



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Commissioner

January 13, 2012

Tri Town Water Board
One JFK Memorial Drive
Braintree, MA 02184

Dear Board Members:

Over each of the last seven years, MassDEP has received an application for State Revolving Fund (SRF) financing from the Tri Town Water Board for a new water treatment facility to serve Braintree, Holbrook and Randolph. This new treatment facility would allow the ultimate decommissioning of the two existing plants. Owing in part to the economy of scale of replacing two plants with one, the Department has in each of the last seven years offered Tri Town a state-subsidized low interest loan to finance the project. In each instance, the member communities of Tri Town have failed to authorize the borrowing for the project. The Department is aware that there has been and may continue to be sincere disagreement between the three towns as to the equitable distribution of the capital cost of the project.

This year, in a departure from past years, the town of Braintree has submitted a stand-alone application for financing the replacement of its existing plant. In addition, MassDEP received an eighth application for the Tri Town plant. This submission suggests that the members of Tri Town Water remain at an impasse, while it also clouds the issue of the appropriate long-term solution to Tri Town's drinking water needs.

In the intervening years since the project was first proposed, the two existing plants have continued to age – it is inevitable that these plants will soon be obsolete. The aging infrastructure at the plants is cause for concern at MassDEP as a matter of Public Health.

The water withdrawal volumes provided in your Annual Statistical Reports (ASRs) during the last several years indicate that withdrawals have and continue to exceed your reservoir system's safe yield. Those same ASRs also indicate that on occasion, actual withdrawals have exceeded the Water Management Act authorized registered withdrawal volumes of your member communities. Both matters are of serious concern to MassDEP because of the potential negative environmental impacts associated with over-pumping, and the public health and safety implications of long-term demand exceeding supply.

The collective impact of these economic, public health and environmental issues has been to suggest to MassDEP staff that there should be a master plan developed to address the immediate and long term

water needs of the three communities. A sufficient and reliable source or sources of safe drinking water is vital to the future of the communities.

As it appears the member communities do not share a vision for how to address long term water needs and since water withdrawal at times exceeds both the safe yield and Water Management Act registered volume, the Department would like to meet with the Tri Town Water Board and its member communities, to discuss these matters. In the meantime, because there is significant demand for the SRF loan capacity and as there remains much uncertainty as to whether either project can or should move forward, MassDEP is not including either project on this year's Intended Use Plan list of projects that will be offered financing from the Drinking Water State Revolving Fund program.

MassDEP staff are available to participate in further discussions, so that we may assist Tri Town as it attempts to address its water management issues moving forward. Please feel free to contact me or Steve McCurdy of my staff with any questions.

Sincerely,



Bethany A. Card
Assistant Commissioner
Bureau of Resource Protection

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