



**Town of Stow
Conservation Commission**

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November 26, 2007

By Fax and Mail (617-626-1181)

Mr. Ian Bowles, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge St., Suite 900
Boston MA 02114

Attn. Nicholas Zavalas, MEPA Office

**Subject: Comments Regarding EOEEA #12348
 Assabet River Consortium CWMP/Final EIR
 Phase III/IV—Recommended Plan**

Dear Secretary Bowles,

The Stow Conservation Commission (SCC) has received and reviewed the Evaluation of the Most Feasible Options and Recommended Plans for Marlborough and Northborough prepared by CDM and Fay, Spofford & Thorndike (Recommended Plans).

The SCC appreciates receipt of the documents and updated information regarding water conservation and infiltration and inflow.

The preferred alternative selected by Marlborough and Northborough is to proceed with Marlborough Westerly WWTF upgrades that discharge an increased flow of effluent and increased phosphorus load to the Assabet River (Alt 1a). Many of our previous comments and concerns remain, and we request that the Consortium conduct ongoing assessments of land planning and growth management strategies outside of the MEPA review process as population growth continues.

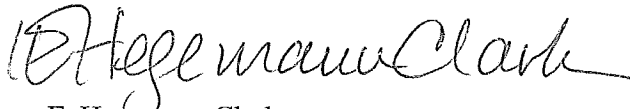
Since the Stow Commission wrote its initial comments, the Town of Stow held a public meeting to allow the U.S. Army Corps of Engineers, New England District and its consultant, CDM, to present the findings of the 'Draft Modeling Report for the Assabet River Sediment and Dam Removal Study' (the study). The purpose of the study was to review alternative approaches to achieve a 90% reduction in phosphorus flux from river sediment. The two alternatives evaluated include dredging of river sediment and removal of dams along the river. As part of the presentation, the study noted that winter discharge from the WWTFs affects phosphorus flux the following summer, specifically, that phosphorus introduced in the winter can contribute over 50% of the summer phosphorus flux. Another finding was that a reduction in winter phosphorus loading from point sources, including the WWTFs, could reduce phosphorus sediment flux loading within a 2 to 4 year period. The Army Corps spent a considerable amount of public funds in

preparing the study, and implementation of proposed recommendations, should they go forward, will require significantly more public funds for impact reports and permitting documents, as well as actual hard costs. Given the significant effort and costs associated with the goal to improve the condition of the Assabet River, the Stow Conservation Commission believes it appropriate to raise this fact into the public comment process for the Recommended Plans as an issue the Assabet River Consortium should seriously consider as it continues its efforts to manage waste water flows. For this reason, the Commission also believes it appropriate to consider an amendment to Marlborough's permit conditions to reduce its winter phosphorus limits.

Westborough, Shrewsbury, Hudson, and Maynard are meeting NPDES requirements and will be proceeding with required upgrades. Marlborough and Northborough still propose increasing their wastewater flows and discharging the increase to the Assabet River via the Marlborough Westerly plant. In summary, the FEIR/Recommended Plans for Marlborough and Northborough do not adequately address the indirect impacts associated with continued reliance on centralized waste water treatment.

Sincerely,

STOW CONSERVATION COMMISSION



Ingeborg E. Hegemann Clark
Chair

cc: Organization for the Assabet River