

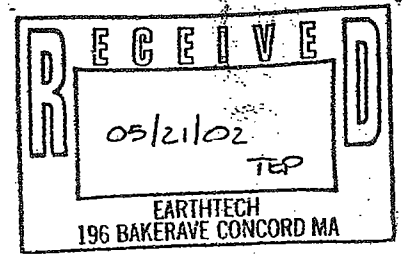
The Commonwealth of Massachusetts
 Executive Office of Environmental Affairs
 251 Causeway Street, Suite 900
 Boston, MA 02114-2119

JANE SWIFT
 GOVERNOR
 BOB DURAND
 SECRETARY

Tel. (617) 626-1000
 Fax (617) 626-1181
<http://www.magnet.state.ma.us/envir>

May 17, 2002

Mr. Thomas E. Parece, P.E.
 EarthTech
 196 Baker Avenue
 Concord, MA 01742



Re: Nantucket CWMP/EIR; EOE# 12617
 Request to proceed with Phase II

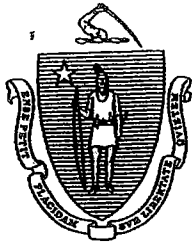
Dear Mr. Parece,

I have received your letter of May 14, 2002, requesting authorization to proceed with Phase II. Upon review of the comments and the November, 2001 Certificate on the ENF, and in light of the prior submission of the Phase I document with the ENF and the Department of Environmental Protection's substantive approval of the proposed Phase II scope, I hereby authorize you to submit a single filing that combines the Phase II document and the requested information updates and responses to the comments received on the ENF and on the Phase I document.

Sincerely,

Jay Wickersham
 Assistant Secretary

cc: Jeff Whitt 8/28/02



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Executive Office of Environmental Affairs

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November 16, 2001

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS
ESTABLISHING A SPECIAL REVIEW PROCEDURE

PROJECT NAME : Comprehensive Wastewater Management Plan

PROJECT MUNICIPALITY : Nantucket

PROJECT WATERSHED : Islands

EOEA NUMBER : 12617

PROJECT PROPONENT : Town of Nantucket

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. Furthermore, pursuant to Section 11.09 of the MEPA Regulations, I hereby establish a special procedure for the review of this project.

PROJECT DESCRIPTION

This project involves the development of a Comprehensive Wastewater Management Plan (CWMP) for the island of Nantucket. This plan is proposed to identify areas on the island where on-site sub-surface wastewater disposal problems occur; to identify the most effective and environmentally sound means of dealing with those problem areas; and to provide a detailed environmental analysis of the proposed plan to ensure that impacts are avoided or minimized and that appropriate mitigation is proposed for those impacts that are considered unavoidable.

The project is expected to exceed Mandatory EIR thresholds established in the MEPA Regulations, certainly the threshold at Section 11.03(5)(a)3 dealing with construction of more than 10 miles of new sewers. The project will require a variety of federal, state and local permits and approvals and the Town is



seeking public financial assistance from the State Revolving Fund. The provision of financial assistance grants broad based jurisdiction that extends to all aspects of the project that might cause adverse environmental impact.

SPECIAL REVIEW PROCEDURE

The Town has requested that I establish a Special Review Procedure (SRP) for the review of this project under MEPA that would consist of the filing of three documents: Phase I, the ENF, the Needs Analysis, and the Screening of Alternatives; Phase II, the Draft CWMP and EIR; and Phase III, the Final CWMP and EIR. The Town has filed the ENF and a Phase I report that provides significant information on both needs and alternatives. However, additional work and information is required for both the needs analysis and the screening of alternatives before that phase can be determined to be complete and adequate under MEPA.

Consequently, I hereby establish, with the consent of the Town, a SRP consisting of three filings:

- Phase I, Needs Analysis and Screening of Alternatives, based on the existing information developed in these earlier studies and including the additional information identified below, and a revised proposed scope for the Phase II document;
- Phase II, the Draft CWMP and EIR; and
- Phase III, the Final CWMP and EIR.

