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June 29, 2018

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS  
ON THE  
FINAL ENVIRONMENTAL IMPACT REPORT

PROJECT NAME : Supplemental Water Supply  
PROJECT MUNICIPALITY : Ashland  
PROJECT WATERSHED : Concord River  
EEA NUMBER : 15388  
PROJECT PROPONENT : Town of Ashland  
DATE NOTICED IN MONITOR : May 23, 2018

Pursuant to the Massachusetts Environmental Policy Act (MEPA) (M.G. L. c. 30, ss. 61-62I) and Section 11.07 of the MEPA regulations (301 CMR 11.00), I have reviewed the Final Environmental Impact Report (FEIR) and hereby determine that it **adequately and properly complies** with MEPA and its implementing regulations

Project Description

The Town of Ashland intends to purchase up to 1.6 million gallons per day (mgd) and up to 73 million gallons per year (mgy) from the Massachusetts Water Resources Authority (MWRA). The purchase of water is intended to supplement the Town's existing water supply. The Town currently pumps water from five groundwater wells at the Howe Street Water Treatment Plant. A portion of the water supply is provided to the Town of Hopkinton. The average daily withdrawal authorized by the Massachusetts Department of Environmental Protection (MassDEP) from the five wells is 2.18 mgd, including 1.23 mgd authorized by Water Management Act (WMA) registrations and 0.95 mgd by WMA permits. The permitted volume includes 0.5 mgd for Hopkinton's use. In 2017, the Town withdrew 1.55 mgd from the wells, of which 1.17 mgd was used by Ashland and 0.38 mgd was used by Hopkinton.

The Howe Street wells are located adjacent to the Hopkinton Reservoir, a recreational waterbody owned by the Department of Conservation and Recreation (DCR). The Town's average daily water withdrawal has remained fairly constant over the last 10 years, ranging from

1.53 mgd to 1.81 mgd. However, in recent years the water level of the Hopkinton Reservoir has dropped precipitously under some conditions, indicating low groundwater conditions under the reservoir. The Town is concerned about the impact of this on the yield of the Ashland water supply wells. In addition, the Hopkinton Reservoir is a recreational resource that is adversely affected by lower water levels. The WMA permit for the groundwater withdrawals include a requirement that two of the wells be shut off if the level of Hopkinton Reservoir reaches elevation 295.35 National Geodetic Vertical Datum of 1929 (NGVD 29), which generally corresponds to a water level in the reservoir that would significantly impact its recreational use. Data prepared for the Commonwealth's Sustainable Water Management Initiative (SWMI) indicate that most of Ashland, including the Town's wells, is located in an area where the groundwater is severely depleted.

The Town obtained approval from MassDEP and MWRA for emergency connections to the MWRA water system in 2007, 2013 and 2016. Approximately 5.6 million gallons of water were purchased from the MWRA in December 2007 and January 2008; in 2013, the connection was made but not used. The Town purchased a total of approximately 3 million gallons of water in September and October of 2017. As a condition of its approval of the 2007 emergency connection, MassDEP required the Town to develop a plan to address its long-term water supply needs. As described below, the Town determined that purchasing water from the MWRA would address its current and future water needs. The Preferred Alternative described in the FEIR consists of a connection to the water system of the adjoining town of Southborough, which already receives its water from the MWRA. Physical components of the project include:

- A connection to the Southborough water system through a buried meter vault (seven-foot (ft) by 15-ft) on Oregon Road in Ashland;
- New pumps, a new transformer and pad, and a new gate valve and fittings at Southborough's Hosmer Pump Station to support pumping of up to 2.8 mgd, of which 1.0 mgd would be intended for Ashland;
- Construction of a building (12-ft nine-inch by seven-ft five-inch) at Southborough's Overlook water storage tank to house a new altitude valve and pipe fittings; and
- A water main (12-inch and 1,550-ft long) running south from the Hosmer pump station which will be installed under an existing access road adjacent to the Sudbury Reservoir for most of its length.

