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Subject: [EXTERNAL] - Clarification: Impact on Water Capacity and Reduction (Rationing) and Population Growth

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[MBTS-Water-Treatment-CREAT-Final-Report-10052022 \(manchester.ma.us\)](#)

Attn: Select Board, Planning Board, MBTA Zoning TF, Director of Planning and Development, DPW Director, BOH

Cc: TA, ConCom Members, MBTA Task Force, and Climate Resiliency Committee.

(Ms. Powers, please share with all members of ConCom, the Water Resources Task Force, and members of the Coastal and Climate Resiliency Committee. Thank you).

(Ms. Hunter, please share with all PB and MBTA TF members and post to the MBTA Zoning website. Thank you.)

Good morning Select Board et al,

As I research the topic of water capacity in MBTS as it relates to several matters regarding intentional and non-intentional population growth, I am seeking clarifying responses with respect to the following 2 documents:

1. Last EPA Report (*link* above) entitled; "Climate Resilience Evaluation and Awareness Tool (CREAT) Exercise Report for MBTS dated September 2022, specifically *pages 39 and 40*: Appendix D (Existing and Potential Adaptive Measures). Excerpt:

"Develop schemes and rules for limiting service provisions when conditions are unfavorable for supply to meet demand. These plans should be devised based on customer expectations, current practices and regulations and expected changes in climate conditions.

Establishing authorizations to establish rates for rationing and working with research community to define conditions to trigger the program should be considered. Voluntary restrictions under moderate conditions; mandatory restrictions under more severe conditions. No enforcement capability."

2. Memorandum as an Attachment from DPW Director, Chuck Dam, to Betsy Ware, former Town Planner, dated May 18, 2023: Subject: Town Water and Summary Status.

"Future Capacity Discussion Initial estimates for build out in response to the MBTA zoning requirements could increase the population by up to 1500 additional residents over time. Assuming all of those residents are on Town water and sewer, and assuming a basic figure of 65 gallons per capita per day, the increase in capacity would be approximately 97,500 gpd. This figure combined with our 2022 daily average use would put the Town at approximately 732,500 gpd water and 468,500 wastewater (101.7% and 69.9% utilized respectively). As described above these numbers would be considered conservative assuming no additional improvements implemented within the system. Even then the Town could reasonably accommodate such an increase."

First, our DPW Director has done a highly *professional* job of addressing potential increases estimated to be in the range a 1500 for population increase, specifically with regard to MBTA Zoning. This data point **does not address population** increases with regard to the new issue of CST 115 units requested in the LCD for multifamily employee housing, and a potential failure to prevail on the 40 B litigation. An increase of over 300 people plus in BOTH situations in addition to the 1500 projection, if that seems reasonable, may be anticipated...15 to 20 % increase in our population?

Secondly, and most importantly, the joint **EPA, NOAA and MBTS stakeholders** who collaborated on the EPA Report concurred with the following based on CREAT DATA value inputs: *"Establishing authorizations to establish rates for rationing and working with research community to define conditions to trigger the program should be considered."* I want to highlight the word **rationing** and the phrase **"should be considered."** This should raise a red flag to our Town Governance since the 2022 study was based ON CURRENT POPULATION.

There appears to be a dichotomy with regard to these 2 documents. On the one hand in 2022 the CREAT Team of professionals from EPA, NOAA, and

MBTS Representatives appear to identify the need for a decrease in water consumption overall since the values for coastal flooding and drought are uncertain (refer to the CREAT Report). On the other hand, the threat of significant population increases in this Town via MBTA Zoning, development of the LCD by CST employee housing or loss of 40 B litigation does not seem to be factored into limited and threatened water supply as a result of climate change...coastal flooding and drought.

Impact studies, as the excellent one done by Chuck Dam, are necessary as we go forward. 40 B impact studies are in place, MBTA Zoning studies on the matter are not clearly in place (is the 1500 figure in the right zone based on recent recommendations?), and CST for multifamily housing is definitely not in place, as it relates to MBTA Zoning.

These are *legitimate* concerns. Residents in Hamilton, MA, the Town sharing our watershed locus, has asked the Superior CT to be an Intervenor in MBTA Zoning dispute based on impact of population increases on its resources. At a minimum, this Town needs a level of review on our water capacity with regard to significant increase in population from many pressures. The Nonpartisan Committee of Hamilton Citizens Supporting Responsible Development, represented by Ellen A. Wright, has filed a motion to MA Superior CT to intervene in a zoning dispute that could have significant ramifications for the town of Hamilton. At the heart:

"The proposed increase in multi-unit dwellings, estimated at over 700 units, could strain essential resources and infrastructure, such as traffic management, water supply, and waste disposal, among others."

I am compelled to ask our MBTS Town Governance:

1. Has MBTS looked strategically at the impact on water supply, waste disposal, and traffic management regarding the potential for significant increased population from many events? If not, why not?

2. If so, what is the position of MBTS governance with regard to significant population growth (what is the estimated number) and the recommendation for reduction in water usage by residents as identified in the EPA Report in light of climate factors? Are we seriously prepared to consider "rationing" our

finite water supply and under what "triggers" as population increases?

Respectfully,

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