

The Commonwealth of Massachusetts

Executive Office of Environmental Affairs

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Boston, MA 02114-2119

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JANE SWIFT
GOVERNOR

BOB DURAND
SECRETARY

November 9, 2001

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS
ON THE
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME : Comprehensive Nitrogen and Wastewater Management Plan

PROJECT MUNICIPALITY : Mashpee

PROJECT WATERSHED : Cape Cod

EOEA NUMBER : 12615

PROJECT PROPONENT : Town of Mashpee

DATE NOTICED IN MONITOR : October 10, 2001

Pursuant to the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62H) and Section 11.03 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **requires** the preparation of an Environmental Impact Report.

This project involves the development of a comprehensive nitrogen and wastewater management plan for the Town of Mashpee. The project is expected to proceed in phases with the submission of reports dealing with four major work elements: (1) a Needs Assessment Report, defining those areas that need nitrogen and wastewater management and establishing project flows from those areas; (2) an Alternatives Screening Analysis Report, evaluating the various means of meeting the wastewater requirements of the needs areas; (3) the Nitrogen and Wastewater Management Plan and Draft EIR, which will identify a proposed management plan and assess the potential environmental impacts of that plan; and (4) the Nitrogen and Wastewater Management Plan and Final EIR, which will provide what additional environmental analysis might be required and will address the comments received on the Draft EIR.

The first two reports will be prepared and reviewed prior to submission of the Draft EIR, and their analyses and recommendations will be reflected in that document.



The project is subject to MEPA review and to the Mandatory EIR provisions of the MEPA Regulations (301 CMR 11.03(5)(a)3) since it is presumed that the project will ultimately result in the construction of more than 10 miles of new sewers. The Town is also seeking financial assistance from the Commonwealth under the State Revolving Fund.

The Town has requested that the project be reviewed under the Joint Environmental Review Process established between the Executive Office of Environmental Affairs (EOEA) and the Cape Cod Commission (CCC). Each of the documents filed under this Certificate should be prepared to satisfy both the EIR requirements of MEPA and the Development of Regional Impact (DRI) requirement of the CCC.

The Draft and Final EIR should follow the outline contained at Section 11.07 for form and content. The ENF filed for the project contains a proposed scope for each of the filings anticipated by the process. I find that the scope has provided detailed direction for each and that, with the addition of the several issues that follow, it should ensure that the necessary issues are addressed in appropriate detail. Consequently, I adopt that scope as my own, modified by the scoping items that follow.

RESOURCE DELINEATION

The Town should create a clear delineation of coastal and other resources that might be directly or indirectly affected by the proposed project. This information is necessary to allow designers to avoid or minimize impacts to such resources. The comments of the Office of Coastal Zone Management (CZM) and the CCC provide detailed guidance on what resources need to be identified.

EXECUTIVE ORDER #149; FEMA AND FLOODPLAIN USE

EO#149 directs agencies with permitting responsibilities over project involving construction of infrastructure to evaluate the flood damage potential to these facilities and to consider flood hazards when evaluating infrastructure proposals. The EIR should provide an analysis of the flood damage potential of any facilities that would be located within flood hazard zones and should otherwise show compliance with the intent of EO#149.

EXECUTIVE ORDER #181; BARRIER BEACHES

EO#181 directs agencies that would issue funding for projects to avoid using public monies to encourage growth and development on barrier beaches. The EIR should provide assurances that the project will be consistent with EO#181.

EXECUTIVE ORDER #385; PLANNING FOR GROWTH

Executive Order #385 requires that state and local agencies engage in proactive and coordinated planning oriented towards both resource protection and sustainable development. For reasons both of environmental protection and fiscal prudence, investments in public infrastructure should be carefully targeted toward those areas for which clear existing need has been established and for areas where denser development is appropriate, thereby relieving pressures on open space, agricultural lands, and other valuable natural resources.

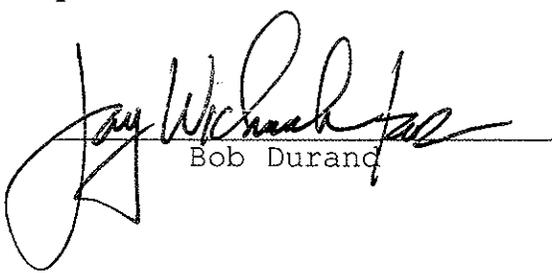
Consequently, the EIR should provide a clear delineation of sensitive resources in the project area and should describe the ways in which the project will consider local and regional land use and growth management plans, and ensure consistency with those plans.

