



Orleans Pond Coalition
PO Box 2485 Orleans, MA 02653

Ms. Kristy Senatori, Executive Director
Cape Cod Commission
P.O. Box 226
Barnstable, MA 02630-0226

December 22, 2018

Dear Ms. Senatori:

The Orleans Pond Coalition is a non-profit organization dedicated to the protection and enhancement of Cape Cod waters: its watersheds, estuaries, lakes and ponds. We have reviewed the Cape Cod Commission's draft Regional Policy Plan and Technical Bulletins, and have a few comments.

OPC applauds the valuable contributions that the Cape Cod Commission has made to regional planning, past and present, helping to provide a roadmap for growth that also prioritizes conservation of our natural resources. This year's draft RPP utilizes a framework of specific placetypes as context for addressing regional challenges and strategies that helps to clarify goals and objectives in practical, understandable terms.

The accompanying technical bulletins, another format change this year, go further in giving detailed guidance for review of Developments of Regional Impact (DRIs). It appears that these technical bulletins now provide the minimum performance standards once contained in the body of the RPP itself, setting forth "...the methods by which the goals and objectives of the RPP may be met," including project design details for applicants. There is no explanation in the RPP of the regulatory weight that these technical bulletins will have in Commission deliberations of DRIs.

The Commission's 2014 survey of homeowners consistently identified pollution of ponds and coastal waters among key problems on the Cape. Yet the RPP's section on Natural Systems has only very brief sections on various water types. "Freshwater" contains some basic information on the number, size and general problems of ponds and lakes, a far cry from the level of detail in past RPPs that included accompanying maps giving location, water quality, and other information about ponds, their character and role in the Cape Cod aquifer. To an organization like OPC that works to increase public education and awareness about these issues, this is a missed opportunity that should and could be addressed. Perhaps the graphics for the Natural Systems section, not included in the draft, will provide more information.

The RPP's Natural Systems section on "Wetlands" includes all surface water, including ponds and lakes, without defining a specific difference in their respective roles and function in the ecosystem. The draft Wetlands Technical Bulletin, in its introduction, mentions several kinds of wetlands, but does not include lakes and ponds, although the objectives and methods outlined could and should apply equally to them as well. It is not clear if all categories of surface water are subsumed under wetlands or not. However, the specific term "wetlands" is included in the draft Water Resources Technical Bulletin as distinct from ponds, lakes and other surface waters. This is a minor quibble.

Again, we thank the Cape Cod Commission for its leadership in critical regional planning. OPC supports the Commission's underlying strategies for sustainable growth and protection of the natural environment. Thanks for this valuable effort.

With best regards,

A handwritten signature in black ink, appearing to read "Suzanne Moore". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Suzanne Moore
President,
Orleans Pond Coalition