

# DEPARTMENT OF PUBLIC WORKS AND PARKS

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**Paul J. Moosey, P.E.**  
Commissioner

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September 12, 2017

Martin Suuberg, Commissioner  
MassDEP  
One Winter Street, 2<sup>nd</sup> Floor  
Boston, MA 02108

RE: Mass Rivers Alliance Petition to Condition WMA Registrations

Dear Commissioner Suuberg,

The City of Worcester Department of Public Works & Parks, Water Operations (WDPWP) is pleased to submit the following comments on the Massachusetts Rivers Alliance (Alliance) petition to regulate registered withdrawals under the Water Management Act, MGL 21G (WMA). WDPWP is adamantly opposed to such regulations and finds that this initiative is contrary to the intent of the WMA and is unwarranted and unnecessary. We urge MassDEP to deny this petition and continue to renew registrations without conservation conditions as has been the practice in the past.

While the need for environmental regulations is clear, any call for a regulatory approach to address an issue must recognize that all regulations impose a cost and a staff burden on the regulated community and on state agencies. Therefore, regulations should only be enacted when there is no alternative to address a real environmental problem; where the problem is clearly associated with the actions or inactions of the targeted regulatory community; and where the regulatory controls implemented will result in measurable environmental benefits. New regulations, with their associated costs and burdens, should never be applied simply to appease special interest groups or regulate for the sake of regulation.

In its petition, the Alliance fails to show that there is a real environmental problem associated with the actions of the targeted regulatory community of public water systems with registered water withdrawals. Furthermore, the Alliance offers nothing that suggests the proposed regulations will improve the environment in any tangible way. This is just the latest quest by river advocates to gain more say and therefore more control over the daily operations of public water systems, operations that are already challenging enough given water quality requirements, public demands, staffing concerns and infrastructure needs.

The Alliance hinges its petition for regulations on five key areas. First, it claims the lack of regulation of registered withdrawals is inconsistent with the WMA. Second, it suggests, using inaccurate and overstated figures, that most water withdrawals in Massachusetts are exempt from conservation standards because they are registered and not permitted. Third, it offers that environmental harm is being done by registered withdrawals and their lack of conservation conditions as demonstrated by streamflow depletion in 2016. Fourth, the Alliance believes the Water Resources Commission's water conservation standards should dictate the law. Lastly, the petition claims that registrations must be conditioned to help address climate change. Each of these claims is addressed below.

### **Inconsistent with Water Management Act**

In the world of legislation and regulation it is always tempting to interpret what was intended by actions taken years or decades earlier by parties no longer in the discussion. Such is the case with the WMA. The Alliance and their like-minded advocates attempt to re-write history by making it appear that registrations were not to be treated any differently than permits. Yet, the WMA is very clear that registrations are very different than permits, with an entirely unique set of rules. Perhaps river advocates never liked this distinction but that is what came out of the legislative process in the early 1980's, the very American process of compromise and consensus that gives all parties some of what they want but not all of what they want. MassDEP (then DEQE) also clearly recognized the distinction between registered withdrawals and permitted withdrawals. In multiple documents issued to public water suppliers in the mid-1980's, DEQE reminded systems to register their withdrawals as that process was needed to **grandfather current use** and **establish a baseline** upon which to evaluate future actions. The WMA was never viewed as a retroactive law; it was intended to guide the world of water management going forward. Who would better understand the intentions of this new law, those who helped shape it or those some 30 years later who appear unhappy with any environmental progress unless it follows their dictates?

Also noteworthy is the amazing progress in water resources management that has ensued since 1985. Those who crafted MGL 21G would likely be awestruck and immeasurably pleased with the state of water use in Massachusetts today. Up through the 1980's, water customers had little concern about consumption levels and water waste was profligate with overuse the norm all across the State. Today, Massachusetts, thanks to improved fixtures, higher rates and a conservation ethic, has seen drastic water consumption declines despite a growing population and strong economic growth. Many sectors can share in this progress though it seems to get very little publicity.

### **Exempt Registrations Dominate Water Withdrawals**

The Alliance petition targets public water systems with registrations, and not all registrant sectors, for regulatory control. That is evident in the repeated assertions about meeting the residential gallon per capita and unaccounted for water standards, which only apply to public water systems and not agricultural, industrial or golf course registrants. The Alliance also states that 60% of all authorized withdrawals are unconditioned with respect to water conservation. This claim was repeated throughout the petition.

