

Board of Selectmen Town of Plymouth,

On behalf of the Eel River Watershed Association (ERWA), we appreciate the Town's ongoing efforts to manage and invest in Plymouth's complex wastewater infrastructure through increased tertiary treatment. We share the fundamental goal of ensuring a sustainable future for Plymouth's water resources and recognize the challenge of balancing growth with environmental stewardship. The concept of recharging clean water to our local sole source aquifer — the water-saturated glacial sands and gravels that exist below our 100 square mile town — is an objective we support, as returning clean water to the ground is vital for drinking water and the long-term health of our bays and river systems.

However, we remained concerned with the current proposal to discharge treated effluent into the groundwater disposal beds near Russell Mill Pond, and therefore, fully support the Groundwater Wastewater Discharge Citizen Advisory Committee's (CAC) vote in opposition to the Draft Environmental Impact Report (DEIR).

While the intent of aquifer recharge is sound, the specific execution of this plan at the headwaters of the Eel River raises critical concerns that have not yet been adequately addressed. Transitioning this process to a land-based disposal system without the proper safeguards risks degrading the very ecosystem we are all working to protect.

Our primary concerns center on the following risks:

- **Emerging Contaminants and PFAS:** Even treated wastewater can contain "forever chemicals" (PFAS), which are synthetic substances that do not break down in the environment. Discharging these into the headwaters of the Eel River could allow them to migrate through the aquifer, potentially impacting private wells and sensitive downstream habitats for generations.
- **Nutrient Loading and Algae Blooms:** The addition of nitrogen and phosphorus from wastewater can "fertilize" the river, leading to excessive plant growth and harmful cyanobacteria (blue-green algae) blooms. We have already seen public health advisories for Russell Mill Pond in 2025; adding more nutrients risks making these toxic blooms a more permanent fixture.
- **"Trucked-In" Waste:** Plymouth's WWTP currently accepts trucked-in septage from local sources and from other communities, yet there is no formal, standardized screening and testing program to evaluate incoming loads for industrial contaminants or other incompatible pollutants before they enter the treatment system. Beyond limited checks such as pH and odor, the Town lacks a defined "check-before-dump" protocol—creating a real risk that some loads may contain pollutants that can disrupt treatment processes, damage equipment, and impair overall plant operations.

- **Lack of Transparency:** Significant questions remain regarding the funding of the current studies, the urgent need to address this now, the exact problem we're looking to solve and the executive sponsorship necessary to drive this proposal. The public deserves a clear understanding of how this project fits into the town's broader environmental and economic vision.

Rather than moving forward with land-based disposal now, we believe a more prudent and acceptable path forward exists. The Town should immediately utilize its authorized funding to implement **tertiary treatment**—a high-level cleaning process that removes significantly more pollutants than standard treatment—and continue discharging through the existing harbor outfall. This allows the Town to improve water quality today while the long-term impacts of land disposal are properly studied.

Ultimately, this proposal cannot be evaluated in isolation. It must be fully incorporated into the town's **Comprehensive Wastewater Management Plan (CWMP)** and the ongoing **Total Maximum Daily Load (TMDL)** studies, which determine the maximum amount of pollutants a body of water can receive while still meeting safety standards. We ask that the Board delay the current permit application until these town-wide strategic plans are complete, ensuring that our solution to one problem does not create an even greater environmental crisis for the Eel River.

The ERWA stands ready to help this effort in any way that we can.

Sincerely,

Mark

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