### Jurisdiction and Permitting

The project is subject to a mandatory EIR pursuant to 301 CMR 11.03(4)(a)(2) of the MEPA regulations because it requires State Agency Actions and involves a New interbasin transfer of water of 1,000,000 or more gpd or any amount determined to be significant by the Water Resources Commission (WRC). It requires an Admission of New Community to Water System Permit and an 8(m) Construction Permit from the MWRA. It also requires Approval of Distribution System Modifications for more than 3,300 People and a Renewal of its Water Management Act (WMA) Permit from MassDEP. The project will also require approval in accordance with the Interbasin Transfer Act (ITA) (M.G.L. c.21 ss. 8B-D; 313 CMR 4.00) from the WRC. The project is subject to the MEPA Greenhouse Gas (GHG) Emissions Policy and Protocol. The project will also require an Order of Conditions from the Southborough

Conservation Commission, or in the case of an appeal, Superseding Order(s) of Conditions from MassDEP.

Because the Town is not seeking Financial Assistance from the Commonwealth for the project, MEPA jurisdiction extends to those aspects of the project that are within the subject matter of required or potentially required State Agency Actions and that may cause Damage to the Environment as defined in the MEPA regulations. In this case, MEPA jurisdiction extends to land alteration, water supply, wetlands, water quality and GHG emissions.

#### Environmental Impacts and Mitigation

The project involves an interbasin transfer of water from the MWRA Quabbin and Wachusett Reservoirs in the Chicopee and Nashua River watersheds, respectively, to the Sudbury/Assabet/Concord (SUASCO) watersheds in which the Town of Ashland is located. Environmental impacts are primarily associated with the construction period and land alteration associated with construction of the new building and installation of the pipeline. Mitigation measures include sedimentation and erosion control measures to prevent wetland impacts, a Traffic Management Plan, and use of mufflers and other measures to reduce construction noise.

The transfer of water from the MWRA's system will allow the Town to maintain a safe and reliable drinking water supply and reduce potential impacts to Hopkinton Reservoir and the aquifer from additional water withdrawals from the Town. The MWRA's reservoirs have sufficient capacity to provide water to Ashland while still providing mandatory releases to the Swift and Nashua Rivers and maintaining recreational, ecological, and other water-dependent uses.

#### Review of the FEIR

The FEIR was generally responsive to the limited Scope issued in the Certificate on the DEIR. During the review period, the Town provided supplemental information that clarified that the annual use of MWRA water will not exceed 73 mgd, which is a reduction of the 120 mgd reported in the DEIR, and provided additional analysis to support selection of the Preferred Alternative.<sup>1</sup> It included additional analysis of the potential effects on water levels in Hopkinton Reservoir, including information in support of the Town's proposal to intermittently purchase water from the MWRA and its contention that purchasing water to maintain higher water levels in Hopkinton reservoir during the summer months is infeasible. It reviewed the Town's activities to promote water conservation and water savings; these activities, including the replacement of old water meters, have reduced the Town's Unaccounted for Water (UAW) from 15.6 percent in 2015 to 8.7 percent in 2016. The FEIR provided an updated GHG emissions analysis, a response to comments received on the DEIR and draft Section 61 Findings.

#### *Water Use*

In their comments on the FEIR (and previous MEPA submittals), the WRC and DCR have noted that a supplemental water supply source for Ashland to address its water supply

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<sup>1</sup> This information was submitted on June 27, 2018 by email from Rajitha Purimetla, Town of Ashland, to Alex Strysky of the MEPA Office.

needs could have the added benefit of maintaining higher water levels in the Hopkinton Reservoir for recreational uses during the summer if it were to be managed to achieve both goals. As directed in the DEIR Certificate, the Town provided an analysis of potential benefits and constraints associated with the use of MWRA water during the spring and summer months.

