

8. Consistency with Cape Cod Commission Section 208

The 2015 Section 208 Plan outlines the Cape Cod Commission's (CCC) consistency criteria for review of large planning efforts as a replacement to the Development of Regional Impact (DRI) review process, which was its regulatory predecessor. The criteria outlined in the CCCs "Guidance on Section 208 Plan Update: Obtaining a Consistency Determination" are listed in Table 8.1 along with Falmouth's strategy to meet each criterion. Compliance with these criteria is required for the Town to be eligible for State Revolving Fund (SRF) loan opportunities and is required as part of the MEPA process and Watershed permitting process.

Table 8.1 Consistency with Cape Cod Commission Section 208 Plan

Criteria	Consistency Approach
Waste Treatment Management Agency (WMA) assumes responsibility for controllable nitrogen for any part of the watershed within its jurisdiction	The Town of Falmouth is a designated WMA and is actively addressing its controllable nitrogen needs through the CWMP process.
Plan meets applicable nutrient reduction targets	The Great Pond TWMP has been developed to meet target nitrogen thresholds as established by the MEP report for Great Pond as summarized in Tables 5.1 and 5.8.
Planning occurs at a watershed level with consideration of a hybrid approach	The Great Pond TWMP presents a hybrid approach to watershed management utilizing both traditional and non-traditional nitrogen management strategies. The TWMP also includes a contingency approach if the pilot projects do not perform as anticipated. See Tables 5.1 and 5.8 for proposed approach and contingency approach and associated management strategies.
Public Engagement	The Great Pond TWMP has a strong public outreach component engaging stakeholders and the general public through multiple public meetings as outlined in Section 1.2.
Plan includes proposed strategies to manage nitrogen from new growth	Falmouth adopted a flow neutral bylaw in January 2014, which applies to all existing and future sewer service areas.
Plan includes an Adaptive Management Approach	The Town of Falmouth's CWMP includes the implementation of an adaptive management process to incorporate cost effective non-traditional methods into the plan as they demonstrate feasibility. The adaptive management process will involve ongoing water quality monitoring to monitor and respond to the results of the implementation of the preferred compliance plan
Plan includes a pre- and post-implementation program.	The Town continues to implement a monitoring program to track pre- and post-implementation conditions in its impaired coastal estuaries.
Plan includes a description and assessment of the Town's proposed funding strategy	Refer to Section 5 of this Great Pond TWMP for an outline of major funding milestones in the implementation schedule.
WMA commits to regular 208 Plan Consistency reviews until water quality goals, generally reviewed at least every 5 years	Falmouth will continue to support the CCC in their submittal of 208 Plan Consistency reviews and provide supporting documentation, as requested, outlining their progress.
In shared watersheds, WMA seeking 208 Consistency Review collaborate with neighboring WMA(s) on nitrogen allocation, shared solutions, and cost saving measures	The Great Pond watershed is entirely within the Town of Falmouth.