

Appendix C  
Response to Comments from CWMP

Agency	Summary of Comment	Response
EOEEA	Review Final MEP Report for Nauset Marsh to determine if any changes to the CWMP are needed to address nutrient loading and water quality issues affecting Nauset Marsh/Town Cove	Adaptive Management Plan, Section 8.4. SMAST will be conducting additional modelling.
	Conduct confirmatory modelling with Linked Model to identify estimated nitrogen reductions to be achieved	SMAST will be conducting additional modelling.
	Conduct additional modelling to confirm impacts of discharge to Little Namskaket Marsh	Up to six potential groundwater discharge locations have been identified. Further evaluation of these will occur to determine which is/are most appropriate and the Final CWMP will be updated with this information.
	Conduct additional monitoring and characterization of the existing Tri-Town plume	Up to six potential groundwater discharge locations have been identified. Further evaluation of these will occur to determine which is/are most appropriate and the Final CWMP will be updated with this information.
	Re-evaluate cluster systems for Cedar Pond	Requires input from Town of Orleans
	Conduct monitoring to assess future groundwater discharge at Tri-Town site	Up to six potential groundwater discharge locations have been identified. Further evaluation of these will occur to determine which is/are most appropriate and the Final CWMP will be updated with this information.
	Prepare annual TMDL Compliance Report	Requires input from Town of Orleans
	Conduct monitoring for and address treatment of Contaminants of Emerging Concern (CEC)	Requires input from Town of Orleans
	Confirm that the Core components of the proposed program do not require a MassDEP Chapter 91 License	Permitting requirements will be confirmed as the project moves from the planning phase into the design phase.
Work closely with MA NHESP to minimize impacts to rare species from all project components	Permitting requirements will be confirmed as the project moves from the planning phase into the design phase.	

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	Submit final design plans to MHC for assessment of potential for impacts to historic and archaeological resources	Permitting requirements will be confirmed as the project moves from the planning phase into the design phase.
	Consider DOER comments regarding greater CO2 reductions via alternative nitrogen demand technology and incorporate measures to increase energy efficiency	Greenhouse gas emissions will be confirmed as the project moves from the planning phase into the design phase. Demonstration Projects for Non Traditional Technologies are intended to confirm nitrogen removal efficiencies, and therefore confirm potential to reduce emissions from traditional treatment
	Adopt by-laws, regulations and policies to limit new growth prior to installation of new sewers	Section 6.3.2 Downtown Future Growth Scenarios, Strategies to Limit Growth, Draft Regulations to Obtain Zero Interest Financing, and Implications for Wastewater Loading Impacts and Other Community Impacts in the Downtown.
	Work with Brewster, Eastham, MassDEP, Cape Cod Commission, Pleasant Bay Resource Management Alliance, and Cape Cod Water Protection Collaborative regarding regional solutions to water quality issues	Requires input from Town of Orleans
	Use lower emission equipment and require contractors to retrofit diesel equipment and on-road Low Diesel Fuel	Greenhouse gas emissions will be confirmed as the project moves from the planning phase into the design phase. Demonstration Projects for Non Traditional Technologies are intended to confirm nitrogen removal efficiencies, and therefore confirm potential to reduce emissions from traditional treatment