The use of MWRA water in in the spring and summer would maintain water levels in Hopkinton Reservoir throughout the summer and achieve groundwater levels later in the year that would support Ashland's use of its wells during that time period. DCR estimates that the use of 1.0 mgd of MWRA water from May to August would support maintenance of an additional two feet to the water level of the Hopkinton Reservoir. This water level may also allow Town residents to continue unrestricted water use during the summer; the Town's Water Conservation By-law restricts outdoor water use once the level of Hopkinton Reservoir drops below 295.85 feet NGVD 29. According to the Town, purchasing MWRA water in the spring and summer, which may not be required later in the year, would represent an unnecessary expenditure by the Town and its ratepayers. In addition, interbasin transfers would not be minimized because water from the MWRA basins would be used annually, even when not needed by the Town.

The Town's MWRA Supplemental Connection Use By-law would prohibit the purchase of MWRA water to maintain Hopkinton Reservoir water levels. The By-law authorizes the purchase of MWRA water under the following circumstances:

- The Hopkinton Reservoir water level is at or below 293 ft NGVD 29, which corresponds to the minimum level of groundwater at which the Town's wells may be operated;
- The Distribution system is damaged;
- Water Pressure in the system drops below a safe level for fire protection; or
- Routine maintenance of the connection between Ashland and Southborough is required.

I encourage the Town to closely monitor its use of MWRA water to understand the timing and volume of its supplemental water needs and opportunities for minimizing environmental impacts on the reservoir. According to the FEIR, Ashland's projected water use will continue to climb in excess of its permitted well capacity. In the future, the purchase of MWRA water may become a more predictable and necessary component of the Town's water supply. During permitting, the Town will be required to provide MassDEP with a plan for minimizing the impacts of its groundwater withdrawals to the greatest extent feasible while maintaining a safe water supply.

According to MassDEP, the town's groundwater supply and MWRA's water differ in orthophosphate content, pH and fluoride levels. In its WMA permit application, the Town must evaluate measures for avoiding impacts to drinking water quality associated with these differences. The Town has agreed to add orthophosphate to MWRA water entering its system to prevent an increase in lead levels. MassDEP has identified additional information that will be required as part of its review, including clarification of ownership and maintenance responsibilities among Ashland, Southborough and the MWRA; documentation to support the conditions specified in the By-law under which water will be purchased; and clarification the nominal flow rates and periods of supplemental water use. In response to MassDEP's requests in

its comments on the DEIR, the Town has updated its Emergency Response Plan and will complete a Drought Management Plan by the end of 2018.

### *GHG Emissions*

The FEIR provided a supplemental analysis of GHG emissions associated with operation of new pumps. The analysis used the updated emissions factor of 710 pounds of carbon dioxide (CO<sub>2</sub>) per megawatt-hour (MWh) provided in the 2016 *Electric Generator Air Emissions Report* prepared by the Independent System Operator-New England (ISO-NE). The project includes the replacement of two small pumps (40 horsepower (hp) and 60 hp) at the Hosmer Pump Station with two 125-hp pumps. The new pumps will be larger than the existing pumps and will use more electricity. The Town compared GHG emissions of standard-efficiency motors and high-efficiency motors with variable frequency drives (VFD). The selected high-efficiency pumps will use electricity at a rate of 740,000 kilowatt-hours per year (kWh/yr) which will generate 262.7 tons per year (tpy) of GHG emissions, a reduction of 10.65 tpy (4 percent).

I note that the Town has implemented energy-efficiency measures for its water treatment and distribution systems as a result of an energy audit completed in 2009, including installing VFD on well pumps and High Service Water Pumps, operational controls on pumps to increase efficiency, and minimizing electric heat in well houses. In addition, solar photovoltaic (PV) systems supply approximately 70 percent of the electricity used at Ashland's Water Department offices and meets 20 percent of the electricity needs of the Howe Street Water Treatment Plant.

### Mitigation/Draft Section 61 Findings

The FEIR contained updated draft Section 61 Findings. In order to ensure that all GHG emissions reduction measures adopted by the Town as the Preferred Alternative are actually constructed or performed by the Town, the Town shall provide a self-certification to the MEPA Office indicating that all of the required mitigation measures, or their equivalent, have been completed.

