SIERRA CLUB
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Algonquin Pipeline Relocation (CCC File No. 25012)
Cape Cod Commission
3225 Main St.
Barnstable, MA 02630

On behalf of the Sierra Club Massachusetts Chapter, and our Cape Cod & Islands Group made up of 6,860 members and supporters across the region, we write to request careful and comprehensive consideration of the Algonquin Pipeline Relocation (CC#25012) project as a Development of Regional Impact (DRI) and to caution Cape Cod Commission members and staff of the need to scrutinize the claims that Algonquin Gas Transmission (AGT) makes in its DRI application.

Sierra Club is concerned that state and federal efforts to expedite environmental review of the Cape Cod Bridges Program are leading to incomplete assessments of long-term region-wide impacts on growth, development, and resource protection; a stealth attempt to expand fossil fuel infrastructure - and undermine regional goals and state decarbonization mandates - on the taxpayers' dime; and missed opportunities for investment in the Cape's future sustainability. As these concerns are already being raised during public comment, we encourage a proactive response prior to the hearing scheduled for October 28th.

Sierra Club does not oppose relocation of bridge-attached methane gas infrastructure. While AGT asserts that this project is not a pipeline expansion, simple calculations show a 62% increase in cross-section and suggest at least a doubling of maximum fuel transmission capacity serving methane gas customers on Cape Cod. Unnecessary and harmful pipeline expansion runs in direct opposition to *Cape Cod Regional Policy Plan* (RPP) goals and objectives.

To support an efficient DRI review process, the Commission should conduct - or request - an independent validation of AGT's "no expansion" claims based on construction and operation of the proposed under-the-Canal replacement pipeline and related infrastructure under various future growth and development scenarios for Cape Cod. This should include a comprehensive comparison of gas consumption, air pollution, and greenhouse gas emissions from the preferred alternative vs. from existing pipelines and infrastructure, as well as an assessment of appropriate mitigation options.

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Sierra Club urges the Commission to take action in support of timely replacement of lifeline infrastructures consistent with the unique values, purposes, and goals enumerated in the Cape Cod Commission Act.

Chris Powicki, Chair, Cape Cod & Islands Group, Sierra Club Massachusetts

Vickash Mohanka, State Director, Sierra Club Massachusetts