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	Use Ultra Low Sulfur Diesel (ULSD) fuel to reduce emissions of fine particulate matter	Greenhouse gas emissions will be confirmed as the project moves from the planning phase into the design phase. Demonstration Projects for Non Traditional Technologies are intended to confirm nitrogen removal efficiencies, and therefore confirm potential to reduce emissions from traditional treatment
	Use lower emission equipment in addition to requiring contractors to retrofit diesel-powered equipment with emissions controls, such as particulate filters or traps. Require contractors to use On-Road Low Sulfur Diesel in off-road construction equipment	Greenhouse gas emissions will be confirmed as the project moves from the planning phase into the design phase. Demonstration Projects for Non Traditional Technologies are intended to confirm nitrogen removal efficiencies, and therefore confirm potential to reduce emissions from traditional treatment
	All refueling and maintenance should be on pavement and outside of sensitive areas	Construction requirements will be confirmed as the project moves from the planning phase into the design phase.
	Develop a spill contingency plan	Construction requirements will be confirmed as the project moves from the planning phase into the design phase.
MassDEP	Characterize Tri-Town Plume	Up to six potential groundwater discharge locations have been identified. Further evaluation of these will occur to determine which is/are most appropriate and the Final CWMP will be updated with this information
	Monitor cluster systems at Cedar Pond	Requires input from Town of Orleans
	Conduct confirmatory modelling regarding nitrogen reductions to be achieved	SMAST will be conducting additional modelling.

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	Conduct water quality monitoring at Namskaket Marsh	Up to six potential groundwater discharge locations have been identified. Further evaluation of these will occur to determine which is/are most appropriate and the Final CWMP will be updated with this information
	Minimize greenhouse gas emissions	Greenhouse gas emissions will be confirmed as the project moves from the planning phase into the design phase. Demonstration Projects for Non Traditional Technologies are intended to confirm nitrogen removal efficiencies, and therefore confirm potential to reduce emissions from traditional treatment
Cape Cod Commission	Evaluate need for sewerage around Cedar Pond and address in Adaptive Management Plan (AMP)	Requires input from Town of Orleans
	DRI Approval is effective through October 13, 2018	Noted
	Incorporate MEP TMDLs for Nauset Marsh and Rock Harbor and revise approach to meet mandated load reductions	Adaptive Management Plan, Section 8.4. S Mast will be conducting additional modelling.
	Evaluate need for cluster systems at Bakers Pond	Requires input from Town of Orleans
	Submit Preliminary Design Report for review	Permitting requirements will be confirmed as the project moves from the planning phase into the design phase.
	Participate in regionalization discussions with towns and CCC and report status every two years in AMP report	Requires input from Town of Orleans
	Adjust Namskaket remaining assimilative capacity	Up to six potential groundwater discharge locations have been identified. Further evaluation of these will occur to determine which is/are most appropriate and the Final CWMP will be updated with this information

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	Update project schedule	Schedule will be confirmed as the project moves from the planning phase into the design phase.
	Report on changes to geographical extent of sewerage in AMP	Section 6.4.1, Collection System
	Report on non-structural components	Section 9.6, Adaptive Management Plan, Stormwater and Fertilizer
	Provide for review final building , site and landscaping plans; coastal wetland impacts; stormwater management controls; impacts to wetland buffer; and planned turf management	Permitting requirements will be confirmed as the project moves from the planning phase into the design phase.
	Submit updated AMP and detailed subtasks	Permitting requirements will be confirmed as the project moves from the planning phase into the design phase.
	Submit various reports and monitoring results	Permitting requirements will be confirmed as the project moves from the planning phase into the design phase.
	Submit report on stormwater management/MS4 Phase II Program	Section 9.6, Adaptive Management Plan, Stormwater and Fertilizer
	Submit results of enhanced natural attenuation determination	Non-Traditional treatment technologies under consideration – Section 8.0
	Submit hydrogeological scope for plume analysis	Up to six potential groundwater discharge locations have been identified. Further evaluation of these will occur to determine which is/are most appropriate and the Final CWMP will be updated with this information
	Minimize impacts to NHESP resources	Permitting requirements will be confirmed as the project moves from the planning phase into the design phase.
	Avoid impacts to wetland resource areas	Permitting requirements will be confirmed as the project moves from the planning phase into the design phase.