### *Water Quality and Conservation*

- Add orthophosphate to MWRA water entering the system to address chemical differences between water sources;
- Prepare a Drought Management Plan that includes a seasonal demand management strategy;
- Prepare an updated Emergency Response Plan;
- Continue its leak detection and system repair program;
- Continue its program to install, replace, repair and maintain water meters;
- Continue its public educational programs and participation in programs that provide low-flow plumbing fixtures and rain barrels to residents; and
- Enforce outdoor water use bans during low-groundwater conditions.

*GHG*

- Install two new pumps with an efficiency of 94 percent at the Hosmer Pump Station;
- Use LED lighting;
- Use Variable Flow Drives (VFD) on well pumps and High Service Water Pumps;
- Change control settings on raw water pumps;
- Operate only one High Service pump at full speed;
- Minimize electric heat in well houses;
- Operate treatment plant during off-peak hours to the extent practicable;
- Install an energy-efficient ozone generator; and,
- Evaluate the use of skylights and dimming controls in the treatment plant.

*Construction*

- Implement erosion and sedimentation controls within 100 feet of any wetland resource areas;
- Revegetate disturbed areas;
- Require contractors to refuel vehicles off-site and maintain spill control and cleanup materials at the work site;
- Require contractors to stockpile materials as far away from wetland resource areas as possible;
- Regular street cleaning to minimize dust and sediment;
- Manage any contaminated material excavated during the course of the project in accordance with the Massachusetts Contingency Plan (MCP);
- Use electronic message board to alert the public about construction activities and potential traffic delays;
- Require contractors to develop Traffic Management Plans;
- Require contractors to use Ultra Low Sulfur Diesel fuel (ULSD) in motorized equipment; and
- Require contractors to comply with the anti-idling provisions of 310 CMR 7.11.

Conclusion

Based on a review of the FEIR, comments letters, and consultation with State Agencies, I find that the FEIR adequately and properly complies with MEPA and its implementing regulations. Outstanding issues can be addressed during State and local permitting and review. No further MEPA review is required and the project may proceed to permitting. State Agencies should forward copies of the final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12.

June 29, 2018  
Date



Matthew A. Beaton

Comments received:

- 06/18/2018 Water Resources Commission (WRC)
- 06/21/2018 Massachusetts Department of Environmental Protection (MassDEP) - Northeast Regional Office (NERO)
- 06/22/2018 Department of Conservation and Recreation (DCR)
- 06/22/2018 Massachusetts Water Resources Authority (MWRA)

MAB/AJS/ajs



THE COMMONWEALTH OF MASSACHUSETTS  
WATER RESOURCES COMMISSION  
100 CAMBRIDGE STREET, BOSTON MA 02114

June 19, 2018

Matthew Beaton, Secretary  
Executive Office of Energy and Environmental Affairs  
Attention: Alex Strycky, MEPA Office  
EOEEA #15388  
100 Cambridge Street  
Boston, MA 02114

RECEIVED  
JUN 19 2018  
MEPA

Dear Secretary Beaton:

The Water Resources Commission (WRC) staff has worked with the Town of Ashland for several years as the town struggled to find alternatives to supplement and provide redundancy for its water supply. We have reviewed the Final Environmental Impact Report (FEIR)/Interbasin Transfer Act (ITA) Response to the Request for Additional Information, for the Town of Ashland's Supplemental Water Supply. Ashland is proposing to purchase up to 1.6 mgd (peak day demand) from the Massachusetts Water Resources Authority (MWRA), an action that represents a change in operating rules by the MWRA, triggering the ITA.

Ashland has adequately responded in the FEIR to the WRC's request for the additional information needed to review its proposal under the ITA. Consequently, WRC Staff has all of the information it needs to proceed with the ITA review. Once the MEPA process is complete, the WRC Staff will hold the required public hearings in accordance with the ITA, Chapter 21 Section 8D.