SCOPE FOR PHASE I DOCUMENT

Needs Areas

The Phase I report should provide further documentation on the process uses to determine individual needs areas and how the application of the criteria was consistent between areas. The report should provide adequate clarification, and modification if required, to ensure that the rankings and the rationale for them are clear and appropriate.

Disposal Site Alternatives

The Phase I report should contain a screening of disposal site alternatives. The screening is important at this level to ensure that public and agency review is provided early in the process for those sites that receive a high ranking. This early screening and ranking will avoid time consuming and costly analyses of sites that the Town may not be able to develop.

Water Supply

The report should provide a summary of the existing and projected water use in the Town and how the existing and projected water use fits with the Water Management Act approval for the Town.

Planning for Growth (Executive Order # 385)

The proposed scope for the Phase II document should include a section dealing with compliance with the directives of Executive Order #385.

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.

I note that the comments of the Nantucket Planning & Economic Development Commission (NPEDC) are generally supportive of this project. However, NPEDC also notes several areas in which the CWMP does not fully reflect the approved Comprehensive Plan. Their comments should be addressed in future filings, to ensure compliance with EO #385.

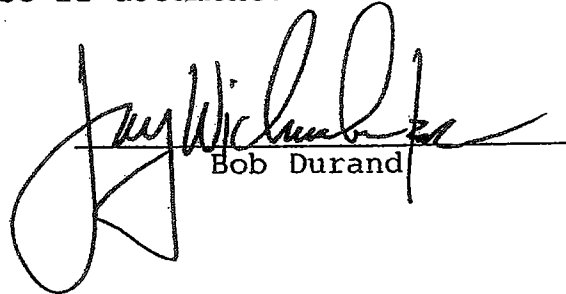
Responses to Comments

The report should include responses to the issues raised in the attached comment letters, insofar as those issues relate to

needs and screening of alternatives. Issues other than those relating to needs and alternatives should be included in the proposed scope for the Phase II document.

November 16, 2001

Date


Bob Durand

Date

for the Town of Nantucket

Comments received :

- Department of Environmental Protection
- Coastal Zone Management
- Division of Marine Fisheries
- Department of Food and Agriculture
- Massachusetts Historical Commission
- Nantucket Planning & Economic Development Commission
- Nantucket Conservation Commission
- Nantucket Land Council, Inc.
- Nantucket Community Association
- Sylvie O'Donnell (2)

BD/rf

MEMORANDUM

TO: Richard Foster, Environmental Reviewer, MEPA Unit

THROUGH: Robert P. Fagan, Regional Engineer, BRP
David Johnston, Deputy Regional Director
David DeLorenzo, Deputy Regional Director
John Viola, Deputy Regional Director
Paul L. Grady Jr., Service Center Manager

CC: Elizabeth Kouloheras, Chief, Wetlands
and Team Leader, Cape Cod Watershed
Jeffrey Gould, Chief, Water Pollution Control
and Team Leader, Buzzards Bay Watershed
Tena Davies, Team Leader, Ten Mile River and Islands Watershed
Deborah Marshall, Acting Chief, Audits/Site Management
Andrea Langhauser, EOE A Team Leader, Ten Mile River Watershed
David Murphy, Commissioner's Office

FROM: Sharon Stone, SERO MEPA Coordinator

DATE: November 9, 2001

RE: ENF EOE A #12617 - NANTUCKET - Nantucket Comprehensive
Wastewater Management Plan
Nantucket, MA

"For Use in Intra-Agency Policy Deliberations"

The Southeast Regional Office of the Department of Environmental Protection has reviewed the Environmental Notification Form (ENF) for the proposed Nantucket Comprehensive Wastewater Management Plan to be located in Nantucket, Massachusetts (EOEA #12617). The project proponent provides the following information for the project:

"This ENF is presented as the first step of the process of the preparation of an Island-wide Comprehensive Wastewater Management Plan (CWMP/EIR) to identify areas within the Island with sub-surface wastewater disposal problems and to develop a plan to mitigate or eliminate the problems. This work has been and is accomplished under the DEP CWMP Program as State Revolving Fund Numbers CWSRF340 and CWSRF625.

