



Andrew Gottlieb
Executive Director

February 18, 2025

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Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs
Attention: Alexander Strysky
MEPA Office
100 Cambridge St., Suite 900
Boston, MA 02114

**RE: Bourne Comprehensive Wastewater Management Plan
Expanded Environmental Notification Form, EEA# 16910**

Dear Secretary Tepper:

John Carroll

Bob Ciolek

Tom Cohn

John Cumbler

Jamie Demas

Tony Gallo

Meredith Harris

DeeDee Holt

Pat Hughes

Molly Karlson

Rick O'Connor

Kris Ramsay

Dottie Smith

Marcie Truesdale

The Association to Preserve Cape Cod (APCC) has reviewed the Bourne Comprehensive Wastewater Management Plan Expanded Environmental Notification Form (EENF) and provides the following comments.

Founded in 1968, APCC is the Cape region's leading nonprofit environmental advocacy and education organization, working for the adoption of laws, policies and programs that protect, preserve and restore Cape Cod's natural resources. APCC focuses our efforts on the protection of groundwater, surface water, and wetland resources, preservation of open space, the promotion of responsible, planned growth and the achievement of an environmental ethic.

APCC is pleased that the town of Bourne has submitted a Comprehensive Wastewater Management Plan (CWMP) to MEPA for review. That said, the plan's reliance on on-site septic systems will burden residents with high costs while failing to reduce nitrogen loads sufficiently to restore embayment water quality. The proposed plan, no matter how well-intentioned, does not provide the required assurances that the plan can achieve water quality requirements, nor does it lay out a more conventional collection and treatment strategy if reliance on the alternative septic plan fails to attain needed nutrient reduction requirements.

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APCC shares and echos the concerns expressed by the Cape Cod Commission regarding the derivation and presentation of the nitrogen loading requirement for the estuaries and the demonstration of how the proposed strategy is supposed to achieve the necessary reductions. It is APCC's view that an onsite system-only strategy cannot meet the required reductions in nitrogen and that the proposed CWMP fails to provide a clear demonstration that the needed reductions can be achieved.

The proposed CWMP effectively transfers the town's obligation to provide a publicly funded solution to water quality directly to the individual homeowners by requiring homeowners to fully self-fund septic upgrades. The net effect of following this path will be to hold the municipal budget harmless while imposing high septic upgrade costs on individuals for an approach that will fail to meet the necessary water quality standards. This is simply not good environmental or public policy. It runs counter to the approach of direct municipal involvement encouraged by the Commonwealth, which is being uniformly pursued by the rest of the towns on Cape Cod.

Thank you for the opportunity to comment on the above-referenced EENF. APCC is ready to work with your staff and the town of Bourne on a revised CWMP that achieves the water quality objectives we all share at a reasonable and affordable cost to the residents of Bourne.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew Gottlieb', with a long horizontal flourish extending to the right.

Andrew Gottlieb

cc: Marlene McCollem, Bourne