We remain concerned about the timing of use of the MWRA connection. As we stated in our comments on the DEIR, the Town's existing sources, the Howe Street Wells, are located on the shoreline of Hopkinton Reservoir, within Hopkinton State Park, managed by the MA Department of Conservation and Recreation (DCR). DCR is an agency member of the WRC and manages the Reservoir to provide recreation at a popular swim beach, boat access, and flood control.

Ashland proposes to use MWRA water during periods of low water levels from October through January, or when the water levels in the Hopkinton Reservoir fall below 293 feet. However, Ashland's groundwater withdrawals during the summer months cause water level declines in the Hopkinton Reservoir that persist into the fall. Although we are encouraged that Ashland's water use restriction by-law is tied to levels at which recreational use at the Reservoir begins to be

impacted, we urge that the Town continue to work with DCR to assure that impacts to DCR's prior rights to the Hopkinton Reservoir will not be impacted by continued use of the Howe Street wells during the recreation season.

Thank you for the opportunity to comment.

Sincerely,



Vandana Rao, PhD  
Executive Director

cc: Water Resources Commission  
ecc: John Scannell, DCR  
Anne Carroll, DCR  
Michele Drury, DCR  
Erin Graham, DCR  
Nathaniel Tipton, DCR  
Susan Hamilton, DCR  
Tom Walsh, DCR  
Kevin Hollenbeck, DCR  
Jeff Cate, DCR  
Richard Trubiano, DCR  
Andy Backman, DCR  
William C. Salomaa, DCR  
Beth Card, MWRA  
Rajitha Purimetla, Ashland



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

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Charles D. Baker  
Governor

Karyn E. Polito  
Lieutenant Governor

Matthew A. Beaton  
Secretary

Martin Suuberg  
Commissioner

June 21, 2018

Matthew A. Beaton, Secretary  
Executive Office of  
Energy & Environmental Affairs  
100 Cambridge Street  
Boston MA, 02114

RE: Ashland  
Supplemental Water Supply  
EEA # 15388

Attn: MEPA Unit

Dear Secretary Beaton:

The Massachusetts Department of Environmental Protection (MassDEP) has reviewed the Final Environmental Impact Report (FEIR) submitted by the Town of Ashland to purchase water, up to 1.6 million gallons per day (MGD) and 120 million gallons per year from the Massachusetts Water Resources Authority (MWRA) to provide a supplemental water supply for the Town of Ashland (EEA #15388). The FEIR proposes an MWRA connection through the Town of Southborough, which will require construction of a connection between the existing Southborough and Ashland water lines. The Department provides the following comments.

### Water Supply

As noted in Department Policy 08-01, the addition of an interconnection is considered a substantial modification to a Public Water Supply. The Massachusetts Drinking Water Regulations, under 310 CMR 22.04, call for Department approval of any substantial modification to a public water supply. In light of that, and as outlined in the comments on the Environmental Notification Form and Draft EIR, Ashland will need to submit a permit application for modification of its distribution system. This permit would be in addition to any permit that Southborough may need to submit as a result of any upgrades needed to provide the capacity to convey water through Southborough to the interconnection.

As part of the permit submittal, the following issues would need to be addressed:

1. **Water Quality Impacts/Requirements for Corrosion Control:**
  - a. As proposed in the EIR, an active interconnection between Ashland and Southborough would combine water with different water quality characteristics. These differences are due to different sources and treatment processes and include differences in the orthophosphate content, pH, and fluoride levels. As called for in the Department's Guidelines and Policies for Public Water Systems, an evaluation of the water quality impacts on future compliance and aesthetics would need to be provided as part of the permit.
  - b. As part of that evaluation, a specific evaluation and opinion on continued compliance with the Lead and Copper Rule needs to be included. While the Department recognizes that both Ashland and Southborough have met the Action Levels for Lead and Copper based on the results of the most recent sampling round, the change in water quality, specifically the change in orthophosphate levels, may result in disturbances to the orthophosphate coating in Ashland, which in turn could result in an increase in lead levels at the taps. **More specifically, MWRA water (as is proposed to be connected to Ashland's system via Southborough) is not treated with orthophosphate but Ashland's water is.** To address this issue and prevent potential increases in lead levels, the permit will need to include mitigation measures. In a letter to the Department dated **June 20, 2018** from Ashland's consultants Haley and Ward, Inc., it was stated that "Ashland has agreed to add an orthophosphate feed system to the proposed meter vault to address corrosion control concerns while the connection is active".
2. **Clarification of Ownership and Maintenance:** The permit would need to explain the ownership and operation and maintenance responsibilities of Ashland, Southborough, and the MWRA for the facilities and equipment that will be installed as part of the project. The Department understands, based on assertions made during discussions with Ashland, that an agreement exists that details this information. A copy of that agreement will need to be provided as part of the permit submittal. Additionally, the permit needs to outline the authorities and limitations that may exist for using the interconnection.
3. **Clarification of the Bylaw and Conditions of When the Interconnection Would be Used.** The EIR outlines that the use of the interconnection would be governed in part based on a Town of Ashland by-law. As part of the permit, the Department would need clarification on the basis of the various conditions in the by-law. For example, the bylaw cites certain water levels as the basis for using the interconnection; the Department would like to understand how that water level was established and the expectation on how often that condition would be met. Further, the Department would consider the by-law a pre-requisite of approval, and any changes in the by-law would result in reconsideration of any approval.

4. Clarification of the Volumes and Flow Rates: The permit would need to clarify the nominal flow rates and periods of use, particularly if blending of water is used to mitigate water quality concerns.

The MassDEP Northeast Regional Office appreciates the opportunity to comment on this proposed project. Please contact [Thomas.Mahin@state.ma.us](mailto:Thomas.Mahin@state.ma.us) at (978) 694-3226 for further information on water supply issues. If you have any general questions regarding these comments, please contact me at [John.D.Viola@state.ma.us](mailto:John.D.Viola@state.ma.us) or at (978) 694-3304.

Sincerely,

**This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.**

John D. Viola  
Deputy Regional Director

cc: Brona Simon, Massachusetts Historical Commission  
Tom Mahin, MassDEP-NERO



June 22, 2018

Secretary Matthew A. Beaton  
Executive Office of Energy and Environmental Affairs  
Attn: Alex Strysky, MEPA Office  
100 Cambridge Street, Suite 900  
Boston, Massachusetts 02114

Re: EOEEA #15388, Supplemental Water Supply for Town of Ashland FEIR

Dear Secretary Beaton:

The Department of Conservation and Recreation (“DCR” or “Department”) submits the following comments on the Final Environmental Impact Report (“FEIR”) submitted by the Town of Ashland (the “Proponent” or the “Town”) for its Supplemental Water Supply project (the “Project”).

As stated in the FEIR, the Proponent seeks to obtain an additional water source by connecting to the water system of the Massachusetts Water Resources Authority (“MWRA”), through the town of Southborough. The Proponent seeks to purchase from the MWRA system 0.329 million gallons a day (“MGD”) on an annualized average daily basis, and a maximum of 1.6 million gallons a day at peak use. The preferred alternative to connect to the MWRA system would involve the construction of a buried meter vault and bypass pipe in Oregon Road in Ashland; installation of 1,550 linear feet of 12-inch diameter new water main; improvement of fittings and a valve at Southborough’s Overlook water storage tank; and expansion of pump capacity at the town of Southborough’s Hosmer Pump Station (for potential use by the Proponent).

DCR manages Hopkinton State Park, a 1,287-acre facility that provides water-based recreation activities, including boating and swimming, at Hopkinton Reservoir. Currently, the Town pumps all of its water from five wells at its Howe Street pumping facility, located along the shoreline of Hopkinton Reservoir.

