

Key Comments and Issues **Related to the Amended CWMP**

November 9, 2016

Comments on the Amended Comprehensive Wastewater Management Plan (ACWMP) were received from six parties. A complete summary of all comments has been provided to the OWQAP and Board of Selectmen. The following is a summary of major comments and key issues related to the Amended CWMP. “ES” refers to the Executive Summary of the document.

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1. The document needs a thorough editing and clean-up. Graphics, maps and figures should be used wherever feasible to break the pattern of long textural sections and ease understanding by the reader. Add maps of the watersheds and sub-watersheds as references up front and reference throughout the document for various purposes
 2. The internal and external (regulatory) processes for review, modification and approval of the Amended CWMP need to be defined.
 3. Revise the Floating Constructed Wetlands (FCW) text to address On-Site Nitrogen Reducing Barriers (NRBs) or other emerging I/A technologies that may be added to the program as part of the on-going Adaptive Management Plan. Include rationale for not considering FCWs for marine water but possibility for use in freshwater ponds
 4. Mention that the stormwater management planning needs to be focused on water quality not quantity only. Options for stormwater nutrient reduction need to be evaluated and implemented.
 5. Mention that preliminary design is necessary to obtain better cost estimates and fully evaluated alternatives for laterals, use of remaining design life of existing on-site systems and alternative collection and pumping options.
 6. Define difference between “Conceptual Design”, “Preliminary Design” and “Final Design”. Use terms consistently. Discuss in general terms the criteria and conditions that will drive the phasing of the downtown wastewater system.
 7. Discuss and summarize the financial conclusions, including potential Design-Build savings and financial model results. Provide an overview, preferably in a graphic, of what D/B and D/B/O are for the average reader?
 8. Add description of planning proposed for Freshwater Ponds Protection and Remediation
 9. Add detailed implementation schedule for all the plan components

10. Add a compliance table that shows for the items listed in the Cape Cod Commission comments MEPA comments and DEP MEP/TMDL requirements:
 - i. The items that are not still applicable due to plans changes of other reasons
 - ii. The applicable items that have been satisfied and a summary of how
 - iii. Those that remain to be satisfied (e.g. disposal site approvals or permits)
11. For the TMDL/MEP requirements, include a table that summarizes the plan nitrogen removal load for each watershed referencing the MEP/TMDL requirements, using the information developed for the Pleasant Bay Plan.
12. Need to add a section on updating the CWMP for Rock Harbor Creek based on the forthcoming decision by MEPA and the Town on Cedar Pond salinity status. A revised management plan will be required considering Traditional and Non-Traditional options.
13. Executive Summary: Include summary of plans for the Downtown WWTF not just collection system. Explain change in design capacity of the Downtown WWTF from the Stantec sizing.
14. Mention additional studies that have been completed of boundary conditions, WQ data from last 12 years, inlet condition changes for the impaired water bodies (e.g. Nauset Inlet). Mention that we have requested that SMAST do a preliminary rerun of the MEP model for Nauset with revised inlet hydraulics to confirm existing n load reduction estimates...rather than wait for 3-4 years.
15. Need to summarize Namskaket Marsh status. The USGS study indicates that the TTSTP did not significantly impact the marsh, but the Town did decide, and has committed funding, to develop a land use and watershed management plan for the upper reaches of the watershed around Route 6a south of Route 6.
16. Include more accurate assumptions on nitrate load from the Orleans landfill based on the landfill PRB studies.
17. Define the ultimate goals for aquaculture in terms of envisioned full scale program nitrogen reduction, types of projects, operation and management of the projects, costs of the projects, etc. and not just the short-term demonstration project goals. Clarify how we envision the full scale program to be cost-effective vs. other traditional and/or non-traditional options.
18. Have the average costs to Orleans homeowners been fully explained and vetted with the BoS? We should summarize the information we have collected from the EPA, Massachusetts reports and Cape towns on the “affordability” of wastewater management for the average single family home.
19. Add section at the end for Next Steps in Implementation of the Plan