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Cape Cod Canal Pipeline Relocation Project Environmental Assessment Public Comment Guide To Submit to FERC

Overview

Comment period deadline: June 29, 2026 at 5:00PM Eastern Time

What is the Cape Cod Canal Pipeline Relocation Project?

Algonquin Gas Transmission, LLC, which is a subsidiary of the major Canadian pipeline Enbridge, is applying for permission from the Federal Government to construct a new natural gas pipeline that would be crossing beneath the Cape Cod Canal as well as over the Sagamore Bridge corridor. Algonquin states that the project is necessary because of the Cape Cod Canal Bridges Program (CCBP). However, aspects of the proposed infrastructure suggest the project may increase gas delivery capacity.

The Federal agency responsible for permitting this project is the Federal Energy Regulatory Commission (FERC). [FERC has issued an Environmental Assessment \(EA\)](#) concluding that the project's impacts would not be significant. FERC is accepting public comments on the EA. Federal law requires FERC to consider all substantive comments submitted during the comment period.

The deadline for the submission of comments is June 29, 2026 at 5:00 PM Eastern Time. It is the same date for MEPA (state level) commenting for this project. You can submit to both.

How to file a comment

Option 1: [eComment](#)

- This option is text only - it cannot include attachments or images.
- The comment must be under 10,000 characters.
- Creating an account with FERC is *not* necessary to file an eComment.

Option 2: [eFiling](#)

- If the comment is over 10,000 characters
- If the comment has attachments
- This option does require a [FERC account](#)
- (Best for Longer Comments or Attachments)

1. Go to www.ferc.gov and use the eFiling system. You can attach a formatted document.
2. Include **Docket No. CP25-552-000** in your filing.
3. Use this [Step by Step guide](#) on how to file comments with FERC

Option 3: Mail

Include Docket No. CP25-552-000 and mail your comment to:



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Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Key Points in Response to the EA for the Cape Cod Pipeline Replacement Project

1. Increases pipeline capacity

Algonquin states that the project will not increase gas delivery capacity to Cape Cod. However, details of the proposed infrastructure suggest that gas delivery capacity could increase. The existing pipeline crossings include two 10-inch pipelines operating at 270 psi. The following additional infrastructure suggests an expansion in the proposed project's natural gas capacity:

- The new G-31 pipeline will have an 18 inch diameter operating at 750 psi, almost three times the pressure of the old pipelines.
- The proposed second second crossing of the new pipeline is a 16-inch G-32 pipeline.
- The number of M&R (Metering and Regulating) stations, which control and regulate the flow of the gas, would double from two to four.
- Algonquin's proposal includes two new P.I.G. launchers, which deploy a device that clean debris and inspects the pipeline interior

2. FERC Should Independently Evaluate Claims About Project Capacity

Remind the Commission that greater pipe diameter along with dramatically higher operating pressures results in much greater gas flow. FERC should independently verify Algonquin's claim that the project will not increase gas delivery capacity.

3. Premature EA from FERC

Federal environmental reviews are intended to be based on complete information about a project's potential impacts. However, FERC released the Environmental Assessment before several key environmental reviews and consultations had been completed, including:

- Consultation with the U.S. Fish and Wildlife Service (USFWS) regarding the federally endangered northern long-eared bat and the federally proposed endangered tricolored bat has not yet been completed.
- Consultation with NOAA Fisheries regarding right whales, fin whales, sea turtles, and sturgeon has not yet been completed.
- Consultation with the Massachusetts Natural Heritage and Endangered Species Program (NHESP) regarding state-listed species, including four species identified within the project area, has not yet been completed.
- Review by the Massachusetts State Historic Preservation Office (SHPO) under Section 106 of the National Historic Preservation Act has not yet been completed.



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- A federal consistency determination from the Massachusetts Coastal Zone Management Office has not yet been issued.

Under FERC's mandatory pre-construction conditions (Conditions 14-17), several environmental reviews and consultations may be completed after project approval. As a result, the public is being asked to comment before all environmental information is available.

4. Potential Impacts on Sensitive Ecosystems and Protected Species

The project area contains habitat for several state- and federally listed species identified by FERC in Appendix B of the Environmental Assessment, including the eastern hognose snake, eastern box turtle, purple tiger beetle, buck moth, and papillose nut-sedge. Species protection plans for the eastern hognose snake and eastern box turtle are still being developed by Algonquin.