According to MassDEP documents, there is a total of 1,273.43 million gallons (MG) in total authorized withdrawals as of January 2016. Of this, 1,090.62 MG are in registered withdrawals by all sectors (water supply, agriculture, golf courses, etc.). MassDEP documents also show that 795.09 MG are held in registrations by public water

systems. Thus, 73% of all registered volumes are held by water supplies. Most public water systems hold both a registration for historic withdrawals and a permit for new withdrawals. Permit conditions thus apply to the majority of water systems. In reality, the only public water systems that remain outside the grasp of permit conditions are the systems that only hold a registration with no permit. The universe of such systems numbers about 60 with a combined registered volume of 494.26 MG. Rather than over 60% of all authorized withdrawals being unconditioned by water conservation performance standards, only 39% are “exempt” from conditions and the target of this petition. Included in this registered-only category is the Massachusetts Water Resources Authority (MWRA), whose registered volume makes up 63% of the registered-only public water system total volume. While MWRA should not be exempted from any proposed registration conditions, is there anything to be gained by regulating a water system that, without the need of conservation conditions imposed by WMA regulation, has managed to reduce its withdrawal by 35% since 1985. It would be hard to believe that even the most fervent river advocate would have MWRA in its crosshairs for conservation conditions. That leaves only 17% of total registrations, the non-MWRA Registration-only public water systems, as the true target of this petition. A far cry from the “more than 60 % of withdrawals” not required to comply with conservation standards and hardly a total worthy of pursuing statewide regulations.

But are the non-MWRA registered-only systems bad actors on the water conservation stage? Recent MassDEP data would suggest they are identical to permitted systems relative to water conservation performance as measured by MassDEP and river advocates. While fraught with problems, the performance standards for public water system conservation that were selected by the Water Resources Commission and MassDEP are the residential gallons per capita per day (RGPCD) and unaccounted for water (UAW). A review of seven years (2010-2016 for RGPCD; 2009-2015 for UAW) of data on these metrics taken from MassDEP’s website shows that statewide RGPCD averages 58 while UAW averages 14%. For systems with WMA permits the averages are 58 and 14% respectively. For the notorious registered-only systems (exclusive of MWRA for whom data was not available) the averages are 58 and 15%, very much in line with their permitted peers. While not all permitted systems have to meet the 65/10% standards yet, this “standard” has effectively been in play since 2004. Since that time most water systems, permitted or registered-only, have been working toward these standards. Despite best efforts the UAW target of 10% is an elusive goal for many. There is no demonstrated cause and effect for either standard that shows improved performance following implementation of new practices. Water systems have a limited number of tactics available to reduce UAW in particular and many have used all of the tools and still cannot reach the goal. This speaks to the many issues that accompany the now-outdated metric, issues that have been raised by water suppliers and Massachusetts Water Works Association since 2004. Regardless, if RGPCD and UAW are the performance standards of choice and a measure of conservation success, the data clearly shows that registered-only systems are on par with permitted systems and both groups generally show a high degree of water use efficiency and commendable level of conservation occurring across the state. Where is the need to further regulate the registered-only systems and what would be gained?

### **Environmental Harm by Registered-only systems**

The Alliance claims that there is demonstrated harm done to the rivers and streams of Massachusetts as a result of the unconditioned and unregulated registered withdrawals. In particular, the Ipswich River is cited as an example with 2016 “painfully demonstrating” the horrific impacts to flora and fauna that result from MassDEP failing to condition registrations. This accusation is beyond ridiculous. The drought of 2016, which was really a two-year drought for most of the state, was one of the most severe in decades. In some areas it may have been even more severe than the “great drought” of the 1960’s. To suggest that having a handful of communities

reduce their UAW or RGPCD or implement lawn watering bans would have made any difference in streamflow during a drought of epic proportions is nothing short of outrageous. The US Drought Portal-Northeast Region noted that many waterways set record low flows in 2016 including the Saco River in Cornish, Maine which had its lowest 7-day average streamflow last September based on 99 years of record. The USGS Water Watch shows that 28 stream gages across Massachusetts set or tied 7-day low flow records, While the Ipswich was among that group it also includes rivers in the west/central part of the state including the Quaboag, Quinebaug, Seven Mile, Millers and East Branch of the Swift. Are registered –only withdrawals responsible for such impacts or is it simply that severe droughts have severe consequences for streamflow? Regulation and conditioning of registrations would not have made any difference in lessening drought impacts in 2016.

