TOWN OF WESTON, MA

Proposed Environmental Impact Report

DEC 2025

Weston Water Storage Tanks Replacement

Submitted To:
Executive Office of Energy and Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Proponent:
Town of Weston Department of Public Works
Water Division
190 Boston Post Road By-pass
Weston, MA 02493

Prepared By:
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Suite 404
Burlington, MA 01803

WRIGHT-PIERCE
Engineering a Better Environment

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Section 1 Project Description

1.1 Introduction

The Town of Weston (the Town) Department of Public Works (DPW) owns and operates three drinking water storage tanks: Paines Hill, Cat Rock and Doublet Hill, which were constructed in 1953, 1946, and 1931, respectively. These tanks are approaching or have exceeded their useful life and must be replaced. The existing tanks are generally located at the highest elevations within the community and the replacement tanks must be located on property directly adjacent to each existing tank to provide sufficient water pressure to homes and fire hydrants in accordance with regulations and standard engineering practices. No other feasible locations exist in town for construction of the new tanks. The new water storage tanks will replace aged critical infrastructure as well as improve pressures in the distribution system and provide water storage volume for firefighting.

An analysis of alternatives to meet the Town's drinking water system needs determined that constructing new storage tanks to replace the aged storage tanks and to store water at a higher elevation is recommended. Each existing tank site parcel is surrounded by existing residential homes as well as open space protected under Article 97 of the Amendments to the Constitution of the Commonwealth ("Article 97") for conservation and in the case of Cat Rock, conservation and recreation. An alternatives analysis evaluating potential sites for the replacement tanks was completed. As discussed in the alternatives analysis presented herein, the existing tanks must remain in service during construction and, due to the small size of the existing tank site parcels, the Town proposes to change the use of a total of 4.501 acres of Article 97 lands from protected for conservation and/or recreation to protected for water supply in order to construct the replacement tanks. Change in use of Article 97 lands meets the review threshold for Massachusetts Environmental Policy Act (MEPA) review and is subject to the requirements of *An Act Preserving Open Space in the Commonwealth*. The Cat Rock tank site and Doublet Hill tank site are also located within 1-mile of Environmental Justice (EJ) populations. In a pre-filing meeting held with the Executive Office of Energy and Environmental Affairs (EEA) on June 1, 2022, the EEA recommended that the Town submit one MEPA review request that encompasses all three tank sites.

A summary of project locations and land areas is provided in Table 1-1. All figures are provided in Attachment C. In Attachment C, the Paines Hill and Doublet Hill tank sites are shown on the Natick quadrangle topographic map (Figure 1) while the Cat Rock tank site is shown the Concord quadrangle topographic map (Figure 2). The replacement land identified and approved by the Town is summarized in Table 1-2, shown on Figure 1, and described in detail in this report.

Table 1-1 Summary of Tank Site Locations and Areas

		Paines Hill Tank Site	Cat Rock Tank Site	Doublet Hill Tank Site
Existing Tank Sites	Address	150 Highland St, Weston	0 Overlook Dr, Weston	85 Doublet Hill Rd, Weston
	Parcel ID	31-5	13-93	40-37-10
	Area	1.09 acres	1.46 acres	0.36 acres
Proposed Tank Sites	Address	0 Chestnut St, Weston	0 Drabbington Way, Weston	0 Doublet Hill Rd, Weston
	Parcel ID	31-6-30	14-6	40-37
	Area	1.268 acres	1.718 acres	1.515 acres

Table 1-2 Summary of Replacement Land

Description	Parcel B on Case Estates Parcel 9
Address	0 Ash Street, Weston
Parcel ID	32-23-20 (to be subdivided)
Area	5.000 acres

1.2 Regulatory Review

The Project will require several permits, approvals and reviews from federal, state and local agencies. The following subsections provide an overview of the permitting anticipated for this project.

1.2.1 Massachusetts Environmental Policy Act (MEPA)

Article 97 establishes a right to a clean environment and declares that land subject to Article 97 shall not be used for other purposes without a two-thirds roll call vote of Legislature. This project proposes to change the use of portions of Article 97 lands from "preserved for conservation," and in the case of Cat Rock "preserved for conservation and recreation," to "preserved for water supply." Therefore, this project meets the review threshold under 301 CMR 11.03(1)(b)(3) for changing the use of land subject to Article 97.

Since the Project is located within 1 mile of Environmental Justice (EJ) populations, the review threshold under 301 CMR 11.03(12)(b) based on the promulgation of Section 58 of the Climate Roadmap Act also applies and an Environmental Impact Report (EIR) is required under 301 CMR 11.06(7)(b). The Cat Rock tank site and Doublet Hill tank site are within 1 mile of EJ populations located in the City of Waltham. The Paines Hill tank site is not within a Designated Geographic Area (DGA).

For these reasons, a Public Review of Environmental Impacts under MEPA is required. *An Act Preserving Open Space in the Commonwealth* formalizes this process by requiring that the Proponent notify the public, perform an alternatives analysis, and identify replacement land (land swap) to achieve no net loss of conservation land.

Pursuant to 301 CMR 11.05(9), the Town is submitting this Proposed Environmental Impact Report (PEIR) and the Expanded Environmental Notification Form (EENF) submitted under separate cover. The Town respectfully requests that the Secretary allow a rollover EIR in accordance with 301 CMR 11.06(13). The dual EIR and EENF addresses the criteria required under 301 CMR 11.06(13) as follows:

(a) *presents a complete and definitive description and analysis of the Project and its alternatives, and an assessment of its potential environmental and public health impacts and mitigation measures sufficient to allow a Participating Agency to fulfill its obligations in accordance with M.G.L. c. 30, §§ 61 and 62K and 301 CMR 11.12(5);*

The Project Description is provided in Section 2 while the Alternatives Analysis is provided in Section 4. The Alternatives Analysis includes an evaluation of potential options to address the Town's water storage deficit as well as a separate evaluation for potential replacement tank locations at each tank site. Potential environmental and public health impacts and mitigation measures are described in Section 5.

(b) *demonstrates that the Project will not materially exacerbate any existing unfair or inequitable Environmental Burden and related public health consequences impacting an Environmental Justice Population, and will not result in a disproportionate adverse effect or increased climate change effects on an Environmental Justice Population;*

The replacement tanks will significantly improve the hydraulics and resiliency of the Town's water system. The change in use of conservation land to water supply land will permanently impact three conservation areas and hiking trail systems in the Town. These conservation areas are open to the public, including residents and non-residents. The changes to the conservation areas and hiking trails will impact all users of these areas and are, therefore, not expected to disproportionately impact EJ Populations. During construction of the replacement tanks, there will be an increase in the traffic of construction equipment on roads near the tank sites in Weston. It is not anticipated that traffic in EJ communities in Waltham will be affected during construction of the tanks. Other temporary impacts from construction such as stormwater runoff, noise, dust, and solid waste generation will be mitigated as described in Section 5 and are not anticipated to impact EJ Populations in Waltham.

(c) *describes measures taken to provide meaningful opportunities for public involvement by Environmental Justice Populations prior to filing the dual ENF and Proposed EIR, including any changes made to the Project to address concerns raised by or on behalf of Environmental Justice Populations;*

Starting in February 2023, the Town has implemented a public outreach campaign which has included a dedicated project website (https://www.westonma.gov/1828/Water-Tank-Replacement-Project), multiple public forums and site visits, and a notification mailing list that any member of the public can opt in to.

On October 6, 2025, advanced notification was sent to the community-based organization (CBOs) and tribes listed in the Project-Specific EJ Reference List. Additionally, advanced notification materials were posted to the Town of Weston's dedicated tank replacement project website. A link to these documents was also posted to the "Waltham, MA Residents" Facebook group and to a Waltham Chinese-American WeChat group. Hard copies of the advanced notification documents were posted at the Waltham Public Library. Advanced notification materials were provided in English and Chinese.

Public outreach efforts are further described in Section 1.4. Materials used to outreach to EJ Populations are included in Attachment G.

(d) *shows that comments received on the dual ENF and Proposed EIR do not raise substantial issues not previously considered by the Proponent; and*

(e) *shows that no substantive issues remain to be resolved.*

The Proponent addressed public comments and concerns throughout the conceptual planning efforts. For further details related to the proponents efforts in regards to addressing public comments, refer to the dedicated project website "https://www.westonma.gov/1828/Water-Tank-Replacement-Project" and the Water Tank Project Document Center which contains folders titled "Public Forums" and "Resident Questions & Answers".

The Proponent has also coordinated with the EEA throughout the planning phase of this project. The Proponent and a representative of the EEA completed site visits to the three tank sites and the proposed land swap parcel on December 20, 2024. No substantive issues were identified during the site visits. For these reasons, no substantive issues are anticipated.

Attachment A includes the MEPA Distribution List, Attachment B includes the List of Permits and Reviews Required by the Project, and Attachment O includes the Public Notice of Environmental Review to be published in a local newspaper.

1.2.2 Environmental Protection Agency

A National Pollutant Discharge Elimination System (NPDES) Construction General Permit authorized by the Environmental Protection Agency (EPA) will be required as the construction activities are anticipated to disturb one or more acres of land.

1.2.3 Federal Aviation Administration

Based on the results of the Federal Aviation Administration (FAA) Pre-Screening Tool, all three replacement tanks required notice to the FAA though the sites are outside of any airport approach airspace. Form 7460-1 Notice of Proposed Construction or Alteration notices were submitted for each tank site on May 27, 2025. On June 11, 2025, the FAA issued determinations of no hazard to air navigation for the Paines Hill, Cat Rock, and Doublet Hill replacement tanks. The file notices submitted by the Proponent and the Obstruction Evaluation/Airport Airspace Analysis studies completed by the FAA are included as Attachment M.

1.2.4 Massachusetts Department of Environmental Protection

The design, operation, and maintenance of public water systems in Massachusetts must comply with *310 CMR 22: The Massachusetts Drinking Water Regulations* and the Massachusetts Department of Environmental Protection (MassDEP) Drinking Water Program's *Guidelines for Public Water Systems*. Public water systems which provide fire protection for the community must also comply with National Fire Protection Association (NFPA) codes.

The design of the tank replacements must be submitted for review and approval to MassDEP under the Bureau of Resource Protection (BRP) permit WS 32: Distribution Modifications for Systems that serve more than 3,300 people to ensure that drinking water requirements are met. The BRP WS 32 will be submitted when the Project's design is at 90% completion.

