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July 17, 2009

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS  
ON THE  
PHASE III - FINAL EIR/COMPREHENSIVE WASTEWATER MANAGEMENT PLAN

PROJECT NAME : Chatham Comprehensive Wastewater Management Plan  
PROJECT MUNICIPALITY : Chatham  
PROJECT WATERSHED : Cape Cod  
EOEA NUMBER : 11510  
PROJECT PROPONENT : Town of Chatham  
DATE NOTICED IN MONITOR : June 10, 2009

As Secretary of Energy and Environmental Affairs, I hereby determine that the Phase III - Final Environmental Impact Report (FEIR) submitted on the above project **adequately and properly complies** with the Massachusetts Environmental Policy Act (M.G.L. c. 30, ss. 61-62I) and with its implementing regulations (301 CMR 11.00).

Project Overview

The Town of Chatham's comprehensive wastewater management planning process has been undertaken for the purposes of:

- 1) Evaluating and planning for the impacts to the Town's marine and freshwater resources from existing development and anticipated future residential and commercial growth in the Town of Chatham over the 20-year project planning period (ending in 2030);
- 2) Evaluating and quantifying the Town of Chatham's existing and future contributions to nitrogen loading of coastal embayments and freshwater ponds from on-site septic systems over the project planning period;

- 3) Evaluating the feasibility of centralized and decentralized wastewater treatment options, including the upgrade and expansion of the Chatham Wastewater Treatment Facility (Chatham WWTF) to meet the estimated 2030 nitrogen control needs and Total Maximum Daily Loads (TMDLs) established for the marine embayments surrounding Chatham;
- 4) Evaluating alternative methods for the disposal of treated wastewater including on-site and off-site groundwater disposal and wastewater reuse for landscape spray irrigation, with the intent of reducing groundwater discharges from the Chatham WWTF;
- 5) Evaluating the feasibility of non-structural and non-traditional nutrient management techniques to further reduce nutrient loading to the marine embayments surrounding Chatham; and,
- 6) Reviewing the long-term effectiveness of regional wastewater treatment and disposal options involving the Towns of Chatham and Harwich.

As presented in the Phase III – FEIR, the Town’s comprehensive wastewater management plan (CWMP) has been designed to achieve reductions of nitrogen loading sufficient to meet nutrient TMDLs established for the Town of Chatham’s coastal embayments and freshwater ponds including Stag Harbor, Pleasant Bay, Sulphur Springs and Taylor’s Pond. I note that the Pleasant Bay watershed area is located within the Towns of Chatham, Harwich and Brewster. Pleasant Bay been designated an Areas of Critical Environmental Concern (ACEC) and an Outstanding Resource Waters (ORW) under the Massachusetts Surface Water Quality Standards (314 CMR 4.00). Extensive areas of Priority and Estimated Habitat of rare wildlife have been mapped by the Natural Heritage and Endangered Species Program (NHESP) within the Pleasant Bay ACEC.

### MEPA History

This project involves the development of a comprehensive wastewater management plan/facilities plan for the Town of Chatham. The environmental review of the project under MEPA was defined in a Special Review Procedure established by agreement between the Town of Chatham and the MEPA Office in April 1998. The Special Review Procedure called for the filing of four documents:

- Phase I - Needs Analysis;
- Phase II - Screening of Alternatives;
- Phase III - Draft EIR/Facilities Plan; and
- Phase IV - Final EIR/Facilities Plan.

*Phase I– Needs Analysis*

The Phase I – Needs Analysis was submitted to the MEPA Office in September 1999 and was found adequate in October of 1999. The Secretary’s Certificate on the Phase I - Needs Analysis required the Town to include in the Phase II submittal additional information pertaining to the Town’s Needs Analysis, a discussion of the consistency of the CWMP with Executive Order 385, (Planning for Growth), and a discussion of the Town of Chatham’s land use and open space goals.