### **Water Resources Commission Standards**

The Alliance petition, under the heading, The Public Trust Doctrine, suggests that water conservation standards adopted by the Water Resources Commission (WRC) should govern all decisions of state agencies relative to water. Apparently, they believe that to be the case even if state law says otherwise. The WRC Conservation Standards are not law or regulation. They are little more than policy or guidelines waiting for an opportunity to be interjected. Within the WMA, that opportunity is presented in the form of permits. The WMA and its implementing regulations give MassDEP tremendous authority to control permitted withdrawals to the degree they see fit. Not so with registered withdrawals which are handled very differently. Even the final decision in the Fairhaven case made clear that rights to registered volumes cannot be infringed upon even through regulation. Registrations may be regulated, but there is no obligation to do so. It would be a very fine legal line between regulating registered withdrawals through mandatory conservation measures and infringing on registrant rights.

### **Climate Change**

The petition offers that due to climate change and the pending calamity of higher temperatures, shorter winters and more drought, regulation of registered-only public water systems is a critical need to safeguard our water resources. It presents a number of statistics to make a case for a disastrous future.

The climate is changing, of that there is no doubt, and at some point it could lead to more droughts and or more floods, higher temperatures and a host of implications for the environment and public water systems. Of course the entire history of humankind has been one of constant environmental change. Just here in Massachusetts over the last century we have witnessed a devastating hurricane that flattened forests from Rhode Island to the White Mountains in 1938. In 1955 much of Massachusetts was inundated by record-setting floods. Less than ten years later the region was gripped by the worst drought ever. Such events have happened and will continue to happen and municipalities will deal with them using the best tools available. That will include expanded water supplies, flood control projects, better land use planning and a host of green and gray infrastructure improvements. Water conservation will play some role but it is not a significant one at this point in time when so much progress has already been made to reduce water waste and improve efficiency. There is a limit to reasonable conservation and one cannot plan for the uncertain future using an equally uncertain approach. Water conservation depends to a large degree on social engineering and that is not an area of practice with a well- documented track record of success.

If the climate change gloom and doom portrayed by the Alliance is truly of concern, does a reasonable person think regulating 60 additional water systems to reduce UAW from 15% to 10% and limit lawn watering is in any way an effective approach to dealing with climate change? If the Commonwealth seeks to address climate change from a water resources perspective then it should not be wasting time on developing and implementing regulations that will produce nothing of consequence. Rather, it should be working with municipalities to identify and protect new sources of drinking water, help build resilient infrastructure, locate potential new flood control facilities, search for sites to construct flood retention impoundments that can then function to supplement streamflow in dry periods and an overall large scale planning effort for the future.

In summary, the Alliance petition should be denied on the grounds it is inconsistent with the intent of the WMA, is unwarranted, unnecessary and will not make the least bit of difference relative to the environment or climate change. There are much more important things for public water systems and MassDEP to be focused on. This ongoing effort to rewrite the WMA has been and continues to be a waste of time for many at the local and state level. We are forever bogged down in this trivial pursuit while important and meaningful work languishes.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip D. Guerin". The signature is fluid and cursive, with the first name being the most prominent.

Philip D. Guerin  
Director of Water and Sewer Operations

CC: Lieutenant Governor Karyn Polito  
Secretary of Environmental Affairs Matthew Beaton