1.2.5 Massachusetts Historical Commission

Massachusetts Cultural Resource Information System mapping shows that the Paines Hill tank site is within the Chestnut Street Historic Area while the Cat Rock tank site and the Doublet Hill tank site are not shown as being within historic areas. Massachusetts Historical Commission (MHC) Project Notification Forms were submitted for each of the three sites: Paines Hill located at 150 Highland Street (existing tank) and 0 Chestnut Street (proposed tank), Cat Rock located at 0 Overlook Drive (existing tank) and 0 Drabbington Way (proposed tank), and Doublet Hill located at 85 Doublet Hill Road (existing tank) and 0 Doublet Hill Road (proposed tank). MHC received the PNFs on January 10, 2023. Based on MHC's review of the files and materials included in the PNFs, they determined that none of the projects are likely to affect significant historic or archeological resources. The PNFs and MHC's reviews are included as Attachment E.

1.2.6 Weston Select Board

In order for the Project to proceed, the Select Board must vote by a majority to approve the change in use of Article 97 land to construct the replacement tanks and approve of the land swap parcel to be placed into protection for conservation under Article 97. The Select Board voted to approve the proposed Paines Hill and Doublet Hill tank sites on January 23, 2024 and the Cat Rock tank site on February 27, 2024. The Select Board then voted to approve the proposed land swap parcel on August 27, 2024, as discussed in Section 5.6.

The Proponent will continue to coordinate with the Select Board throughout the design and construction phases of the Project.

1.2.7 Weston Conservation Commission

In order for the Project to proceed, the Conservation Commission must vote unanimously to declare the Article 97 land at the replacement tank sites as surplus and approve of the land swap parcel to be placed into Article 97 protection under Article 97. On August 27, 2024, the Conservation Commission voted unanimously to approve the proposed land swap parcel, as discussed in Section 5.6.

The Proponent will continue to coordinate with the Conservation Commission throughout the design and construction phases of the project.

1.2.8 Weston Planning and Zoning

1.2.8.1 Zoning By-Law Amendment

The Town passed an amendment to its Zoning By-law to exempt infrastructure owned and operated by the Town that is used to provide essential or emergency services, including these three water tanks, from standard height

and placement zoning dimensional requirements. The amendment allows these three water tanks owned by the Town to be constructed to a maximum elevation of 410 feet NAVD88, not including any appurtenances necessary for the proper operations of the tank or related infrastructure. The Planning Board voted to approve the amendment on November 6, 2024. During the Special Town Meeting held on March 12, 2025, the Town residents voted by a two-thirds majority to approve this Zoning By-law amendment. The Warrant for the March 2025 Special Town Meeting is included as Attachment K.

1.2.8.2 Site Plan Review

The Town's Select Board and Planning Board developed a Letter of Intent for the water tank replacement project. The Letter of Intent provides a structure for the Select Board and Planning Board to coordinate with each other with the goal of minimizing the impacts of the tank replacement project to the natural woodlands and neighborhoods. The Letter of Intent was memorialized by both parties on October 8, 2024. The project has and will continue to undergo Site Plan Review by the Planning Board.

1.2.9 Weston Zoning Board of Appeals

The design of the replacement tank sites includes installation of permanent 8-foot tall chain link fence with barbed wire around the tanks to protect public water supplies and infrastructure. Per the Town's Zoning By-Laws, a fence is considered a structure if it is more than 6 feet tall. All three tank sites are located in residential districts where structures must meet setback requirements. Therefore, a petition to the Board of Appeals for a variance from the zoning by-Law's will be submitted at the time of 90% design to allow for the security fencing around the tanks.

1.2.10 Weston Town Meeting

During a Special Town Meeting held on March 12, 2025, the Town residents voted by a two-thirds majority to authorize the land swap and file for Article 97 legislation. The Warrant for the March 2025 Special Town Meeting is included as Attachment K.

1.2.11 Weston Board of Health

At the time of construction, the project will require that permits for New Construction and Demolition be obtained from the Weston Board of Health.

1.2.12 Status of Permits, Approvals, and Reviews

Table 1-3 includes a summary of required permits, approvals and reviews anticipated for the project and a status of each pending action as noted above. Anticipated permits, approvals and/or reviews include, but are not limited to the following:

Table 1-3 Anticipated Permits, Approvals and/or Reviews

Organization	Title	Status
Environmental Protection Agency	National Pollutant Discharge Elimination System General Construction Permit	To be Filed by Contractor

Organization	Title	Status
Federal Aviation Administration	Form 7460-1 Notice of Proposed Construction or Alteration	Completed
Massachusetts Department of Environmental Protection	BRP WS-32 Distribution System Modifications for System that Serves More Than 3,300 People	To be Completed at 90% Design
Massachusetts Historical Commission	Project Notification Form	Completed
Weston Select Board	Approval of the change in use of Article 97 land and the land swap parcel	Approved by majority
Weston Conservation Commission	Declaration that Article 97 land at the replacement tank sites is surplus and approval of the land swap parcel	Approved unanimously
Weston Planning and Zoning	Zoning By-Law Amendment to Allow Tank Height	Completed
Weston Planning and Zoning	Site Plan Review	In Progress
Weston Zoning Board of Appeals	By-Law Variance for Tank Site Security Fencing	To be Completed at 90%
Weston Town Meeting	Authorization of the land swap and filing for Article 97 legislation	Approved by two-thirds majority
Weston Board of Health	Permits for New Construction and Demolition	To be Filed by Contractor

1.3 Financial Assistance

The Town intends to utilize a combination of the Water Enterprise Fund, free Town cash, and direct State grants to fund the Project. During the Special Town Meeting held on March 12, 2025, the Town residents voted by a two-thirds majority to appropriate the money needed for the design and construction of the water storage tanks. The Warrant for the March 2025 Special Town Meeting is included as Attachment K. The Town has also sought funding for the Project from a State low interest loan through the Drinking Water State Revolving Fund (DWSRF 2026).

1.4 Public Outreach

The Town of Weston maintains a website (https://www.weston.org/1828/Proposed-Water-Tank-Replacement-Project) dedicated to the tank replacement project to provide the public with project updates, meeting recordings, and informational materials. Anyone in the public can opt in to receive email/text notifications when project updates are posted. Since the beginning of 2023, the Select Board has held many public forums to discuss the water tank replacement project. All forums were open to all members of the public. These included:

- February 16, 2023 – Virtual forum to discuss the engineering and hydraulics of the proposed new system.
- March 21, 2023 – Virtual forum to discuss siting of the proposed new tanks.
- April 25, 2023 – Virtual forum to discuss the finances of the project.
- December 5, 2023 – Virtual forum to present the Tank Site Alternatives Analysis.
- January 23, 2024 – Virtual forum to continue discussion of the Tank Site Alternatives Analysis.
- February 13, 2024 – Virtual forum to continue discussion of site alternatives for Cat Rock.
- September 11, 2024 – Hybrid forum to discuss the proposed land swap.
- October 9, 2024 – Hybrid forum to discuss the project's coordination with the Planning Board and the proposed zoning bylaw to allow for the increased height of the new tanks.
- November 14, 2024 – Hybrid forum to discuss project funding.

One key outcome of the 2023 forums was for the Town to conduct site walks at each tank location to further engage with the community and facilitate collaboration between the neighbors of the tanks and various town departments including the Town Manager, Select Board, DPW, Planning Board, Conservation Commission, Tree Advisory Group, Town Engineer and Fire Department.

The Town posted a notification for the site walk meetings on their tank project website and distributed letters to abutters of the tank sites. Site meetings were held at Doublet Hill and Paines Hill on May 31, 2023, and the site meeting at Cat Rock was held on June 7, 2023. Follow up meetings with individual abutters to Paines Hill were conducted on June 7 and June 28, 2023 upon request of the abutters. Minutes from the advertised site walks were posted on Weston's website.

The primary objective of the site walk meetings was to obtain feedback on the proposed conceptual location of each tank to be considered in a final siting evaluation. The Tank Sites Alternatives Analysis report was prepared to provide an evaluation and recommendation for the preferred location of a new tank at the Paines Hill, Cat Rock and Doublet Hill locations based on engineering and hydraulic needs, construction challenges and costs, Article 97 constraints, and feedback received from the public site walks.

The initial Tank Site Alternatives Analysis Report was issued to the Town and posted to the Town's website in November 2023. A virtual forum was held on December 5, 2023, to review the alternatives sites, evaluation criteria, and analysis and recommendations presented in the report. Two additional forums were held on January 23, 2024, and February 27, 2024 to discuss the alternatives analysis and evaluate additional site alternatives. As a result of these forums, two additional alternative sites for the Cat Rock tank and one additional alternative site for the Doublet Hill tank were evaluated and incorporated into the updated Tank Site Alternatives Analysis Report, which was posted to the Town's dedicated tank replacement website in June 2024. Based on the Alternative Analysis, the Select Board voted to approve the proposed Paines Hill and Doublet Hill tank sites on January 23, 2024 and the Cat

Rock tank site on February 27, 2024. The Select Board then voted to approve the proposed land swap parcel on August 27, 2024, as discussed in Section 5.6.

At the March 12, 2025 Special Town Meeting, Town residents voted on the following three articles: (1) appropriate money for construction of the three replacement tanks and other distribution system improvements, (2) approve the Planning and Zoning by-law to allow for the height of the replacement tanks, and (3) approve the land swap. These three articles passed by a two-thirds majority.

1.4.1 Environmental Justice Community Outreach

On October 6, 2025, advanced notification was sent to the community-based organization (CBOs) and tribes listed in the Project-Specific EJ Reference List. The advanced notification materials included the Environmental Justice Screening Form, Additional Project Information, and maps showing EJ Populations with 1- and 5-miles from the project sites. Chinese translations of these materials were also provided. The Environmental Justice Screening Form stated that the community may contact the Owner's Representative to request a meeting to discuss the project. Advanced notification materials and the Project-Specific EJ Reference List are included in Attachment G. Additionally, advanced notification materials were posted to the Town of Weston's dedicated tank replacement project website. A link to these documents was also posted to the "Waltham, MA Residents" Facebook group and to a Waltham Chinese-American WeChat group. Hard copies of the advanced notification documents were posted at the Waltham Public Library.

