

## Wellfleet Wastewater Planning Process

### August 20 Public Meeting Summary and Comment Response

On August 20, 2012, the Wellfleet Comprehensive Wastewater Management Planning Committee hosted a community meeting at the Wellfleet Senior Center to discuss and gather public comments on its *Draft Interim Needs Assessment and Alternatives Analysis Report* on a comprehensive wastewater management plan for Wellfleet. The goals of the public meeting were:

- to explain Wellfleet's wastewater planning process, review the work done to date, and gather public input on the Interim Needs Assessment report prior to producing the formal alternatives assessment;
- to introduce the public to the range of approaches to wastewater planning in Wellfleet, including natural systems approaches and work to date; and
- to provide an opportunity for the public to discuss the *Draft Interim Needs Assessment Report* and related activities and to weigh in on Wellfleet's plans and solutions to the wastewater problem.

This document summarizes the presentations and public discussion at the August 20 meeting and presents additional public comments submitted to CLF Ventures on the *Draft Interim Needs Assessment Report*. The August 20 meeting was recorded by Lower Cape Community Television and can be viewed here: <http://testwkg.lowercapetv.org/Cablecast/Public/Show.aspx?ChannelID=1&ShowID=1303>.

### Wellfleet Wastewater Planning Committee Public Meeting Summary

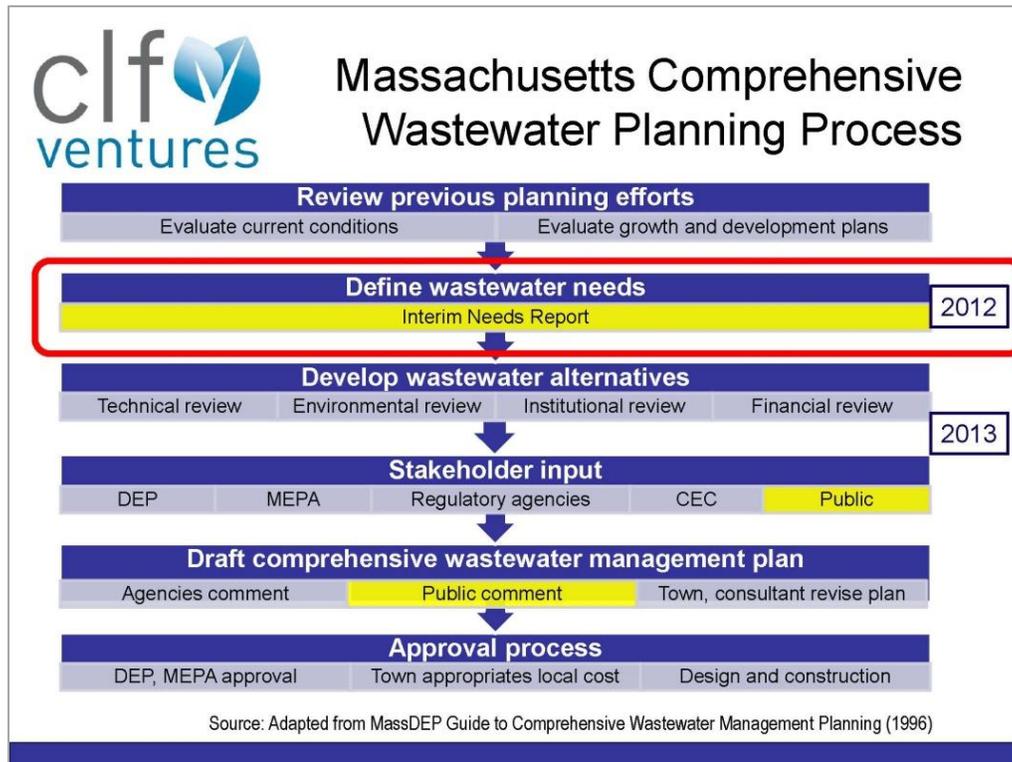
Over 35 people attended the meeting, including staff from the Massachusetts Department of Environmental Protection and the Cape Cod Commission as well as representatives from the Wellfleet Select Board, Planning Board, Conservation Committee, and Finance Committee.