**MassDEP Bureau of Water Resources**  
**Safe Yield and Its Components by Major Basin**  
**March 29, 2016**

Basin Name	Drainage Area (sq mi)	Annualized Basin Yield (Q90 Streamflow and/or Drought Aquifer Recharge) (MGD)	Reservoir Storage Credit (MGD)	SAFE YIELD: 55% of Q90 Streamflow and/or 100% of Drought Aquifer Recharge, + Storage (MGD) <sup>1</sup>	Total Annualized Authorized Withdrawals <sup>2</sup> (MGD)	Total Annualized Registered Withdrawals (MGD) <sup>2</sup>
Blackstone	431.2	162.0	0	89.1	35.53	24.92
Boston Harbor	289.0	98.6	0.6	54.9	39.14	31.62
Buzzards Bay	374.6	178.1 <sup>3</sup>	0	148.4	84.02	73.26
Cape Cod	401.8	266.0	0	266.0	51.87	32.68
Charles	312.9	117.6	0.5	65.2	46.62	34.11
Chicopee	721.6	252.9	214.0	353.1	204.96	201.56
Concord	400.3	159.2	0	87.5	36.79	28.62
Connecticut (NET)	7368.8	3,393.6	0	1,866.5	149.67	143.19
Deerfield	663.5	236.4	0	130.0	3.93	3.77
Farmington	151.9	46.3	0	25.5	0.0	0
French	94.7	35.8	0	19.7	3.54	3.42
Housatonic	549.9	175.2	0	96.4	35.61	30.75
Hudson	231.3	69.4	0	38.2	13.35	10.69
Ipswich	155.2	53.4	0	29.4	32.81	29.59
Islands	157.8	104.4	0	104.4	7.38	5.2
Merrimack (NET)	3901.4	1,637.1	0	900.4	80.22	54.68
Millers	389.1	120.1	0	66.0	10.87	8.73
Narr-Mt. Hope Bay	116.7	46.2	12.6	38.0	13.16	12.41
Nashua	507.8	212.3	138.8	255.5	180.87	167.46
North Coastal	171.5	46.4	0	25.5	21.93	20.8
Parker	82.8	27.2	0	15.0	2.52	1.61
Quinebaug	164.0	61.0	0.40	33.9	5.63	2.7
Shawsheen	78.2	26.4	0	14.5	5.01	5.01
South Coastal	240.7	92.4 <sup>3</sup>	0	70.1	47.4	36.39
Taunton	530.1	244.4	0	134.4	92.45	66.36
Tenmile	53.1	21.1	0	11.6	12.94	9.99
Westfield	516.9	152.6	14.9	98.8	55.21	51.1

sq mi = square miles; MGD = million gallons per day

*1273.43      1090.62*

1. The annualized basin yields of the Cape Cod, Islands, and portions of the South Coastal and Buzzards Bay basins were not adjusted by 55% of streamflow because they are based on drought year aquifer recharge, rather than on simulated drought streamflow.

2. As of January 2016

3. Basin Yield values are a combination of streamflow-based (Q90) in one portion of major basin and aquifer-recharge based in another portion.

Connecticut (NET) = Connecticut River at USGS gage in Thompsonville, CT minus Westfield, Chicopee, Millers, and Deerfield River basins

Merrimack (NET) = Merrimack River at USGS gage in Lowell, MA minus Nashua, Concord, and Shawsheen River basins, plus drainage area below Lowell gage.

# WaterWatch

## Summary of Recent 7-day Average Flow Conditions

(2016-01-01 -- 2016-12-31)

["-", no data; "&gt;", greater than all historical minimum values]