Section 2 Project Description

2.1 Project Overview

The Project consists of the replacement of three existing water storage tanks in the Town of Weston with three new tanks. The new tanks will replace aged infrastructure, increase water storage volume and, in the case of Paines Hill and Doublet, increase overflow elevations to provide improved water service conditions, and needed fire flow to the distribution system. Hydraulic analyses completed during design indicated that the Cat Rock tank does not need to be raised to serve the northern portion of the town. Instead, a new booster pump station will be installed to provide increased pressures to localized high elevation areas in the northern part of the town (the booster pump station is a project separate from the tank replacement project).

As described in the alternatives analysis in the sections below, due to the small size of the existing tank site parcels and the need to maintain the existing tanks in service during construction, it is proposed that portions of adjacent conservation land protected by Article 97 be transferred to water supply land protected under Article 97 to allow for construction of the new tanks at each location. Approximately 4.501 acres of Article 97 are proposed for change in use. Replacement land totaling 5.000 acres has been identified and approved by the Town. This land will be placed under Article 97 protection for the purposes of conservation and will be used for passive recreation.

In addition to the replacement of the water storage tanks, other system improvements will be needed including upgrades to the existing Wellesley Street booster pumping system, installation of a new pump station to serve neighborhoods located at elevations too high to be served by the Cat Rock tank, and pressure reducing valves in select areas of the system to maintain pressures in lower elevations to manageable levels. These improvements will be implemented in already developed areas and do not trigger MEPA review thresholds.

2.2 Project Objectives

Weston's water system serves approximately 95% of the Town's population through a total of 3,882 service connections, as of 2024. The Town's drinking water is supplied by the Massachusetts Water Resources Authority (MWRA) and pumped into the town's distribution system by the Wellesley Street Booster Pump Station. The water system includes three active water storage tanks: Paines Hill, Cat Rock, and Doublet Hill, which were constructed in 1953, 1946, and 1931, respectively. The three water storage tanks are needed to establish and sustain adequate pressure throughout the distribution system, to provide stored water during peak demand periods, and to provide storage for firefighting and emergency purposes (i.e., failure of the Wellesley Street Booster Pump Station or MWRA transmission main). Storage also helps to improve service reliability and provide operational flexibility.

A Water System Master Plan (Master Plan) prepared by Wright-Pierce for the Weston DPW in June 2019 identified system deficiencies related to water storage and hydraulic conditions: a serious deficit in active storage of approximately 2.5 million gallons (MGs) (active storage is the portion of total storage that is available for use based on system hydraulics), substandard pressures in multiple areas of the distribution system, and concerns with the physical conditions of the existing tanks, particularly Paines Hill, due to their age. The storage deficit and substandard pressures are a result of hundreds of homes being constructed at elevations above which the existing water system cannot serve. The impact of the active storage deficit is such that the system has no storage capacity for supplying water during peak demand or to fight fire under maximum day demand conditions without significant loss of service. As a result, the Wellesley Street booster pumps, which supply 100% of the system water from the MWRA, will run 24 hours a day during peak summer demands to try to keep up with demand. This storage deficit is likely to worsen as new developments are constructed and population increases. After the Master Plan was

completed, Weston experienced a population increase greater than that projected in the Master Plan. The water storage will be further impacted if housing requirements mandated by Massachusetts General Law (MGL) Chapter 40B (the Comprehensive Permit Law) and Section 3A of MGL Chapter 40A (the Zoning Act) are implemented. Potential increases in population from this required development have been incorporated into the Town's future water demand projections. Based on the new population projections which assume a higher rate of population increase than was assumed in the Master Plan, the total active storage tank recommended to serve the community has increased from 2.5 MGs to 2.84 MGs.

Per the MassDEP's 2017 Guidelines for Public Water Systems, active storage in the system should be located at an elevation to provide a minimum of 35 pounds per square inch (psi) to households under normal maximum day demand conditions. Additionally, under maximum-day plus fire flow demand conditions, a system must be capable of providing the needed fire flow, while maintaining a minimum residual pressure of 20 psi coincidental throughout the distribution system per the 310 CMR 22: The Massachusetts Drinking Water Regulations. The existing tanks were generally constructed at the highest elevations in the town and were designed to provide service up to approximately elevation 262 feet NAVD88. If the tanks are kept full by pumping, they can provide the minimum required pressure to elevations up to 280 feet. In the years since the existing tanks were constructed, houses have been developed at elevations up to 345 feet. The existing tanks cannot provide sufficient water pressure to those houses located at elevations between 280 feet and 345 feet even when the tanks are full. Low system pressures result in poor water service for domestic needs, limited available flows for firefighting, customer complaints, and may affect the accuracy of meters.

In addition to the storage and hydraulic issues noted above, the existing tanks are approaching or have exceeded their useful life and must be replaced. If not replaced, the tanks will require costly interior and exterior rehabilitation. The replacement tanks must be designed such that they improve the hydraulics of Weston's water system and provide adequate pressure to homes and fire hydrants in accordance with regulations and standard water system engineering practice. Addressing the storage deficit and substandard pressure in the system requires the addition of approximately 2.84 MGs of active storage volume. Storage can be added to the system by replacing the tanks with higher overflow elevations; increasing the diameter alone will not increase active storage.

Based on hydraulic modeling completed during project design, the recommendation was made to divide the town's distribution system into multiple pressure zones to increase the active storage in the system and provide at least 35 psi of pressure to customers located at elevations of approximately 305 feet NAVD88 or lower without increasing pressure in areas of the town that already have high pressures. To create multiple pressure zones in Weston, the water elevation of the Paines Hill and Doublet Hill tanks would be raised to serve most of the higher elevation areas, located in the southern portion of the town. In much of the northern portion of the town, with the exception of the Kings Grant neighborhood located near the Cat Rock tank, water pressures exceed the required minimum pressure under existing conditions. Therefore, it was recommended that the Cat Rock tank be replaced with a greater volume tank that stores water up to the same elevation as the existing Cat Rock tank to limit the number of pressure reducing valves that would need to be installed to lower water pressures in areas where the maximum pressure allowed by regulations would be exceeded.

Active storage for equalization and fire flow capacity will need to be provided in both pressure zones. The addition of active storage would reduce pump run time to normal durations (16 hours), improve service reliability, improve operational flexibility, and would provide storage volume needed for firefighting.

The new tanks must be constructed prior to taking the existing tanks out-of-service to maintain water service to the town. The parcels upon which the three tanks are currently located are insufficient in size to construct new tanks while maintaining the existing tanks in-service. Therefore, additional property directly adjacent to each site will need to be acquired to accommodate the addition of new tanks.

2.3 Construction Schedule, Methods, and Costs

The Project is currently in the preliminary design phase. The subsections below describe the preliminary phasing and schedule of the Project, construction methods, and construction costs.

2.3.1 Phasing and Schedule

The project will be advanced in multiple phases as described below.

The first phase will consist of the design of the three replacement water storage tanks and related infrastructure needed to accommodate the increased height of the new tanks and to improve hydraulics. The projects to be designed will include:

1. Three replacement water storage tanks at Paines Hill, Doublet Hill and Cat Rock
2. Pump upgrades at the Wellesley Street Booster Pump Station (the town's only and primary pumping station that provides water to the system from the MWRA) to accommodate the increased hydraulic gradeline from taller tanks
3. Pressure reducing valves and water main improvements (less than 1 mile in length) throughout the system to maintain pressures within reasonable limits
4. A new booster pump station to increase water pressure to the neighborhoods north of the Cat Rock tank site (referred to as the Kings Grant area)

The next phase will be bidding. All four projects will be bid concurrently to ensure that the projects needed to accommodate the new tanks are completed.

The final phase will be construction. Construction of all four projects will commence concurrently. They will be designed such that the system improvements will be completed in advance of the completion of the new storage tanks. An anticipated construction duration for the water storage tanks is 2 years while the other three remaining projects will be completed over 1 to 1.5 years.

The preliminary project schedule is presented in Table 2-1 below.

Table 2-1 Preliminary Project Schedule

Task	Estimated Timeframe
Final Design	September 2025 to May 2026
Bidding	July 2026 to August 2026
Construction	September 2026 to September 2028

2.3.2 Construction Methods

The Paines Hill replacement tank and Cat Rock replacement tank are proposed to be American Water Works Association (AWWA) D110 Type III concrete tanks. This type of tank is constructed of prestressed concrete with an embedded steel diaphragm. The tank walls are cast onsite, set in-place with a crane and then placed in permanent compression by horizontal wire-wound pre-stressing. Construction of concrete precast tanks requires a large laydown area for equipment and for forming the wall and dome panels. Casting beds are generally constructed around the perimeter of the proposed tank floor. The wall casting beds are generally set far enough away from the floor to allow other construction activity and close enough to minimize the size of the crane required to lift the panels from their casting bed in-place.

The Doublet Hill replacement tank is proposed to be a composite elevated steel tank. A composite elevated tank (CET) stores all the needed water in a bowl at a higher elevation to provide adequate pressure by gravity to the distribution system and it can minimize unusable water that cannot be avoided in ground storage tanks. CETs consist of a steel tank on top of a concrete pedestal. The concrete pedestal is poured on-site, and the steel sheets are manufactured and then delivered to the site where they are welded together. The steel bowl is either lifted by crane or jacked up to the top of the pedestal. Finally, the steel dome roof panels are put into place by crane.

A geotechnical investigation was performed at each proposed tank site in December 2024 to determine soil bearing conditions and capacity, the relative extent of bedrock and groundwater levels. The investigations determined that the soil conditions are suitable for construction of water storage tanks.

After the replacements tanks are placed online, the old tanks will be demolished and removed from the sites. Since the existing Cat Rock tank and Doublet Hill tank are constructed of welded steel, lead and polychlorinated biphenyls (PCBs) paint sampling has been performed at both sites to facilitate waste removal. PCBs were not detected while lead was detected at concentrations below the threshold for lead-based paint. The construction contract will require that OSHA standards be met for worker safety and that all demolition materials are disposed or recycled in accordance with applicable laws and regulations.

2.3.3 Cost

Preliminary construction costs for the replacement of the tanks are summarized in Table 2-2. At the March 12, 2025 Special Town Meeting, the Town voted by a two-thirds majority to approve $43 million for the tank replacement construction as well as the other system improvements needed including pump upgrades at the Wellesley Street Booster Pump Station and installation of pressure reducing valves.

Table 2-2 Preliminary Construction Cost Estimates

Tank Site	Preliminary Construction Cost Estimate
Paines Hill	$8,250,000
Cat Rock	$8,300,000
Doublet Hill	$8,300,000
Total	$24,850,000

Section 3 Existing Conditions

The project consists of the replacement of three active water storage tanks: Paines Hill, Cat Rock, and Doublet Hill, which are part of the town's municipal water system in Weston. The existing conditions and land use on each of the three existing sites are described below. All figures are included in Attachment C.