*Notice of Project Change*

A Notice of Project Change (NPC) was filed with the MEPA Office on March 10, 2004 pursuant to Section 11.10(2) of the MEPA Regulations because more than three years elapsed between the publication of the Secretary’s Certificate on the Phase I - Needs Analysis submittal and the Town’s filing of the Phase II - Screening of Alternatives document with the MEPA Office. According to the comments received from the Department of Environmental Protection (MassDEP) and Massachusetts Coastal Zone Management (CZM) on the NPC submittal, the Town continued to demonstrate its commitment to the comprehensive wastewater management planning process and continued to work closely with MassDEP, the Cape Cod Commission (CCC), the Marine Estuaries Project (MEP) and others to develop appropriate nitrogen load limits (TMDLs) to be incorporated in the Town’s CWMP for coastal embayments surrounding the Town of Chatham.

The NPC included the Town’s request to modify the previously established April 1998 Special Review Procedure. The Town proposed to submit for MEPA review a Supplemental Needs Analysis, the Phase II - Screening of Alternatives document and the Phase III - Draft EIR/Facilities Plan document into one MEPA submittal entitled “Alternatives Analysis and Draft Environmental Impact Report (DEIR)/Draft Comprehensive Wastewater Management Plan”. The proposed change to the Special Review Procedure allowed the MEPA review of the Town of Chatham’s Comprehensive Wastewater Management Plan in three steps:

- Phase I – Needs Analysis;
- Phase II – Draft Environmental Impact Report/Draft CWMP; and,
- Phase III - Final Environmental Impact Report /Final CWMP.

The Secretary’s Certificate on the NPC submittal (April 9, 2004) found that the proposed changes to the Special Review Procedure were appropriate and acceptable. The Secretary’s Certificate on the NPC required the Town to include in the Phase II document detailed responses to the issues raised in the comment letters previously submitted on the Phase I document and a discussion of the proposed project’s consistency with Executive Order 385 (Planning for Growth), and the Town of Chatham’s land use and open space goals.

*Draft Environmental Impact Report /Draft CWMP- 2<sup>nd</sup> Notice of Project Change*

The Town filed a Draft Environmental Impact Report (DEIR)/Draft CWMP with the MEPA Office on May 7, 2008. On June 13, 2008, I issued a Certificate on the DEIR/Draft CWMP submittal and determined that it adequately and properly complied with the Massachusetts Environmental Policy Act. The Secretary's Certificate required the Phase III - FEIR/Final CWMP submittal provide additional information and a response to comments pertaining to the Town's proposed Adaptive Management Plan, Restoration of Muddy Creek, Growth Management policies, regulations and bylaws and Mitigation.

State Permits and Jurisdiction

The project is undergoing review pursuant to Sections 11.03(5)(a)(3) and (5)(b)(2) of the MEPA regulations, because the project will likely involve the construction of sewer mains ten or more miles in length and the expansion of an existing wastewater treatment facility/disposal facility by more than 1,000,000 gallons per day (gpd). The project will require a Groundwater Discharge Permit and a 401 Water Quality Certificate from MassDEP. The project must be reviewed by the Natural Heritage Endangered Species Program (NHESP) and the Massachusetts Historical Commission (MHC) because portions of the project occur within Priority Habitat and within or adjacent to recorded archaeological sites and archaeologically sensitive areas, respectively. It may require Federal Consistency Review with the Massachusetts Coastal Zone Management (MCZM) Office. It may also require a Construction Access Permit from the Massachusetts Highway Department. The project should comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for stormwater discharges from a construction site. It will also require an Order of Conditions from the Chatham Conservation Commission and, on appeal only, a Superseding Order of Conditions from MassDEP.

The Town anticipates applying for State Revolving Fund (SRF) loans for subsequent planning and construction of proposed sewer project. Therefore, MEPA jurisdiction is broad and extends to all aspects of the project that may cause Damage to the Environment, as defined in the MEPA regulations.

REVIEW OF THE PHASE III - FINAL ENVIRONMENTAL IMPACT REPORT and  
FINAL CWMP

The FEIR contains a detailed description of the Town of Chatham's recommended CWMP. Phase 1 of the Chatham CWMP involves the upgrade and expansion of the existing WWTF, located on an 80.2-acre parcel of municipally-owned property on Sam Ryder Road in Chatham, to meet Enhanced Nitrogen Removal (ENR) standards.