Jo Anne Shatkin facilitated the meeting, Curt Felix provided an overview of the wastewater planning process, and Paul Gabriel presented the results of the *Interim Needs Assessment and Alternatives Analysis Report* (available online at: [http://www.wellfleetma.org/Public\\_Documents/WellfleetMA\\_BComm/wastewater](http://www.wellfleetma.org/Public_Documents/WellfleetMA_BComm/wastewater)). A question and answer session followed the presentations, and comments were made about the report and the wastewater planning process.

#### **Welcome: Jo Anne Shatkin, CLF Ventures, meeting facilitator**

Jo Anne Shatkin opened the presentations and explained how this meeting fits into the larger comprehensive wastewater planning process. The meeting was an opportunity to inform the public and allow people to give comments or ask questions about the information developed and documented in the *Interim Needs Assessment and Alternatives Analysis Report*. As the process moves forward, there

will be additional opportunities for formal public comment on Wellfleet’s wastewater planning, as highlighted in yellow in the figure below:



**Overview and Background: Curt Felix, vice-chair, Wastewater Management Planning Committee**

Wellfleet is undertaking the wastewater planning process to meet US EPA Clean Water Act standards, to achieve a level of water quality in estuarine systems that allows them to thrive, and to maintain excellent water quality. The primary issue is an excess of nutrients, and there is a need to restore the balance. The nutrients of primary concern are nitrogen in salt water and phosphorus in fresh water.

Wellfleet is trying to be proactive and identify alternatives to the construction of a large, traditional wastewater treatment system. The town is exploring the potential beneficial impacts of a combination of salt marsh restoration and oyster beds, two natural systems that would consume excess nutrients and improve the environmental health of Wellfleet Harbor and the surrounding watersheds. The *Interim Needs Assessment and Alternative Analysis Report* is the first step in the process to assess baseline conditions, prioritize areas for study, and collect data that will allow Wellfleet to make informed decisions justified by science.

Through a variety of grants and other funding sources, Wellfleet has installed monitoring equipment in multiple locations and has begun to collect real-time water quality data around the marina. Funds also allowed the creation of a pilot oyster bed near the marina, an area that experiences significant runoff and nutrient overload problems.

A combination of salt marsh reclamation and oyster bed production could have a significant positive impact on nutrient levels in Wellfleet at a much lower cost than the construction of a traditional wastewater system. However, the town will need to comply with state and federal discharge standards and will need the data to demonstrate the ability of natural systems to achieve these standards reliably over time.

**Interim Needs Assessment and Alternatives Analysis Report: Paul Gabriel, Environmental Partners Group (EPG)**

EPG is working with the town of Wellfleet on wastewater planning. Paul Gabriel presented the key findings of the *Interim Needs Assessment and Alternative Analysis Report*, which is part of Wellfleet's Comprehensive Wastewater Management Planning (CWMP) effort. The CWMP is being driven in part by the Massachusetts Department of Environmental Protection (MassDEP) study of Cape Cod embayments, as part of the Massachusetts Estuaries Project (MEP). However, Wellfleet wishes to proactively address its water quality issues ahead of the release of the MEP study. This needs assessment and alternatives analysis is the beginning of that process, but water quality actions will need to also consider and address the MEP study results.

**MassDEP description of the Massachusetts Estuaries Project (MEP)**

The MEP was developed in 2001 to determine current nutrient loads and assist in the evaluation of future nutrient load scenarios for 89 estuaries located in 32 southeastern Massachusetts coastal communities. In order to accomplish this, a Total Maximum Daily Load (TMDL) has to be established for a body of water, in accordance with MassDEP and USEPA requirements. TMDLs determine how much of a given nutrient a water body can accumulate before the water body can no longer support a healthy habitat for aquatic life.

The MEP uses a linked model to evaluate nitrogen inputs to the tidal estuaries and provides technical guidance to support appropriate wastewater, watershed, and embayment management as well as development of TMDLs. Currently, a number of these planning efforts are being supplemented with additional nutrient management-focused components, and the remaining Cape towns are all in various stages of the CWMP process.