3.1 Paines Hill Tank Site

The existing Paines Hill tank site (Paines Hill) is located at 150 Highland Street, on the west side of town, and is 1.09 acres in size with dimensions of approximately 190 feet by 262 feet. Paines Hill is bordered by private residential properties to the northwest, west, and south and by the Highland Street Forest (located on 0 Chestnut Street), which is Protected Open Space in accordance with Article 97, to the northeast and east. The Paines Hill tank site is zoned as Residential District A. The undeveloped portion of the property is heavily wooded. Access to the site is by a gravel accessway from Highland Street. The Highland Street Forest trail network traverses the site. The site includes an active 1-million-gallon (MG) water storage tank which is surrounded by security fencing, a small building that houses telemetry equipment for the tank and the Town's public safety communications equipment, and a propane-powered generator. The Paines Hill tank serves as the controlling tank for the Wellesley Street booster pump station, which supplies water to the entire distribution system. The existing tank is constructed of concrete having a diameter of 80 feet and overall exposed height to top of dome of approximately 22 feet above ground surface (approximately 5 feet of the tank is buried below grade). The base elevation of the Paines Hill tank is 341.5 feet North American Vertical Datum of 1988 (NAVD 88) while the overflow elevation is 367.60 feet NAVD 88. The water main that feeds the tank comes into the site off Highland Street beneath the accessway. This project proposes to change the use of 1.268 acres of the adjacent Article 97 conservation land on the 0 Chestnut Street parcel to Article 97 land protected for water supply to allow for the construction of a new tank to replace the existing tank. The Paines Hill replacement tank site is owned by the Town of Weston, is part of the Highland Street Forest, and is used for conservation and passive recreation. Subsurface conditions at the replacement tank site consist of a surficial topsoil layer underlain by a glacial till layer and inferred bedrock. The Highland Street Forest consists of approximately 203 acres, includes a hiking trail system, and is open to residents and non-residents. A U.S.G.S. topographic map of the site is included as Figure 1 in Attachment C. A site plan depicting existing conditions is included as Figure 3. The proposed Paines Hill tank site referred to herein would include the existing tank parcel and the portion of conservation land proposed for construction of the replacement tank.

3.2 Cat Rock Tank Site

The Cat Rock tank site (Cat Rock) is located at 0 Overlook Drive at the end of Bradford Road, on the northeast side of town, and is 1.46 acres in size with dimensions of approximately 250 feet by 270 feet. However, due to the steep grades on three of its sides, the actual usable tank site area where the existing tank stands is only approximately 75 feet by 75 feet. The site includes an active 850,000 gallon water storage tank which is surrounded by security fencing. The property is bordered by private residential properties to the east, south, and west and by Cat Rock & 80 Acres Conservation Area (also referred to as Cat Rock Park and located on 0 Drabbington Way), which is Article 97 land, to the north. The Cat Rock tank site is zoned as Residential District A. Access to the site is from a gravel accessway from the end of Bradford Road. The accessway is located on Article 97 land protected for conservation and recreation. Recreation is listed as the parcel's primary use under Article 97; however, the Town refers to Cat Rock & 80 Acres as a conservation area. Therefore, the area is referred to as recreation and conservation throughout this filing. The portion of the Cat Rock & 80 Acres Conservation Area that will be impacted by the tank replacement project is used for hiking though a baseball field is located elsewhere in the park.

The existing Cat Rock tank is constructed of welded steel having a diameter of 60 feet and overall height to top of dome of approximately 43 feet with a total volume of 0.85 MGs. The base elevation of the Cat Rock tank is 326.81 feet NAVD 88 while the overflow elevation is 366.84 feet NAVD 88. The water main that feeds the tank comes into the site off North Avenue through an easement that traverses two private residential properties. A site plan depicting existing conditions is included as Figure 4. This project proposes to transfer 1.718 acres of the Article 97 conservation and recreation land on the 0 Drabbington Way parcel to Article 97 land protected for water supply to allow for the replacement of the Cat Rock tank. The Cat Rock replacement tank site is owned by the Town of Weston, is part of the Cat Rock & 80 Acres conservation land, and is used for conservation and passive recreation. Subsurface conditions at the replacement tank site consist of a surficial topsoil layer underlain by a glacial till layer and shallow bedrock. The Cat Rock & 80 Acres conservation land consists of 130 acres, includes 5.5 miles of hiking trails, and is open to residents and non-residents. The summit, Cat Rock Hill, is located approximately 100 feet from the existing water tank. A U.S.G.S. topographic map of the site is included as Figure 2. The proposed Cat Rock tank site referred to herein would include the existing tank parcel and the portion of conservation land proposed for construction of the replacement tank.

3.3 Doublet Hill Tank Site

The Doublet Hill tank site (Doublet Hill) is located at 85 Doublet Hill Road, on the southeast side of town, and is approximately 0.36 acres in size with dimensions of 125 feet by 125 feet. The property is bordered by private residential properties to the northwest, west, and southwest and by the Doublet Hill Conservation Area (located on 0 Doublet Hill Road), which is Article 97 open space conservation land, to the northeast, east, and southeast. The Doublet Hill tank site is zoned as Residential District A. Access to the site is from a gravel accessway that extends from the end of Doublet Hill Road. The existing tank is constructed of rivetted steel having a diameter of 52 feet and overall height to top of dome of 52 feet with a total volume of 0.78 MGs. The base elevation of the tank is 318.5 feet NAVD while the overflow elevation is 367.50 feet NAVD 88. The tank is surrounded by security fencing. The water main that feeds the tank comes in off Doublet Hill Road. This project proposes to transfer a portion of the Article 97 conservation land on the 0 Doublet Hill Road parcel to Article 97 land protected for water supply to allow for the replacement of the Doublet Hill tank. The Doublet Hill replacement tank site is owned by the Town of Weston, is part of the Doublet Hill Conservation Area, and is used primarily for conservation and passive recreation. Subsurface conditions at the replacement tank site consist of a surficial topsoil layer underlain by a glacial till layer and shallow bedrock. The Doublet Hill Conservation Area consists of approximately 109 acres, has a hiking trail system, and is open to residents and non-residents. The summit, Doublet Hill, is located approximately 360 feet from the existing tank. A U.S.G.S. topographic map of the site is included as Figure 1. A site plan depicting existing conditions is included as Figure 5. The proposed Doublet Hill tank site referred to herein includes the existing tank parcel and the portion of conservation land proposed for construction of the replacement tank.

3.4 Environmental Resources

A screening of environmentally sensitive areas (i.e., rare species, wetlands, vernal pools, flood zones, historical places, impacted water bodies, and Areas of Critical Environmental Concern) in the vicinity of the three subject properties was performed using the MassMapper interactive map from MassGIS. All three project subject areas are in the Charles River Basin and in the Public Water Supply Watershed area for Stony Brook Reservoir. None of the three subject areas are in the vicinity of flood zones, vernal pools, or Areas of Critical Environmental Concern. The Cat Rock site is within 0.5 miles of Hobbs Brook which is impacted by chloride and Stony Brook which has an impairment related to temperature. The existing land cover at all three replacement tank sites is forested.

The Paines Hill tank site is within the Chestnut Street Historic Area. The Cat Rock tank site and the Doublet Hill tank site are not within historic areas. Project notification forms were submitted to the MHC for each site. The MHC determined that the project is unlikely to affect significant historic or archeological resources at any of the sites. The MHC's review of the PNFs are included in Attachment E. Maps from MassMapper depicting environmental constraints in the vicinity of the Paines Hill tank site, Cat Rock tank site, and Doublet Hill tank site are included as Figures 6, 7, and 8, respectively, in Attachment C.

A wetlands survey and delineation were performed by a wetland specialist at each of the three sites. The delineation determined that no wetlands are near the Paines Hill or Cat Rock sites; however, a small, isolated wetland was located in the Doublet Hill Conservation Area. This isolated wetland area is not jurisdictional under the Massachusetts Wetlands Protection. In 2023, the Town of Weston adopted the Wetlands Protection By-Law which includes protection of isolated wetlands and the buffer zone (out to 100 feet beyond wetlands). The project work zone is outside the wetland area and outside of the buffer zone. If this area were within the proposed project area, it would likely be regulated by the Army Corp of Engineers (USACE); however, the project work zone is outside the wetland area. The isolated wetlands are shown on Figure 5 in Attachment C.

During the wetlands survey, the state-listed rare species Violet Bush Clover was observed in the Doublet Hill Conservation Area but outside of the project work area. An information request was sent to the Natural Heritage and Endangered Species Program of the MA Division of Fisheries & Wildlife (the Division). The Division determined that the area is not mapped as Priority Habitat for rare species so a MA Endangered Species Act (MESA) review is not required. Correspondence from the Division is provided in Attachment D.

3.5 Environmental Justice Populations

The Massachusetts Environmental Public Health Tracking Program's 2020 EJ Tool was used to determine if EJ populations are located within a 1-mile radius and 5-mile radius of each site as of the 2020 United States Census. While Paines Hill is not located within 1 mile of any EJ populations, both Cat Rock and Doublet Hill are located within 1 mile of neighborhoods that meet the EJ Policy criteria. This includes 4 block groups in the City of Waltham where minorities comprise 25% or more of the population and which has a median household income that is less than 150% of the statewide median household income. These block groups include Block Group 3 in Census Tract 3682, Block Group 4 in Census Tract 3683, Block Group 2 in Census Tract 3684, and Block Group 6 in Census Tract 3684. In Census Tract 3684, the Chinese language is spoken by 5.8% of persons who report they do not speak English very well.

Figures created from the EJ Tool are included in Attachment C. Figures 13 through 16 depict all EJ populations within a 1-mile radius of the project sites. Figure 17 shows census tracts where a language other than English is spoken by at least 5% of the population who do not report speaking English well. Figures 23 through 27 depict all EJ populations within a 5-mile radius of the project sites.

MEPA projects located within the Designated Geographic Area (DGA) of EJ populations, as this project is, must meet the requirements promulgated in the "MEPA Interim Protocol for Analysis of Project Impacts on Environmental Justice Populations" (effective 1/1/2022). A DGA is defined as an area within one mile of the EJ population. None of the tank replacements will impact air quality; therefore, EJ populations greater than 1 mile and less than 5 miles from any of the project sites will not be impacted and are not evaluated further. The transfer of the Article 97 conservation lands to water supply lands to facilitate the construction of the Paines Hill, Cat Rock,

and the Doublet Hill replacement tanks would result in the destruction or impairment of open spaces and natural areas which is considered "Damage to the Environment" as defined in 301 CMR 11.02.