COMMENTS

The EIR should contain detailed responses to the issues raised in the public and agency comments received on the ENF, which are listed below.

November 9, 2001

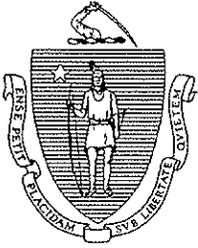
Date


Bob Durand

Comments received :

Department of Environmental Protection
Coastal Zone Management
Massachusetts Historical Commission
Cape Cod Commission
Edward Baker

BD/rf



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
20 RIVERSIDE DRIVE, LAKEVILLE, MA 02347 508-946-2700

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JANE SWIFT
Governor

BOB DURAND
Secretary
LAUREN A. LISS
Commissioner

RECEIVED
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MEPA

November 1, 2001

Secretary Bob Durand
Executive Office of
Environmental Affairs
251 Causeway Street, 9th Floor
Boston, Massachusetts 02202

RE: MASHPEE – ENF Review
EOEA # 12615 – Watershed
Nitrogen Management Planning
Study
Mashpee, MA

Dear Secretary Durand,

"For Use in Intra-Agency Policy Deliberations"

The Southeast Regional Office and the Boston Office of the Department of Environmental Protection have reviewed the Environmental Notification Form (ENF) for the proposed project for a Watershed Nitrogen Management Planning Study to be located in Mashpee, Massachusetts (EOEA #12615). The project proponent provides the following information for the project:

"The Watershed Nitrogen Management Planning Study (Project) is a comprehensive nitrogen and wastewater management planning project for the Town of Mashpee, the Popponessett Bay Watershed, and Mashpee's portions of the Waquoit Bay Watersheds. The Project Area is illustrated in Figure 1; and Figure 2 illustrates the location of the Project Area on Cape Cod. The Project will result in a comprehensive Nitrogen and Wastewater Management Plan and Environmental Impact Report for the Town.

Because the Project is a study, there is no facility or construction project at this time. Therefore, this document is submitted for the planning process that is proposed to perform the study and the project. The planning process is detailed in the attached Proposed project Scope."

The DEP Cape Cod Watershed Team indicates that the ENF prepared for the nitrogen management planning study presents an acceptable scope of work for the project. The Town of Mashpee and its consultant have worked in close cooperation with DEP and the Cape Cod Commission in developing the proposed plan and is using an appropriate nitrogen-loading model

on which to base management options. The Town is proposing a comprehensive review of wastewater management alternatives. The Department is happy to note that Mashpee is actively pursuing the formation of a Citizens Advisory Committee that is representative of the community.

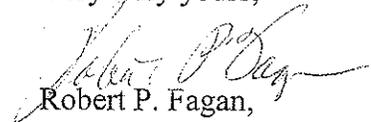
DEP had previously approved a Scope of Work (SOW). The following items are absent from the SOW presented in the ENF and should be addressed. They are:

1. Pg.19: Phase VII. A. The consultant was supposed to have developed a screening process with criteria for rating potential disposal sites.
2. Pg. 19 VII.B. The approved SOW referenced alternatives (as opposed to a single disposal site) for infiltration and was supposed to account for the evaluation of multiple disposal sites.
3. Pg. 21 VII.1. The approved SOW referenced evaluation of more than one discharge site to account for the potential for multiple disposal sites.

The project is a Planning Study and does not propose any construction. To assist the Town of Mashpee during this planning process, disposal sites identified by the Bureau of Waste Site Cleanup(BWSC) in Mashpee are available online at the Department's website at <http://www.state.ma.us/dep/bwsc/sites/report.htm>

The Department appreciates the opportunity to comment on this proposed project. If you have any questions regarding these comments, please contact Sharon Stone at (508) 946-2846.

