

Debra Dennis

NOV 02 2018

From: Matthew J. Mayo
Sent: Friday, November 2, 2018 8:11 AM
To: Debra Dennis
Subject: FW: [Lancaster MA] Lancaster Water Use Study (Sent by Greg Jackson,
Attachments: 102518_town_of_lancaster_water_projections.pdf

COMMUNITY DEVELOPMENT
AND PLANNING

Deb,

Can you share with with the board and post?

Matthew J. Mayo, M.S.,

-----Original Message-----

From: cmsmailer@civicplus.com [<mailto:cmsmailer@civicplus.com>]

Sent: Thursday, November 01, 2018 9:13 PM

To: Matthew J. Mayo <

Subject: [Lancaster MA] Lancaster Water Use Study (Sent by Greg Jackson)

Hello mmayo,

Greg Jackson has sent you a message via your contact form
 (<https://www.ci.lancaster.ma.us/user/613/contact>) at Lancaster MA.

If you don't want to receive such e-mails, you can change your settings at
<https://www.ci.lancaster.ma.us/user/613/edit>.

Message:

Dear Chairman Mayo,

I have attended many of the recent hearings on the Goodridge Brook Estates proposal. It is my understanding that the 40B process is supposed to allow for collaboration and negotiation with the applicant. While I have not seen much to suggest that Crescent Builders is a constructive participant, I support the Board's pursuit of a fair and thorough public hearing and appreciate their efforts towards that goal.

However, I have not seen the Board make many demands on or set conditions for the applicant. In instances where they have, such as requesting additional parking, the developer's spokesman has been reluctant to comply. Likewise, the few items the town's engineers have suggested for mitigation, frontage sidewalks and railroad crossing signage, have been received with little enthusiasm from the builder.

The lack of effort exerted by the applicant to accommodate requests from the town is shocking.

I suspect their behavior is not going to improve if they are permitted to build here. They have been consistently late, unprepared, and uncooperative during these hearings.

At the last public

meeting, they were simply absent. Their lack of competence and credibility indicates that they are not a capable or reliable partner for a project of this scope and scale.

The decisions the Board makes in the coming months are going to impact the town of Lancaster for years as a result of the un-precedented size of this project. It will place unreasonable demands upon the town's resources. I would like to see this developer either radically scale back their greedy ambitions or leave town. There are far better affordable housing options for Lancaster, so I'm hoping the Board will weigh its decisions carefully.

The impact upon our public water supply is as critical as any aspect of this project. Goodridge Brook Estates could increase demand by as much as 54,000 Ga/Day. For 9 of the past 10 years, the town has operated with withdrawal levels above its 530,000 Ga/Day average permit level. However, it would likely continue to operate within its 630,000 Ga/Day buffer limit for the next decade without the addition of this particular project.

If you remove the population decline that was projected by the Haley & Ward water use study, the town would exceed its volume limit and be required to pursue a new permit through DEP within the next 3 to 5 years with the addition of GBE. For that reason, the Board should require the applicant to cover all costs associated with the water permit process including any necessary infrastructure upgrades and all related mitigation efforts.

It would be best to work proactively to identify those costs. I have not yet seen an engineering review of the water system to evaluate the impact of this project, but believe it is essential that one be conducted. Accordingly, the Board should require a water impact study to help them evaluate the water-related issues. The applicant should be required to pay for both the water use and the system impact studies.

It would be best if the DPW could determine and quantify the true cost that this massive project would impose upon the town. Following a wait and see approach will mean that the town has to cover the costs when it is too late to hold the developer accountable.

I have attached a brief presentation pertaining to the Haley & Ward water use projections and concerns about the increased water demands the GBE project would produce.

Another resident and myself were prepared to present this information at last week's Board of Appeals hearing. Obviously, we were not allowed that opportunity due to the applicant's absence.

I would appreciate it if you could share this information with the members of the board. Please let me know if there are any questions or concerns. We would like to review these issues at the next scheduled hearing on GBE.