The federally endangered northern long-eared bat, the federally proposed endangered tricolored bat, and the federally endangered northern red-bellied cooter have also been identified within the project area. However, consultation with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act has not yet been completed for these species. Commenters may wish to request that FERC complete these consultations before issuing a final project authorization.

5. Potential Risks Associated with Drilling Beneath the Cape Cod Canal

Algonquin proposes to use horizontal directional drilling (HDD) continuously for approximately 141 days to construct a 3,850-foot tunnel approximately 87 feet beneath the Cape Cod Canal for installation of the 18-inch G-31 pipeline. The proposed drilling route passes through permeable glacial sands and gravel, conditions that may increase the risk of drilling fluid releases, commonly known as frac-outs, because highly permeable soils can make it more difficult to contain drilling pressures (see the discussion of geology and HDD in [Geology and Horizontal Directional Drilling \(NAWM\)](#)). A frac-out occurs when drilling fluid escapes the borehole and enters surrounding soils or waterways.

In October 2024, a frac-out occurred during Algonquin's Sakonnet River Replacement Project in Portsmouth, Rhode Island. The length and location of the proposed HDD beneath the Cape Cod Canal may present similar risks to the Canal and adjacent shellfish habitat.

The proposed HDD route also crosses the Plymouth-Carver and Cape Cod Sole Source Aquifers, which provide drinking water to the region. Commenters may wish to ask FERC to evaluate whether site-specific mitigation measures are adequate to protect these resources.

6. Wetland disturbance

Wetlands are important for both biodiversity and human well-being. Many species depend exclusively on wetlands for habitat. Wetlands also provide important ecosystem services, including flood storage,



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groundwater recharge, and water filtration. These functions depend on intact wetland soils and hydrology, which can be sensitive to disturbance.

The Algonquin Cape Cod Canal Pipeline Relocation Project would affect several wetland types, including palustrine scrub-shrub wetlands, palustrine emergent wetlands, and palustrine forested wetlands. In the Environmental Assessment, FERC states that it "does not anticipate permanent loss of wetlands or functional changes to the wetland communities" ([Pg. 26](#)). However, FERC also states that impacts to palustrine forested (PFO) wetlands would be long-term ([Pg. 26](#)). Commenters may wish to ask FERC to clarify how these conclusions were reached and whether additional mitigation measures are warranted.

Although the project would affect approximately 0.5 acres of wetlands during construction and operation (p. 26), wetlands can be sensitive to even limited disturbance. This sensitivity is recognized under the Massachusetts Wetlands Protection Act (M.G.L. Chapter 131, Section 40). The project would occur in areas with sensitive soils and hydrology, and commenters may wish to ask FERC to further evaluate potential impacts to wetland functions, soils, and hydrology, particularly in light of the risks associated with horizontal directional drilling.

7. Proximity to vernal pools

Algonquin identified two certified vernal pools adjacent to the project area during its wetland and habitat surveys. Vernal pools are seasonal wetlands that typically hold water during the winter and spring and dry during the summer and fall. These habitats provide important breeding areas for a variety of amphibians and invertebrates and receive special protection under Massachusetts law.

One certified vernal pool is located approximately 115 feet from the proposed construction workspace, while a second is located approximately 300 feet away. FERC concluded that, because the vernal pools are located outside of project workspaces and Algonquin would implement measures to minimize off-right-of-way impacts such as sedimentation, "potential for effects to certified vernal pools would be minimized" ([Pg. 24](#)).

Vernal pools provide breeding habitat for species including spotted, marbled, blue-spotted, and Jefferson salamanders, wood frogs, and fairy shrimp. Several of these species are protected under the Massachusetts Endangered Species Act Regulations. Although these species breed in vernal pools, they spend much of the year in surrounding upland habitats and migrate between these habitats and the pools during breeding periods.

Because many vernal pool species depend on both aquatic and surrounding terrestrial habitats, habitat fragmentation and disturbance near vernal pools may affect breeding migrations and habitat use. Although the Massachusetts Wetlands Protection Act establishes a 100-foot buffer zone around vernal pools, the proposed construction workspace would be located approximately 115 feet from one certified



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vernal pool. Commenters may wish to ask FERC to further evaluate potential impacts to vernal pool species and to consider whether additional measures are needed to protect breeding and migratory habitat.

