



**TOWN OF TRURO
HEALTH & CONSERVATION DEPARTMENT
24 Town Hall Road, Truro 02666
508-349-7004 x119**

To: Truro Zoning Board of Appeals

From: Emily Beebe, Health & Conservation Agent 

Date: December 5, 2019

Re: Comprehensive Permit application for the Cloverleaf project at 22 Highland Road

At their meeting of December 3, 2019, the Truro Board of Health discussed the proposed development plans for this property and received public comments; one written comment was received and has been submitted to you for the public record.

The members of the Board of Health are acutely aware of the shortage of housing as they are currently engaged in ongoing legal proceedings in the pursuit of improving the habitability and safety of existing housing in Truro.

The review of the Cloverleaf project site plans generated 2 main points of discussion, those being the design for the disposal of wastewater and the design for storm-water drainage. The Board of Health considers groundwater protection their top priority and have concerns about the waiver requested from their local regulations; specifically, the regulation that requires all properties in Truro to comply with the nitrogen loading standard of Title 5. The nitrogen loading requirements establish a correlation between the amount and type of use on a property and that property's land area in order to reduce wastewater contamination of our water resources. It is important to understand that Title 5 does not require its nitrogen loading standards be applied to properties that are served by a municipal water supply.

The majority of the town of Truro is served by private wells, but in North Truro there are properties connected to the municipal Public Water Supply with neighbors who rely on private wells. In order to better protect the groundwater resource the Board of Health developed a local regulation many years ago to address this "mix" of town water and private wells. Simply put, the local regulation requires that all properties comply with the nitrogen loading requirements of Title 5, not just those properties served by private wells or located in a zone 2.

The present proposal describes construction of 40 units of housing with 72 bedrooms, and office and community space; this use has a total wastewater design flow of 8,293 gal/day. The scale of the project has raised concerns about potential impacts to groundwater resources and private wells in the immediate area, the Pond Village neighborhood, and impact to Pilgrim Pond itself.

Pursuant to these concerns and in light of the statement in the application that adding additional treatment to the wastewater would be an excessive cost the Board has requested the applicant to provide them with the estimated costs of adding innovative/alternative (I/A) treatment to the wastewater disposal system; additional treatment would reduce the concentrations of nitrogen and other contaminants prior to disposal.

Additionally, the Board has asked that the applicant explore costs for larger pump chambers to increase storage during electrical outage events.

There was also discussion about the drainage for storm-water; this project is within an area that suffers from poor storm-water drainage design. We understand the proposed design would accommodate 50-year storm events and wish to underscore the importance of containing all storm-water runoff on-site. Further, the Board echo's the comments of the Cape Cod Commission (letter dated 12-3-19) regarding the treatment of storm-water where possible by using rain gardens and vegetated swales to reduce the nutrient load from pavement and roof runoff.

We understand that the applicant is not obligated to address these concerns, and we have advanced them with the hope that there may be ways to balance the true needs for both affordable rental housing and thoughtful stewardship of our groundwater resources.

We regret not being able to attend this evenings hearing, but we will however be present at your meeting of December 12. In the meantime, the membership of the Board of Health sends their thanks to the members of the Zoning Board of Appeals for the opportunity to provide comment on this development project.