

From: cj g [mailto:cjgavin@gmail.com]  
Sent: Thursday, November 13, 2014 9:22 AM  
To: Paul Niedzwiecki; Tom Cambareri  
Subject: Public Comment for Cape Cod Commission Draft 208 Plan

Despite all the self promotion and hype, the Cape Cod Commission's Draft Section 208 Plan has turned out to be a major disappointment for Cape Cod and Massachusetts as a whole. For the majority of its existence, the Cape Cod Commission has attempted to force its centrally controlled "Smart Growth" model on towns throughout Cape Cod. This outdated and seriously flawed policy has caused the Commission to promote equally outdated and seriously flawed technology - town sewer. At every turn, the Commission has sought to demonize septic system technology while espousing the alleged virtues of large scale sewer treatment for rural and suburban communities on the Cape. The current Draft 208 Plan is nothing but a continuation of that propaganda campaign with a modest acknowledgment of the potential for alternative onsite treatment technology solutions. For that minor acknowledgment, the Commission deserves a D+ grade instead of an outright F for its belated Clean Water Act mandated plan effort.

In the final analysis, the cold hard facts of waste water treatment have demonstrated time and again that large scale sewers don't really improve water quality for suburban and rural communities. The federal government and Sierra Club have been telling us for years that large scale publicly funded sewers only encourage more water use and contamination in these settings. As a prime example, the proposal that was shot down recently in Orleans would have created a down town collection system capable of handling 165,000 gallons per day of flow for an area that's been consuming roughly half that amount over recent history. And ironically, recent water quality data for Orleans, a town that has never seen town sewer, shows it to be twice as clean as neighboring Chatham's drinking water and Chatham has had town sewer for well over thirty years! (.23 ppm nitrate vs. .58 ppm average). Orleans's drinking water quality also easily trounces that of the other long time sewered towns of Falmouth and Barnstable. The reason is simple and it's something the Cape Cod Commission doesn't want to address in its 208 Plan because it doesn't fit into the "Smart Growth" model. Water quality is primarily a function of a simple ratio:

The annual amount of water pulled from the ground, contaminated, and returned to the water table versus the amount of relatively clean rain water that falls, is biologically and physically filtered, and returned to the water table over the same time period.

In Orleans's case, the bulk of its drinking water washes through the aquifer lens under Nickerson State Park and much of eastern Brewster - a sparsely populated area. If Brewster decided to erect a sewage treatment facility in this area and discharge large quantities of effluent with nitrates in the range of 2 to 5 mg/liter

(considered state of the art performance), Orleans would lose its .23 mg/liter drinking water quality in very short order.

So what's the take away from this? Quite simply, the most important weapons in our arsenal to fight deteriorating ground water quality are conservation, recycling, and development restrictions - not advanced waste water treatment technology. States like Arizona and California, where water resources are stressed, scarce, and highly prized, have been paving the way with new legislation to promote gray water separation, recycling, and the acceptance of low nitrogen emission onsite treatment technology. In this respect, the Cape Cod Commission and state of Massachusetts are way behind the eight ball. Their focus has been on endless growth with the urbanization of Cape villages that will help increase business activity and ultimately revenues to the state. And this approach clearly has gained considerable favor in the Chamber of Commerce community which has lobbied heavily for publicly funded sewers. Crucial conservation and new recycling measures are conspicuously absent from the Cape Cod Commission's 208 Draft Plan. Worse yet, the Commission has refused to acknowledge that in many cases, naturally occurring nitrogen sources are fouling embayments with excess nitrogen around Cape Cod - Orlean's flood tide estuary - Town Cove, being a prime example. There is also no acknowledgment for rain water high in nitrate levels that passes directly to the aquifer from hard impervious, man-made surfaces without the benefit of biological filtration - also contributing substantially to the presence of nitrates in groundwater. Close scrutiny of the current 208 Draft Plan reveals that it is seriously flawed and was generated largely to promote the myopic view and poorly thought out goals of its author.

For all of its flaws and shortcomings, Mass Title V still recognizes the finite capacity of raw land to absorb and process contaminants in ground water. The current Title V assessment breaks down to 440 gallons per day per acre or effectively one 4 bedroom home per acre. Town sewer completely sidesteps this vital restriction on over development and environmental degradation. The Cape Cod Commission's longstanding and continued support for town sewer rather than newer adaptive management approaches endorsed by the federal government and Sierra Club suggests that it is not the most appropriate entity to assemble a Section 208 Plan that will help Cape Cod successfully achieve Clean Water Act goals in the 21st Century.

Courtney Gavin  
Sunshine Committee of Orleans