**Hopkinton Reservoir**

Annually between May and Labor Day, DCR aims to maintain water levels within the Reservoir between 296 and 298 feet above sea level in order to ensure safe and convenient access to recreational water-based uses. Maintenance of the water level can be manipulated by drawdown of water levels at Hopkinton Reservoir Dam. The Reservoir is 176 acres in size and is 22 feet deep on average, with a maximum depth of 50 feet.

DCR continues to support the Proponent’s application to purchase MWRA water, as it could potentially ensure adequate water levels at Hopkinton Reservoir for recreational activities. Historical withdrawals from the Howe Street wells have likely contributed to diminished water levels of Hopkinton Reservoir, as there is a direct hydraulic connection between the wells and the reservoir.

COMMONWEALTH OF MASSACHUSETTS · EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS

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Matthew A. Beaton, Secretary, Executive  
Office of Energy & Environmental Affairs

Leo Roy, Commissioner  
Department of Conservation & Recreation

The Proponent is authorized by Town Meeting approval of a water conservation bylaw to purchase water from MWRA when the Hopkinton Reservoir drops below 293 feet, something that generally occurs between October and January. DCR continues to encourage the Proponent to maximize its use of MWRA water during the summer months, as opposed to only using it during periods of low ground water levels during the fall and winter months, as it would facilitate DCR's recreational needs during the summer and ensure the Ashland Water Department can safely meet various demands. As DCR mentioned in our DEIR comments, the Department estimates that use of MWRA water by the Proponent at a rate of 1 MGD from May to August would prevent Hopkinton Reservoir level declines by approximately two feet.

DCR requests that the Proponent, as a courtesy, notify Hopkinton State Park staff should the water levels drop to Stage 1 (295.85 feet) and Stage 2 (295.35 feet) conditional water use restrictions.

Thank you for the opportunity to comment on the ENF. If you have questions regarding our comments please contact Michele Drury at 617-626-1366 or [michele.drury@state.ma.us](mailto:michele.drury@state.ma.us).

Sincerely,



Leo P. Roy  
Commissioner

cc: Andy Backman, Jeff Cate, Michele Drury, Priscilla Geigis, John Scannell (DCR)  
Rajitha Purimetla, Doug Small (Town of Ashland)  
Vandana Rao, Water Resources Commission  
Duane LeVangie, James Persky (MassDEP)



# MASSACHUSETTS WATER RESOURCES AUTHORITY

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June 22, 2018

Matthew Beaton, Secretary  
Executive Office of Energy and Environmental Affairs  
MEPA Office – Attention Alex Strysky  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Subject: EOEEA # 15388, Final Environmental Impact Report  
Supplemental Water Supply for Ashland

Dear Secretary Beaton:

The Massachusetts Water Resources Authority (MWRA) welcomes the opportunity to comment on Ashland's Final Environmental Impact Report (FEIR), addressing the Town of Ashland's plan to supplement their local water supplies with MWRA water and to seek admission to the MWRA waterworks system.

Ashland is seeking MEPA and Water Resources Commission approval to join the MWRA as a partially supplied community with permitted volumes up to 1.6 million gallons per day (mgd) peak use and up to 73 million gallons annually. Water from MWRA would be conveyed via an interconnection with the Town of Southborough. MWRA's comments relate to Water System Expansion, Water Quality and MWRA Enabling Statute Section 8(m) Permitting.

### Water System Expansion

MWRA has worked with Ashland over the years, to support the Town's development of a long term plan to remedy its water supply deficiencies. In addition, MWRA has supplied water to the Town of Ashland when emergency declarations have been issued by the Massachusetts Department of Environmental Protection. As noted in previous comments on the ENF and DEIR, Ashland's proposal is consistent with MWRA's goal to advance reasonable water system expansion. MWRA is in a position to serve communities, given that the Authority's current use over the last decade has averaged 202 mgd and the safe yield for the system as a whole is 300 mgd. This means there is a large volume of available water for MWRA to add new communities, without impairing the ability of MWRA to operate its water system to optimize water quality and to assure customers a reliable and continuous water supply now and in the future. The MWRA's supply to Ashland will have a positive effect on local water resources. As Ashland states in its ENF, stream flow depletion in the Sudbury-Assabet-Concord River and the effects of Ashland's withdrawals on the Hopkinton Reservoir are concerns. Use of MWRA's large multi-year

reservoirs to reduce withdrawals from these local sources can be part of an effective regional water management approach and help to reduce or alleviate low-flow conditions.

