



August 10, 2017

Shi Chen
MassDEP Water Management Act Program
One Winter Street, 5th floor
Boston, MA 02108

Andrew Gottlieb
Executive Director

BOARD OF DIRECTORS

Margo L. Fenn
President

Charles Sumner
Vice President

Robert Summersgill
Treasurer

Elizabeth Jenkins
Clerk

Elliott Carr

Michael Corrigan

Anne Ekstrom

Katherine Garofoli

DeeDee Holt

Thomas Huettner

Pat Hughes

Cheryl Lubin

Blue Magruder

Eliza McClennen

Maureen O'Shea

Donald Palladino

Daniel Webb

RE: Water Management Act Chatham Water Department Permit Application
Water Management Act Harwich Water Department Permit Application

Dear Ms. Chen:

The Association to Preserve Cape Cod (APCC), the Cape Cod region's leading nonprofit environmental advocacy and education organization, submits the following comments regarding the Water Management Act permit applications for the towns of Chatham and Harwich to increase water withdrawals in their respective municipalities.

The Chatham Water Department is current authorized to withdraw a total average daily amount of 1.32 million gallons per day (MGD) and is seeking a permit to increase withdrawals up to 1.63 MGD by 2030. The Harwich Water Department is currently authorized to withdraw a total average daily amount of 2.16 MGD and is seeking a permit to increase withdrawals up to 2.63 MGD by 2030.

The basis for the requested increases needs to be documented and verified. It is APCC's position that water efficiency should be the first and best option prior to taking more water from the aquifer. To that end, a thorough evaluation of the effectiveness of the applicants' conservation programs should be conducted, and the full range of measures in the state conservation standards ought to be uniformly and consistently applied to these and all Cape Cod applications. The applicants should each be required to provide a history of their respective efforts to reduce or limit outdoor water use as well as a plan for going forward.

Secondly, special attention should be given to assessing the impacts of additional drawdowns from withdrawal on sensitive surface water features such as ponds, vernal pools and other wetlands within the cone of influence of the wells, as well as for the entire Zone II of the operating wells. In addition, special attention should be given to identifying and mitigating any impacts associated with peak pumping periods in the summer and early fall periods where demand is high and water levels are typically low.

APCC looks forward to reviewing additional information relative to the above issue areas as the permit review process moves forward.

Sincerely,

A handwritten signature in blue ink, appearing to be "Andrew Gottlieb", written over a horizontal line.

Andrew Gottlieb
Executive Director