



# MASSACHUSETTS WATER RESOURCES AUTHORITY

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July 30, 2009

Ian Bowles, Secretary  
Executive Office of Energy and Environmental Affairs  
Attn: MEPA Office  
100 Cambridge Street – Suite 900  
Boston, MA 02114

**RECEIVED**

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**MEPA**

Subject: Birch Road Well Reactivation and Water Treatment Plant, Town of Framingham, EOEEA 14197

Dear Secretary Bowles:

The Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to comment on the Town of Framingham's Birch Road Well Redevelopment EIR. Framingham's EIR documents the Town's proposal to reactivate its local water source, the Birch Road Wells, to provide 4.3 million gallons per day on an annual basis. Since the relationship of Framingham to MWRA is touched upon in many places in the EIR, this letter is intended to provide further information on MWRA service to Framingham.

For more than fifty years, Framingham has been a member of the MWRA water and sewer service areas. Framingham joined the water system in 1966 (prior to 1966, the Town purchased MDC water via non-member user Agreements) and joined the MWRA Sewer System in 1957, when the Framingham Trunk Sewer was constructed to serve limited areas of Framingham. Framingham is well served by MWRA and the investments that MWRA has made to provide modern and cost effective water and wastewater services.

These investments include MWRA's Integrated Water Supply Program, \$1.7 billion 10-year program consisting of a series of projects to protect watersheds and to build new treatment and transmission facilities. The highest quality drinking water is ensured by an aggressive watershed protection program coupled with the recently constructed John J. Carroll Treatment Plant. Excellent redundancy and reliability of water supply transmission is provided via dedicated connections between MWRA and Framingham. During the recent construction of the MetroWest Tunnel, MWRA incurred significant expense to built four riser shafts to assure reliable water supply to Framingham. The riser shafts and associated piping and valves provide connections from both the MetroWest Tunnel and the Hultman Aqueduct to each of the four Framingham pump stations. The MetroWest Tunnel is part of the total asset value of the MWRA waterworks system; all water system communities now share in the cost of paying off these assets.

Allocation of water supply to Framingham is not an issue for MWRA, both because of plentiful supply and because MWRA has constructed dedicated interconnections between the MWRA and Framingham systems. While current and foreseeable circumstances thus suggest that there are no operational benefits to MWRA associated with Framingham's development of local sources and its reduction of withdrawals from MWRA, there would be economic consequences to other MWRA communities. Most of MWRA's water supply costs are fixed; operating costs vary little with demand, so a decrease in water demand in the existing service area requires MWRA to either raise the unit cost of water sold or expand its rate base (e.g., add new communities) to ensure sufficient revenues to cover costs. Framingham's proposal to decrease its demand from MWRA exacerbates the financial problems associated with already shrinking water sales.

In its discussion of the applicability of the Interbasin Transfer Act (ITA), the EIR refers to Framingham's connection to MWRA/MDC's Framingham Reservoir #3 via the Winter Street Pump Station and notes that the Winter Street pump station was used by Framingham from 1930s to the 1950s as a regular source of water. To provide further context, it is important to stress that the Winter Street pump station withdrew water from a Metropolitan Water District (MDC/MWRA) pipeline and Framingham paid for the water during this time. Framingham chose to enter into a contract to purchase water rather than develop its own infrastructure.

The water in the Sudbury/Framingham Reservoir system originates from both within and outside the Sudbury Basin. Historically, water from the Chicopee and Nashua River basins was conveyed eastward via the Wachusett Open Channel, which flowed into Sudbury Reservoir. The proportion of Sudbury to Chicopee/Nashua varied, but certainly the Sudbury watershed is much smaller than the watershed of the Quabbin/Wachusett Reservoirs. Once the Hultman Aqueduct was constructed in the 1940s, the proportion of water from the Chicopee/Nashua River basins that flowed into the Sudbury reservoir system decreased; the Hultman Aqueduct replaced the function of the Open Channel to convey flow from Marlborough to Weston via Framingham. MWRA still, however, continued to discharge water from the Wachusett Reservoir into the Wachusett Open Channel and the Sudbury system.

Today the north Sudbury system is an MWRA emergency source; it is still protected through watershed management and MWRA ratepayers continue to fund Payments in Lieu of Taxes (Pilot) payments to North Sudbury watershed communities. MWRA's rights and ability to use the Sudbury watershed system in the future cannot and should not be compromised.

The above noted considerations should be factored into the ITA analysis.

The EIR indicates that Framingham intends to withdraw 1,570 million gallons annually from its Birch Road wells, and that potential ground and surface water impacts in the Sudbury basin could be mitigated by curtailing local source withdrawals during low flow periods and increasing MWRA withdrawals at such times. Because of the success of its conservation programs coupled with the improvements that MWRA has undertaken to

provide its member communities the best water supply around, MWRA has more than adequate capacity to meet Framingham's demands, whether or not the Town's use of its proposed local sources is ultimately restricted.

The EIR reflects Framingham's intent to discharge its water treatment residuals to the MWRA system and indicates that the sludge discharged from the water treatment facility into the sanitary sewer system shall not exceed the allowable 3% maximum total suspended solids concentration. The Town intends to submit a Sewer Use Discharge Permit Application for Publicly Owned Drinking Water Plants to MWRA at least 90 days prior to commencement of operations, pursuant to MWRA's Sewer User Regulations (360 CMR 10). That Sewer Use Discharge application may be obtained from Lisa Chapman, MWRA Industrial Coordinator, at (617) 305-5622. Along with the application, Framingham must also submit a complete and detailed hydraulic analysis of the sewer system that will receive the effluent from the water treatment plant. This analysis is required to ensure adequate capacities are available. Framingham must also have the capacity to hold its discharge from its water treatment facility for at least three days.

Should you have any questions or desire further information, please do not hesitate to contact Pam Heidell at (617) 788 -1102.

Very truly yours,

*For Pam Heidell*

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