



August 26, 2015

Harold Mitchell, Chair
Cape Cod Commission Subcommittee
Cape Cod Commission
PO Box 226
Barnstable, MA 02630

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Attention: Jonathon Idman

RE: Atkins Road Cluster Subdivision Development of Regional Impact

Dear Mr. Mitchell and Subcommittee Members:

The Association to Preserve Cape Cod (APCC) is the Cape's leading nonprofit environmental advocacy and education organization. Founded in 1968 and today representing over 5,000 members across the region, APCC's mission is to preserve, protect and enhance the natural resources of Cape Cod. APCC has reviewed the project plans for the Atkins Road Cluster Subdivision Development of Regional Impact (DRI) and submits the following comments.

The Atkins Road DRI is proposed for 36.911 acres of land in the town of Sandwich that is mapped as Priority Habitat for the eastern box turtle, a state-listed rare species. As required by the Regional Policy Plan, this residential subdivision project has been designed as a cluster subdivision. However, the plan as currently proposed shows two separate clusters of house lots along with associated roads and access drives that result in fragmentation of woodland habitat into several smaller areas. For example, the 1.2 acres of "open space" sandwiched between the two development clusters creates an isolated island with no useful habitat value for eastern box turtle or other wildlife. As designed, the overall layout of this subdivision unnecessarily diminishes the value of the open space, which in a cluster subdivision should be configured to maximize conservation of contiguous wildlife habitat.

APCC respectfully requests the subcommittee to direct the project applicant to work with Cape Cod Commission staff on further improvements to the subdivision design with the goal of clustering the development area more efficiently and eliminating fragmentation of contiguous rare species habitat.

APCC thanks the Cape Cod Commission for the opportunity to provide comments on this project.

Sincerely,

Edward DeWitt
Executive Director

Don Keeran
Assistant Director