Very truly yours,


Robert P. Fagan,
Regional Engineer,
Bureau of Resource Protection

cc: DEP/SERO

ATTN: David DeLorenzo,
Deputy Regional Director

David Johnston,
Deputy Regional Director

John Viola,
Deputy Regional Director

Paul L. Grady Jr.
Service Center Director

Elizabeth Kouloheras
Chief, Wetlands

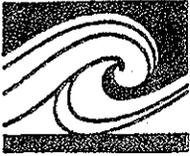
Jeffrey Gould
Chief, Water Pollution Control

Brian Dudley
SERO Watershed Team Leader

Ronald Lyberger
Project Manager, BMF/Boston

cc: EOE/SERO

ATTN: Patti Kellogg
EOEA Basin Team Leader
Cape and Islands Watershed



DF

MEMORANDUM



TO: Bob Durand, Secretary, EOEA
ATTN: Dick Foster, MEPA Unit
FROM: Tom Skinner, Director, CZM *T. Skinner*
DATE: October 29, 2001
RE: EOEA #12615 – Mashpee Watershed Nitrogen Management; Mashpee

The Massachusetts Office of Coastal Zone Management (CZM) has completed its review of the above-referenced Environmental Notification Form (ENF), noticed in the Environmental Monitor dated October 10, 2001. CZM recommends that the following matters be addressed in the Draft Environmental Impact Report (DEIR)

The Town of Mashpee is undertaking a study to develop a comprehensive nitrogen management plan for the entire town, including Popponesset Bay and the Mashpee watershed to Waquoit Bay, in order to determine the most appropriate means to address its nitrogen overload problem to these estuaries.

Nitrogen Load and Management Plans

CZM commends the Town of Mashpee for including the Towns of Barnstable, Falmouth and Sandwich as members of the Community Advisory Committee set up to oversee the project and to assist in its implementation. Multi-town cooperation will be critical to ensuring that the nitrogen loading limits established through this study will be addressed effectively and fairly across all municipalities impacting the watersheds.

CZM recommends that the methodology for determining critical nitrogen loading values be clearly defined in the Phase VIII reports and that the University of Massachusetts School for Marine Science and Technology (SMAST) allow the state agencies and the Town to participate in the critical loading value determination process, where appropriate.

CZM suggests that, in addition to recommending wastewater management plans, the proponent provide recommendations to achieve target levels of nitrogen by reducing the load from non-wastewater sources (e.g., fertilizers, impervious surface runoff, pet waste, etc.).

Resource Delineation

The initial planning effort includes a limited amount of resource delineation. CZM believes that the information requested below is necessary to facilitate the analysis of potential nitrogen and wastewater management alternatives and will assist the Town and permitting agencies in their assessment of future project proposals resulting from this planning study.

- Delineation of coastal resources including coastal dune, coastal beach, barrier beach, land subject to coastal storm flowage, salt marsh, coastal bank, and endangered species habitat overlaid onto proposed project plans;
- A description of alternatives considered to avoid potential adverse impacts to resource areas. If impacts are unavoidable, a description of measures that will be taken to minimize short-term and long-term impacts as well as any mitigation plan to address those impacts;
- If there are no alternatives to siting any infrastructure within flood zones, documentation that any proposed infrastructure is protected from flood and erosion-related damage and that any utility connections will be capable of withstanding storm forces without damage or contamination of natural resource areas;
- Preliminary construction plans and cross-sections, with elevations and relevant resource delineations of any proposed infrastructure;
- Construction sequencing and methodology, including appropriate erosion and sedimentation controls.

As the project progresses and alternatives are considered, CZM recommends that the proponent address the applicability of Executive Orders 149, 181, and 385 to any proposed activities.

Executive Order 149: FEMA and Floodplain Use, directs state agencies responsible for the administration of grant or loan programs involving the construction of infrastructure to evaluate potential flood hazards to such facilities and the need for future state expenditures for flood protection and disaster relief. The Order also directs state agencies reviewing such proposals to take flood hazards into account when evaluating plans.

Executive Order 181: Barrier Beaches, states that state funds and federal grants for construction projects shall not be used to encourage growth and development in hazard prone barrier beach areas. CZM notes that there are six mapped barrier beach units within Mashpee.

Executive Order 385: Planning For Growth, emphasizes the importance of balancing economic development and resource protection. It also states that infrastructure should not result in or contribute to avoidable loss of environmental quality and resources.

- In light of Executive Orders 149, 385, and 181, as outlined above, CZM recommends that the proponent explore mechanisms to address growth and development that may be able to occur based upon the implementation of a selected nitrogen management alternative. Depending on the selected alternative and based on the wording in Massachusetts General Law Chapter 83, special legislation may be necessary for the implementation of growth controls.