Thank You,

Greg Jackson

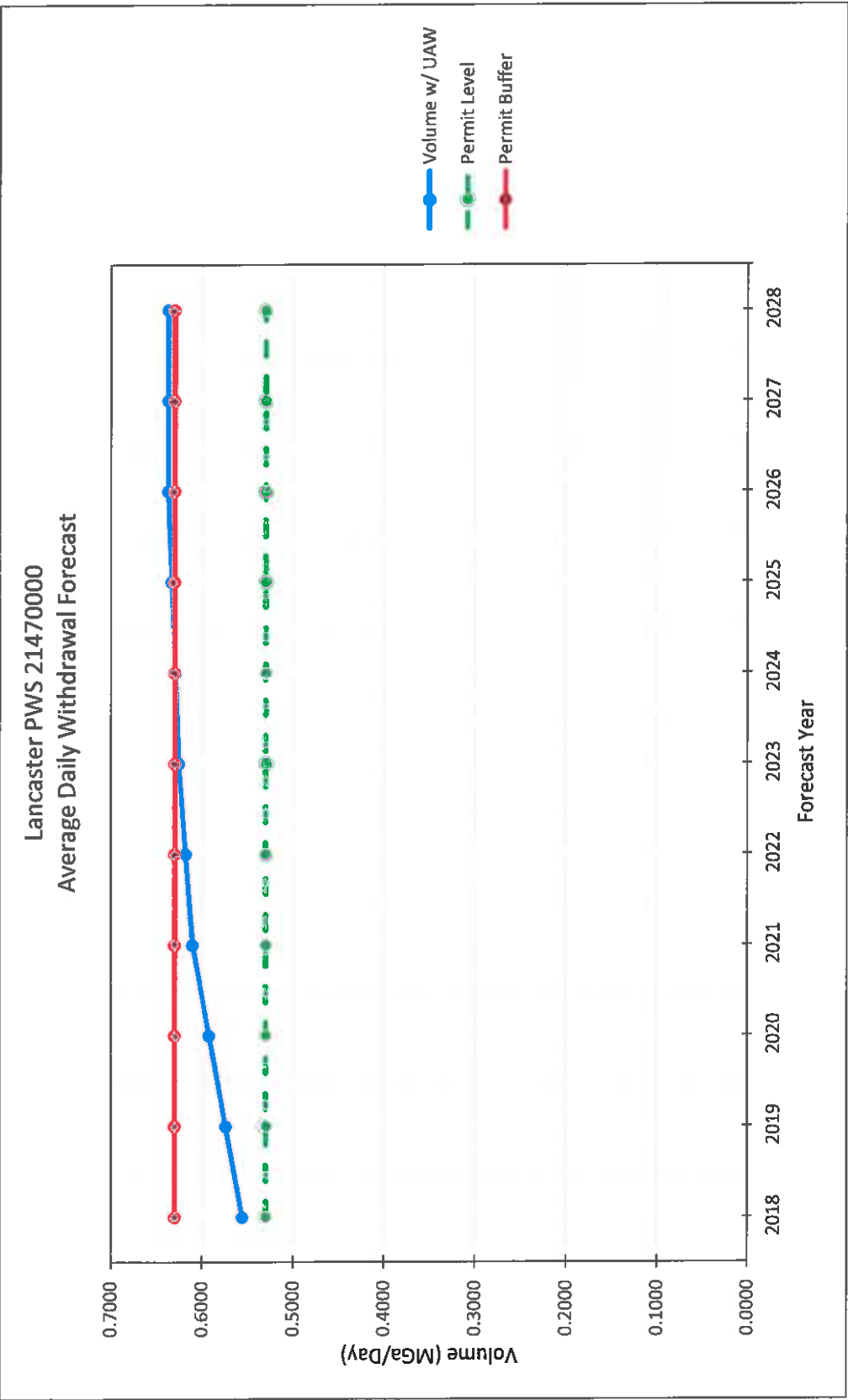
Town of Lancaster – 2018 Water Use Concerns

10/25/18 Resident's Presentation to the Board of Appeals:

- Lancaster has operated **above its Water Management Act (WMA) permit volume of 0.53 MGa/day for 9 of the past 10 years** based upon average daily withdrawals reported to Mass DEP.
- The water use projection for 2018 is 0.56 MGa/Day according to Scott Miller's report to the DPW on 8/6/18 (1.).
- Mass DEP allows a 0.10 MGa/Day buffer for a maximum average level of 0.63 MGa/Day (1.).
- Projections indicate **Lancaster would operate within the buffer for the next decade without the addition of any major new demands** (eg: resumption of activities at Atlantic Union College, construction of Goodridge Brook Estates).
- The proposed Goodridge Brook Estates (GBE) project would increase daily water demand by as much as 54,000 Ga/Day (450 x 1.2 x 100), which would **require obtaining a new permit from Mass DEP to withdraw at higher levels.**
- The permitting process for increased volumes from existing wells is substantially more involved than simply renewing at the same level, requiring a water use study and possibly a MEPA review. **It's potentially a 2 to 3 year process (2.).**
- Obtaining a new permit requires the town to reduce its unaccounted for water percentage down from 18% to 10%.
- The developer of GBE should be asked to **pay all costs associated with pursuing a new permit** including consultant fees and lost water mitigation as well as any upgrades needed to maintain service and water quality for existing customers.
- **The developer's support for the permit process should be a condition for approving the GBE project.** Otherwise, the town will have to cover the costs as demand from the new units increases water use over the next 3 to 5 years.

References:

1. Scott Miller, Haley & Ward, Summary of Water Use Projections on 8/06/2018.
2. Table 3-3: New Permit Application Timeline, Mass DEP WMA Permit Guide, 11/7/2014.



Projected Service Population Assumptions:

- Established service population does not continue to decline.
- Established service population does not grow.
- Demand from developments begins in 2019.