The proposed facility upgrades will enable the Chatham WWTF to treat and dispose approximately 1.3 million gallons per day (MGD) of additional wastewater flows. Under Phase 1, the Town also proposes to expand its existing sewer collection and conveyance system to serve 61 Areas of Concern ((AOCs) – areas experiencing high groundwater and failing septic systems, and industrial/commercial areas)) in Chatham located primarily within the watersheds for Stage Harbor, Sulphur Springs and Taylor's Pond. Construction of Phase 1 is expected to be completed in 2030.

Phase 2 sewer construction activities will involve the further expansion of the Town's sewer collection and conveyance system to serve Chatham's remaining 33 AOCs. Phase 2 will include additional upgrades to the Chatham WWTF and the construction of approximately 11 miles of gravity sewers to collect and convey approximately 0.6 MGD of additional wastewater flow (1.9 MGD total wastewater flows) for treatment and on-site disposal at the Chatham WWTF. The Phase 2 sewer construction work is expected to begin in 2030 and be completed by 2040. Proposed upgrades to the Chatham WWTF will also include the construction of a new Sewer and Water Department maintenance and administration building. As noted in the FEIR, the Chatham CWMP incorporates reserved treatment capacity at the Chatham WWTF to also accommodate the potential wastewater flows from portions of the neighboring Town of Harwich.

Chatham's CWMP incorporates an Adaptive Management Plan (AMP) that outlines a process for reporting the results of the Town's ongoing annual groundwater quality and marine habitat monitoring program to identify the need for any adjustments or mid-course corrections to the phased construction of the sewer expansion project to achieve compliance with TMDLs for the coastal embayments surrounding Chatham. The Draft CWMP also includes a number of non-structural elements designed to reduce nutrient loading including proposed programs for controlling the use of fertilizer products on lawns, gardens and agricultural areas, stormwater management and water conservation.

## Wastewater Treatment and Water Quality

### *Chatham Wastewater Treatment Facility*

As described in the FEIR, the previously completed (1996) improvements to the Chatham WWTF have enabled the treatment facility to achieve nitrogen effluent concentrations of 5.6 parts per million (ppm).

The existing treatment capacity of the Chatham WWTF (150,000 gpd) was established by MassDEP in a 1996 Administrative Consent Order (ACO). The Chatham CWMP proposes the phased upgrade and expansion of the Chatham WWTF that will include the Phase 1 construction of an Orbal biological nitrogen oxidation removal process system to provide treatment levels capable of achieving nitrogen effluent concentrations of 3 parts per million (ppm). The Chatham WWTF site is located upgradient of the Cackle Cove embayment and the Sulphur Springs and Taylor's Pond watersheds.

As described in the FEIR, the Town conducted a review of hydrogeological studies, hydraulic load testing and other groundwater modeling analyses pertaining to the existing Chatham WWTF site and concluded that the proposed increases to on-site disposal and groundwater recharge of treated effluent from the Chatham WWTF will not impact existing groundwater table mound heights and nutrient loading to the Cackle Cove and Taylor's Pond. Although the Town's modeling indicates that the TMDL threshold for nitrogen loading to Suphur Springs would be minimally exceeded under Phase 1 and Phase 2 of the Town's sewer expansion project, both MassDEP and CCC have agreed that the Town's modeling parameters pertaining to groundwater flows may be conservative. The Town has agreed to work closely with MassDEP, CCC and the University of Massachusetts School of marine Science and Technology (UMass SMAST) to conduct additional hydrogeologic investigations to document groundwater flow and potentially greater nitrogen attenuation of the downgradient Cackle Cove salt marsh system.

In its previous comments on the Draft EIR/Draft CWMP, MassDEP indicated that a portion of the Chatham WWTF's groundwater discharge site is located within the Zone II of the Town's Indian Hill public drinking water supply well. As a result, the facility's effluent discharge will need to include disinfection to meet Total Organic Carbon (TOC) limits of less than 3 mg/L treatment pursuant to MassDEP's Interim Guidelines on Reclaimed Water (Revised), January 3, 2000. As described in the FEIR, the Town has worked closely with MassDEP to identify TOC treatment alternatives. According to the information provided in the FEIR, MassDEP has subsequently agreed not to require the Chatham WWTF to meet MassDEP's TOC limits because the Indian Hill Well was taken out of production by the Chatham Water Department in 1999 due to the presence of trace amounts of contaminant (tetrachloroethylene (PCE)) and is not presently anticipated to be re-activated and reused as a water supply production well. MassDEP will require the Town to re-evaluate disinfection technology alternatives for the facility should the Town elect to re-activate and reuse the Indian Hill Well in the future.

