



## Statement on the Draft 208 Plan for Cape Cod

November 20, 2014

The Cape Cod Chamber of Commerce would like to submit the following comments on the Cape Cod Commission 208 Plan.

We applaud the efforts of the Commission to create a comprehensive plan to deal with wastewater issues on Cape Cod. The Chamber believes that our current wastewater infrastructure is inadequate and fails to protect our marine and coastal environment, choking our embayments, and threatening our beaches.

We understand that these environmental threats are inextricably linked to our economic well-being. Cape Cod is a national treasure attracting visitors and retirees from around the world. But ultimately, our prosperity is dependent upon the quality of our natural environment. We recognize the need to engage in sensible regional planning that will balance our future growth and the infrastructure it requires, with ecologically sound management practices that mitigate man-made impacts on the environment.

We are also pleased with the process. From the outset, the Chamber observed and participated in the updating of the 208 Plan. From our perspective, the effort was open, transparent, and at times quite innovative. It effectively engaged local officials, community organizations, and the general public. There was also a clear effort to reach out to state and federal regulators and policy makers, a wise strategy considering the obvious need for future funding and implementation requirements.

In particular, we appreciate the emphasis on a regional and watershed based approach. Although the fifteen towns of Barnstable County will individually be at the center of any implementation efforts, it is also clear that the problems of wastewater and water quality transcend any particular town, and will require collaboration and cooperation. We believe the 208 Plan successfully promotes this critical relationship.

We note that the innovative watershed based planning approach will present new challenges to the existing regulatory process and standards, and encourage both the Commission and the Department of Environmental Protection to collaborate on amendments to the regulations that will facilitate the implementation of these aspects of the 208 Plan.

Further, we note that although the draft 208 plan presents a much needed watershed framework with a menu of new treatment technologies and helpful decision-making tools with supporting information, we hope that the final draft will contain more specific information about each watershed and priority options for local decision makers to consider and they take this process to the next implementation steps.

Finally, we understand that this effort will be expensive. If we are to be successful we need to be cognizant of the financial constraints that face our residents, businesses, and town governments. Therefore, we are particularly pleased with the Commission's emphasis on containing costs through a blend of traditional and non-traditional solutions, adopting innovative and flexible strategies, and rejecting an overly centralized and expensive approach.

On behalf of the Board of the Cape Cod Chamber of Commerce,

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Chief Executive Officer