

By Fax and Mail

July 25, 2005

Secretary Stephen Pritchard
Executive Office of Environmental Affairs
251 Causeway Street
Boston, MA 02114
ATTN: MEPA Unit

***Re: Dedham Westwood Water District Draft Environmental Impact Report;
EOEA # 13337***

Dear Secretary Pritchard,

The Charles River Watershed Association (CRWA) submits comments on this proposed project from the broad, watershed perspective, and within the framework of changing water resource conditions and policies, statewide.

The Charles River has been classified by the Water Resources Commission as a medium stressed basin. The Department of Environmental Protection (DEP) is therefore beginning to require significant conservation and restoration efforts across all permitting programs in stressed basins. The Dedham Westwood Water District's (DWWD) proposed admission to the Massachusetts Water Resources Authority (MWRA) Waterworks Division must be considered in the context of the watershed realities and statewide sustainable water resource goals. See, Massachusetts Water Policy (EOEA 2004).

Given the potential impacts of the proposed admission to the MWRA at the local, watershed and regional scale, we believe a Final Environmental Impact Report (FEIR) is needed to explore fully the impacts and opportunities for improvements to water resources management in Dedham and Westwood. Several areas compel further review, and we ask that you require in the scope for the FEIR an analysis of the impacts in particular to the wastewater system, which have been poorly addressed in the DEIR; and an investigation into whether there are opportunities to actually improve Dedham's and

Westwood's overall water resource management programs so as to reduce water deficits and begin to restore impaired resources.

Background and Existing Impacts

CRWA has been actively involved in assessing water resource conditions in the Charles River for many years. We have long recognized that some geographic regions are more significantly stressed than others, and that in some sections of the watershed, water is being exported at large rates, with direct impacts to ground and surface water resources. Dedham and Westwood are both significant net exporters of water because their water supplies come from local sources, while their wastewater is discharged to the MWRA sewer system and thus leaves the basin en route to the main treatment works. This results in a large water deficit.

Millions of gallons of water are pumped out of local aquifers, and discharged into Massachusetts Bay every day. Millions more gallons of water seep into these same sewers through Inflow and Infiltration (I/I), causing an even greater loss to both the Charles and the Neponset basins. Dedham has some of the highest I/I levels of any community in the MWRA, system, with an average of under 30% of the flow in its sewer pipes being actual sanitary waste. Dedham's infiltration rates (water leaking out of groundwater and into sewer pipes) have been the highest in the MWRA system in past years.

Despite successful conservation efforts, a reasonable per capita daily water use level, and a summer to winter water use ratio that generally meets the DEP's performance standard, Dedham's local water resources are not sustainable under current practices. It is our understanding that Westwood's per capita daily water use is higher than that in Dedham and may not currently meet DEP's performance standard. In both communities, local demand is outstripping local supply, and impacts to ground and surface waters are increasing. This is exacerbated by the sewer and storm drainage systems. Any long term solution to these problems needs to encompass all elements of water resource management or these trends will not be reversed and incremental impacts to the watershed will continue.

Impacts of Proposed Project

The argument is made in the DEIR that water supply demand will continue to grow at rapid rates in spite of conservation because of growth; that no additional local sources can or will be pursued; and that the only viable option is a connection to MWRA. Other communities that have joined MWRA recently have made similar arguments, and dozens of communities may begin to do so in the future. We need to identify ways to make water resource use sustainable. Joining the MWRA to provide for the growing water supply demands of a community cannot be a universal solution.

Clearly, the proposed project will help DWWD meet its customers' water demands, especially in the summer. Bringing water in from the MWRA system may

have beneficial impacts to the Charles and Neponset basins, as suggested in the DEIR, but only if there are changes in Dedham's and Westwood's overall water resource management. Bringing in a new supply of water, without changing the way the system operates, will simply result in more net water use, more wastewater generation, and more impacts to the environment.

Recommendations for the FEIR

1. An examination of opportunities to integrate water supply planning with wastewater planning in order to offset impacts to the wastewater system.

