



December 30, 2023

The following comments from the Corsica River Conservancy correspond to the questions and answers the Town provided to the Commissioners in a letter dated December 5, 2023 regarding their proposal for replacement of the WWTP, increasing surface discharge to the Corsica River and relocation of its discharge point.

Question 5, pg 2: What are the environmental implications for full year discharge and the impact on water quality?

Town: “Through MDE’s water quality Total Maximum Daily Loads (TMDL) reports developed for the Corsica River, approved by EPA, allow for full year discharge.”

CRC: The TMDL document cited is almost 25 years old. Since then, the Corsica has become one of the most studied and documented estuaries in the State. Also, EPA has since then developed a more sophisticated model of the Corsica. Meanwhile, the River remains classified by the State as “impaired” for nutrients (N and P), as well as other impairments including habitat. ShoreRivers regularly conducts water quality testing on the main stem, including the area of the proposed new surface discharge. They graded it at “D+” in their most recent report. The River, especially the upper portion, has recurring problems with algae fed by this overabundance of nutrients. These conditions are exacerbated by warm weather and Spring rains.

Over twenty years of concentrated restoration efforts have led to measurable reductions of nutrients in the Corsica tributaries. However, these improvements have yet to manifest in the main stem of the River where the Town plans to increase discharge to as much as 5 times current volume.

The increased discharge and relocation aspect of the Town’s plan should be seen as a potential threat to the health and continued restoration of the Corsica to which it and the County have pledged their commitment in the Corsica WRAS.

Questions 7 and 8, pg 3: Will the marine habitat or fish spawning areas be degraded by the proposal?

Town: Those concerns will be addressed by MDE in the next phase.

CRC: It is not clear that MDE will assess these impacts. A marine habitat study, which would be needed, has not been done or planned. MDE will be focused on permitting based on nutrient loads, not natural resource concerns.

If the Commissioners amend the County plan to include relocation of the discharge point along with the significantly increased discharge, without understanding its impact, the County may lose its opportunity to protect precious habitat.

Comment 9, pg 3: Decreased benefit from nutrient uptake that now occurs in the extensive wetland area of the current discharge point if that point is moved to the main channel.

Town: With the new outfall location, it may still be acceptable to discharge to the current outfall, while remaining within the existing permit limits.

CRC: We are not clear what the Town means here. Are two discharge points proposed? We have not heard any reference to this previously and not sure how it would work.

Comment 10, pg 3: Increased toxins from pharmaceuticals and microplastics, which are not filtered out by the membrane technology, as discharges increase.

Town: Such constituents (elements?) are not currently being targeted for removal by any WWTP in the State.

CRC: That is probably true. However, that does not change the fact that the proposal would substantially increase the amount, and thus the threat, that these toxins would pose in this sensitive area of high public use and environmental sensitivity.

Question 11, pg 3: Does the current permit allow for 100% of the effluent to be surface discharged from Dec 1 to Mar 31?

Town: Yes.

CRC: The proposal would allow for almost twice as much to be discharged in these winter months and introduce up to **a million gallons a day** during the other months when there is none currently. This represents a 4 to 5 times increase in the amount of effluent that could be released to the River annually unless otherwise stipulated.

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