Available: <http://www.mass.gov/dep/water/resources/mep.htm>

As part of the Needs Assessment, EPG identified a significant amount of existing water quality data from Wellfleet and surrounding areas. This includes over 3,000 data points from Board of Health files which were used to create a geographic information system (GIS) database and to map water quality.

The presentation reviewed several maps created using the GIS data developed by Environmental Partners Group for the report, demonstrating areas with higher nutrient (nitrogen) levels, including a map of drinking water well data. Drinking water well data is reported when a property changes ownership or when a building permit is pulled, and the mapped data was based on this available information. The map demonstrates that nitrogen levels in drinking water wells are generally higher in areas with denser development.

Working with the existing data, the project team developed a wastewater needs screening matrix for each watershed and used the matrix to identify four areas to prioritize for further study. The screening matrix compared data to specific criteria thresholds and evaluated whether or not the water quality in a specific location met the criteria. For example, if nitrate levels were greater than 2 milligrams per liter (mg/l), the location received a “1” mark; if not it received a zero. The total scores for each location identify Duck Creek, Chipman’s Cove, and two Wellfleet Harbor locations (A and B, which are near Mayo Beach and Indian Neck) as priority areas for study due to likely elevated nutrient levels. This information is available on page 5-2 of the report. Discussion of the wastewater needs matrix led to several audience questions, including whether or not the criteria considered seasonal variability. The criteria are based on Title 5 wastewater standards which do not account for seasonality, and the point was noted that seasonal variability should be considered as the wastewater planning process moves forward.

The goals of the CWMP effort are to protect and enhance the Wellfleet Harbor ecosystem, develop a measured step-by-step approach to nutrient management, identify low-cost sustainable approaches, and use solid marine science with a focus on aquaculture, oyster reef restoration, and salt marsh restoration.

Based on the needs assessment and alternatives analysis, future study will include on-site modifications, decentralized cluster systems, alternative technologies that make sense (e.g. potentially oysters), centralized wastewater systems, expansion of the drinking water system, stormwater management systems, and fertilizer control measures.

The next steps for the study process are:

- Continue the pilot oyster program near the marina
- Evaluate an array of alternatives for improving and sustaining harbor water quality
- Assess the MEP report when it is issued and integrate it into the planning process
- Continue public information sharing and soliciting input
- Ultimately select a town-wide strategy to meet water quality standards

At this point the meeting transitioned into the Question and Answer portion of the evening.

## **August 20 Meeting Q&A Session**

**Q1: Most of the meeting has dealt with saltwater issues; will the wastewater management process also address freshwater and drinking water in particular?**

A1: Drinking water will be part of the next phase of work. Wellfleet studied its freshwater ponds a few years ago, and the results of that study indicate the ponds do not suffer from nutrient pollution. In fresh water, the nutrient of primary concern is phosphorus rather than nitrogen. However, this current wastewater planning process will address drinking water sources such as wells. Wellfleet town wells are in or near protected areas so public drinking water should not be negatively impacted by nutrients.

**Q2: Has the study team considered waterless urinals as an option to prevent high nitrogen in the first place?**

A2: Yes, and waterless urinals would have some beneficial impact. Composting toilets have been previously proposed to address nutrients in public restrooms in high traffic areas, such as Mayo Beach and the marina area, but the proposal was not approved.

**Q3: Regarding newly installed catch basins, how effective are the basins at handling stormwater and dealing with the nutrient issue?**

A3: They're very effective because they are able to capture suspended and dissolved particles and prevent the "first flush" that occurs when a storm washes built-up material from road surfaces after extended dry periods. Stormwater management is an important part of wastewater management, and constructed catch basins are an effective solution for stormwater. There are catch basin technologies that can also handle nutrients such as phosphorus and nitrogen, but they are much more expensive. These options will be considered in the next phase of work.

**Q4: How serious is the problem of nutrients from septic systems contaminating drinking water wells in the densely populated areas, and is the only solution to run a pipe to every house [for drinking water]?**

A4: Outside of the Central District and several more densely developed areas, the issue of nutrients from septic systems does not appear to be as widespread or significant as we have seen in other towns. In low-density areas, water quality is generally pretty good.

