

First Name	Last Name	Street No	Street Name	City	email	Created
Lindsey	Counsell	864 Main Str	Post Office B	Osterville	lcounsell@3b	10/28/2014

Lindsey	Counsell	864 Main Str	Post Office B	Osterville	lcounsell@3b	10/28/2014
---------	----------	--------------	---------------	------------	--------------	------------

Lindsey Counsell 864 Main Street Post Office Box Osterville lcounsell@3b 11/6/2014  
Lindsey Counsell 864 Main Street Post Office Box Osterville lcounsell@3b 11/10/2014

Raymondby Raymondby Bereeda Bereeda de697bd7@y 11/14/2014

Raymondby Raymondby Bereeda Bereeda de697bd7@y 11/16/2014

Diane Murphy Box 367 Barnstable dmurphy@wl 11/18/2014

David

Mason

16 Jan Sebastian East Sandwicl dmason@tov 11/19/2014

Brian

Baumgaertel

bbaumgaerte 11/19/2014

H carter      Hunt, jr.

chunt@mass 11/19/2014

Brian Baumgaertel

bbaumgaerte 11/19/2014

Brian Baumgaertel

bbaumgaerte 11/19/2014

Brian Baumgaertel

bbaumgaerte 11/19/2014

David Dow  
Anne McGuire Main

18 Treetop Lane East Falmouth| ddow420@cc 11/20/2014  
Barnstable amcguire@ca 11/20/2014

Wendy Northcross 5 Patti Page Way

Centerville wendy@cape 11/20/2014

Earle

Barnhart

28 Common Wa East Falmout|capecodalche 11/20/2014



Mike

Giggey

99 Main Street Topsham

mike.giggey@ 11/20/2014

Hilde

Maingay

28 Common Wa East Falmout|capecodalche 11/20/2014

## Comments

How does one submit a report that is a supporting document to a comment?

First off I want to praise your efforts to bring this draft of the 208 Plan forward in a timely, clear and concise manner. You have done an outstanding job.

As I have read through I have a few comments to share. The first being I think a clear explanation of the importance of low oxygen events should be given in Section 2, Page 6, Eutrophication this is an important point that average folks can understand and the cause and effect could be stated in more depth, particularly the link to fish kills and the like.

Page 2-8 Mass Estuaries Project Section I would suggest that more background regarding the Non-profit partners such as my organization Three Bays Preservation and others like the Falmouth Pond Watchers should be included here so folks will understand the grassroots efforts that went in MEP.

Page 2-9, Fig. 2-11 shows Lewis Bays as a completed TMDL however I am not certain that it has been released by the EPA, so that may still be pending.

Regarding Estuary dredging there is a technique that is being used elsewhere the places hydraulically dredged material from an estuary onto adjacent saltmarsh areas by spray application of the dredged slurry. The material is applied in layers when the marsh is dormant and acts as a "top dressing" common in lawn care practices.

This type of placement of dredged material has several advantages:

• Local material is beneficially reused in the area from which it is generated

• Considerable cost savings as opposed to traditional dredge and disposal

• Nutrient recycling within the marsh

• Pollution and impacts from transport and disposal of dredged materials is eliminated

• Marsh elevations are raised, potentially offsetting sea level rise

• Degraded marshes can be restored with this technique

• Sites with limited areas for dewatering and transfer of the material can be dredged

Disadvantages;

• This is not a technique currently used in Mass.

In order to be effective and produce results in a timely manner for towns adopting the Watershed App  
(Nice post )

<http://m66uzk0v.com> my blog

(Nice post )

<http://m66uzk0v.com> my blog

"Diseases and bacteria present on Cape Cod could affect oyster survival rates and regulations for oyster harvest. There are three diseases that have been known to affect oyster populations on Cape Cod and will be a challenge to projects focused on increasing oyster populations. These diseases are MSX(haplosporidium nelsoni), dermo(perkinsus marinus) and vibrio (vibrio parahaemolyticus)."

November 19, 2014

Mr. Paul Niedzwiecki

Executive Director

Cape Cod Commission

P.O. Box 226

3225 Main Street

Barnstable, MA 02630

Subject: Draft 208 Plan Cape Cod Area Wide Water Quality Management Plan Update

Comments from the Town of Sandwich

Small correction, in the Executive Summary pg xii and again on pg 5-16, the number of I/A systems is cited as more than 1,500. This number is actually north of 1,700.

The link on pg 3-34 has changed to <https://septic.barnstablecountyhealth.org/category/data-and-statistics>

Also, I am a little confused as to the purpose of drawing a distinction between I/A Systems and

## Comments on the Draft Plan:

Page 6-9 1st Paragraph: include USCG Base Cape Cod. It is a new command on the installation.

Page 6-9 2nd Paragraph: JBCC include parts of the Town of Falmouth and not just "abuts".

Page 6-10 2nd Paragraph: include the Massachusetts Alternative Septic System Test Center as an individual septic system or as a multiple septic system

Page 6-12 5th Paragraph: Do you plan to conduct a separate study from the one already in progress by MassDevelopment? If not MassDevelopment should be mentioned in this paragraph as funding the study.

