

Summary of Comments, Suggestions and Issues
Related to the Amended CWMP

October 19, 2016

Comments on the Amended Comprehensive Wastewater Management Plan (ACWMP) were received from six individuals. See notes below clarifying the review and revision process. The following is a summary of the responses received as of October 15, 2016.

I. General editorial corrections and suggestions

(Not enumerated)

II. General Comments

1. The Amended CWMP runs to over 100 pages and it will be difficult for most people to work their way through the entire document. At this point, it's almost certainly too late to produce a tighter, more condensed document although that should always be our goal. That said, we can expect most people to read the Executive Summary and I recommend that you re-assess the Executive Summary to make sure it adequately presents a strategic view of where we're going. In particular, I found it difficult to understand our overall goals for aquaculture. Under the Consensus Agreement, the town has agreed we will try aquaculture solutions, well aware that those solutions come with potential benefits and corresponding risks. The Amended CWMP should clearly communicate those benefits and risks as part of the overall plan. At the recent selectmen's meeting, Mark Matheson directed us to present our aquaculture plans more clearly and as part of an overall plan. His comments were valid and I believe the Executive Summary can do a better job presenting our efforts as part of an overall strategy.
2. Eliminate 90% of the acronyms. CWMP, OWQAP if you must although I hate it. Not many more. Not WWTF, ACWMP, BOS, CHR, and most of the others. By the way, why do we refer to the Center for Coastal Studies as CSC? I can't stress how important this is. All these acronyms make your document exclusionary and there's no reason for them, other than to make people like me feel stupid.
3. 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.
3. The internal and external (regulatory) processes for review, modification and approval of the Amended CWMP need to be defined.

III. Updates and Clarifying Changes

1. Pg. 6-21 Update Tri-Town Septage Treatment Plant status
2. Sec. 8.1 Modify to reflect change from Floating Constructed Wetlands to other technologies
3. Clarify reference to the “consensus plan” in contrast to the “Consensus Agreement”
4. Decisions regarding disposal sites have not been made
5. Define OWQAP, including list of participating members and liaisons.
6. Clarify the use of the terms “Nauset Harbor”, “Nauset Estuary”, “Nauset Harbor Embayment” and “Town Cove”
7. Mention migration of Nauset Inlet to the north
8. Appendix T: pg. 5 Mention additions to sampling stations in Nauset estuary planned for 2016
9. Appendix T; pg. 7 Note that current data sets span from 2003 to 2015
10. Appendix V: pg 5 Define difference between Town Cove and Nauset Harbor
11. Appendix X: pg. 4 Note that the stormwater team has not met in 2-3 years
12. Add a table summarizing the recommendations of the plan by watershed including key design criteria (e.g. plant capacity, number of parcels sewered, length of PRB, etc.), estimated capital and operating cost and comparison to the CWMP recommendations (could be separate tables)
13. Revise the FCW text to address On-Site 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
14. Update all of the demonstration project information for all NT technologies
15. Add the estimate of nitrate flux from the landfill to the MEP model calibration and n-load reduction estimates (it may not change load reduction from other sources to Town Cove)
16. ES: Define the term “Hybrid”
17. ES: 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.
18. State why June 1 closure of TTSTP was necessitated by potential staff depletion and aged equipment failures leading to more expensive emergency closure.
19. ES and Report: Explain CHR. It is a goal of which the first step is aquaculture. We need more developed plan going forward. We don’t have designated CHR projects
20. Mention that the SWM planning needs to be focused on WQ not quantity only. Options for SW nutrient reduction need to be evaluated and implemented.
21. Add maps of the watersheds and sub-watersheds as references up front and reference throughout the document for various purposes
22. Include pictures where appropriate of Nauset Inlet and other key features of the waterbodies e.g. Rock Harbor Marina, Cedar Pond with wires, etc.
23. Enumerate and quantify changes made from the Consensus Plan, e.g. parcels sewered and why, flows, septage treatment, disposal site changes, etc.

24. State that MA DEP and CCC participated in the OWQAP monthly meetings, understood and supported the process and conclusions
25. Sec. 6.2.3 Describe Parcel 1/1A characteristics in detail also; i.e. near WWTF, previously studied, in Little Namskaket, already receives effluent from s end of Orleans, town owned, AECOM model tests, etc. Show on a map.
26. Sec. 6.3.2.3 Update zoning options based on latest Planning Board draft proposals or at least changes being considered.
27. Sec. 6.4 Define difference between “Conceptual Design”, “Preliminary Design” and “Final Design”. Use terms consistently.
28. Sec. 6.4.1.1 State that flexibility for phased development was a key factor
29. Sec. 6.4.1.2 State that non-potable water reuse was considered as a means of effluent disposal as well to reduce requirements for downtown disposal sites.
30. Sec. 6.4.4.3 Is AECOM sure that reference O&M costs you are using do not include repair and replacement components?
31. Sec. 6.4.4.5 Explain how this is different for MEP nitrogen compliance vs. traditional BOD/TSS/Bacteria for which only the effluent needed to be monitored.
32. Table 5.2 Needs to update table based on actual Lonnie's Pond and PRB and NRB estimates.