It is probably not necessary to run a water pipe to every house. Some areas have higher nitrogen levels than others. For example in the central district there are a lot of septic systems close to individual drinking water wells, and it may be most cost-effective for buildings to connect to the town water system rather than continuing to use well water and installing individual water treatment systems. The areas that are currently most impacted are also close to existing town water lines, so it should be relatively straightforward to connect to those if people wish to do so. However, the decision to expand

the town water system is a larger debate that would have to be a town-wide public process. Generally the areas that are most impacted would likely be prioritized for connection to the town water system.

**Q5: How many new residential units can be added to Wellfleet before the water system reaches its permitted capacity?**

A5: The system is permitted for approximately 300 additional residential units, but the capacity could likely be expanded beyond this with an expansion of the permits. We anticipate that supplemental pump testing would successfully demonstrate that the Town's wells can be permitted for higher production than the current limit of 100,000 gallons per day.

**Q6: While I am happy with the sensible and scientific approach Wellfleet is undertaking, I'm concerned that state and federal regulators will insist on concrete and plumbing—sewers—and won't accept oysters and salt march reclamation as a viable means of controlling nutrient levels. How will Wellfleet respond to this criticism or lack of acceptance?**

A6: It's clear that we have a nutrient problem. Sewers are an option, but as we're seeing in Mayo Creek now, we have a surface runoff problem; it has nothing to do with septic. It is important to be careful, to look closely at the data to assess the real problem, so that the solution applied will be effective. A sewer wouldn't fix the Mayo Creek problem. Wellfleet is currently collecting the data it needs to identify the real problems and determine how effective alternative solutions like oysters are at mitigating nutrient levels, and how practical they may be in different locations. Wellfleet does not expect oysters will be the only solution to the nutrient problem, but the data being collected may lead to oysters being a part of the solution. At the same time, sewers might not solve all the nutrient issues and additional measures may be necessary to fully mitigate nutrient levels.

Participants suggested that the Massachusetts Department of Environmental Protection (MassDEP) and the United States Environmental Protection Agency (EPA) are beginning to open up to alternative solutions and may be willing to consider options other than standard sewers; MassDEP has never said alternative solutions are off the table. MassDEP supports a mix of the available tools put together in an appropriate way and with an appropriate plan to meet the water quality thresholds established through a town's individual study or through the MEP (Massachusetts Estuaries Project). The MEP document will also provide the technical foundation for looking into alternative solutions, and MassDEP has been able to apply alternative approaches and take advantage of things like natural attenuation in order to minimize the amount of infrastructure that would be needed if alternative approaches weren't also taken into account. It's also a study that enables communities to pinpoint exactly where problems are and be able to look at the most cost-effective, optimal alternative. Sometimes that will mean looking at conventional infrastructure; other times, it may mean using more innovative, alternative approaches.

**Q7: Has Wellfleet considered unintended consequences of seeding the harbor with large numbers of oysters, such as a dramatic increase in broken shells on popular beaches or impeding safe harbor navigation by boats with center boards?**

A7: Oysters will not be a good option in all locations, but will potentially be used in areas with high nutrient levels, which are generally not appropriate for recreation (e.g. there is a lot of muck). Regarding navigation, oysters will not proliferate quickly enough to create widespread problems anytime soon. Generally, as the process moves forward, the team will not attempt to grow oysters where they may create a hazard.

**Q8: Is the ocean mung problem related to excess nitrogen? Will these solutions help to address it?**

A8: It isn't clear what factors are causing the ocean mung/seaweed problem.

**Q9: What are the compliance requirements for nutrient levels that Wellfleet needs to achieve and is consideration given to seasonal variations?**

A9: Wellfleet needs to achieve the following levels for water quality: dissolved oxygen below 6 milligrams per liter (mg/l) and chlorophyll below 12 mg/l. The MEP study will provide site-specific nutrient/nitrogen thresholds that will have to be met by Wellfleet's nutrient management plan. Wellfleet has discussed with MassDEP how to monitor compliance and what constitutes compliance. Seasonal variation is part of the discussions, which are ongoing.

