Municipal Airport Commission is proposing several capital improvement projects for the purpose of upgrading safety and improving facilities at the airport, which is located on 322 acres of federally owned land within the Cape Cod National Seashore (CCNS). The project applicant is proposing the following projects:

- Westerly Taxiway System Improvements
- Relocate East End Taxiway
- Reconstruct Terminal Apron
- Reconstruct Easterly End of Partial Parallel Taxiway
- Install Taxiway Lighting and Construct Electric Vault
- Sightseeing Shack Improvements
- Improve Access Road to Approach Lights
- Construct Service Access Roads to AWOS and LES
- Install Perimeter Fence
- Expand Auto Parking
- Expand Terminal Building
- Expand Turf Apron

In 2006, APCC submitted written comments on the project's Environmental

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Notification Form (ENF) and in 2007 on the Notice of Project Change/Draft Environmental Impact Report/Environmental Assessment (NPC/DEIR/EA) for the project. In those previous comments, and as it does now, APCC acknowledged the need to address issues that affect the safety and security of airport operations. However, APCC also expressed concern over the significant impacts the project would have on wetlands and coastal dunes, the potential for impacts to rare species habitat, and visual impacts to the CCNS.

After reviewing the FEIR, APCC was gratified to learn that the project applicant has made a great effort in attempting to minimize impacts to natural resources, such as developing an alternative plan for the perimeter fence that will reduce the area impacted. APCC also commends the applicant on the proposed 27,925 sf net reduction in impervious surfaces at the airport.

Despite the effort made on the part of the applicant, the project as currently proposed will still result in significant impacts to the extremely sensitive natural resources found at this location. According to the FEIR, the project will result in the following impacts:

- Isolated Vegetated Wetland: 169,738 sf altered
- Bordering Vegetated Wetland: 13,196 sf altered
- Coastal Dune: 125,452 sf altered

These resource areas also support Priority and Estimated Habitat for four state-listed rare species: eastern box turtle, eastern spadefoot toad, vesper sparrow, and broom crowberry, although the FEIR states that the plan as proposed avoids direct impacts to broom crowberry documented on the site.

As an environmental organization dedicated to protecting and preserving Cape Cod's natural resources, APCC must look beyond the intended benefits of the airport project and give serious weight to how it will impact the delicate wetland and coastal dune ecosystem and rare species habitat that exist at this location. APCC remains concerned about the extent of alteration to wetlands and coastal dunes that is being proposed for this project, and continues to worry that the proposed mitigation will be insufficient to address the impacts of such a high value resource area.

In particular, the applicant is proposing to mitigate wetland impacts through what is described in the FEIR as restoration, replacement or replication of wetlands. In its comments on the DEIR, APCC referred to reports by the Environmental Protection Agency and the Massachusetts DEP stating that historically, many wetland replication efforts are not successful.

In the DEIR, APCC also referenced the 1991 Buzzards Bay National Estuary Program's Wetlands Protection Action Plan, which stated, "Many scientists and managers are concerned with the use of wetlands replication as a routine management tool for two reasons. First, the wetlands replication projects have a high failure rate. In New England it is estimated that 50 percent of all replication efforts fail because of inadequate design or maintenance (Ed Reiner, EPA). Second, many functions performed by natural wetlands may not be performed by artificial or replicated wetlands. Although it may be possible to replicate the flood control, sediment trapping, and waterfowl values of some wetlands, scientists have identified at least 75 complex

ecological relationships among soils, hydrology, water quality, vegetation, and wildlife, many of which takes centuries to develop.”

A study published this year out of the University of California, Berkeley, also found that restored wetlands do not recover their normal plant communities or soils for many decades, if ever. The study showed that restored wetlands are 25 percent less productive than natural wetlands, and that wetland restoration in colder climates such as New England recover even slower than in warmer climates. Smaller wetlands responded less to restoration than larger wetlands.

With the above in mind, APCC recommends that as the project moves forward through the regulatory process, every effort should continue to be made to further avoid and minimize natural resource impacts. It is APCC’s understanding that, while the Federal Aviation Administration has adopted standards for safety and security, the physical realities of existing airports sometimes dictate that those standards can only be met to the greatest extent practicable. APCC would like to know if this flexibility can be applied to the proposed improvements for the Provincetown airport for the projects that would have the greatest impact on the environment.

For example, despite the improvements to the perimeter fence plan proposed in the FEIR, the fence will still result in significant impacts to coastal dunes (32,088 sf), isolated vegetated wetlands (29,600 sf) and bordering vegetated wetlands (10,124 sf), require maintaining a cleared vegetation path along the length of the fence through rare species habitat, and create visual impacts within the CCNS. APCC questions whether the level of need for a perimeter fence is sufficient to warrant the extent of alteration to natural resources that would result from its installation and maintenance.

As stated earlier, APCC recognizes and supports the necessity for airport facilities to provide adequate safety and security, but APCC also recognizes that the Provincetown Municipal Airport was built in an environmentally sensitive area that must be protected. APCC urges the Secretary, when issuing the Certificate for the FEIR, to encourage the project applicant and all federal, state and regional permitting agencies to continue to work toward reducing and even eliminating additional project impacts.

APCC thanks the Secretary for this opportunity to provide comments.

Sincerely,



Ed DeWitt
Executive Director



Don Keeran
Assistant Director

cc: Cape Cod Commission
FAA