In summary, THE CWMP/EIR is to investigate, evaluate, and report on the existing environmental conditions in Nantucket and determine the Town's present and future water pollution needs. The focus of the CWMP/EIR is to evaluate and develop wastewater collection, transmission, treatment, disposal and residuals management programs and

facilities that will best serve Nantucket's existing and future needs, while maintaining and/or improving the environment. The CWMP/EIR utilizes available data from previous studies and reports performed by and/or for the Town to the fullest extent possible."

The ENE submittal includes the Phase 1-Needs Analysis and Screening of Alternatives document as well as the proposed scope for the complete CWMP/EIR. The Department has the following comments on the Phase 1 report and the scope:

Phase 1 Report:

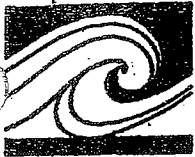
1. The Phase 1 report should include a discussion of the current and projected water supply and demand situation in the town, and discuss the status of the town's Water Management Act limits and whether there are or will be exceedances of the WMA limits.
2. The Phase 1 report should present an analysis of the current and projected flows at the Surfside WWTP, as well as a presentation of the current status of the wastewater treatment plant facilities and an evaluation of the capabilities and deficiencies of the treatment plant units and operations. The report should also describe the existing wastewater collection system and evaluate its condition and deficiencies.
3. In the Needs Analysis section of the report, there needs to be a clearer presentation of the two-step methodology used for the rating of the individual needs areas. It is not clear what the threshold level from the first step means in terms of the actual degree of Title 5 compliance, and how the second step of the process resulted in the conclusions for given areas to be designated for further analysis or not. It is not readily apparent from the discussion in the report that the decisions for inclusion or exclusion for the areas were consistent. The Department has had discussions with Earth Tech regarding these issues on other CWMPs recently, and based on those discussions, the report should be modified and clarified to ensure that the discussion of the rating process and rationale for the decisions on each area are clear. The Department will discuss this issue more specifically with Earth Tech.
4. The report is labeled both a Needs Analysis and Screening of Alternatives, but there is no screening of alternative disposal sites. Since the screening of disposal site alternatives is a very significant issue in Nantucket, which has been difficult and controversial in the past, the Department does not recommend using a Special Procedure that would have the next MEPA filing be the Draft CWMP/EIR. There should be a filing of the revised Phase 1 report that addresses the comments discussed above and that includes the screening of alternative disposal sites so that any public and agency comments can be addressed before proceeding to the full detailed analysis of alternatives in the Draft CWMP/EIR.

CWMP/EIR Scope:

1. The Department, in conjunction with the University of Massachusetts School of Marine Science and Technology (SMAST), has recently committed to the development of a program to evaluate the status of nutrient sensitive embayments in coastal areas of Southeastern Massachusetts and determine appropriate targets for nitrogen loadings to the embayments. As part of that program, Nantucket Harbor will be one of the first priorities due to the amount of available data already collected in the harbor. The scope for the CWMP/EIR should include a task to evaluate alternative wastewater treatment and disposal options that may need to be considered in order to maintain nitrogen levels below the targets established by the DEP/SMAST evaluations. The Department will provide additional guidance to the town and Earth Tech once a more definitive schedule for the Nantucket Harbor work is developed.
2. A scope of work for any hydrogeological evaluations should be prepared and submitted to DEP for review and approval prior to any fieldwork being conducted at the potential disposal sites.
3. An evaluation of the existing and potential erosion at the disposal bed area at Surfside should be conducted in order to determine the useful disposal area that may be available at that site.
4. The CWMP/EIR should include, as part of the recommended plan, a plan for ongoing collection system operation-and-maintenance program, including a program for Infiltration and Inflow (I/I) control. The Department can provide additional guidance regarding the elements of such a program to the town and Earth Tech.
5. The Department has reviewed the separately submitted detailed scope of work for the purposes of the SRF program, and the above comments should be addressed in a revised scope that should then be submitted to DEP for review and approval.