3.5.1 Vulnerable Health

In accordance with the first proponent of the "MEPA Interim Protocol for Analysis of Project Impacts on Environmental Justice Populations," the Massachusetts 2020 EJ Tool was used to identify any EJ Populations within a 1-mile radius of the project sites that exhibit any of the four vulnerable health EJ criteria. There are no block groups within a 1-mile radius of the project sites that meet the vulnerable health EJ criteria. It is noted that census tract 3683 is shown as meeting the vulnerable health EJ criteria for low birth rate and lead poisoning but the data for low birth rate is considered by Massachusetts Department of Public Health (MA DPH) to be "not statistically significantly different" and "unstable" while the data for lead poisoning is "not statistically different" and "stable." Figures 18 through 21 depict the prevalence of the four vulnerable health EJ criteria within a 1-mile radius of the project sites.

3.5.2 Pollution Sources

In accordance with the second proponent of the "MEPA Interim Protocol for Analysis of Project Impacts on Environmental Justice Populations," a survey of pollution sources within the boundaries of the EJ populations located within 1 mile of the project was performed. The survey indicated that MassDOT roads (Route 95, Route 128, and Route 117), MBTA bus routes and shelters, and a MBTA commuter rail line are present in the nearby EJ Populations. There are also approximately 24 Tier II Facilities including gas and electric stations, telephone companies, a hospital, health therapeutic facilities, data centers, a Home Depot store, a Costco Wholesale store, a drilling and blasting company, and a defense contractor, 2 underground storage tanks used by gas stations, 8 MassDEP sites with Activity and Use Limitations including a spa, a hospital, an office park, and indeterminate uses, 5 large quantity generators including biotechnology companies, pharmaceutical companies, and electrical providers, and 1 hydro power plant (plus 2 large quantity generators shown on the map with no data associated with them). The Weston Storage Tanks Replacement project will not impact any of these existing pollution sources and will not result in any new sources of pollution. Figure 22 depicts potential sources of pollution as shown by the MA EJ Tool.

3.5.3 Climate Risk

In accordance with the third proponent of "MEPA Interim Protocol for Analysis of Project Impacts on Environmental Justice Populations," the RMAT Climate Resilience Design Standards Tool was used to determine the project's climate risk rating. The RMAT Tool indicates the following Asset Preliminary Climate Risk Ratings:

Table 3-1 RMAT Asset Preliminary Climate Risk Ratings

Site	Sea Level Rise/Storm Surge	Extreme Precipitation – Urban Flooding	Extreme Precipitation – Riverine Flooding	Extreme Heat
Paines Hill	Low Risk	High Risk	Low Risk	High Risk
Cat Rock	Low Risk	High Risk	Low Risk	High Risk

Site	Sea Level Rise/Storm Surge	Extreme Precipitation – Urban Flooding	Extreme Precipitation – Riverine Flooding	Extreme Heat
Doublet Hill	Low Risk	High Risk	Low Risk	High Risk

All three sites are considered to have low risk of sea level rise/storm surge and riverine flooding since they are not near the coast, rivers, or flood zones. The high-risk ratings for urban flooding are due to the maximum annual daily rainfall exceeding 10 inches over the course of the project's useful life (50 years) and the slight increase in impervious area. The Weston Storage Tanks Replacement project will result in small increases to impervious area resulting from the new gravel accessways to the replacement tanks; however, the project will include stormwater management systems designed in accordance with the Massachusetts Stormwater Handbook and will not result in any net increase in surface runoff. The tanks are also located at the highest elevations in the town and therefore, these sites are far less likely to be affected by flooding than lower elevation areas. For these reasons, the replacement tanks are not expected to contribute to additional flooding risk nor are they expected to be susceptible to the impacts of urban flooding.

The high-risk ratings for extreme heat are due to the expected regional increase in high temperatures within the project's useful life. While the removal of trees to facilitate construction of the replacement tanks may exacerbate heat exposure, due to their regional location the project areas are designated as high-risk regardless of whether trees are removed as part of this project. Additionally, the project will include reforestation of those areas temporarily disturbed for construction. The replacement tanks are being designed to provide the Town of Weston with a more resilient water system. The urgency of this project was demonstrated during the 2015-2016 drought that affected Massachusetts when water usage in Weston increased dramatically and as a result, water reserves in the existing storage tanks dropped to dangerously low levels. Should another drought occur during periods of high demand, the Town would be at risk of being unable to refill the existing storage tanks. The replacement tanks will provide significantly improved water storage capacity, which will reduce the risk of potable water shortages during drought conditions. The replacement tanks will also be replacing aging infrastructure that is more vulnerable to damage from extreme weather. The new tanks will be constructed to current tank standards which provide for more structurally sound structures that are better able to withstand extreme heat and cold. The RMAT Tool reports for each site are provided in Attachment F.

3.5.4 Environmental Indicators

In accordance with the fourth proponent of the "MEPA Interim Protocol for Analysis of Project Impacts on Environmental Justice Populations," the U.S. EPA's EJScreen was used in January 2023 to evaluate the environmental indicators in the 3 subject block groups at the time, including Block Group 3 in Census Tract 3682, Block Group 4 in Census Tract 3683, and Block Group 2 in Census Tract 3684, as compared to the statewide averages. Environmental indicators that are above the 50th percentile in the 3 block groups that are within 1 mile of the tank sites include particulate matter 2.5, diesel particulate matter, air toxics cancer risk, air toxics respiratory index ratio, traffic proximity, hazardous waste proximity, and underground storage tanks. The Weston Storage Tanks Replacement project will not affect any of these environmental indicators. The EJScreen Report printed in January 2023 is included in Attachment G. (Note that at the time of conceptual site design in 2023, Block Group 6

in Census Tract 3684 was not located within 1-mile of the site boundaries proposed for the Doublet Hill Tank. The proposed tank site boundary was extended farther northeast in later phases of design. Therefore, this Block Group was not evaluated using U.S. EPA's EJScreen prior to the removal of the EJScreen by the EPA).

Waltham was historically an industrial center and is now a research center, particularly for pharmaceuticals and biotechnology. The above assessment of existing unfair or inequitable environmental burdens indicates that there are a number of potentially polluting sources in the EJ Populations which may result in environmental exposures although, based on available data presented in the EJ Tool, the City of Waltham does not appear to experience disproportionately high levels of vulnerable health criteria when compared to the general population of Massachusetts. While the RMAT tool indicates that the project sites are located in areas with high urban flooding risk and high heat exposure risk, the Weston Storage Tanks Replacement project will not contribute to these issues. This project will not cause any permanent increases in surface runoff, traffic, or pollution. Traffic near the site will increase during construction; however, the primary roads to the sites are not in EJ Populations and EJ Populations will not be disproportionately affected by construction traffic. The damage to the environment caused by the change in use of Article 97 lands will be mitigated by a land swap for an equal area of land to be placed into conservation.

Section 4 Alternatives Analysis

Four alternatives analyses are discussed below. The first alternatives analysis evaluates options to address the Town's water storage deficit. The next three alternatives analysis evaluate potential locations for the new tanks at Paines Hill, Cat Rock, and Doublet Hill.

4.1 Alternatives Analysis – Adding Storage

4.1.1 Alternative 1 – No-Build

Under this alternative, the existing tanks would remain in-service as they are, and the system would continue to operate under deficient conditions with tanks that have outlived their service life. The existing usable storage deficit would not be improved, pressures throughout the system would remain substandard, and there would continue to be insufficient reserve storage capacity to deal with a major fire event. Hydraulic modeling shows that if there were a fire on a day of maximum demands (under existing conditions), the volume within the tanks could be completely depleted and services at higher elevations would see pressures drop below 20 psi if flow is not controlled. Furthermore, if a major drought were to occur, the system would be at risk of being unable to refill the existing storage tanks during peak demand periods. The storage deficit also requires the Wellesley Street pumps to run 24-hours a day during extreme peak demand periods which is causing additional wear and a reduction in service life of these pumps.

In addition to the storage deficit, the aging of infrastructure poses some risk of failure and will certainly require increased maintenance. The Paines Hill tank appears structurally sound; however, it is in poor aesthetic condition and interior and exterior repairs are needed. Meanwhile, both the Cat Rock tank and Doublet Hill tank have reached the end of their useful lives and if maintained for more than 5 years, will require expensive recoating of the interior and exterior surfaces. Additionally, the existing tanks are not compliant with current regulatory standards and if kept in service, improvements or replacement of ladders, hatches fall protection systems, vents and overflow structures. In 2024, the DPW obtained preliminary cost estimates from an engineering consultant for the rehabilitation of the Cat Rock and Doublet Hill tanks. Costs to recoat each tank were estimated to range from $1,000,000 to $1,300,000 per tank while costs to make repairs to address deficiencies identified in the DEP's Sanitary Survey were estimated to be $240,000 per tank. In 2017, the DPW obtained a cost estimate of $600,000 to rehabilitate the Paines Hill tank. These costs do not include the engineering design, construction administration, or inspection services that would be needed to complete the project.

The storage deficit will increase as the Town's population is projected to continue to increase. If additional storage is not added to the system, new development in Town should be curtailed. Large building projects which require extensive water needs should be delayed to limit the town's inability to provide adequate firefighting capabilities during peak water demand conditions. At a minimum, new development should be required to provide fire sprinkler systems until the storage deficit has been addressed.

Having adequate firefighting capacity is critical to meeting the needs of the community. In addition, lack of sufficient storage would violate policy and standards of the water and engineering industries for the operation of water systems. Finally, the total cost to rehabilitate all three existing tanks would be approximately $3,000,000 to $5,000,000. For these reasons, Alternative 1 was not considered to be a viable alternative for Weston.

4.1.2 Alternative 2 – Maintain Current Gradeline and Add Storage

Under this alternative, the current gradeline of the system would be maintained and current operating procedures would continue but additional storage would be added to the system to increase storage capacity. To meet the projected useable storage needs both now and in the future, significantly larger tanks would be needed to satisfy the needed usable capacity because all the needed active volume would have to be provided in a very short operating band. Since hydraulic gradelines would be maintained, usable storage would be a small fraction of the total storage added. This would increase the prevalence of water quality issues in the system because there would be very little water exchange in the tanks. Due to the exorbitant cost to add storage, the limited availability of land and the impacts to water quality, Alternative 2 was not considered to be a feasible alternative for Weston.