CZM is available to provide technical assistance to the Town and other permitting agencies to assist in the planning process and address the issues raised in this memorandum.

The proposed project may be subject to CZM federal consistency review, in which case the project must be found to be consistent with CZM's enforceable program policies. For further information on this process, please contact Jane W. Mead, Senior Project Review Coordinator, at 617-626-1219 or visit the CZM web site at www.state.ma.us/czm/fcr.htm.

TWS/tpc/wq

cc: Nathan Weeks, Senior Project Manager
Stearns and Wheeler, LLC, 255 Stevens St., PO Box 975, Hyannis, MA 02601
Mashpee Sewer Commission
Mashpee Conservation Commission
Truman Henson
CZM Cape and Islands Regional Coordinator
Elizabeth Kouloheras, Section Chief
DEP Southeast Regional Office
Patti Kellogg, Team Leader
Cape and Islands Watershed
Sharon Pelosi, Section Chief
Waterways Program, MA DEP
Karen Kirk Adams, Chief
Regulatory Branch, US Army Corps of Engineers



CAPE COD COMMISSION

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October 25, 2001

RECEIVED

OCT 29 2001

MEPA

Mr. Bob Durand, Secretary
Executive Office of Environmental Affairs
Attn: MEPA Office,
Richard Foster, EOEA No:12615
251 Causeway Street, Suite 900,
Boston, MA 02114

Attention:

RE: Mashpee Watershed Nitrogen Management Plan
EOEA #: 12615
CCC: JR#20076

Dear Secretary Durand:

The proposed Mashpee Watershed Nitrogen Management Plan is being reviewed jointly by the Executive Office of Environmental Affairs (EOEA) – MEPA Unit, and by the Cape Cod Commission as a Development of Regional Impact (DRI) in accordance with the Memorandum of Understanding (MOU) between the Commission and EOEA. The Commission received an Environmental Notification Form on September 26, 2001. A joint public hearing/scoping session for the Commission and EOEA was held on October 16, 2001 in Mashpee, MA.

The proposed project is intended to develop a comprehensive nitrogen and wastewater management plan for the Town of Mashpee. The purpose of the study is to ascertain the most feasible options for addressing the nitrogen overload problems that have been identified in the Popponesset Bay Watershed and Mashpee's portion of the Waquoit Bay Watershed. These estuarine systems have shown significant signs of degradation attributable to excessive inputs of nitrogen from a variety of sources.

The ENF included a comprehensive draft scope of services for the planning process. The plan will identify the existing and projected nitrogen inputs to the watersheds from wastewater and other sources, identify alternative solutions to address any needs with a detailed evaluation of the feasible alternatives, followed by a recommended plan to address the Town's needs. No facilities or construction are proposed at this time.





October 30, 2001

The Commonwealth of Massachusetts

Secretary Bob Durand William Francis Galvin, Secretary of the Commonwealth
Attn.: MEPA Office Massachusetts Historical Commission
Executive Office of Environmental Affairs
251 Causeway Street, 9th Floor
Boston, MA 02114-2150

ATTN: Richard Foster

RE: Watershed Nitrogen Management Planning Study, Mashpee, MA. MHC #RC.29581. EOE #12615.

Dear Secretary Durand:

Staff of the Massachusetts Historical Commission have reviewed the Environmental Notification Form (ENF) for the proposed project referenced above and have the following comments.

The Watershed Nitrogen Planning Study (WNPS) is now in the preliminary planning stage, and specific project alternatives that may affect specific geographical areas have yet to be identified. Once specific project alternatives have been determined, project information should be submitted to the MHC. Typically, the information submitted should consist of completed Project Notification Form (available online at <http://www.state.ma.us/sec/mhc/>), a photocopy of the appropriate section of the US Geological Survey quadrangle map with the boundaries of the project area(s) clearly indicated, and scaled project plans showing existing and proposed conditions within the project area(s). Current, representative photos of the project area(s) and any buildings or objects that may be located there are also helpful for MHC review of the project(s).

If they have not already done so, the project proponents should also contact the Mashpee Historical Commission, the Wampanoag Tribe of Gay Head (Aquinnah), and the Mashpee Wampanoag Tribal Council Inc. These groups may wish to participate in the project planning activities and may wish to have representatives on the Community Advisory Committee now in formation.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 as amended (36 CFR 800), Massachusetts General Laws, Chapter 9, Sections 26-27C as amended by Chapter 254 of the Acts of 1988 (950 CMR 71), and MEPA (301 CMR 11). If you have any questions, please feel free to contact Margo Muhl Davis at this office.

