

**From:** [Scott horsley](#)  
**To:** [CCC 2018 Tech Bulletins](#)  
**Subject:** Comments on Water Resources bulletins  
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These guidance documents have been very helpful to towns in regulating development over the years. I commend you for your continued work in this area. The suggested updates look good. However, I have the following comments/suggestions/questions for your consideration:

1. Could the High Groundwater and Wetlands Technical Bulletins incorporate some provisions for sea level rise and associated water table rises per the recent USGS/APCC study and publication? One possibility would be add an additional water level adjustment to incorporate these projected changes. A landward wetland migration zone could also be established to ensure that no physical barriers are placed in these areas.
2. I question the validity and adequacy of the 300-foot phosphorus protection zone around lakes. Recent publications by the USGS suggest that phosphorus can migrate longer distances over time ([https://toxics.usgs.gov/highlights/phosphorous\\_migration.html](https://toxics.usgs.gov/highlights/phosphorous_migration.html)). A longer-term, more sustainable approach might be to utilize a phosphorus loading approach based upon steady state conditions similar to the nitrogen loading approach utilized by the CCC. This approach could be recommended for medium sized wastewater discharges 2000 gallons/day or greater.

I would be happy to meet and discuss these in more detail.

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