The Town of Nantucket has submitted the ENF for the purpose of initiating a "need analysis and preliminary screening of alternatives" for a comprehensive wastewater management plan/environmental impact report. To assist the Town of Nantucket during this phase of the planning process, the Bureau of Waste Site Cleanup (BWSC) would like to make the Town aware that disposal sites do exist in the Town. A list of the disposal sites identified by the BWSC are available online at the Department's website at <http://www.state.ma.us/dep/bwsc/sites/report.htm>

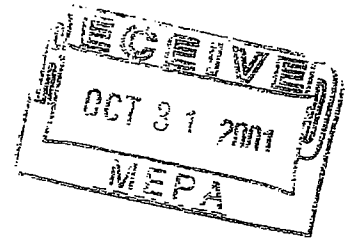
The DEP Southeast Regional Office appreciates the opportunity to comment on this proposed project. If you have any questions regarding these comments, please contact Sharon Stone at (508) 946-2846.



THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
OFFICE OF COASTAL ZONE MANAGEMENT
251 CAUSEWAY STREET, SUITE 900, BOSTON, MA 02114-2136
(617) 626-1200 FAX: (617) 626-1240

DF

MEMORANDUM



TO: Bob Durand, Secretary, EOE
ATTN: Dick Foster, MEPA Unit
FROM: Tom Skinner, Director, CZM *TS*
DATE: October 29, 2001
RE: EOE #12617 – Nantucket Island Comprehensive Wastewater Management Plan;
Nantucket

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 Nantucket has prepared a Comprehensive Wastewater Management Plan (CWWMP) to identify areas of the island with wastewater disposal problems and to develop a plan to eliminate or mitigate the problems. This ENF establishes existing and future needs, provides an analysis of the alternatives for addressing wastewater treatment and disposal, and lists recommended priority areas of need.

CZM is supportive of the overall project and the approach to rating the suitability of potential wastewater treatment plant and effluent disposal sites. We are pleased to see that the proponent recognizes that siting wastewater facilities in hazard-prone areas is problematic from a long-term planning perspective and identifies the floodplain as one of the 10 screening criteria.

CZM feels that the evaluation criteria could be modified to make them more comprehensive and inclusive. CZM recommends that the criteria for rating sites adjacent to fisheries resources (p. 4-8) be reevaluated. Other studies have suggested that sites greater than 1000 feet downstream from a source of wastewater discharged to the ground or a surface water body can experience decreased water quality and decreased habitat for shellfish and juvenile finfish. We suggest that the proponent include proximity to shellfish beds in the "fisheries" screening criteria and reconsider labeling these sites as "no constraint" in relation to siting wastewater discharge facilities. As described in the ENF, the fisheries criteria only take into account stocked fish. We suggest that shellfish also be included in this definition.

CZM recommends that shoreline change data be added to the screening criteria for facilities siting. The shoreline change history, especially along the south and east shores of

Nantucket, is complex, with the shoreline fluctuating over time with alternating periods of significant erosion and accretion. Nantucket has some of the highest erosion rates in the Commonwealth. For example, Aubrey Consulting Inc., in a 1990 report, found that the shoreline in the Siasconset area experienced severe erosion in the 40 years prior to 1990, that periods of erosion were intermixed with periods of accretion, and that between 1971 and 1990 there was an erosional trend along the entire area from Tom Nevers Head eastward to Siasconset Cliffs. Due to the ongoing rapid erosion, particular attention should be directed toward the siting of any facilities along the south or east shores. CZM is finalizing updated historic shoreline change maps and encourages the Town to use this resource and other available shoreline change data to ensure that the Town's investment will not be threatened by erosion or flooding. Another example of information that could be very useful to the Town is the beach profile data collected by the Sconset Beach Preservation Association. These data are collected on a quarterly basis at approximately 44 transects on the southeastern shore of Nantucket.

Finally, it is CZM's understanding that a nitrogen loading model for Nantucket Harbor will soon be completed as part of a Department of Environmental Protection regional project. CZM recommends that, when this modeling effort is complete, the data be considered in the CWWMP process and the proponent consider the nitrogen assimilation capabilities of the waterbodies downstream of the proposed effluent disposal sites in its screening process.

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, Project Review Coordinator, at 617-626-1219 or visit the CZM web site at www.state.ma.us/czm/fcr.htm.