Mass DEP has surface water quality standards based on numeric criteria, but there are also narrative criteria. The expectation for Wellfleet Harbor is to maintain excellent habitat quality that is fishable and swimmable.

**Q10: Please explain Total Maximum Daily Loads (TMDLs).**

A10: The MEP is a Cape-wide study that MassDEP is managing with UMass/Dartmouth. They're taking all the water quality data that's been shown tonight to establish a Total Maximum Daily Load (TMDL) of each nutrient that can be discharged into the environment per day. As part of the wastewater planning process, Wellfleet is collecting data to determine whether alternative options such as oysters and salt marsh reclamation can achieve the TMDL values, or whether these alternative solutions may be a part of the solution along with some traditional solutions such as sewers and waterless toilets.

Over the next couple years, we need to understand which approaches will be effective, and it depends on the specific locations involved and how high the nutrient loads are relative to the regulated standards. We need to understand if alternative approaches will meet the removal goals that will come out of the MEP report next year, or what percentage of the goal alternative approaches can achieve. Overall, the goal is to minimize costs and maintain sustainability.

The Herring River restoration is another variable in the mix. Restoring that many acres would remove tens of thousands of pounds of nitrogen. EPA allows some trading, so a removal requirement in one part of the harbor could be offset by something else in the harbor that's removing nitrogen. The Herring River restoration is in the planning horizon for addressing the wastewater issue, so we're trying to build in layers of integration, redundancy, and certainty to be able to meet the regulatory thresholds.

**Q11: Is Wellfleet waiting for the MEP report before setting standards?**

A11: Yes, the town is waiting, and MEP report will be the State's version of nutrient standards. MassDEP is confident the MEP report will be released no later than June 2013.

**Q12: The committee is discussing the ecological health of the harbor and in particular the marina area. There have been a lot of projects around the marina that have harmed the ecological health of that area (e.g., the breakwater, dredging projects, railroad dike, etc.), so the committee should take a broad view of possible solutions to consider the impact of reversing some of the harmful past projects.**

A12: The committee is discussing this issue, e.g., removing the railroad trestle and duckbill at Mayo Creek.

**Q13: What about marine sanctuaries to protect the new oyster reefs going forward?**

A13: The wastewater committee has publicly commented on the change in the MA Division of Marine Fisheries (DMF) regulations that just happened. In the new DMF guidelines, there is an expanding appreciation for ecological services of oysters that may lead to more formal protection. Oysters do need genetic diversity to maintain robust beds that resist disease. The DMF is now considering water quality and is beginning to recognize the value of set-asides and sanctuary as a water quality management tool and as an enhancement to the shellfish industry by developing disease-resistant oysters. DMF may be open to setting aside oyster propagation areas, but the set-asides would have to be win-win if they take an area out of production (i.e., they would have to show a strong shellfish benefit). Also, if oysters were a formal part of a nutrient management plan, there would have to be assurances in place to ensure a healthy long-term population.

**Q14: Oysters are fragile and die easily, so there needs to be consideration for solutions that handle nutrient problems before they get to the water, or prevent the problem in the first place. If oysters have a bad year, they won't be able to handle the excess nutrients to meet the discharge standards. Oyster reefs can't be the magic bullet because an ecosystem can surprise you.**

A14: For millions of years, salt marshes and oyster reefs and shellfish and eel grass beds were in a relationship that only nature could create, handling far more nutrients and organic matter than we produce now. The ecosystems worked together; there was not a reliance on only one part of the system. The wastewater planning is similarly considering multiple alternative options including salt marsh restoration and eel grass that work together with oysters to manage nutrients.

Ocean acidification is also an issue. It's already affecting shellfish on the West Coast, and will mainly affect coastal waters. Today, we've reduced the oyster population while we've concentrated pollutants into smaller numbers of younger shellfish. We're in a more perilous predicament, but calcium carbonate is a natural buffer in the ocean, so a larger oyster population here can help buffer Wellfleet Harbor from ocean acidification.

