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November 20, 2014

Ms. Patty Daley
Deputy Director
Cape Cod Commission
3225 Main Street (Route 6A)
P.O. Box 226
Barnstable, MA 02630

RE: Draft 208 Plan (Plan) Comments

Dear Ms. Daley,

We have reviewed the Draft 208 Plan and offer up the following comments:

- The regulatory reforms proposed in the Draft Plan should be a large help to the Cape towns as they complete Targeted Watershed Management Plans (TWMP) and Comprehensive Wastewater Management Plans (CWMP).
- The technology evaluations have developed a greater understanding of all the available nitrogen management options, and should assist and streamline decision-making at the local level.
- We have worked with some of the planning tools that have been developed and believe that they will streamline technology screening decisions at the local and regulatory-review levels.
- As you have heard from others, the Plan is "light" on pond water quality evaluations and mitigation decision-making procedures. Stacy Smith and others requested public input on how to improve this issue at the last Mid-Cape Stakeholders meeting, and we offer up the following information:
 - The Town of Eastham conducted a Comprehensive Pond Action Planning Process that is similar to your 208 Planning Process. It utilized facilitated public meetings to 1) understand the levels of impairment of the fresh water ponds in Eastham, 2) understand intended use of the ponds, 3) review pro and con information on available mitigation technologies and management options, 4) set priorities, and 5) approve an Action Plan for the ponds. Since the development of the Action Plan, the Town has mitigated eutrophic water quality in the two highest priority ponds. This project would be a good model for the 208 Plan. It is noted that Chatham and Barnstable have also developed similar Pond Action Plans as part of their CWMP projects that have also been successful.

- The Town of Harwich developed a Guidance Document and Case Study Report for wastewater management for fresh water ponds in 2007. The project was funded by the Commission and the project report is on the Commission Web site. This could be used as a source of information.
- We look forward to reviewing the watershed reports completed as part of the Plan and integrating the applicable ones into the CWMP and TWMP on which we are working.

We would be pleased to assist if you have any questions, and we appreciate the opportunity to comment on the Draft Plan.

Sincerely,

GHD Inc.



Nathan C. Weeks, P.E., BCEE
Senior Project Manager

NCW/lm

cc: Dale Saad, Ph.D—Town of Barnstable
Jane Crowley—Town of Eastham
Robert Duncanson, Ph.D—Town of Chatham
Tom Fudala, AICP—Town of Mashpee
Jerry Potamis, P.E.—Town of Falmouth