TWS/tpc/rh

cc: Abigail Thomas,
Earth Tech, 300 Baker St., Suite 300, Concord, MA 01742
Truman Henson
CZM Cape and Islands Regional Coordinator
Elizabeth Kouloheras, Section Chief
Southeast Regional Office, MA DEP
Sharon Pelosi, Section Chief
Waterways Program, MA DEP
Jack Schwartz, Division of Marine Fisheries
Patti Kellogg, Team Leader
Cape and Islands Watershed
Karen Kirk Adams, Chief
Regulatory Branch, US Army Corps of Engineers



Paul J. Diodati
Director

Commonwealth of Massachusetts

Division of Marine Fisheries

251 Causeway Street • Suite 400

Boston, Massachusetts 02114

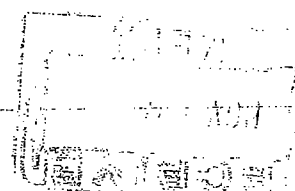
(617) 626-1520

fax (617) 626-1509



November 5, 2001

Bob Durand, Secretary
Executive Office of Environmental Affairs
Attention: MEPA Office
Rick Foster, EOE no. 12617
251 Causeway Street, Suite 900
Boston, MA 02114



Dear Secretary Durand:

The Division of Marine Fisheries (the Division) has reviewed the Environmental Notification Form (ENF) #12617 entitled Nantucket Comprehensive Wastewater Management Plan submitted on behalf of the Town of Nantucket (the proponent). The Proponent is requesting a special review procedure as provided under MEPA regulations 301 CMR 11.00 to complete a review of the plan in phases that will ultimately result in a final plan for the treatment of sewerage and discharge of wastewater. No plan has been proposed at this time. The Division is providing the following comments.

Many coastal areas of Nantucket produce an abundant harvest of shellfish. However, attachment 6, section 2.0 listing specific thresholds for review gives no mention to land containing shellfish. The Division requests that land containing shellfish be added to this list, and that a complete review and assessment of environmental impacts to fishery resources be submitted prior to the issuance of permits or the Secretary's Certificate.

Eliminating the discharge of sewerage to marine waters of Nantucket will improve water quality and protect harvestable fishery resources. The Division supports the intent of the ENF. With the exception of three nearshore embayments of limited area, western Nantucket Harbor, Polpis Harbor, and Madaket Harbor, all other marine waters are classified SA, which is the highest standard for marine water quality. The Division recommends that all future phases of wastewater treatment and discharge plans not result in any degradation below these standards.

Since no plans have been submitted the Division is unable to provide specific comments relative to the proposed wastewater treatment facility and discharge. However, The Division requests that consideration be given to the waters in those areas currently impacted by fecal coliform pollution noted above for remediation to the SA standard of not exceeding a geometric mean MPN (most probable number) of 14 organisms per 100 milliliters (ml) with no more than ten percent of the samples exceeding a MPN of 28 organisms per 100 ml.

The Division appreciates the opportunity to comment and requests the opportunity to review future phases of this project. The Division will provide further assistance as needed. Please contact Dr. Jack P. Schwartz at our Gloucester office (978.282.0308x122) if you need further assistance.

Sincerely,

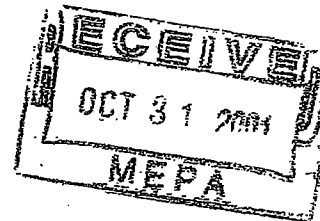
A handwritten signature in black ink that reads "Paul J. Diodati". The signature is written in a cursive style with a large, sweeping initial "P".

Paul J. Diodati
Director

cc: Neil Churchill, MDMF
Mike Hickey, MDMF
Jack Schwartz, MDMF
Paul Hogan, DEP
David Burns, DEP
Todd Callaghan, MCZM



DF



The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

October 26, 2001

Secretary Bob Durand
Attn.: MEPA Office
Executive Office of Environmental Affairs
251 Causeway Street, 9th Floor
Boston, MA 02114-2150

RE: Comprehensive Wastewater Management Plan, Nantucket, MHC #RC.22107. EOE # 12617.