The Town of Chatham's CWMP includes a commitment to conduct groundwater monitoring around the periphery and downgradient of the Chatham WWTF site to identify any impacts on groundwater resources and embayments surrounding the Town of Chatham. This groundwater monitoring program is expected to be incorporated into a MassDEP groundwater discharge permit for the Chatham WWTF. In its comments, the CCC has recommended that Town's groundwater monitoring program include monitoring for water levels, stream flow and water quality. I ask that the Town work closely with MassDEP, CCC and the Pleasant Bay Resource Management Alliance during the final design of its water quality monitoring program.

### *Marine Embayments*

The Town of Chatham continues to participate in the Massachusetts Estuaries Project (MEP) to conduct water quality sampling and identify nutrient loading problems for the Town's coastal embayments. MEP was created by MassDEP, and UMass SMAST to define the nitrogen limits of coastal estuaries in southeastern Massachusetts.

The Technical Reports produced by the MEP, together with the Linked Water Quality Model and citizen water quality monitoring efforts, were used by MassDEP and the US Environmental Protection Agency (EPA) to establish Total Maximum Daily Loads (TMDLs) for nitrogen loading to Chatham's coastal embayments and their tributaries. According to the comments received from MassDEP, CCC and others, the estimated nitrogen loading reductions resulting from the Town's proposed phased sewer expansion program are consistent with published TMDLs for Chatham's estuaries and salt marsh embayment systems including; the Stage Harbor/Oyster Pond system, the Taylor's Pond/Mill Creek system and the Pleasant Bay/Upper Muddy Creek/Lower Muddy Creek/Bassing Harbor system. According to MassDEP, the Town will need to provide MassDEP with additional information to demonstrate the maximum nitrogen load that can be assimilated in the Sulphur Springs/Bucks Creek/Cockle Cove system. The Town of Chatham's CWMP also includes a commitment to design and implement a long-term embayment monitoring program that will monitor water quality, eel grass coverage and benthic infauna habitat of Chatham's embayments to document the reductions in watershed nitrogen loads achieved from the Town's phased sewer construction program. The Town should work closely with MassDEP during permitting to ensure that the Town's embayment monitoring program includes compliance milestones to measure the CWMP's success in achieving target reductions of nitrogen loading sufficient to meet nutrient TMDLs established for the Town of Chatham's coastal embayments and freshwater ponds.

#### *Muddy Creek Basin Restoration*

The Muddy Creek watershed to Pleasant Bay is shared between the Towns of Chatham, Harwich and Brewster. According to the comments from CCC, sixtyfour percent of the nitrogen load to Muddy Creek originates from the Town of Harwich and thirtysix percent from the Town of Chatham. In addition to reserving capacity at the Chatham WWTF to accept a portion of the Town of Harwich's future wastewater flows, the Town of Chatham has identified the restoration of an old dyke located in the Muddy Creek basin to change the habitat of the upper portion of the creek to a freshwater body or the installation of a 8-16 foot wide culvert at the Route 28 crossing as a means of naturally removing a large amount of nitrogen from Muddy Creek and Pleasant Bay. According to the Town, the enhanced restoration of the Muddy Creek to a partial freshwater system could also reduce the extent of needed sewers currently proposed in the Town's recommended CWMP. As indicated in the FEIR, the Pleasant Bay Resource Management Alliance (Pleasant Bay Alliance) has obtained funding for additional evaluations pertaining to the potential impacts to surrounding resource areas associated with the restoration of Muddy Creek.

#### *Freshwater Ponds*

The Final CWMP/FEIR includes an evaluation of the impacts of phosphorous groundwater loading from residential land use on the water quality of large freshwater ponds and lakes located in Chatham.

Using water quality monitoring results collected as part of the Cape Cod Ponds and Lakes Stewardship (PALS), the Town has identified the need for restoring and protecting the water quality of two of Chatham's seven Great Ponds; Lovers Lake and Stillwater Pond. According to the Town, the proposed CWMP will significantly reduce phosphorous to groundwater and phosphorous loading to these ponds and will go a long way to meet the nutrient loading thresholds established in the Town of Chatham's *Action Plan for the Town of Chatham Ponds, November 2003*.

