

During public comment time at the February 10 Select Board meeting, two Truro residents raised questions about the Town's plans for treating wastewater from the housing development planned for the Walsh Property. The speakers pointedly linked wastewater flow and the risk of polluting wells supplying drinking water both on the Walsh Property and in Route 6 neighborhoods where there are many private wells. The speakers referred to the recent hydrogeological report designating Walsh Property Site A as the best, most cost-efficient site for a new well to support future growth in Truro and Provincetown, as well as to another report proposing a wastewater facility at Truro Central School.¹ Although Town Manager Kelly Clark assured the speakers that wastewater planning is still at the conceptual stage and that rigorous state requirements and permits would ultimately regulate wastewater treatment, important discussions lie ahead about the Town's plans to secure water sources for future needs and to situate an environmentally safe wastewater facility.

In 2023, the Massachusetts Department of Environmental Protection (DEP) acted to mitigate widespread pollution of coastal waters by nitrogen, chiefly derived from septic systems, stormwater runoff, and fertilizer. In [amendments to Title 5](#), which "governs the construction and maintenance of septic systems and the transport of septic-system waste," DEP designated Nitrogen-Sensitive Areas (NSAs) that must safeguard

(a) Public and Private Water Supply Protection Areas:

1. Department-approved Zone IIs for wells or wellfields used by public water systems as defined in 310 CMR 22.02 and, in the absence of a Department-approved Zone II, the Interim Wellhead Protection Area (IWPA) for a public water system's well or wellfield as defined in 310 CMR 22.02; and
2. Any areas where the use of both on-site systems and wells that are not regulated as public water supplies under 310 CMR 22.00: *Drinking Water* serve facilities.

(b) Natural Resource Areas, which include coastal estuaries and embayments.

On September 29, 2023, DEP designated Truro a Natural Resource Nitrogen Sensitive Area (NRNSA), meaning that the Town must either upgrade to the best available nitrogen-reducing technology within five years, or apply for a Watershed Permit that allows time for

¹ See the Apex reports, [Regional Water Supply and Watershed Management Study](#), which include monthly presentations from January 13, 2026; December 10, 2025; October 16, 2025; September 18, 2025; August 28, 2025; July 24, 2025; and May 22, 2025. The most recent reports conclude that "potentially viable new water supply sources are extremely limited, and...should be preserved for public water supply development;" "To best preserve...Walsh Property Site A, wastewater from any development on the Walsh Property should be directed to the west of Route 6;" and "Due to the limited availability of potentially viable PWS [Public Water Supply] sites, identified potential new sources and existing water supply sources need to be protected from future impacts."

developing a long-range plan.² In response, Truro launched its [Comprehensive Watershed Management Plan](#) (CWMP), “a 20-year roadmap for nitrogen management. It evaluates current and future needs, compares alternatives, and recommends the most cost-effective solution to protect public health and the environment.” Public health is an issue because “Nitrogen pollution of the groundwater (primarily from individual septic systems) puts Truro’s drinking water supply at risk.” The CWMP commits Truro to preventing groundwater pollution of the recharge area for any drinking water wells, public or private, including those adjacent to a Walsh Property housing development.

The Town retained the global environmental consultants, [GHD](#), to develop the CWMP, and they delivered their 883-page [Alternatives Screening Analysis Report and Draft Recommended Plan](#) on October 31, 2025. In the [Executive Summary](#), the Report notes that “in addition to water quality impacts, increased nitrogen loading in groundwater can increase the risk of elevated nitrogen concentrations in private drinking water wells.” Relevant here is an earlier [memorandum](#) (October 7, 2025) from GHD Engineer, Julia Khrakovsky, to DPW Director, Jarrod Cabral, and Health and Conservation Agent, Emily Beebe, which summarizes “the evaluations that have been conducted to determine the impacts of recharging treated wastewater from the proposed Walsh development on Truro’s groundwater resources, with particular attention to potential impacts on nearby wells.”

This GHD evaluation modeled the impact of discharged flows from a proposed cluster wastewater treatment system at Truro Central School, simulating consequent groundwater mounding: “The model indicated that the groundwater mound from the Walsh recharge intersects with interim wellhead protection area (IWPA), but does not impact sensitive resources including MassDEP mapped priority and estimated habitats, wetlands, vernal pools, and areas of critical environmental concern.” When GHD modeled “particle pathways” to determine the movement of discharged water from the Walsh Property, they found that “particles from the Walsh discharge move west, away from the North Union Field wells. This means that treated effluent discharged from the Walsh property is not anticipated to be captured by the two NUF wells...” under the specifically cited pumping conditions. However, it is important to note that if the effluent moves west, it is headed towards the many private wells west of Route 6. Additionally, when GHD included specific pumping conditions from a proposed new well at Quail Ridge B in their modeling, they found that “the effluent migration pathways from the treatment recharge at the Truro School appear to be within the NUF wells primary capture area.”

