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Commission staff & consultants:

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.

The next section, MEP Report Status, that section is a jumble and needs to be reviewed.

The Freshwater Ponds section starting on page 2-9 is also in need of reworking. It starts with the state listing of impaired waters without some of the history that comes in later paragraphs. Paragraphs 2-4 should be the intro, then #8 and so on down into more detail. The first paragraph should be in the section on Pond Water Quality starting on page 2-12.

Overall my opinion is that more can be said of the fact that the watershed management approach proposed in this plan will be a net creator of jobs here on the Cape. The types of innovative solutions available as options proposed in this plan lend themselves to locally based implementation of these techniques as opposed to large off Cape contractors being awarded big contracts to install miles of sewer lines.

My thoughts for now, again great job on a complex task.

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

- â€¢ Considerable cost savings as opposed to traditional dredge and disposal
- â€¢ Nutrient recycling within the marsh
- â€¢ Pollution and impacts from transport and disposal of dredged materials is eliminated
- â€¢ Marsh elevations are raised, potentially offsetting sea level rise
- â€¢ Degraded marshes can be restored with this technique
- â€¢ Sites with limited areas for dewatering and transfer of the material can be dredged

Disadvantages;

- â€¢ This is not a technique currently used in Mass.
- â€¢ Permitting will be extensive
- â€¢ Careful monitoring will be necessary
- â€¢ Given that the depth of material to be placed is limited, several seasons may be needed to complete an area

This type of project would do well to be included in the 208 Plan with study and review through the pilot projects process to determine if it is a feasible technique.

In order to be effective and produce results in a timely manner for towns adopting the Watershed Approach recommended in the 208 Plan, Barnstable County should include in future budgets an expansion of the County Dredge program. The County should consider the purchase of a second dredge that will allow for more efficient operation of the program. Currently the single dredge moves from site to site around the Cape and much actual dredging time is lost during mobilization and 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. More actual production would occur and there would be a more efficient use of the limited "dredge 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 the projects.

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Three Bays Preservation