**Q15: How can the Herring River and Mayo Creek projects to restore salt marsh get underway more quickly? Those projects seem to be an essential part of the solution.**

A15: These projects are moving forward, but it's a complex process. Local residents need to get comfortable with the plan, and certain areas may need to be put on the town water line if their wells become contaminated with saltwater.

**Q16: The Cape Cod Commission (CCC) studied the water quality issues around areas like Mayo Creek and has been pondering how Wellfleet would address the problem. The CCC is glad to see that Wellfleet is gathering geographical and water quality data and moving forward to address the problems. The alternative approaches Wellfleet is looking at are great. The CCC is developing parameters for regional wastewater options and will encourage these alternative options. By gathering these data Wellfleet will be able to respond well to the MEP when it is released.**

A16: *This was a comment, so there was no response.*

**Q17: What happens to oysters in winter?**

A17: They slow down but still filter. In nature, the beds build up structures that help protect the oysters. For aquaculture, the farmers often remove the oysters over the winter.

## **Submitted questions and comments**

Public comments on the *Interim Needs Assessment and Alternatives Analysis Report* were accepted through September 4, 2012.

### **Comment 1.**

The interim report was informative, thoughtful and well balanced. It would be useful to have a one- or two-page executive summary for easier access and broad distribution. Here are questions for Paul regarding the report. How is storm water measured, both in terms of quantity and quality? Is there an acceptable level of nitrogen in stormwater? In assessing nitrogen levels in private wells, which reports are used? The last test? If there are multiple reports over recent years, are they averaged? Can we determine what percentage of private wells has been tested in the last 5 years? The last 10, 15 years? It may be that we need a reminder program like Eastham's to encourage annual testing. As I understand it, Eastham pays for the process in order to encourage participation.

### **Response.**

The quantity and quality of stormwater runoff in Wellfleet are not measured at this time, and one needs to consider both quality and quantity in assessing what is acceptable in any given watershed, as the sensitivity of the receiving waters can vary from one location to another.

With respect to private well water quality, there is no routine program for monitoring quality. Samples are taken and nitrate concentrations are measured when a property is sold, or if an owner undertakes the sampling on their own. Our work included the logging of test data that existed in Board of Health files in the summer of 2011. What is depicted on the GIS map figures is the highest level reported in a given property file. We did not average multiple test results.

It is important to note that nitrate concentrations in private wells can be highly variable over short time frames, so one is only seeing a snapshot of that specific time. Household water use and wastewater generation patterns, as well as local rainfall patterns, can impact contaminant concentrations in any given well, particularly when the wells are relatively shallow. It appears that most drinking water wells are near the top of the local aquifer, where variability in water quality can be higher.

We can determine percentages of wells tested and segregate by dates as well. It is true that the Eastham Board of Health has a routine well testing program that covers approximately the last ten years, and consists of thousands of samples.

**Comment 2.**

It says that the Herring River is the only area in town considered by EPA as impaired and requiring a TMDL. But isn't the river categorized as "impaired" only for (low) pH and (high) metals (303(d) list), not for nutrients which are the focus of wastewater planning? Maybe I'm confused, but if not, we don't want people to think that nutrients from the river are especially high.

Past monitoring has found slightly higher dissolved nitrogen in the Herring River mouth than in most of the harbor, and past reports have made much of this. This is interesting but may be more a sign of restricted flushing than of higher N loading. If sampling has been conducted at low-ebb tide, i.e. to capture worst-case conditions, the river mouth contains mostly low-salinity river water because of the effectiveness of the tide restriction. In contrast, most if not all other harbor sampling sites are dominated by seawater, whose source is low-nitrogen Cape Cod Bay water.

In general, I think that it's great that the Committee is looking to ecological science and natural systems for N attenuation, rather than jumping immediately to engineered treatment solutions.

**Response.**

It is true that the Herring River has not been cited in water quality reports for nutrients. The 2010 USEPA Waterbody Report for the Herring River cited only aluminum and low pH for the upper reaches of the river. We would anticipate higher water quality conditions throughout the Herring River and in Wellfleet Harbor after the proposed improvements plan is implemented at the mouth of the river.