The MWRA has a policy for admission of new communities, Operating Policy, #10, Admission of New Community to MWRA Water System. The policy builds on the requirements described in Section 8 (d) of MWRA's Enabling Act. Applicants for admission are required to have developed effective demand management measures and also need to demonstrate that a local water supply feasible for development has not been identified by either the community or MassDEP. Further, the applicant must show that no existing or potential water supply source for the community has been abandoned unless DEP has declared that the source is unfit for drinking and cannot be economically restored. The FEIR also describes Ashland's ability to provide water to "straddle" projects and describes what that means. MWRA has a policy, OP .09: Water Connection Serving Property Partially Located in a Non-MWRA Community, that is also known as a "straddle" policy. Should Ashland become an MWRA member this policy would govern the practice of selling water to any new "straddle" entities as defined by the MWRA.

As noted in previous comments, MWRA's analysis on the donor basin presented in the DEIR demonstrated that water may be supplied to Ashland without adverse impact on the MWRA system, existing users, and the donor basin. The analysis showed that with the addition of Ashland, as well as other potential new communities, reasonable instream flow in the rivers downstream of MWRA's reservoirs from which the water is transferred will be maintained.

The FEIR appears to indicate that the proposed use of MWRA's water will be to supplement Ashland's local withdrawals only for its own use. MWRA notes however, that if the intent changes so that the purpose is to supplement Ashland's local withdrawals in order to allow the Howe Treatment Plant to supply more than Hopkinton's current use, then Hopkinton would need to apply to admission to the MWRA in a filing separate from Ashland.

### Water Quality

Ashland and its technical consultant have analyzed MWRA and Ashland water quality and treatment, and appear to have summarized the data accurately. Both MWRA and Ashland use chloramine for residual disinfection, and have low levels of lead and copper corrosion meeting current Lead and Copper Rule standards, but the two systems use different approaches for successful corrosion control. Final determinations about any regulatory implications of mixing MWRA water and Ashland's are correctly noted as being based on input and direction from MassDEP.

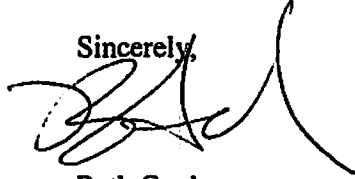
### Section 8 (m) Permitting

Section 8 (m) of Chapter 372 of the Acts of 1984, MWRA's Enabling Legislation, allows the MWRA to issue permits to build, construct, excavate, or cross within or near an easement or other property interest held by the MWRA, with the goal of protecting Authority-owned infrastructure. Ashland's interconnection with Southborough will require improvements to Southborough's Hosmer Pump Station and installation of approximately 1,550 feet of a new 12-inch diameter water main. Due to proximity of the pump station and pipeline to existing MWRA

water infrastructure, an 8 (m) Permit from MWRA will be required for this work. The Town of Southborough has applied for this permit and should continue to coordinate with Mr. Ralph Francesconi at 1 (617) 305-5827 for assistance in this process.

On behalf of the MWRA, thank you for the opportunity to provide comments on this Project. Please do not hesitate to contact me at 1 (617) 788-4958 with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Beth Card', written over the word 'Sincerely,'.

**Beth Card**  
**Director**  
**Environmental and Regulatory Affairs**

cc: **Doug Small, Director, Ashland Public Works**  
**Joseph Favaloro, MWRA Advisory Board**  
**Vandana Rao, Executive Director, MA Water Resources Commission**