



TOWN OF FALMOUTH
Office of the Town Manager & Select Board

59 Town Hall Square, Falmouth, Massachusetts 02540
Telephone: (508) 495-7320
townmanager@falmouthma.gov

October 7, 2026

Massachusetts Board of Examiners of Plumbers and Gas Fitters
One Federal Street, Suite 600
Boston, MA 02110-2012

Dear Board Members:

I write on behalf of the Falmouth Select Board which voted to approve this letter at a meeting on October 5, 2026. As a coastal community struggling to protect our natural resources, we write today to urge you to identify an approval pathway for testing and usage of innovative urine diverting (UD) toilet fixtures for the Falmouth Urine Diversion (UD) Demonstration Project. This project is currently active and funded through the Barnstable County Massachusetts Alternative Septic System Test Center (MASSTC) via a MassDEP 319 grant, but is not able to move forward without permitted UD toilets despite extensive conversations with staff. We ask the Board to allow test site status or variance approval of UD fixtures specifically for this active project before the funding is lost.

Currently, only a few composting toilets and incinerating toilets are on the Mass Plumbing Board list of accepted fixtures. No urine diverting or urine collecting fixtures are on this list, and that limitation has caused this study to be delayed. The 2015 state and federally approved Cape Cod Section 208 Area-Wide Water Quality Management Plan identified UD toilets as an important tool to reduce nutrient pollution, yet current regulations prevent their usage in Massachusetts. About 90% of nitrogen pollution enters domestic wastewater through conventional toilets, which is why broader adoption of alternative eco-toilets is so desirable. The amendments to Massachusetts Title 5 regulations adopted in 2023 require every town having nitrogen sensitive areas on Cape Cod to implement and expedite nitrogen pollution reduction plans and many towns are looking to UD and other alternative toilet technologies to help meet those new regulations. A wide variety of community stakeholders want access to UD toilets including state and local elected officials, town staff and committee members, and hundreds of Cape and Islands residents who are all collectively striving to reduce widespread pollution.

Every day that the project is delayed means more nitrogen is entering our coastal ponds and bays from septic systems. This nutrient pollution results in poor water quality, leading to an increase in harmful algal blooms and a decrease in other aquatic life. Beach and pond closures are becoming the new normal for our community. This degraded water quality affects Cape Cod's blue economy by harming our vital fishing, tourism, and recreation industries.

The aforementioned scientific study aims to determine the effectiveness of alternative nitrogen reduction technologies through actual field use. Urine diversion is emerging as a lower cost option for communities like ours, but further data are needed before we can integrate this alternative into the wastewater management plans required by the Massachusetts Department of Environmental Protection. To do that, we need to be able to better quantify the nitrogen removal rates associated with various alternative plumbing fixtures. We also hope to establish which eco-toilet options homeowners prefer based on installation, ease of use, and maintenance requirements. Urine diversion technology can be used in addition to sewer expansion and innovative, alternative (I/A) septic technology upgrades, both of which are significantly more costly and slower to implement.

The Town of Falmouth contracted with MASSTC to obtain all regulatory approvals required to conduct a UD demonstration project. MASSTC has been in communication with the Plumbing Board staff over the past couple of years but we understand that an approval pathway has yet to be identified. Until the Plumbing Board identifies a pathway for approval of more fixtures our grant funded project cannot move forward. Our request is that the Plumbing Board provide some form of variance, or test site status similar to what the Plumbing Board did in 2012 when it permitted Falmouth to use 16 different eco-toilets as part of the Falmouth Eco-Toilet Demonstration Program. Many of those eco-toilet systems are still in use today. It is our understanding that the Executive Director of the plumbing board at that time was able to approve that project without requiring the fixtures to achieve product acceptance. For this current study, we seek permission to install and test a variety of eco-toilet types at residential properties within Falmouth. Some example eco-toilet fixtures are identified and described in a chart on the following page. We implore you to take this up without delay. Our community is at an ecological tipping point and the longer we wait, the more nitrogen will continue to pollute our waterways.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'H M H Goldstone', with a long, sweeping horizontal line extending to the right.

Heather M. H. Goldstone
Chair, Falmouth Select Board

CC: Michael Auerbach, Executive Director, MA Board of Examiners of Plumbers and Gas Fitters
Plumbingboard@mass.gov
Eric Paley, Secretary of the Executive Office of Economic Development
Rebecca Tepper, Secretary of the Executive Office of Environmental Affairs
John Moreschi, Chief of Staff of the Division of Occupational Licensure
Michael Dutton, Barnstable County Administrator
Brian Baumgaertel, Director of the Barnstable County Clean Water Center
Bryan Horsley, Project Assistant at the Massachusetts Alternative Septic System Test Center

Russ Robbins, Falmouth Plumbing & Gas Inspector
Falmouth Water Quality Management Committee
Falmouth Board of Health
Representative Thomas Moakley
Representative David Viera
Senator Dylan Fernandes