We are well aware that this proposed application is for an augmentation of summer water supplies, and that the DWWD does not have control of the operations of Dedham's wastewater system. However, water supplies are the source of wastewater, and changes in one system have direct impacts in the other. The discussion in the FEIR is inadequate to quantify these impacts, and does not propose any mitigation for impacts. It is not possible simply to look at water supply in isolation here without considering wastewater impacts.

Only two paragraphs in the entire FEIR directly address *Impacts upon Wastewater* (p.6-1, 6-2), stating merely that there will be "no impact upon wastewater infrastructure." Yet the DEIR also states that there may be as much as 2 million gallons per day (mgd) purchased from MWRA on certain days, when a combination of peak demand and pumping restrictions on the Fowl Meadow Well create a projected water supply deficit. Since the restrictions on the Fowl Meadow well have been in place for some time, and there is no proposed change in operations of the well systems, this proposal appears to be a potential 2 mgd increase in water in the water supply system on some days, which certainly has impacts to the wastewater system.

The FEIR should examine the long term planning for the wastewater system, assess its capacity to absorb these increases in flows, and examine the opportunities for mitigating the impacts of expanding water supplies and wastewater generation on the town's overall water resource management.

We suggest that a Memorandum of Agreement (MOA), or a similar binding agreement, between the DWWD and the municipalities of Dedham and Westwood may be the best way to ensure that changes in water resource management in these two towns will not increase the negative impacts to the environment that will occur with increased water and sewer services, and could provide the framework for a gradual restoration program.

Such an MOA could specify changes that will be undertaken in both the water supply and wastewater systems to reduce the water deficits in Dedham and Westwood as a condition of importing water from the MWRA system. For example, Dedham and Westwood could agree to improve operations in their

wastewater systems and significantly reduce I/I; they could investigate opportunities for decentralized wastewater treatment with recharge to groundwater in appropriate locations; the DWWD could reduce pumping rates during periods of very low flow in the rivers; and a water banking program could be established whereby the towns could obtain “water credit” for restoration activities, which would be used to offset the impacts of their water supplies.

Additionally, while the District’s water demands, and the towns’ wastewater generation are forecast to grow, the water supply program is isolated from the towns’ wastewater systems. We believe these systems must operate more in tandem and ask that you require an investigation into the opportunities for coordinating planning and operations of the two systems as part of the scope for the FEIR.

2. A plan outlining how DWWD will adapt their conservation program to reflect the additional MWRA supply.

Today, DWWD operates an efficient and effective water supply system. We remain very concerned that the addition of MWRA water during summer months will reduce the effectiveness of the District’s conservation efforts. The FEIR should discuss measures that will ensure that Dedham residential per capita use remains below 65 gallons per person per day, and how Westwood will reduce its use. Without changes in the program, the public may simply perceive that there is no longer a need for conservation and the program will become less effective over time.

3. A discussion of DWWD’s plans for mitigating local withdrawal impacts in exchange for being able to import MWRA water.

The feasibility of an offset/water banking program requiring for every gallon of new demand that two gallons either be saved or kept in basin through measures such as I/I removal or stormwater recharge should be discussed in the FEIR. DWWD has examined implementing a standard conservation fee or other impact fee to mitigate the impacts of new demand. The FEIR should detail this effort, and examine how it could be expanded upon.

With water scarcity becoming a reality in many areas across the state, we must understand how water is managed, and identify changes that will allow towns to accommodate growth without compromising our surface and groundwater resources. Augmenting summer supplies with water from the MWRA system is worth examining further as an option, but only if it is an element of a larger change in water resource management in the two towns. Simply supplementing DWWD’s water supply, without making any changes in water resource management in the towns will result in continuing

incremental negative impacts to the environment, impacts that can be avoided and mitigated.

Thank you for your consideration of these comments, and please feel free to call me if you have any questions.

Sincerely,

Kate Bowditch
Senior Environmental Scientist and Project Manager

cc: Nan Crossland, Director, DWWD
Eileen Simonsen, WSCAC
William Keegan, Town of Dedham
Michael Jaillet, Town of Westwood