USGS station number	USGS station name	Drain. area [mi <sup>2</sup> ]	No. of days with zero flows	2016-01-01 to 2016-12-31			Historical annual minimum 7-day flows		
				Lowest 7-day average flow			No. of years	Min. (year) [ft <sup>3</sup> /s]	No. of years with zero flows
				Date	Stream flow [ft <sup>3</sup> /s]	Rank			
01166500	MILLERS RIVER AT ERVING, MA	372	0	2016-09-18	28.5	1	103	28.5 (2016)	0
011055566	NEPONSET RIVER AT MILTON VILLAGE, MA	101	0	2016-09-23	11.6	1	21	11.6 (2016)	0
01176000	QUABOAG RIVER AT WEST BRIMFIELD, MA	150	0	2016-09-12	5.33	Tie 1	106	5.33 (2016)	0
01109000	WADING RIVER NEAR NORTON, MA	43.3	0	2016-09-27	0.24	Tie 1	93	0.24 (2016)	0
01102000	IPSWICH RIVER NEAR IPSWICH, MA	125	0	2016-09-05	0.25	Tie 1	88	0.25 (2016)	0
01094500	NORTH NASHUA RIVER NEAR LEOMINSTER, MA	110	0	2016-07-28	21	Tie 1	83	21 (2016)	0
01174500	EAST BRANCH SWIFT RIVER NEAR HARDWICK, MA	43.7	22	2016-07-31	0	Tie 1	81	0 (1953)	12
01101500	IPSWICH RIVER AT SOUTH MIDDLETON, MA	44.5	0	2016-10-08	0.06	Tie 1	80	0.06 (2017)	0
01101000	PARKER RIVER AT BYFIELD, MA	21.3	7	2016-09-03	0	Tie 1	72	0 (2016)	1
01096000	SQUANNACOOK RIVER NEAR WEST GROTON, MA	65.9	0	2016-09-18	3.89	Tie 1	68	3.89 (2016)	0
01105500	EAST BRANCH NEPONSET RIVER AT CANTON, MA	27.2	0	2016-09-20	2.36	Tie 1	65	2.36 (2016)	0
01175670	SEVENMILE RIVER NEAR SPENCER, MA	8.81	0	2016-09-18	0.07	Tie 1	57	0.07 (2016)	0
01097300	NASHOBA BROOK NEAR ACTON, MA	12.8	0	2016-07-29	0.01	Tie 1	55	0.01 (2016)	0
01109060	THREEMILE RIVER AT NORTH DIGHTON, MA	84.3	0	2016-09-19	2.8	Tie 1	52	2.8 (2016)	0
01109070	SEGREGANSET RIVER NEAR DIGHTON, MA	10.6	65	2016-07-29	0	Tie 1	52	0 (1966)	19
01098530	SUDBURY RIVER AT SAXONVILLE, MA	106	0	2016-09-05	3.07	Tie 1	38	3.07 (2016)	0
01123360	QUINEBAUG R BL E BRIMFIELD DAM AT FISKDALE, MA	62.6	0	2016-08-05	5.62	Tie 1	33	5.62 (2016)	0
01103280	CHARLES RIVER AT MEDWAY, MA	65.7	0	2016-09-21	2.2	Tie 1	20	2.2 (2016)	0
01104455	STONY BROOK, UNNAMED TRIBUTARY 1, NEAR WALTHAM, MA	0.48	0	2016-09-18	0.06	Tie 1	19	0.06 (2016)	0
01104460		22.0	0	2016-10-20	1.59	Tie 1	18		0

USGS station number	USGS station name	Drain. area [mi <sup>2</sup> ]	No. of days with zero flows	2016-01-01 to 2016-12-31			Historical annual minimum 7-day flows		
				Lowest 7-day average flow			No. of years	Min. (year) [ft <sup>3</sup> /s]	No. of years with zero flows
				Date	Stream flow [ft <sup>3</sup> /s]	Rank			
	STONY BROOK AT RT 20 AT WALTHAM, MA						1.59 (2017)		
01104415	CAMBRIDGE RES., UNNAMED TRIB 2, NR LEXINGTON, MA	0.41	28	2016-08-04	0	Tie 1	16	0 (1998)	4
01104475	STONY BROOK RES., UNNAMED TRIB 1, NEAR WESTON, MA	0.85	0	2016-09-13	0.03	Tie 1	14	0.03 (2016)	0
01105583	MONATIQUOT RIVER AT EAST BRAintree, MA	28.7	0	2016-09-03	0.15	Tie 1	12	0.15 (2016)	0
01100627	SHAWSHEEN RIVER AT BALMORAL STREET AT ANDOVER, MA	72.8	0	2016-09-05	4.94	Tie 1	11	4.94 (2016)	0
01098500	COCHITUATE BK BL LAKE COCHITUATE AT FRAMINGHAM, MA	17.5	0	2016-10-01	0.1	Tie 1	10	0.1 (2017)	0
01105638	WEIR RIVER AT LEAVITT STREET AT HINGHAM, MA	14.1	33	2016-08-29	0	Tie 1	8	0 (2007)	2
01103455	TROUT BROOK AT DOVER, MA	3.72	0	2016-09-03	0.12	Tie 1	7	0.12 (2016)	0
01104420	CAMBRIDGE RES., UNNAMED TRIB 3, NR LEXINGTON, MA	0.73	0	2016-08-01	0.04	Tie 1	7	0.04 (2016)	0
01105000	NEPONSET RIVER AT NORWOOD, MA	34.7	0	2016-09-30	1.64	2	77	0.83 (2002)	0
01109730	BLACKSTONE RIVER, W. MAIN ST., AT MILLBURY, MA	71.4	0	2016-09-18	38.3	2	15	34.6 (2010)	0
01111212	BLACKSTONE RIVER, RT 122 BRIDGE NEAR UXBRIDGE, MA	244	0	2016-09-18	45.2	2	12	45.2 (2016)	0
01162000	MILLERS RIVER NEAR WINCHENDON, MA	81.8	0	2016-08-06	2.5	Tie 2	102	2.39 (2010)	0
01099500	CONCORD R BELOW R MEADOW BROOK, AT LOWELL, MA	400	0	2016-09-08	17.8	Tie 2	81	15.6 (1958)	0
01172500	WARE RIVER NEAR BARRE, MA	55.1	0	2016-07-31	0.4	Tie 2	72	0.11 (1995)	0
01104200	CHARLES RIVER AT WELLESLEY, MA	211	0	2016-08-23	4.17	Tie 2	59	4.13 (1965)	0
01105600	OLD SWAMP RIVER NEAR SOUTH WEYMOUTH, MA	4.50	0	2016-09-03	0.08	Tie 2	52	0.06 (1995)	0
01105870	JONES RIVER AT KINGSTON, MA	19.8	0	2016-08-21	2.42	Tie 2	52	1.06 (1966)	0
01174565	WEST BRANCH SWIFT RIVER NEAR SHUTESBURY, MA	12.6	0	2016-09-18	0.47	Tie 2	25	0.38 (1995)	0
01100568	SHAWSHEEN RIVER AT HANSCOM FIELD NEAR BEDFORD, MA	2.13	0	2016-09-05	0.22	Tie 2	22	0.13 (2002)	0
01104430		6.86	0	2016-11-28	0.02	Tie 2	20		1