In the CWMP, GHD offers both a Recommended Plan, which “integrates multiple nitrogen management strategies including stormwater best management practices, fertilizer management, onsite nitrogen-reducing septic systems (currently in Provisional Use Status), cluster systems, and permeable reactive barriers.” In case these strategies don’t reduce nitrogen sufficiently, there is a Contingency Plan, which “outlines a strategy comprised of traditional nitrogen management technologies (onsite nitrogen-reducing systems (currently in General Use status), centralized wastewater collection, and cluster systems).” Initiating the CWMP comes at a hefty cost. GHD estimates the cost of the Recommended Plan at \$23.56 million. They

² The initial target for a Watershed Permit is 25% nitrogen removal. This number may change after a Total Maximum Daily Load (TMDL) of nitrogen is established for Pamet River and Provincetown Harbor, two of Truro’s coastal estuaries. A TMDL has been established for the third Truro estuary, Wellfleet Harbor.

estimate the cost of the Contingency Plan, which would include centralized sewerage, at \$59.86 million.

The CWMP also includes estimates of future water use and wastewater production, data that must be taken into account when determining the need for new wells and the location of any wastewater treatment facility. For the Walsh Property, estimating that 218 units might eventually be built,³ 31,610 gallons per day (gpd) of water would be needed (p. 28). For the Walsh Property and Quail Ridge Road West, 34,400 gpd of wastewater would be generated (p. 29).

At their March 10 meeting, the Select Board will be asked to vote on two items related to the future of water and wastewater on the Walsh Property.⁴ The first is a FY2026 Seasonal Communities Grant Program Contract for Walsh Property Wastewater Design, which Housing Coordinator, Katie Halvorsen, and DPW Director Jarrod Cabral initiated. The Executive Office of Housing and Livable Communities granted Truro \$106,723 “to complete pre-construction design work for a wastewater system for the Walsh Property.” The location of the wastewater system is apparently to be determined.

The second item for the Select Board’s consideration, an amendment to the original agreement with GHD Engineering and Consulting Services, indicates how the Town will spend the grant. The amendment, the Truro Walsh Property Site Plan Project, adds \$63,000 to the original budget of \$44,500 for a total of \$107,500. GHD will “provide a planning level site plan for the Walsh property. The site plan will support future planning needs, permitting, and public presentations. The preliminary site plan is intended to serve as a conceptual and working tool to evaluate wastewater infrastructure, access, and regulatory constraints.” GHD will provide a base map of the property and develop “a multi-layered site plan including the following components:

- a. Existing and existing proposed utilities, including:
 - i. Water supply options (developed by others and provided by the Town)
 - ii. Existing public water supply (PWS) wells, including Zone IIs and Zone of Contributions (ZOCs) based on available data and existing models
 - iii. Wastewater layout (up to 2 conceptual layouts)
 - iv. Existing electricity distribution and infrastructure, based on publicly available mapping
- b. Regulatory and environmental constraints, including:
 - i. Town of Truro Zoning Overlay
 - ii. 1952 South Hollow Territory, as established in the special legislation from 1952
 - iii. Wetlands and buffer zones, based on publicly-available data and existing BSC

³ GHD incorrectly estimated the number of units for the Walsh Property by subtracting the number of units proposed in the Cloverleaf and 181 Route 6 properties from the total units (260) proposed in the Truro Housing Needs Assessment. Currently the Ad Hoc Walsh Property Advisory Committee is recommending 80 units to be built in Phase 1, with more to be built if they are successful, as approved by voters at ATM 2024 (up to a total of no more than 160). At ATM 2025, voters approved the Zoning Task Force’s Walsh Overlay District that changed Truro’s current zoning bylaws to allow the building of 39 acres of dense housing units and “mixed-use development,” which includes “without limitation, commercial, institutional, industrial or other uses” on the Walsh Property. This change would allow for hundreds of units of housing, less any land allocated for commercial use.

⁴ See the Select Board [Agenda Packet](#), Item F.

Group Survey

iv. NHESP [Natural Heritage and Endangered Species Program] priority habitats, based on publicly-available data.”

GHD may also provide future additional services, such as “discussions with DEP and local water departments; hydrogeological and geotechnical field investigations; SewerCAD modeling [a design and analysis tool for modeling sanitary sewage collection and pumping systems] and sewer costing; low pressure sewer modeling; and preliminary and/or final design of wastewater infrastructure.”

It is becoming increasingly clear that the future of the Walsh Property involves complex environmental, regional, fiscal, and social concerns. When they meet this week, the Select Board has another opportunity to move slowly and carefully while protecting Truro’s future.

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