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	Submit Biological Monitoring Plan for coastal resources	Permitting requirements will be confirmed as the project moves from the planning phase into the design phase.
	Coordinate with MHC regarding potential for impacts to historic/archaeological resources and report findings during construction	Permitting requirements will be confirmed as the project moves from the planning phase into the design phase.
	Restore roadways disturbed for sewer installation	Construction requirements will be confirmed as the project moves from the planning phase into the design phase.
David Farquar	Raised concerns regarding accuracy of MEP reports and the need to consider the National Academy of Scientists report	Up to six potential groundwater discharge locations have been identified. Further evaluation of these will occur to determine which is/are most appropriate and the Final CWMP will be updated with this information
Clean Water Action	Suggest evaluating alternative approaches to achieve water quality improvements, including cluster systems, PRBs, Green Infrastructure, Water Re-Use, oyster farming, and inlet widening	Section 8.0, Non-Traditional Technologies and Section 6.4.3 Water Re-Use. <b>Requires input from Town of Orleans</b>
Orleans Pond Coalition	Supportive of approach proposed in SEIR/CWMP	No response needed
Alan McClennan	Supportive of approach proposed in SEIR/CWMP	No response needed
Ben Buck	Suggest evaluating decentralized and regional approaches to wastewater management	Non-Traditional treatment technologies under consideration – Section 8.0; <b>Requires input from Town of Orleans</b>
Bev Carney	Against approach proposed in SEIR/CWMP and suggest denying SEIR approval	Updated CWMP includes evaluation of Non-Traditional Technologies – Section 8.0
Town of Brewster	Apportioning of Namskaket Marsh assimilative capacity amongst three towns requires evaluation; in favor of monitoring/mapping Tri-Town plume; if regionalization occurs, issue of inter-basin transfer of water to the Tri-Town site must be evaluated	Up to six potential groundwater discharge locations have been identified. Further evaluation of these will occur to determine which is/are most appropriate and the Final CWMP will be updated with this information

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DOER	Evaluate options for decreasing greenhouse gas emission	Greenhouse gas emissions will be confirmed as the project moves from the planning phase into the design phase. Demonstration Projects for Non Traditional Technologies are intended to confirm nitrogen removal efficiencies, and therefore confirm potential to reduce emissions from traditional treatment
Jane Crowley, Eastham	Eastham areas should be included in Tri-Town option	Requires input from Town of Orleans
Brian and Judy Embleton	Little Namskaket Marsh Plume requires further evaluation	Up to six potential groundwater discharge locations have been identified. Further evaluation of these will occur to determine which is/are most appropriate and the Final CWMP will be updated with this information
Kevin Cassidy	Little Namskaket Marsh Plume requires further evaluation	Up to six potential groundwater discharge locations have been identified. Further evaluation of these will occur to determine which is/are most appropriate and the Final CWMP will be updated with this information
Mary Hartley	Little Namskaket Marsh plume requires further evaluation	Up to six potential groundwater discharge locations have been identified. Further evaluation of these will occur to determine which is/are most appropriate and the Final CWMP will be updated with this information
Massachusetts Historical Commission (MHC)	Submit final plans for evaluation of potential for impacts to historical and archaeological resources	Permitting requirements will be confirmed as the project moves from the planning phase into the design phase.
MA Natural Heritage and Endangered Species (NHESP)	Consult with NHESP regarding potential impacts to box turtle	Permitting requirements will be confirmed as the project moves from the planning phase into the design phase.



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Pleasant Bay Alliance	Supportive of approach proposed in SEIR/CWMP; Alliance agrees to implement fertilizer management	Adaptive Management Plan Section 9.6 - Stormwater and Fertilizer Monitoring
David Dow	Contaminants of Emerging Concern (CECs) should be addressed	Requires input from Town of Orleans
Victoria Reis	Further evaluation of existing plume toward Little Namskaket Marsh is needed and the Weiskel report should be considered; SMAST results in MEP report and TMDL accuracy should be reevaluated.	Up to six potential groundwater discharge locations have been identified. Further evaluation of these will occur to determine which is/are most appropriate and the Final CWMP will be updated with this information. SMAST will be updating water quality modelling