Sincerely,

Brona Simon
State Archaeologist
Deputy State Historic Preservation Officer
Massachusetts Historical Commission

xc: Ron Lyberger, DEP/BRP
Steve Hallem, DEP/BRP
Cape Cod Commission
Mashpee Historical Commission
Mashpee Wampanoag Tribal Council Inc.
Mark Harding, Deputy THPO, WTGHA

220 Morrissey Boulevard, Boston, Massachusetts 02125
(617) 727-8470 • Fax: (617) 727-5128
www.state.ma.us/sec/mhc

A Commission subcommittee has reviewed the proposed scope and offers the following comments:

General

1. As the project is currently only a planning study, with no construction or locations specified, specific comments regarding issue areas are limited. However, as specific sites and facilities are considered as potential alternatives, the impacts on resources protected under the Regional Policy Plan will need to be more closely and comprehensively studied and addressed. For instance, impacts on land use, economic development, community character, historic preservation and transportation may vary depending on the final plan recommendations.

2. The subcommittee would like to ensure that project reviewers are aware that the Commission is in the process of completing some of the activities indicated in the scope. Using a portion of a state Department of Environmental Protection grant and in coordination with the School for Marine Science and Technology (SMAST), Sterns & Wheler, and the Mashpee Town Planner, the Commission has gathered together the parcel and water use information that will be used to assess the nutrient management needs within the town. Staff previously consulted with the USGS under the state grant to provide a revised watershed for Popponesset Bay, including groundwater time of travel bands and pond recharge area delineations. These delineations, and revised delineations developed by Commission staff in the project's portion of the Waquoit Bay watershed, are being combined through the use of the Commission's Geographic Information System (GIS) with parcel, assessors, and wateruse information from Mashpee, Falmouth, Barnstable, and Sandwich. This information will be used to calibrate the SMAST water quality models of Waquoit and Popponesset Bays. Buildout information developed by the Town Planner will also be incorporated into the GIS in order to assess potential future conditions. Most of these activities are described under Phase I of the scope of services attached to the ENF.

3. The scope of services indicates that the Mashpee Sewer Commission will provide direction for preparation of the plan, and that the town is also forming a Community Advisory Committee (CAC) to oversee the details of the project and to assist in the implementation. The subcommittee recommends that the town clarify the role of each of these committees in the planning process.

Natural Resources

4. The nitrogen management strategy developed in Mashpee will likely result in the development of infrastructure that may pose impacts to sensitive resources, including wetlands, rare species habitat and other wildlife and plant habitats. The EIR should address both how the nitrogen management strategy may have beneficial impacts on these sensitive resources (i.e. reductions in nitrogen that may improve water quality in degraded areas), and how the installation of infrastructure may negatively impact sensitive habitats. Where infrastructure development may pose adverse impacts the

project should be designed to minimize those impacts, and where impacts to sensitive resources are unavoidable, appropriate mitigation should be proposed.

5. The subcommittee supports the proposal in the scope to consider growth management strategies to address future nitrogen loading potential. This may include changes in local zoning and regulations and a focus on open space acquisition.

Marine Resources

6. The scope proposes investigating the feasibility of dredging as a means for increasing flushing within nitrogen sensitive embayments. Although new dredging is typically prohibited in the Regional Policy Plan (RPP), new dredging to improve water quality may be permitted in certain instances. However, dredging of this kind may only alleviate the short-term effects unless appropriate nitrogen reduction and wastewater treatment strategies are in place. Therefore, the plan should only recommend dredging as part of a comprehensive overall strategy.

Thank you for the opportunity to comment,

Sincerely,

A handwritten signature in cursive script that reads "Jay Schlaikjer".