**Comment 3.**

The Town of Wellfleet through its Waste-water Committee (WWC) is taking a proactive approach to protecting the harbor. The broadest goal:

“Protect and enhance the harbor ecosystem and aquaculture base. The harbor is the life-blood of Wellfleet’s shell fishing industry, and its protection and enhancement are paramount.”

is a challenge but is to be commended.

The Interim Plan already shows the benefits of this approach. The discussion at the public meeting on August 20 showed that the publication of the MEP report for Wellfleet will be a critical step in the process. What follows are some suggestions to enhance the Interim Plan so that the Town would be better able to critically evaluate and respond to the MEP report.

1. Many reports conclude that the most impacted area is the harbor is the Inner Harbor: Duck Creek plus Chipman’s Cove. Being near the Town center, the inner harbor receives the highest septic influx. It is also the area of the harbor with the most engineering modifications: the breakwater; the dredging of the main channel, the mooring basin and the marina; the marina pier itself, the diking of Mayo Creek, the rail-road dike. Collectively, these changes have had two consequences which will affect the MEP report:

- A. The tidal flushing efficiency could be reduced, making the inner harbor more susceptible to an N overload. The MEP report will include a hydrology model which should go a long way to help clarify the issue. There was also an early hydrology report by Geise, McSherry & Spencer, to be found as an appendix in the 1995 HMP. Both these reports could be referenced in the interim plan.
- B. The engineering modifications have also caused major sediment deposits in the inner harbor, as witness the “black mayo” and the sediments on either side of the RR dike.

This may affect the MEP conclusions in a very direct way. The MEP proposes a N standard by comparing the N loadings in an estuary with the biological health of the estuary. The initial measure of health is eelgrass: but Wellfleet inner harbor never had any of this plant. The secondary measure of health is “benthic diversity”. It is likely that in the inner harbor, this diversity will be low. It seems that it will be very difficult to assign the loss to sediment or to N.

An alternative measure of the inner harbor ecological health may be needed (see below).

2. Phytoplankton. Phytoplankton play a dual role in the harbor ecology. They are the main food for shellfish. However, overproduction of phytoplankton – due to excess N – is a major link in the chain of eutrophication. So the question is: how much is too much?
  - A. It would be useful to investigate, through literature, the quantitative relation between N and phytoplankton production. (Note: chlorophyll-a can be used as a marker for phytoplankton.)
  - B. It might be concluded from this that phytoplankton are the best biological measure of inner harbor health.

- C. The old history of Wellfleet is full of references to a once abundant oyster population. Therefore, phytoplankton must also have been naturally abundant in the harbor. It would be a long shot to make this idea quantitative ... but worth some thought.
3. Oysters and N. There is enough data in the report to be able to estimate the excess N in the inner harbor compared to down harbor. It should therefore be possible to calculate how many oysters are needed to remove this N. The oyster estimate can be compared with a population estimate of the Duck Creek oyster reef. (There is language at the top of page 6.3 of the interim that suggests that an estimate like this has been completed: if so, this should be made explicit.)
  4. The data review in the Appendix was disappointing. Estuaries are complicated systems, with variables such as DO dependent on tide and time of day. (An example from the RR dike is attached.) It is hard to see how the simple regulatory standards can be fit into this picture. The data need a more scientific analysis.
    - A. A suggestion. The hardest question in the MEP process is the biological evaluation that is used to set the final TMDL standard. There is one marsh estuary in Wellfleet that is nearly pristine and can be used as a standard: Middle Meadow. It would be extremely interesting and useful to set up a YSI there next summer (July/August) to obtain a true baseline against which the inner harbor could be compared. At the same time, the N flux from Middle Meadow would be another reference for behavior of a natural estuary. A literature survey would produce other useful data.

**Response.**

These are all very good comments and suggestions, and will be considered as the project moves forward.

**Additional comments.**

Late comments were received from the Wellfleet Conservation Commission. Those comments and responses will be incorporated into final CWMP documents.