Page 6-13 1st Paragraph: What level of increase in nitrogen contribution is expected to come from JBCC? From what activities, currently existing or planned, do you see an increase of nitrogen contribution?

Page 6-13 2nd Paragraph: What non-military nitrogen sources does this plan anticipate in its statement "an unknown level of nitrogen contribution could result from non military uses"?

Page 6-13 2nd and 3rd Paragraphs: MassDevelopment has by virtue of several studies including the MMR Master Plan of 1998 determined that adding activities such as other federal government agencies, non-profit educational or scientific institutions and defense related activities could be used

On page 3-33 you cite "enhanced" I/A systems as being approved by DEP for 13 mg/l. This is false.

FAST Approval

<http://www.mass.gov/eea/docs/dep/water/wastewater/w-thru-z/w101238.pdf>

Page 2, Section I.3 - "Effluent Total Nitrogen (TN) concentration of 19 mg/L (for 660 gallons per day per acre -gpda- loading) or 25 mg/L (for 550 gpda loading). "

RUCK approval

<http://www.mass.gov/eea/docs/dep/water/wastewater/w-thru-z/w152782.pdf>

Page 2, section I.4 "Effluent Total Nitrogen (TN) concentration of 19 mg/L (for 660 gallons per day per acre -gpda- loading) or 25 mg/L (for 550 gpda loading)."

Page 3-33, link is incorrect.

<http://www.mass.gov/eea/agencies/massdep/water/wastewater/septic-systems-title-5.html#5>

I/A information is at anchor #5, not #1 as indicated in your report.

On Pg 3-35 you cite the following on the two tables presented:

Comparison of Costs for Wastewater Management Systems Applicable to Cape Cod, 2014

This report as "updated" does not exist outside of the appendix of the 208 report, based on a simple Google search. In essence, you are referring to a report which was created ("updated") for the express purpose of supporting another report.

What you should have done was leave the original 2010 report alone and written a new report indicating what has changed, so that a reader does not get the false impression that the "updated" material carries the same legitimacy of the original.

Cape Cod & the Islands Group- Sierra Club pdf

Draft Comments on the Cape Cod Commission Section 208 Wastewater Report.pdf  
test



## 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

To: Paul Niedzwiecki 11/20/14

Cape Cod Commission

From: Earle Barnhart

The Green Center, Inc.

East Falmouth, MA

Comments on "Draft Section 208 Plan Update"

I was one of the "self-selected stakeholders" in the Falmouth Watershed Group and Falmouth's Upper Cape Sub-Regional Group. As a stakeholder, I represented the interests of Falmouth's local watersheds, and I also tried to represent the wider interest of global ecological sustainability. I was fortunate to participate in the successful development of your innovative watershed approach, and of your political strategy of letting the Cape's people, acting as local "watershed management agencies", do the planning and choose locally-preferred solutions.

1. The draft 208 Update is very focused on nitrogen control. More emphasis is needed on the control of phosphorus for protection of freshwater ponds, and the control of Contaminants of Emerging Concern (pharmaceuticals, health care products, etc.) with respect to both human health and general environmental impacts.

2. Significant work has been accomplished by the Commission to estimate Cape-wide infrastructure costs. These estimates should be included in the 208 Update to illustrate the order of magnitude of the potential cost, and to identify the principal cost drivers.

3. The Commission has developed a Triple-Bottom-Line model to compare technical, environmental and social aspects of alternative nitrogen control schemes. This model was show-cased at the February 2014 Summit, and is alluded to in the 208 Update, but the model itself has not been released. It should be released and subject to public comment.

To: Paul Niedzwiecki

November 20, 2014

Cape Cod Commission

From: Hilde Maingay

The Green Center, Inc.

East Falmouth, MA 02536

Two board members of The Green Center, Inc., Earle Barnhart and Hilde Maingay, have participated as stakeholders in the Falmouth Watershed Group and the Upper Cape West and South working group.

The Green Center, Inc. thanks the CCC for the considerable effort put into this Section 208 plan and preceding meetings, hearings, reviews and extensive data collection that resulted in the Technologies Matrix.

This 208 report has great potential as a tool to develop environmentally and socially responsible plans that can address local wastewater issues and related pollution problems.



roach recommended in the 208 Plan, Barnstable County should include in future budgets an exp:





















ansion of the County Dredge program. The County should consider the purchase of a second dre























ledge that will allow for more efficient operation of the program. Currently the single dredge mov





















res from site to site around the Cape and much actual dredging time is lost during mobilization at





















nd demobilization of the equipment. A more efficient operation would be to have one crew that





















: does the actual dredging and another that moves the equipment and sets up for the next job. M























More actual production would occur and there would be a more efficient use of the limited resources





















ledge windows that are enforced by the permitting agencies. Another side benefit would be





















: that if one dredge was disabled the second could continue work and at least complete some of t





















:he projects.