Jay Schlaikjer
Subcommittee Chair

cc: Subcommittee Members
Tom Fudala, Mashpee Town Planner
Nate Weeks, Stearns and Wheeler
Ed Baker, 197 Captains Row, Mashpee, MA 02640

Edward A. Baker
197 Captains Row
Mashpee, MA 02649

October 16, 2001

Bob Durand, Secretary
Executive Office of Environmental Affairs
Attn: MEPA Office
Mr. Richard Foster, EOE A No. 12615
251 Causeway Street, Suite 900
Boston, MA 02114

Re: Watershed Nitrogen Management Planning Study, Environmental Notification Form (ENF)

Dear Secretary Durand,

I am concerned that the proposed study will not yield the information needed to develop an adequate road map to the solution of Mashpee's Nutrient overload problem.

Although it is obvious that major gains may be accomplished via reductions in wastewater nutrient concentrations and movement of infiltration sites to less sensitive areas, that is only a partial solution. Reduction of existing levels and nutrient growth controls for Mashpee's already impaired waters will require actions for all nutrient sources

If, in fact, there are only minor activities for items such as flushing improvements, estuarine regeneration reductions, stormwater and fertilizers as the ENF seems to suggest; it may be appropriate for the Town to undertake additional activities in areas not currently covered in an adequate manner for the development of a realistic plan.

1. A minor correction to the ENF to include the Town of Mashpee, Conservation Commission representative as a committee member is needed.
2. The review of existing data should include, Rapid Formation And Degradation Of Barrier Spits In Areas With Low Rates Of Littoral Drift, Aubrey, D.G. and Gaines Jr., A.G., 1982, Marine Geology 49 (1982): 257-278 and Coastal Sediment Transport Popponesset Beach, MA, Aubrey, D.G. and Goud, M.R., 1983, Woods Hole Oceanographic Institution, WHOI-83-26.
3. The review of existing data should also include Cape Cod Commission Non-wastewater nitrogen-loading data prepared for the various Developments of Regional Impact (DRI's) located within the study area.
4. I am concerned regarding the use of CCC TB91-001 if occupancy rates, critical load formula or volumetric estimating portions are utilized.
5. I would suggest that the location of nitrogen inputs from non-wastewater sources be identified at least down to the Planning Zone level. Areas of greatest stormwater or fertilizer nitrogen inputs may become important. If a target Nitrogen load for some watersheds cannot be met at a zero wastewater level, these other sources rise in importance.
6. Critical loading values for subembayments are to be based in part on "desired water Quality". The target for "desired water quality" should be in the ENF. I hope it is at least swimmable and open to shell fishing (SA?).

7. Phase IV scenarios should include acquisition and enlargement of the MMR STP facility using the max capacity of the existing piping to the infiltration filters as a guide. A scenario that moves treated wastewater from the Stratford Ponds-Willowbend-Pheasant Run area to the Phase VII disposal site and transfers any rotary local excess to MMR disposal seems logical to me.
8. Phase IV scenarios should include volume impact identifications to help in the determination of phase VII requirements.
9. Vacuum sewer technology should be included in phase III. It might be useful in places like the islands where a low-lying area could be connected to a community system. Remember Seconsett is surrounded by water and Falmouth on the land side.
10. A lot of these sewage treatment systems produce sludge. Sludge disposal technologies and preparation of sludge volume estimates should be addressed in the ENF. You need to get rid of it somehow, somewhere.
11. The Buzzards Bay Project appears to have established that flushing times are important. Partial implementation of Poppy Bay channel ideas in line with WHOI-83-26, Aubrey & Goud should be evaluated. Mashpee River residents have long discussed and complained about the negative flow impacts of other Bay internal dredging. Implementing these changes could have other positive results, i.e. spit protection. Meadow Point protection and shellfish bed restoration.
12. I would suggest public awareness start now. The ENF could have the Town supporting distribution and cable TV exposure of the new CCC video that discusses nutrient impacts. The Town can certainly afford to make copies for distribution to local groups that could in turn utilize them for public education.
13. Although, a plea for charitable donations sent out with tax bills was unpopular, the potential for a "stuffer" with the 4/year mailing has been established. Shouldn't the plan include evaluation of this public information potential?
14. As the difficulty in minimizing nutrient impacts increases with treated wastewater disposal volumes, both in terms of increased infiltration requirements and the difficulty in reducing further already reduced concentrations. It seems appropriate to include a review of potential methods for minimizing total volumes.

Sincerely,



Edward A. Baker

Cc: Town of Mashpee Sewer Commission, attn: F. T. Fudala
Stearns & Wheeler, attn: N.C. Weeks
Cape Cod Commission, attn: Phil Dascombe (JR#20076)