8. Wetland restoration commitments

The Environmental Assessment describes wetland restoration and revegetation measures in several locations. For example, the EA states that disturbed lands would be "allowed to naturally revegetate" ([Pg. 13](#)), "allowed to revert to pre-construction conditions" ([Pg. 26](#)), and that wetlands would "eventually transition back into a community similar to that of the pre-construction state" ([Pg. 26](#)). While the EA references several FERC-approved restoration plans, some restoration measures are described in general terms without detailed site-specific plans.

Natural revegetation can occur over time; however, recovery following construction disturbance may take years, particularly where tree clearing, temporary workspaces, or permanent rights-of-way are required. Construction activities can also alter soils, hydrology, and vegetation communities through soil compaction, erosion, and changes in drainage patterns.

Commenters may wish to ask FERC to provide additional information regarding site-specific restoration and monitoring plans for wetlands and vernal pools. Commenters may also request that FERC further evaluate alternative routes that would avoid or minimize impacts to wetlands, vernal pools, and associated wildlife habitat.

9. Emissions

The project includes the construction of four new metering and regulating (M&R) stations. M&R stations regulate pipeline pressure and periodically release gas through a process known as a blowdown. Blowdowns release methane, a potent greenhouse gas, into the atmosphere. Over a 20-year period, methane has a significantly greater warming effect ([86 times stronger](#)) than carbon dioxide.

In addition to contributing to climate change, blowdowns can generate noise and contribute to the formation of ground-level ozone. [Elevated ozone concentrations can affect air quality, human health, and vegetation.](#)

The project's greenhouse gas emissions would include direct operational emissions, emissions from construction equipment, and emissions associated with vegetation clearing. Commenters may also wish to ask FERC to evaluate downstream greenhouse gas emissions associated with future natural gas use, particularly if the proposed infrastructure could increase gas delivery capacity.

Massachusetts adopted the [Clean Energy and Climate Plan for 2025 and 2030](#) in 2021, which established statewide greenhouse gas reduction targets of:

- at least 50 percent below 1990 emissions levels by 2030;
- at least 75 percent below 1990 emissions levels by 2040; and



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- net-zero greenhouse gas emissions by 2050, including at least an 85 percent absolute reduction before the use of carbon offsets.

FERC states that "based on the direct operational emissions for the Project in Massachusetts, the Project would contribute about 0.09 percent of the state's 2030 goal, 0.2 percent of the state's 2040 goal, and 0.3 percent of the state's 2050 goals" (p. 63). Commenters may wish to ask FERC to evaluate cumulative greenhouse gas emissions, including downstream emissions, and to explain how the project is consistent with Massachusetts' long-term climate goals.

Conclusion

The topics below are examples of issues commenters may wish to address. Focus on the issues that are most important to you. Comments that include personal experiences, local knowledge, or site-specific concerns are often the most effective.

Please do not copy and paste these points directly. Reword any information you choose to include and explain why the issue matters to you.

1. Request that FERC independently evaluate Algonquin's claim that the project will not increase gas delivery capacity, given the increase in pipeline diameter and operating pressure and the addition of new metering and regulating stations.
2. Request that FERC reevaluate whether preparation of an Environmental Impact Statement (EIS) is warranted given the project's potential impacts on wetlands, climate, water resources, air quality, and nearby communities.
3. Request that FERC delay issuing a Certificate of Public Convenience and Necessity until consultations required under Section 7 of the Endangered Species Act have been completed for the northern long-eared bat, tricolored bat, and northern red-bellied cooter, all of which have been identified within the project area.
4. Request that FERC require a site-specific frac-out contingency plan, along with independent monitoring and review, before horizontal directional drilling begins beneath the Cape Cod Canal and the Plymouth-Carver and Cape Cod Sole Source Aquifers. Commenters may also wish to note that a drilling fluid release occurred during Algonquin's Sakonnet River HDD project in Rhode Island in October 2024.
5. Request that FERC further evaluate potential impacts to wetlands, including long-term effects on wetland soils, hydrology, and ecological functions.
6. Remind FERC that certified vernal pools provide important breeding habitat for species protected under the Massachusetts Endangered Species Act and that avoiding direct impacts to vernal pools may not fully address impacts to surrounding migratory and upland habitat.
7. Request that FERC further evaluate alternative routes and construction methods that would avoid or minimize impacts to wetlands, vernal pools, and associated wildlife habitat.



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8. Request that FERC evaluate all greenhouse gas emissions associated with the project, including downstream emissions, and explain how the project is consistent with Massachusetts' legally binding greenhouse gas reduction and net-zero emissions goals.