PO Box 798 • Byfield, MA 01922



www.Parker-River.org • 978-462-2551

9/10/2020

Newbury Zoning Board of Appeals 12 Kent Way Byfield, MA 01922

RE: Village at Cricket Lane

Dear Chairman Traister & Board Members of the ZBA,

The Parker River Clean Water Association (PRCWA) would like to reiterate our concern for the 24-unit development being proposed off Pearson Drive. The Byfield Water District's (BWD) description of the water supply being "adequate" at this time, does not prevent the Zoning Board from imposing reasonable conditions to offset the impact of water use for the site. Indeed, the word "adequate" would not relieve one's anxiety if this was the description of child safety seats in a car you were considering buying.

The Commonwealth has determined the Parker River to be one of the most highly stressed basins in the State, according to the Massachusetts Resource Commission. Increasing instances of low flows and dry riverbeds continue to impact water quality.

Engineers for the BWD, Weston & Sampson, during a site examination of the Larkin Road well field cited the need for additional supply stating, *"Recent reports document the inability of the current wells utilized by the District to meet seasonal high demands in the summer months."* 

The BWD is currently seeking a 15 percent increase in their Water Withdrawal Permit from MassDEP. New standards will require the BWD to develop a Mitigation/Offsets plan to address the additional withdrawal above a set baseline amount, due to the groundwater levels in the Parker River basin.

MassDEP has developed a demand management toolkit for water suppliers to consider. Some of these measures are listed below:

- Ban on nonessential, outdoor water use
- Private well bylaw
- Conservation rate structure

- Water banking
- Higher water efficiency
- Rebates for appliances

Most applicable to land-use boards would be the concept of "water banking." A typical water bank would require that anyone seeking to connect to the municipal water supply must reduce from the existing water supply system or end users at least two gallons for every new gallon that is required. PRCWA believes this concept would help reduce the stress and demand being placed on the basin.

PRCWA encourages Boards to promote and condition water conservation for all of the multihousing development proposals that come before Newbury boards. Our watershed does not have the luxury of an infinite water supply and climate change will continue to stress our natural resources.

If you have any questions or need further assistance, please do not hesitate to contact our organization.

Respectfully,

George W. Comiskey

George Comiskey VP, PRCWA 978-352-7364

CC: Newbury Planning Board