4.1.3 Alternative 3 – Lower the Highest Served Elevation and Add Storage

When calculating the usable storage in a system, the highest elevation that a system serves (or can serve) has a direct impact on the usable storage calculation.

310 CMR 22: The Massachusetts Drinking Water Regulations and the MassDEP Drinking Water Program's Guidelines for Public Water Systems stipulate that water systems provide a minimum of 20 psi of pressure under all operating conditions at the service connection and a working pressure of a minimum of 35 psi under normal conditions. Where less than 35 psi is provided, customers may be required to provide a private booster pumping systems to ensure adequate pressure within the structure being served. When designing a water system with storage, tanks should be sited such that the lowest operating elevation of the tank can provide 35 psi to the highest served elevation in the system; this is equivalent to 81 feet below the lowest tank operating level. In Weston's system, customers have been allowed to construct structures directly adjacent to storage tanks. This results in a reduction of usable tank storage capacity.

Weston could develop a policy establishing a maximum service elevation, based on the current hydraulics of the system, of approximately elevation 282.00 feet (81 feet below the lowest operating level). The effect of this change would be that the existing usable storage capacity would increase, effectively reducing the current deficit.

The disadvantage of this alternative, however, is substantial. First, many existing customers who reside above the minimum served elevation would be required to install in-home booster pump systems at an estimated cost of $10,000 each. This would be an added cost to homeowners that could be difficult for the Town's governance to support. Secondly, many of the homes that would require in-home booster pump stations would likely no longer be afforded fire protection from the water system because system pressure at hydrants would be inadequate. This lack of fire protection would be considered unacceptable to both regulators and the community. For these reasons, Alternative 3 was not recommended for Weston.

4.1.4 Alternative 4 – Raise Gradeline and Add Storage

The system's hydraulic gradeline could be raised to increase active storage volume and improve hydraulics. At a minimum, the tank overflows should be raised by 40 feet. This height would provide needed service to approximately 97% of water users, leaving approximately 120 houses without adequate service. In order to provide adequate pressures to 100% of services, the tank overflows would need to be raised by 76 feet. The added cost to raise the overflow elevation to serve these 120 houses would be cost-prohibitive and the recommendation is to address these customers on an individual basis.

The advantages of this alternative include:

- Active storage would be increased by at least 2.84 MGs, thereby improving the system's ability to meet peak demands and fire flow needs.
- Reduced operating times for primary system pumps.
- Pressure throughout the system would increase by approximately 15-20 psi.
- New tanks would replace older outdated tanks, reducing maintenance and concerns of deteriorating infrastructure.

A detailed analysis of the hydraulics of the Town's distribution system was performed during design. Based on this evaluation completed in September 2025, it was recommended that Paines Hill and Doublet Hill be raised in elevation but that the Cat Rock tank maintain its current overflow elevation and that pressure reducing valves be installed at select locations throughout the distribution system to limit increasing water pressure to areas with already high pressures.

The disadvantage of this alternative is that the cost of constructing three new tanks will be significant.

Consideration was given to raising the existing Doublet Hill tank by jacking/lifting it and adding new tank sections to the bottom to the desired height. Tank jacking would involve draining the existing tank, lifting it with hydraulic jacks, and welding new rings on the bottom. In conjunction with this, the foundations of the tank would also require significant modification or complete replacement because of the added weight and requirement to meet seismic code. The cost to jack the existing tank combined with the need to recoat the tank every 15-20 years thereafter, would far exceed the cost of a new tank. In addition, the added volume would consist primarily of unusable water which would likely impact water quality in the system. The Paines Hill tank would still require replacement as jacking of concrete tanks is not possible. The Cat Rock tank, at 78 years old, is beyond its service life and similar to the Doublet Hill tank, would require expensive recoating within the next 5-10 years. Therefore, any recommended changes to the system hydraulic gradeline and added storage should involve complete replacement of the Paines Hill, Cat Rock and Doublet Hill tanks.

To add new storage, the existing tanks must remain in-service until new tanks are constructed and placed into service. Until both Paines Hill and Doublet Hill are constructed and placed into service, the benefit of added storage will not be realized as a lower tank will not function in conjunction with one higher tank. Delaying the construction of any tank will only result in increased costs. Therefore, it is recommended that all three tanks be constructed concurrently. Since each site is surrounded by protected land, this alternative will require the permanent disturbance of protected lands to construct the new tanks on adjacent property to keep the existing tanks in operation during construction.

4.2 Alternatives Analysis – Tank Siting

A Tank Site Alternatives Analysis draft report was completed in November 2023 and updated in June 2024 to evaluate potential options for replacement tank locations. Both reports were posted to the Town's dedicated website for the tank replacement project and the final June 2024 report is included herein as Attachment H. The Town also held three public forums to discuss the tank site alternatives analysis with residents. Alternative sites were developed based on input provided by residents during public site visits to each tank site. The updated June 2024 report incorporates additional alternative sites requested by residents in subsequent public forums. Site plans developed for the Tank Site Alternatives Analysis report were considered conceptual and subject to change based on preliminary and final design. The alternatives analyses described below summarize the evaluation performed in the Tank Site Alternatives Analysis report.

4.2.1 Evaluation Criteria

Thirteen criteria were selected by the town of Weston and Wright-Pierce to be used to evaluate alternative sites. The 13 criteria were organized into four categories, as listed below.

The first category considers impacts to preserved land of each alternative. Article 97 dictates that protected land adjacent to the existing tanks cannot be used for any purpose other than conservation or in the case of Cat Rock, recreation, without first being evaluated by EEA and approved by the State Legislature. In addition to adhering to Article 97, the Town of Weston also values its conservation land highly and wishes to protect it in perpetuity for the benefit of all residents. Therefore, each tank alternative site location has been evaluated by its impact on conservation lands and the significant landscape features in each area. The "Impacts to Preserved Land" category includes the following criteria:

- Area of Article 97 Land Change in use
- Proximity to Significant Landscape Features
- Tree Clearing
- Impacts to Contiguous Open Space Affecting Wildlife and Hikers

The second category considers impacts to abutters. All three of the existing tank parcels are directly adjacent to residential homes. Abutters requested that their input be considered in the siting of the replacement tanks. The "Impacts to Abutters" category includes the following criteria:

- Requires Acquisition of Private Property
- Proximity to Closest House

The third category considers engineering feasibility and anticipated construction constraints. The "Engineering Evaluation" category includes the following criteria:

- Site Access
- Potential Ledge Removal
- Cut and Fill Site Work
- Tank Height
- Impacts to Infrastructure
- Constructability

The fourth category considers the Construction Cost of each alternative. Preliminary cost estimates were developed for each alternative site. The Opinion of Probable Construction Costs were based on June 2024 costs, which corresponds to an Engineering News-Record (ENR) Construction Cost Index (CCI) of 13546.8.

4.2.2 Alternatives Analysis – Paines Hill Tank Siting

Five site and access road alternatives were considered for the Paines Hill replacement tank site:

1. Replacement tank located southeast of the existing tank, in conservation land. Three ways to access the proposed tank were considered under this alternative:
   a. Access to the replacement tank is to the north of and behind the existing tank.
   b. Access to the replacement tank is to the south of and directly in front of the existing tank.

   c. Access to the replacement tank is farther south of the existing tank, along the hiking path.
2. Replacement tank located immediately west of the existing tank, on the existing tank parcel.
3. Replacement tank located southeast of the existing tank, beyond Alternative 1, in conservation land with an access road south of the existing tank.

Alternative sites for the Paines Hill replacement tank are shown on Figure 28.

4.2.2.1 Impacts to Preserved Land

Alternatives 1A, 1B, 1C, and 3 will require changing the use of an approximately 1.25-acre section of the Highland Town Forest (Article 97 land) from protection for conservation use to protection for the purpose of water supply use. Alternative 2 would not require changing the use of any conservation land. As such, Alternative 2 would not impact protected conservation land and would not require a MEPA review which would expedite MassDEP's and the Town's permitting processes. None of the alternative sites are near significant features of Highland Town Forest.

Alternatives 1A, 1B, 1C, and 3 would require clearing a portion of dense and mature tree coverage in the Highland Town Forest. Although mature trees will be lost, the portion of the new sites that would be cleared for construction staging can be reforested once construction is complete and left undisturbed in perpetuity, allowing for continuity with the existing forest ecosystem. Alternatives 1A, 1B, and 1C vary in their disturbance of the vegetative buffer between residential neighbors due to their different access road locations. For Alternative 1A, the access road would swing north of and behind the existing tank which will primarily utilize the already-cleared area around the tank and require the removal of only a few small-caliper trees close to the existing tank. In this case, almost all the vegetative screening along the northern and southern property lines of the existing tank parcel would remain intact. For Alternative 1B, the access road will swing south of and immediately in front of the existing tank, also utilizing the already-cleared zone around the tank. For Alternative 1C, the access road would be close to the southern property line, requiring clearing of some of that vegetative screening. Like Alternative 1C, Alternative 3 will require clearing in the area between the tank and the southern property line. Alternative 3 requires clearing the most vegetation within the Article 97 conservation land. For Alternative 2, the entire area to the west, north, and south of the existing tank will be cleared of vegetation to the edges of the property, eliminating all screening buffer between the tank site and neighbors. Some vegetation can be replaced but this will be limited because its proximity to the proposed tank will interfere with proper maintenance of the tank.

For Alternatives 1A, 1B, 1C, and 3, the level of disruption to the ecosystem would be similar since they all extend approximately the same distance into the conservation land. Construction at Alternatives 1A, 1B, 1C, and 3 will similarly disturb hiking trails; however, the Town of Weston Conservation Commission has indicated that trails are not protected features and are commonly re-routed. For Alternative 2, impacts will be limited to the existing tank parcel and would not disturb any conservation land.

4.2.2.2 Impacts to Abutters

None of the alternatives necessitate acquiring private property. Alternatives 1A and 1B have tank locations farther away from homes than the existing tank and have access roads farther away from homes than other alternatives. Alternative 1C brings the access road closer to a home. Alternative 3 presents a tank that is the farthest away from homes but an access road that is close to homes. The tank location in Alternative Site 2 is approximately 110 feet from the home at 148 Highland Street and 30 feet from the property line. Paines Hill is in Residential Zoning District

A. Per zoning requirements, all structures in this district are required to be set back a minimum of 45 feet from the lot line. Therefore, a zoning variance for the setback requirements would need to be obtained for this alternative.