### Adaptive Management Planning

The Chatham CWMP includes an AMP that will report to MassDEP the results of the Town's annual ground water monitoring of the Chatham WWTF site and embayment monitoring of Chatham's coastal embayments to document the reductions in watershed nitrogen loads achieved from the Town's phased sewer expansion construction program. The AMP will assist the Town to evaluate the Town's compliance with established TDMLs and identify the need for adjustments or mid-course corrections to Phase 2 of the Chatham CWMP. I strongly encourage the Town to consult with the Pleasant Bay Resource Management Alliance in designing the Town's water quality monitoring program and ask that the Town include the CCC and the Pleasant Bay Resource Management Alliance in the distribution of its annual water quality monitoring report.

### Wetlands

According to the information provided in the FEIR, the Town's proposed WWTF upgrades and sewer expansion construction activities will be located primarily within existing roadway right-of-ways and will not result in any direct impacts to wetland resource areas subject to protection under the MA Wetlands Protection Act. The Town should submit a Request for a Determination of Applicability (RDA) to the Chatham Conservation Commission regarding the extent and boundaries of any jurisdictional wetland resource areas located within the project's WWTF site and sewer corridors. I am confident that the Chatham Conservation Commission's review will evaluate the Town's phased construction program and its erosion and sedimentation control plans and mitigation commitments to ensure that the project will be constructed in a manner consistent with the MassDEP Stormwater Management regulations and the Wetlands Protection Act performance standards.

### Rare Species

The existing Chatham WWTF site is not located within Priority or Estimated Habitat for any state-listed rare plant and wildlife species as indicated in the current 13<sup>th</sup> Edition of the MA Natural Heritage Atlas.



The FEIR indicates that two rare species; the Pine Barrens Bluet (*Enallagma Recurvatum*) and the New England Bluet (*Enallagma Laterale*), have been located within the vicinity of the northern border of the facility which may require further review and future inclusion in the MA Natural Heritage Atlas. According to NHESP's comments on the FEIR, portions of the Town's sewer expansion project may include mapped Priority Habitat. NHESP anticipates being able to address any potential concerns associated with the Town's proposed sewer expansion project through the MESA review process. Should NHESP subsequently find that the project will require a Conservation and Management Permit pursuant to the Massachusetts Endangered Species Act (MESA), the Town will need to notify the MEPA Office to explain these impacts and discuss the Town's avoidance/mitigation strategies. I ask that the Town continue to work closely with NHESP and the Chatham Conservation Commission to identify those portions of the Town's Phase 1 and Phase 2 construction activities that that may require MESA review and to identify necessary project construction and post-construction conditions and commitments to avoid an adverse impact to the habitats of state-listed species.

#### Historical/Archeological Resources

In comments submitted on the FEIR, the Massachusetts Historical Commission (MHC) has requested that the Town provide the MHC with a US Geological Survey topographical map that locates the Town's phased project area and scaled project plans showing existing and proposed conditions to enable MHC to determine if pump stations and other sewer project elements are located within and/or adjacent to recorded archeological sites and archaeologically sensitive areas. These plans should be submitted to MHC as early as possible during the design phase corresponding to each project development phase. If MHC deems the project to have an "adverse effect" on historic or archaeological resources, the Town will need to notify the MEPA Office to describe the Town's commitment to work with MHC to implement appropriate avoidance/mitigation strategies.

#### Sewering and Growth Management

The FEIR/Final CWMP includes a discussion of the potential future build-out of the proposed Phase 1 and Phase 2 sewer areas and the consistency with Executive Order #385 which discourages unintended growth within areas planned for sewerage. In May 2005, the Town passed a new section of the Town of Chatham's *Rules and Regulations of the Sewer Department* designed to limit new growth that might occur in newly seweraged areas of Chatham. As described in the FEIR, the Town has adopted a 'flow-equivalent' regulation that would limit the development or redevelopment of existing properties by restricting the number of bedrooms allowed to the number of bedrooms the property is currently allowed under Title 5 and local zoning.