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 entire island of Nantucket is listed in the National and State Registers of Historic places as a historic district and is designated a National Historic Landmark. Nantucket has one of the highest densities of Native American archaeological sites in the Commonwealth.

MHC requested in a letter to MEPA dated September 18, 2001 that an archaeological reconnaissance survey (950 CMR 70) be conducted for the project. The purpose of the reconnaissance survey is to analyze the project alternatives in order to identify archaeologically sensitive areas within the project area that will require further testing to locate and identify any important archaeological resources that they may contain. The archaeological sensitivity of these areas is assessed on the basis of an in-depth study of land-use history, current conditions, proposed plans, and proximity to favorable environmental characteristics and known archaeological sites. The results of the reconnaissance survey should be integrated into the further analysis of project alternatives by project proponents. MHC is willing to assist project proponents in developing an appropriate scope for the reconnaissance survey and looks forward to reviewing the report when it is complete.

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 Eric S. Johnson or Margo Muhl Davis at this office.

Sincerely,

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

xc: Ron Lyberger, DWPC, DEP (Boston)
Abigail Thomas, Earth Tech, Inc.
Nantucket Historical Commission

NP&EDC



NANTUCKET PLANNING AND ECONOMIC DEVELOPMENT COMMISSION

11-09-01 P03:14 IN

November 8, 2001

Mr. Robert Durand
Secretary of Environmental Affairs
Executive Office of Environmental Affairs
251 Causeway Street, Suite 900
Boston, MA 02114
Attention: MEPA UNIT, Dick Foster, EOEA File # _____

Re: Comprehensive Wastewater Management Plan and Environmental Impact Report,
Phase I: Needs Analysis and Screening of Alternatives: Nantucket, Massachusetts

Dear Secretary Durand:

The Nantucket Planning and Economic Development Commission (the "Commission"), a regional planning agency encompassing the Town of Nantucket, is pleased to submit these comments concerning the above-referenced EIR.

The Comprehensive Wastewater Management Plan ("CWMP") is an important milestone in Nantucket's long-range planning efforts. If done well and comprehensively, it can be a valuable tool for directing growth, ensuring the health of our community, and for planning our future capital needs. Our comments below are in the spirit of ensuring that that these objectives are accomplished.

Relationship to Nantucket Comprehensive Community Plan

The Commission lauds the efforts of the Town of Nantucket, and its consultant, Earth Tech, to relate the Comprehensive Wastewater Management Plan to the Nantucket Comprehensive Community Plan ("Comprehensive Plan"), approved by the Commission on January 5, 2001, and ratified at a Special Town Meeting on January 8, 2001. It is essential to the Commission that the CWMP be consistent with Plan objectives because of the influence that sanitary sewer service has on the health and welfare of the community. Concerning that relationship, we offer the following comments:

1. On pages 1-3, 1-4, 2-7, and in other references throughout the document, the document needs to consistently refer to the approved Nantucket Comprehensive Community Plan. There are places throughout the document that refer to a draft released in January of 2000 that has since been substantially revised and

superceded by a final Plan. The official title should be: "Charting the Future: the Nantucket Comprehensive Community Plan."

2. The Comprehensive Plan advocates the definition of Town and Country as a means of defining areas where development might be encouraged, within the constraints of infrastructure and growth management measures ("Town"), while discouraging growth and the extension of infrastructure in other areas ("Country"). The boundary between Town and Country was conceived of as a sewer and water service area. However, at the time that the boundaries were being designed, we had hoped that the results of this Phase I report would be available for inclusion in the Comprehensive Plan. This did not occur during the period, and the preparation of the CWMP was held in abeyance while other Town priorities could be attended to. Thus, the boundary was a "best guess" as to what might be logical sewer service and growth boundaries based on what was known at the time. Following the review of the document, we find that there is only one area designated "Country" in the ratified Comprehensive Plan that, in retrospect, should have been included in "Town", based on extent and level of development and, as revealed by the CWMP, is an area in need of the extension of sanitary sewers; that area is Somerset (see p. 3-36). We also note that Monomoy (p. 3-48), located within "Town", is now slated for the extension of sanitary sewers, consistent with the recommendations of the Comprehensive Plan and the Nantucket Harbor Watershed Work Group. Specific mention should be made of that fact. In all other respects, suggested "solutions" appear to be consistent with the Comprehensive Plan.
3. p. 1-3,4. Mention the coordination of this CWMP process with that of the Comprehensive Community Plan.