USGS station number	USGS station name	Drain. area [mi <sup>2</sup> ]	No. of days with zero flows	2016-01-01 to 2016-12-31			Historical annual minimum 7-day flows		
				Lowest 7-day average flow			No. of years	Min. (year) [ft <sup>3</sup> /s]	No. of years with zero flows
				Date	Stream flow [ft <sup>3</sup> /s]	Rank			
	HOBBS BK BELOW CAMBRIDGE RES NR KENDALL GREEN, MA							0 (2002)	
01108410	MILL RIVER AT SPRING STREET AT TAUNTON, MA	43.5	0	2016-09-26	2.13	Tie 2	12	1.83 (2014)	0
01104370	STONY BROOK AT VILES STREET, NEAR WESTON, MA	10.2	0	2016-09-05	0.57	Tie 2	8	0.47 (2010)	0
01168250	COLD RIVER AT FLORIDA, MA	6.47	0	2016-07-29	0.21	Tie 2	3	0.19 (2015)	0
01183500	WESTFIELD RIVER NEAR WESTFIELD, MA	497	0	2016-07-28	56.3	3	104	50.1 (1995)	0
01198125	HOUSATONIC RIVER NEAR ASHLEY FALLS, MA	465	0	2016-10-17	82	3	14	68.6 (1995)	0
01103500	CHARLES RIVER AT DOVER, MA	183	0	2016-09-28	4.52	Tie 3	80	4.3 (1995)	0
01105730	INDIAN HEAD RIVER AT HANOVER, MA	30.3	0	2016-09-19	1.31	Tie 3	52	0.38 (1981)	0
01095220	STILLWATER RIVER NEAR STERLING, MA	31.6	0	2016-09-18	0.69	Tie 3	24	0.15 (2002)	0
01102345	SAUGUS RIVER AT SAUGUS IRONWORKS AT SAUGUS, MA	20.8	0	2016-08-09	0.54	Tie 3	24	0.48 (2010)	0
01095375	QUINAPOXET RIVER AT CANADA MILLS NEAR HOLDEN, MA	46.3	0	2016-08-12	1.79	Tie 3	21	0.63 (1999)	0
01104480	STONY BROOK RESERVOIR AT DAM NEAR WALTHAM, MA	23.7	0	2016-11-10	0.01	Tie 3	19	0 (2001)	2
01105917	MATTAPOISETT RIVER NEAR MATTAPOISETT, MA	24.0	0	2016-09-05	0.57	Tie 3	8	0 (2008)	1