IV. Additions, Recommendations and Corrections

1. Sec. 10 Discuss and vet the financial conclusions, including Design-Build savings and financial model
2. Add description of planning proposed for Freshwater Ponds Protection and Remediation
3. AECOM ignores the advantages and cost savings of using STEP systems
4. The projections of future septage quantities and revenue are optimistic
5. The analysis does not account for costs of septage treatment
6. Scoring and ranking of collection and treatment technologies was accomplished by AECOM; Members of OWQAP were not invited to participate.
7. Depths of Paw Wah, Lonnie's, Namequoit Creeek and Quanset ponds do not match records
8. Mention and discuss Namskaket and Rock Harbor sampling program
9. Pg. 15 Mention the Orleans fertilizer program and wetlands by-law
10. Mention cormorants and sources of bacteria and nitrogen in Cedar Pond
11. Appendix M: Kent's Point is owned by the Orleans CC not the Orleans Conservation Trust
12. Appendix T: pg. 4 Note that there are different sampling protocols for Pleasant Bay and Nauset sampling stations
13. Appendix S: pg. 7 Note that salt water is allowed to pass into the upper marsh at the Bike Trail culvert
14. Appendix T
15. Section 5, Mention confirmation of the March 2015 Consensus Agreement by the OWQAP in July 2016

16. Shouldn't the plan be organized by watersheds and sub-watersheds per the 208 recommendations, MEP reports and approach used to develop the plan components?
17. Add detailed implementation schedule for all the plan components
18. Add a compliance table that shows for the items listed in the CCC DRI comments and MEPA comments, or as 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)
19. 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.
20. Add an update of the environmental review of the Tri-Town site (archaeological review, USGS report, AECOM preliminary modeling, existing water well verification, etc.)
21. Need to address the Rock Harbor Creek/Cedar Pond decision and process to revise the CWMP accordingly.
22. Add section at the end for Next Steps in Implementation of the Plan
23. 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.
24. Mention additional studies of boundary conditions, WQ data from last 12 years, inlet condition changes (e.g. Nauset Inlet)
25. ES: This section and the entire report needs a summary of the N reduction requirements by water body and the ACWMP approach (technologies) recommended to meet those reductions. i.e. A compliance plan.
26. Use the flow chart graphic from the Consensus Plan development to explain process.
27. Sec. 6.4.1.1 Add that septage treatment from the remainder of Orleans and Lower Cape towns would add additional new revenue to offset Orleans operating costs
28. Sec. 6.4.1.1 State what was assumed wrt on-site tank replacement with Step systems?
29. Sec. 9 Need to add a section on updating the CWMP for RHC based on the forthcoming decision by MEPA and the Town on Cedar Pond salinity status. A revised management plan will be required considering T and NT options.
30. Sec. 9.1 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.
31. Table 8.2 in unclear
32. Define role of SMAST past present and future in planning process
33. What about study and predictions re: PB barrier break? How will its effect be estimated?

34. Sec. 9.5 Include more accurate assumptions on nitrate load from the Orleans landfill based on the landfill PRB studies.
35. Sec. 9.6 Mention that PBA and SMAST plan re-run of the MEP model for Nauset and PB. Probably will need to update RHC model and requirements also.
36. Sec. 9.6 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.
37. Sec. 9.6.2 Mention that SMAST updated the fertilizer model inputs based on assessment of the 260 parcels that have been developed since the original MEP model runs.
38. Sec. 10.1 Provide an overview, preferably in a graphic, of what D/B and D/B/O are for the average reader?
39. Sec. 11.2 Mention that Brewster and Eastham have attended all of the OWQAP meetings.
40. 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.

IV. Issues for Discussion and Decision

1. Pg. 10-2 Has the BoS discussed and agreed to these steps?
2. Has the BoS reviewed and agreed upon the recommendations of the ACWMP
3. Have the average costs to Orleans homeowners been fully explained and vetted with the BoS?

Notes:

1. All comments, suggestions, recommendation, corrections and statement will be reviewed and addressed, including those not listed above
2. The inclusion of comments, additions, corrections and statements in the above list does not indicate that the basis of the statement is correct. All comments, additions, corrections and statements will be reviewed and addressed in the final draft ACWMP document.
3. Comments made with essentially the same point as a previous comment were not repeated.
4. Page numbers are shown where referenced in the comment
5. ES = Executive Summary