

## Falmouth Associations Concerned with Estuaries and Saltponds (FACES)

October 12, 2006

Secretary Robert W. Golledge, Jr.  
EOEA, Attn: MEPA Office  
Analyst Holly Johnson, EOEA No.13883  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Dear Secretary Golledge:

This letter is regarding our scientific and environmental review of the MEPA Environmental Notification Form and numerous supporting documents prepared by Holmes and McGrath, Inc. for Little Pond Landing LLC, Falmouth, Mass. As you might be aware, the Falmouth Associations Concerned with Estuaries and Saltponds (FACES) is a non-profit citizen's organization whose purpose is to educate and inspire citizens to protect and preserve Cape Cod's environment and natural resources, such as the estuaries, salt ponds, and coastal waters of Falmouth, Mass., and to prevent pollution and degradation of these important resources. We welcome you to visit and learn more about the organization at our web site: <http://www.preservefalmouthbays-ponds.org/>.

FACES is made up of more than 60 homeowner association and organizations in Falmouth and represents perhaps several thousand Massachusetts citizens. This letter represents the views of the Board of Directors which consists of 25 Falmouth residents from scientific experts to long time community leaders. As such, we would like to take the opportunity to make the following comments.

From careful review of the WPA Form 5 Order of Conditions (DEP File 25-3150) and the two reports on Hydrogeologic Investigations and Groundwater Discharge and the Ruck CFT System, we feel that based on the information and facts presented that the proposed development of this site is likely to cause significant long-term harm to important natural resources, to a diversity of wildlife and will reduce flood protection for Falmouth. The resources likely to be impacted are: bordering vegetated wetlands, more than 1000 feet of coastal bank, an important vernal pool, a rare Atlantic White Cedar swamp, the Little Pond tidal estuary, and other important resource areas that are already under considerable environmental stress from disturbance, filling, and eutrophication from nutrient loading. Little Pond is currently not in compliance with the Clean Water Act and according to DEP, is one of the most distressed saltpond in Falmouth. In the TMDL reports for the three adjacent ponds, DEP has stated that approximately 55 to 87 per cent of the septic-derived nitrogen entering these watersheds must be removed to restore water quality. Allowing the proponent to add any nitrogen to Little Pond is not the best interest of restoring Little Pond and the system proposed to treat septic discharge has an unproven record of success. In addition, the mitigation measures proposed to offset environmental degradation from the development are insufficient.

**Based on our analysis of the overall long term potential benefits and environmental consequences of this project, we judge the project is not in the best interests of Falmouth and recommend that the Little Pond Landing project should be denied.**

Thank you for your consideration of our concerns about the Little Pond Landing project. Please feel free to contact me with questions or for more information.

Sincerely yours,

F. Bradley Stumcke Jr., President

P.O. Box 156, Falmouth, MA 02541

[www.preservefalmouthbays-ponds.org](http://www.preservefalmouthbays-ponds.org)