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May 16, 2018

Adam Turner, Director
Martha's Vineyard Commission
PO Box 1447
Oak Bluffs, MA
02557

Dear Mr. Turner:

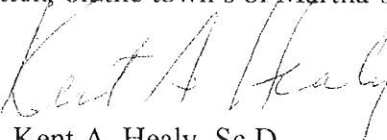
I have reviewed the draft of "Water Quality Management Policy", dated 3/19/18, and make the following comments.

The coastal ponds are very important and I appreciated the effort made by The Martha's Vineyard Commission over the last forty years to monitor and protect the ground water flowing into them.

The deterioration of the ponds has not been quantified and the nitrogen in the ground water has not been documented. Reliance on Mass Estuary Project studies without good measurements of the nitrogen in the ground water is not supportable.

The map of Island ground water flow, shown in appendix A, was based on limited ground water elevation measurements and assumed a homogeneous sand strata. That map illustrates a serious misunderstanding of ground water flow and should not be used to predict flow direction or quantity. Much more realistic maps have been used by the Commission in the past to describe the flow of rain to the ponds and the ocean.

An effective Island wide waste water disposal policy should be based on measured ground water characteristics and a realistic ground water flow map and it is premature to impose the Policy, as written, on the towns of Martha's Vineyard.



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cc. Martha's Vineyard, Boards of Health, Conservation Commissions
Boards of Selectmen