4.2.2.3 Engineering Evaluation

All of the alternatives require extensive cutting and filling work to level the sites for construction, however, Alternatives 1A, 1B, and 1C require less than Alternatives 2 and 3. Additionally, Alternative 2 does not allow for any stockpiling of site soils due to the limited space on the site. This means that soil will need to be trucked and stored off-site until it can be reused on-site. Available resources including USGS mapping and field observations preliminarily indicate that ledge conditions are anticipated to be consistent among the alternative sites.

The tanks at all the alternative site locations will extend up to the same elevation in the air but the ground elevation at the base of the tanks varies slightly; therefore, while the elevation will be the same, the height of the tanks from the ground will vary. Alternatives 1 and 2 have similar ground elevations and will therefore result in similar tank heights. The ground elevation at Alternative 3 is slightly higher so that the tank height will be approximately 2 feet shorter than Alternatives 1 and 2. This slight difference is negligible in the construction and appearance of the tanks.

Alternatives 1A, 1C, and 3 provide sufficient space for laydown, panel casting, and crane placement. All three of these alternatives allow for two crane positions around the tank which makes erection of the tank faster and simpler. The tank manufacturers indicated that they could construct a tank at these locations using standard practices without exorbitant cost or time impacts resulting from the tank's proposed location. While Alternative 3 would require more work upfront to prepare the site for construction, once the ground is ready the tank constructor would not be constrained by site access, proximity to the existing tank, or proximity to neighboring properties. Alternative 2 presents the most challenges and inefficiencies for tank construction. The limited space on-site means that only one crane position is achievable. As a result, a tank manufacturer would need to modify its standard construction approach by installing scaffolding after the wall panels are placed and the dome would have to be cast-in-place. These modifications, which would be necessary to construct Alternative 2, will result in a longer construction timeline and add cost to the project. Alternatives 1B and 2 are not constructable if the existing control building remains in its current location. The control building is located next to an underground vault that houses equipment to monitor pressure and piping that connects the tank to the Town's water distribution system. Once the control building is relocated, Alternative 1B would have similar constructability to Alternatives 1A and 1C. Alternative 2 would require the shortest length of new water main installation and Alternative 3 would require the longest.

4.2.2.4 Cost

Alternatives 1A and 1C have the lowest probable construction costs based on their conceptual-level designs while Alternatives 1B, 2 and 3 are expected to be slightly more expensive.

4.2.2.5 Recommendation

In conclusion, Alternative 1A provides the best balance between the impacts to conservation land and impacts to abutting neighbors while also limiting design and construction inefficiencies. Although Alternative 2 would not impact any Article 97 conservation land, clear cutting of the parcel and the tank location would drastically impact residential neighbors and construction of the tank would be particularly difficult and inefficient due to the space constraints. The tank location in Alternative 2 would also require variance from setback requirements since the new tank would be located only approximately 30 feet from the property line. The tank site in Alternative 3 is farther

away from homes than any of the other alternatives but its access road is not. The Alternative 3 access road would materially and permanently disturb the vegetative buffer at the southern property boundary. Additionally, Alternative 3 would require the most site work including tree clearing and site grading during construction. This would lengthen the project's duration and result in longer truck travel to and from the site during construction. The tank site in Alternative 1A is farther from all neighboring homes than the current tank, and the corresponding access road would have minimal impact to the vegetative buffer between homes and the tank site. Site access for Alternative 1A does not require relocation of the control building, would require less site work, and allows for sufficient area to construct the tanks. Since Alternative 1A limits construction inefficiencies, it is also one of the most cost effective.

An additional alternative was considered consisting of demolishing the existing tank and constructing the new tank in the same footprint. As detailed in the Water System Master Plan, the water system is already in a significant storage deficit and increase in storage is recommended. Removal of the existing tank prior to the construction of the new tank would increase the storage deficit even further and leave the system and community highly vulnerable, unable to meet peak demands or respond to fire events. This option is not recommended.

Alternative Site 1A, as shown in Figure 29, is the recommended site location for the Paines Hill replacement tank.

4.2.3 Alternatives Analysis – Cat Rock Tank Siting

Four site alternatives were considered for construction of the Cat Rock replacement tank:

1. Replacement tank located north of the existing tank along the existing access road, in conservation and recreation land.
2. Replacement tank located northwest of, but closer to the existing tank and to the west of the existing access road, partially in conservation and recreation land.
   a. Replacement tank located southwest of Alternative 2.
3. Replacement tank located immediately northeast of the existing tank and immediately south of the Cat Rock peak.

Alternative sites for the Cat Rock replacement tank are shown on Figure 30.

4.2.3.1 Impacts to Preserved Land

Both the Cat Rock and 80 Acres parcel and the existing tank parcel are preserved under Article 97 with the existing tank parcel protected for water supply use and the Cat Rock and 80 Acres parcel protected for conservation and recreation. The existing access road to the tank is currently on the parcel preserved under Article 97 for conservation and recreation, not for water supply. In a pre-filing meeting, the EEA indicated that it would be prudent to include the access road in the proposed disposition so that the DPW obtains legal rights to the access road in perpetuity and can install and maintain utilities. Therefore, for every alternative, at least 1.2 acres of Article 97 conservation land would be changed to Article 97 water supply land to accommodate the access road, construction laydown area, a stormwater management system, and installation and maintenance of utilities to the tank. Alternatives 1 and 3 would require a slightly larger area (1.57 acres and 1.5 acres, respectively) than Alternatives 2 and 2A (1.2 acres) to accommodate the replacement tank.

The Cat Rock lookout is a significant landscape feature within the Article 97 recreation/conservation land. It is a priority for both the Town and the residents to maintain the integrity of the Cat Rock lookout. The attraction of the

Cat Rock lookout is its preferred northeast and east facing views from which one can see the skyline of Boston and surrounding hills. The existing tank is located approximately 180 feet southwest of the lookout and is not in the preferred field of view. Alternative 1 is located 140 feet northwest of the lookout. Therefore, the new tank would not be in the preferred viewscape but some trees on the periphery of the viewscape may be removed making it very visible in a northwest direction, however the view in this direction is not a primary focus point. Alternative 2 and 2A are located 180 and 210 feet, respectfully, southwest of the lookout and will not impact preferred views. Alternative 3 would be located approximately 100 feet from the lookout and clearing for construction would extend to approximately 40 feet from the lookout. Alternative 3 would also require ledge removal of Cat Rock peak to allow for construction and maintenance of the tank including installation of permanent site security fencing. Alternative 3 would have the greatest impacts to Cat Rock lookout.

All the alternatives require significant clearing of trees to accommodate construction of the new tank. All alternatives require clearing the vegetative screening along the access road on the western property line to develop sufficient space for equipment laydown. Alternative 1 will require the least amount of tree clearing; however, all the clearing will be on what is currently conservation land. Alternatives 2 and 2A will require clearing trees on what is currently recreation/conservation land and private property west of the existing tank. Alternative 3 will require clearing trees on the peak of Cat Rock as well as on two private property parcels east of the existing tank. Alternatives 1 and 3 will both require clearing approximately 1.3 acres of conservation land while Alternatives 2 and 2A will require clearing approximately 1 acre of conservation land as the remainder of those sites are on what is currently residential land which will also be cleared.

Hikers can access the Cat Rock conservation area from the Bradford Road cul-de-sac or Overlook Drive. Hiking trails from Bradford Road will be disturbed by all alternatives during construction. The tank and retaining wall required for Alternative 3 will also impact the hiking trail from Overlook Drive. The tank location at Alternative 1 will disturb more trails and a larger area of contiguous open space than Alternatives 2 and 2A since Alternatives 2 and 2A are located between the existing tank and developed land. The tank location at Alternative 3 requires that the peak of Cat Rock be leveled which will result in significant disturbance to the top of Cat Rock.

4.2.3.2 Impacts to Abutters

Alternative 2 and Alternative 2A require the acquisition of approximately 0.35 acres and 0.43 acres, respectively, of private property west of the existing tank site to accommodate construction and permanent access around the new tank. Even though the new tank would be located outside of private property, the site must be graded around the new tank to allow for construction, provide foundational support, and provide safe access to the tank. In addition, the abutting landowner has not indicated a willingness to transfer their land needed to construct Alternative 2 or 2A. Alternative 3 requires the acquisition of approximately 0.08 acres of private property from two different property owners east of the existing tank to accommodate construction of the proposed retaining wall, as shown on Figure 30, and stormwater management system.

The Alternative 1 tank would be located approximately 150 feet from the nearest residence on Bradford Road (111) and 390 feet from the closest residence on Whitney Tavern Road (52). The Alternative 2 tank would be located approximately 260 feet from the residence at 111 Bradford Road, 330 feet from the residence at 52 Whitney Tavern Road, 370 feet from the closest residence on Overlook Drive (22) and approximately 100 feet closer to the closest home on Spruce Hill Road, about 350 feet away, as compared to Alternative 1. The Alternative 2A tank would be located approximately 310 feet from the residence at 111 Bradford Road, 310 feet from the residence at 52 Whitney Tavern Road, and 340 feet from the residence at 22 Overlook Drive. The Alternative 3 tank would be

located approximately 380 feet from 111 Bradford Road, 170 feet from 52 Whitney Tavern Road, 330 feet from the residence at 50 Whitney Tavern Road, and 345 from the residence at 32 Overlook Drive.

Alternative 3 also requires acquisition of private property to construct a retaining wall needed to support the tank on the eastern side of the site. The retaining wall would be approximately 140 feet from the residence at 52 Whitney Tavern Road. The retaining wall would also require a zoning variance due to its height which must be approved by the affected property owners located at 44 and 52 Whitney Tavern Road. Alternatives 2 and 2A place the new tank farther from any residence as compared to Alternatives 1 and 3.

4.2.3.3 Engineering Evaluation

The existing access road begins at the end of Bradford Road and runs through Article 97 conservation land to the existing tank. For Alternative 2, the existing access road can be used to access the new tank. For Alternatives 1 and 2, the new tank and significant rework of the tank area would obstruct the existing path to the old tank needed for demolition. As such the new access road will deviate from the existing road to allow for access to the existing tank for demolition. After the old tank is demolished, the temporary access road to the old tank can be removed and reforested. During construction of Alternative 1, trucks and equipment would likely be able to back into and pull out of the site without a turnaround. Due to the length and grade of the access road for Alternatives 2, 2A, and 3 a turnaround would likely be needed requiring additional disturbance of the site. Alternatives 2 and 2A can accommodate construction of a turnaround however Alternative 3 cannot due to the limited space near the existing tank requiring multiple moves of a single crane or multiple cranes to move equipment from the bottom of the slope to the top. Alternative 3 is considered the most challenging site for access.