I encourage the Town of Chatham to consider additional growth control by-laws, regulations, and policies and note that the Town of Orleans has recently proposed (EEA #14414, May 6, 2009) to implement a “checkerboard” sewer connection by-law that will enable the Town of Orleans to select specific lots that will be connected to the municipal sewer system and lots that do not need sewerage and therefore will not be allowed to connect to the new sewer system. The Town should adopt any proposed growth by-laws, regulations, and policies prior to the construction of any new sewers extensions.

The Town of Chatham’s recommended CWMP proposes to extend sewers to areas of Chatham characterized as coastal floodplains and barrier beaches. In its previous comments on the Town’s Phase II - Draft CWMP/DEIR submittal, Massachusetts Coastal Zone Management (CZM) indicated that the Town successfully demonstrated that the proposed sewerage project has been designed to eliminate or minimize potential storm damage risks associated with sewerage barrier beach areas by locating proposed pump stations outside of the 100-year flood zone and protecting this portion of the Town’s proposed sewer collection system from potential wave action. As described in the FEIR, the Town has committed to incorporate a system of check valves into the new sewer collection system for barrier beach areas to minimize impacts in the event of a storm-related breach to the collection system.

#### Costs to Homeowners

As described in the FEIR/Final CWMP, the Town’s proposed sewer expansion program will be constructed in two phases over 30 years and will cost an estimated \$340 million dollars. The estimated operation and maintenance costs for the proposed sewer expansion program total approximately \$38 million dollars. Each property owner connecting to the sewer system will incur a one-time connection cost averaging between \$3,000 and \$10,000 depending upon the distance of their home/business from the street, and an average monthly sewer utility cost of approximately \$30.00 - \$40.00. The project’s capital costs will be paid through property taxes. Based on an estimated average Chatham property value of \$600,000, the estimated property tax increase for Fiscal Year (FY) 2012 is \$102.00 and will gradually increase to \$210.00 in FY 2017. The Town anticipates smaller tax increases through FY 2033 and a decline in taxes associated with the sewer project from FY 2033 - 2054. I note the comments received from the Chatham Concerned Taxpayers and others pertaining to the project’s estimated cost to homeowners. The Town should continue its public participation program to ensure that the Town’s residents will continue to be afforded the opportunity to provide input in the final design and cost effectiveness of the Chatham CWMP.

#### Future Sewer Expansion

The Town’s CWMP has been designed to also accommodate potential future additional wastewater flows from portions of the neighboring town Harwich.

I commend the Town for undertaking a study of potential regional approaches to address the wastewater treatment and disposal needs for the Towns of Chatham and Harwich, and the regional issues pertaining to nutrient loading, wastewater treatment and disposal affecting the Pleasant Bay coastal embayment. I ask the Town of Orleans, together with the Town of Harwich to the west to work together with MassDEP, the Cape Cod Commission and others to continue the discussion of possible opportunities to integrate the Town of Chatham's wastewater treatment planning efforts with the planning efforts being undertaken by the Town of Harwich.

### Mitigation

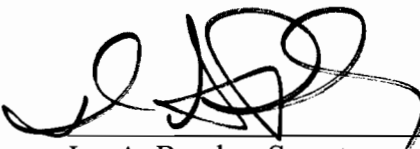
The FEIR provides a detailed description of the Town's proposed mitigation plan, and discusses the value of the proposed mitigation in terms of the resources it provides and the opportunities for open space protection, and active and/or passive recreation it affords.

### Conclusion

After a thorough consideration of the comments received from MassDEP, the Cape Cod Commission, the Town of Chatham and others, I am satisfied that any outstanding design issues relating to sewer layout and construction phasing will be fully considered and addressed during state and local permitting. As noted elsewhere in this Certificate, the Town should continue to work closely with MassDEP, CCC and the Pleasant Bay Alliance during final project design.

July 17, 2009

DATE



Ian A. Bowles, Secretary

### Comments received:

06/22/09	Massachusetts Historical Commission (MHC)
07/02/09	Natural Heritage and Endangered Species Program (NHESP)
07/10/09	Massachusetts Department of Environmental Protection (MassDEP) – SERO
07/06/09	Town of Chatham, Water & Sewer Departments
07/06/09	Cape Cod Commission (CCC)
07/09/09	Town of Chatham, Office of the Town Manager
07/10/09	Chatham Concerned Taxpayers
07/10/09	Pio Lombardo

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