

**From:** Ashley Ochs <[ashley.mattison.ochs@gmail.com](mailto:ashley.mattison.ochs@gmail.com)>

**Sent:** Wednesday, July 27, 2022 5:41 PM

**To:** [smellish11@comcast.net](mailto:smellish11@comcast.net) <[smellish11@comcast.net](mailto:smellish11@comcast.net)>; Sarah Mellish <[ZBACHairperson@manchester.ma.us](mailto:ZBACHairperson@manchester.ma.us)>

**Subject:** Comprehensive waste management plan relative to sewer connection for the 40b

Hi!!

I hope all is well!!

I don't think that our CWMP indicates that Manchester can allocate sewer capacity for the proposed 40b.

The CWMP states that the LCD area sewer connection has only been allotted 31K capacity for the next 20 years for the purposes of enticing commercial (not residential) development. The sewer connection and capacity for the LCD is intended to incent commercial development. The proposed 40b would use the LCD's allotted capacity for the next 20 years for residential development, not the intended commercial development. Using this capacity for residential development goes against the CWMP and the recent DEP letter which indicates little residential growth.

The sections of the CWMP worth reviewing are:

Page 36 has a table showing potential build out flow projections for sewers: total 227K gpd flow increase in the study - the majority of which relates to expansions into existing residential areas. The LCD portion is noted for commercial purposes, not residential, total potential flow of 62K. The comments following the table specifically notes that the study assumes that for the LCD area only 50% of the area is assumed to be developed in 20 years so that only 31K of the flow assumption would be used. The discussion of LCD area notes that lots in the LCD are large enough to treat wastewater onsite. The LCD section discusses commercial development only.

The Ocean Sanctuary Act prevents increased WWTP capacity.

page 45 of CWMP "The town is however advised to reserve capacity at the treatment plant in the event that all options prove ineffective and the Raymond Street area must be tied into the collection system." (elsewhere in the document, the discussion is to try to address the raymond street area in other ways - but if the issue is not getting resolved... explore expansion)

also on page 45... the recommended strategy for the LCD area is sewer expansion with onsite as the alternative (this is the only area recommending sewer expansion as primary option).

\*\* there is a caveat in the doc to the expansion into the LCD area - it hinges on Master Planning efforts continuing to decide that developing LCD is the desired goal. The discussion surrounds future DESIRED development. The doc states that the sewer expansion would attract desired development.

doc is at [http://ma-manchesterbythesea.civicplus.com/DocumentCenter/View/2598/Comprehensive\\_Waste\\_Water\\_Management\\_Plan\\_2016](http://ma-manchesterbythesea.civicplus.com/DocumentCenter/View/2598/Comprehensive_Waste_Water_Management_Plan_2016)

I hope this information is helpful!!

Thanks,  
Ashley