Nantucket Harbor Watershed District; Madaket Harbor Watershed Definition

A Harbor Watershed District was established by vote of Town Meeting at the 2000 Annual Town Meeting, and is codified in Chapter 99 of the Town Code. Although not a regulatory instrument per se, it is important in that it provides the framework for future regulatory measures (i.e., wetlands regulation and enhanced Board of Health regulations) and capital program funding decisions. The boundary has been defined, based on a Horsley, Witten, Heggeman, Inc. report entitled "Nantucket Water Resources Plan", dated 1990. The watershed boundary identified in the CWMP and related references in the text (p. 3-2) are not consistent with that boundary (see Figure 2A-1), and must be amended accordingly. Attached is a map depicting the boundary, and a copy of Chapter 99 of the Town Code.

The Commission recently identified its priority issues that must be dealt with expeditiously. Water quality, and especially harbor water quality was identified as a top priority issue, together with affordable housing and transportation. Recent water quality analyses conducted by the Marine and Coastal Resources Department, for instance, have revealed 50 PPM of coliform in waters of Madaket Harbor, when the "safe" threshold is only 10 ppm. Due to the urgency associated with dealing with these matters, the Commission believes that the relationship of the Harbor Watershed District to the study

areas should feature prominently throughout the document. Specific mention of the inclusion of the District in the following study areas should be added to the narrative: Town; Town (WPZ); Monomoy; Shimmo; Polpis; Pocomo; and Wauwinet. (pp. 3-14, 3-15, 3-16 through 19, 3-19, 3-20, and 3-21; pp. 3-34 through 3-50). Further, when discussing Madaket and the effects on its harbor, we believe that it is essential that the Horsley, Witten, and Heggeman definition of that watershed be used as a frame of reference for planning purposes, notwithstanding the fact that a formal watershed district has not yet been established. A boundary for regulatory purposes will be commissioned within months, pending the receipt of State EOE funding.

Given the increasingly obvious link between septic discharges and the water quality of our harbors, we strongly recommend that the location of any CWMP study area within the Nantucket Harbor Watershed District, the Madaket Harbor Watershed, and within the Wellhead District should be an important determining factor in the establishment of qualifying criteria for needs areas (p. 3-30). If such consideration is made, Pocomo, Shimmo, and Monomoy (pp. 3-42, 3-43, 3-47), would likely be elevated to areas of need on the basis of their importance to maintaining or improving the water quality of Nantucket Harbor. The Phase I report gives recognition to the Town (WPZ) needs area, and similar consideration should also be given to the Harbor. We also strongly recommend that Chart 4A-1 be amended to include Harbor Watershed as a screening criterion.

Data is not Current

The Commission can appreciate the fact that the preparation of this CWMP is a long-range effort that spans a number of years, and that such a long-range project can create difficulties keeping pace with the dynamics of growth and evolving data on Nantucket. The hiatus between the commencement of the process in 1998 and the issuance of this report has certainly not been conducive to continuity. Information gathered in 1998 and 1999 is in many cases now obsolescent. And since that time, the Town's GIS system has become more sophisticated, such that it can provide more current data than that employed in the report, and it has the analytical ability to fill in some statistical gaps. Further, much data in the Report is based on information provided by the NP&EDC in 1997, and there is now more current data available, including the preliminary 2000 census information. Utilizing the most current information is important, because a great deal of growth has occurred during the last half decade – more than any other County in the Commonwealth - and this fact has a bearing on the validity of future plans for meeting our wastewater needs.

The following represent some of the data deficiencies and inconsistencies we noted, as well as other omissions. We urge you to revise the document and make the following revisions:

1. p. 2-8. Use current Nantucket GIS for land use extrapolation.