Exposed ledge outcrops predominate the Cat Rock site and outlook. It is assumed that all alternatives will require a significant amount of ledge removal to provide a level base for the tank. However, Alternatives 2 and 2A, and 3 are likely to require more ledge removal than Alternative 1 since Alternative 1 is located on a flatter area than Alternative 2A, and 3. Ledge removal for the tank base at Alternative 3 will cut into the peak of Cat Rock requiring significant ledge removal. Alternative 2A requires less ledge removal than Alternative 3; however Alternative 2A will require drilling and mechanical fracturing (as opposed to blasting) to remove ledge within 10 feet of the existing water main that connects the Cat Rock tank to the distribution system. This water main is 78 years old and is critical to providing water to the distribution system. Performing ledge removal at Alternative 2A presents a risk to damage to this water main.

Existing grades at Alternative 2 and Alternative 2A are very steep. It is estimated that leveling the tank base area will require approximately twice as much cutting and filling sitework than Alternative 1 since Alternative 1 is on flatter ground. Alternative 3 will also require a significant amount of cutting and filling on the peak of Cat Rock, east of the new tank to construct the retaining wall, and west of the existing tank to create a stabile crane staging area.

The height of the tank pedestal at Alternative 2 may be approximately 2 feet shorter than Alternative 1 and the height of pedestal at Alternative 2A may be approximately 1 foot shorter than Alternative 1. This slight difference is negligible in the construction and appearance of the tanks. The height of the tank pedestal at Alternative 3 may be approximately 16 feet shorter than the other alternatives. Since a composite elevated tank is proposed for the Cat Rock replacement tank, the tank itself would be the same size regardless of ground elevation; adding height to the pedestal is fairly simple in that it only requires pouring and casting more concrete onsite.

Alternative 1 requires approximately 340 feet of electrical wiring to be installed from the end of Bradford Road to the new tank, Alternative 2 requires 520 feet, Alternative 2A requires 570 feet, and Alternative 3 requires 620 feet. Alternative 3 requires longer lengths of new power lines than the other alternatives. the water main used to fill and drain the existing tank will be replaced within the DPW's existing easement from North Ave through private properties located within an existing easement. Alternative 1 will require the longest run of new water main while Alternative 2A will require the shortest run.

Steep slopes and limited space make all these alternative sites challenging for construction of the new tank, but Alternatives 2, 2A, and 3 are not possible without the acquisition of private property and will require substantially more earthwork, lengthening the project's duration. All alternatives have limited space available for equipment laydown and will require using the area along the access road as well as the Bradford Road cul-de-sac to facilitate construction. Alternative 1 is farthest away from critical infrastructure including the existing tank and water main and therefore presents the least risk to Weston's water service. The tank location for Alternative 3 is proposed approximately 15 feet from the edge of the existing tank and presents an unacceptable risk to the existing tank and workers. Damage to the existing tank could severely impact the Town's ability to provide water to the community.

Overall, the site layout for Alternative 1 presents fewer construction constraints and safety concerns than the other alternatives and is recommended. Alternatives 2A presents increased risks associated with the proximity of construction activities near existing infrastructure and the proposed 1:1 slope adjacent to the existing tank which is not maintainable. Alternative 3 presents numerous constructability concerns including the lack of space to set up a crane near the tank without significant filling, construction activities within very close proximity to the existing tank, and the need for a retaining wall to support the new tank on top of the Cat Rock peak.

4.2.3.4 Cost

Alternative 1 is estimated to have the lowest construction cost of all the alternatives. Construction of Alternative 1 is estimated to cost approximately $660,000 less than Alternative 2, $900,000 less than Alternative 2A, and $1,400,000 less than Alternative 3. The higher costs for Alternatives 2 and 2A are associated with sitework, length of new utilities, and acquisition of private property. The higher costs for Alternative 3 are associated with the required retaining wall, length of new utilities, and construction inefficiencies which will increase labor hours and project duration.

4.2.3.5 Recommendation

In conclusion, the Cat Rock tank replacement is the most challenging of all the tank sites. Maintaining the integrity of the Cat Rock lookout while keeping the existing tank in service leaves limited area for a new tank. There is no feasible tank location that would allow vegetation along the western property line to remain undisturbed. Although Alternatives 2 and 2A would require the taking of a slightly smaller area of conservation land than Alternative 1, it would require a portion of private land be acquired in its place and ultimately cause much more disturbance to the natural landscape from significant site grading. Alternative 3 would require leveling the peak of Cat Rock, an unacceptable consequence of the community, and construction of a retaining wall on private property. Alternative 1 provides the only semi-flat area which is best suited for construction of the new tank, presents the least risk to existing water system infrastructure, and is the most cost-effective option.

An additional alternative was considered of constructing a new tank on the existing site which will require demolishing the existing tank first. As is the case with Paines Hill, removing the Cat Rock tank from service without the new replacement tank online will result in an increase in the storage deficit and leave the community highly

vulnerable. Since the Cat Rock tank is the only storage tank located in the northern part of the town's distribution system, taking the existing tank offline would leave the northern part of town particularly vulnerable. Therefore, this option is not recommended.

Alternative 1, as shown on Figure 31, is the preferred site location for the Cat Rock replacement tank.

4.2.4 Alternatives Analysis – Doublet Hill Tank Siting

Four site alternatives were considered for construction of the Doublet Hill replacement tank:

1. Replacement tank located southeast of the existing tank and on the slope of Doublet Hill.
2. Replacement tank located east of the existing tank and just northwest of Alternative 1, at the bottom of the Doublet Hill slope.
    a. Replacement tank located northeast of Alternative 2.
3. Replacement tank located southeast of the existing tank but closer than the other alternatives and on the slope of Doublet Hill.

Alternative sites for the Doublet Hill replacement tank are shown on Figure 32. All four alternative sites are on conservation land and access to all the alternative tank locations would be from the end of Doublet Hill Road.

4.2.4.1 Impacts to Preserved Land

Alternative 1 will require changing the use of approximately 1.6 acres of the Doublet Hill Conservation Area from protected for conservation use to protected for water supply use. Alternatives 2, 2A, and 3 will each require changing the use of 1.5 acres of land. Alternatives 1, 2, and 3 are located northwest of the Doublet Hill peaks. For Alternatives 1, 2, and 3, the proposed tank would be 100 feet, 180 feet, and 150 feet, respectively, from the Doublet Hill peaks. For Alternative 2A, the proposed tank would be 230 feet north of the Doublet Hill peaks. All four alternatives will require significant tree clearing but can be reforested outside of the tank base and access road areas. Alternative 1 will require the most tree clearing since it is the largest site. Alternatives 2, 2A, and 3 will require similar areas of tree clearing; however, the tree clearing required for Alternative 3 will extend to what is currently private property and impact the vegetative screening between the new tank and the residence at 75 Doublet Hill Road.

Alternatives 1 and 2A are located deeper into the forested conservation area than Alternatives 2 and 3, which are located closer to developed areas. Doublet Hill hiking trails can be accessed from the cul-de-sac at the end of Doublet Hill Road. The tank in all four alternatives would also be accessed from this point and therefore would require relocation of hiking trails.

4.2.4.2 Impacts to Abutters

To accommodate construction of Alternative 3, approximately 0.1 acres of private property southeast of the existing tank between the conservation area and the existing tank site would be required. This area would be needed for adequate sloping from the tank base. Alternatives 1, 2A, and 3 do not require the acquisition of private property.

For Alternatives 1, 2, and 2A the proposed tank location is farther away from neighboring homes than the current tank. The proposed tank in Alternative 1 is 350 feet from the closest neighbor (80 Doublet Hill Road), which is farther than any other alternative. The proposed tank location in Alternative 2 is 270 feet from the closest neighbor

(80 Doublet Hill Road) while the tank location in Alternative 2A is 300 feet from the same residence. The proposed tank location in Alternative 2A is approximately 400 feet from the closest residence on Meadowbrook Road. Alternative 3 places the new tank 220 feet from the closest neighbor (75 Doublet Hill Road). Access roads for all four alternatives will be similar in proximity to the closest houses.

4.2.4.3 Engineering Evaluation

The access roads for Alternatives 1 and 3 would need to be constructed up steep grades that lead to the Doublet Hills. This will result in longer and steeper access roads which will require more filling and grading to construct, as compared to Alternatives 2 and 2A. The proposed tank and access road in Alternatives 2 and 2A are on comparatively flat land and will provide much easier access for construction equipment.

Ledge outcroppings predominate the landscape of Doublet Hill. The proposed tank location for Alternative 3 is on a very steep section of the hill and will require approximately twice as much ledge removal as Alternative 1, three times as much ledge removal as Alternative 2, and eight times as much ledge removal as Alternative 2A. Alternative 1 is also on a steep portion of the hill but would require less ledge removal but more filling) but preserves the integrity of the Doublet Hills. Alternative 2A will require the least amount of ledge removal since it is located on a semi-flat area and does not cut into the hill. Alternative 2 is located at the base of the hill and only slightly cuts into the hill and therefore requires more ledge removal than Alternative 2A but less than Alternatives 1 and 3.

For Alternative 1, a significant amount of filling will be required to level the tank base area. For Alternative 3, slightly less cut and fill will be needed, but excess material will likely need to be trucked off site due to the large amount of ledge removal. Alternative 2 will require approximately half the amount of cutting and filling work as Alternative 3 and will result in cut and fill balance which minimizes the amount of imported fill needed. Alternative 2A requires the least amount of cut and fill but will require some imported fill to regrade the lower elevations on the northern portion of the site.

The proposed tanks for Alternatives 2 and 2A will be constructed at the lowest ground elevation and therefore will have the tallest pedestal. The pedestal for Alternative 3 would be approximately 8 feet shorter than Alternative 2 and Alternative 1 would be approximately 12 feet shorter than Alternative 2. Since a composite elevated tank is proposed for the Doublet Hill replacement tank, the tank itself would be the same size regardless of ground elevation; adding height to the pedestal is fairly simple in that it only requires pouring and casting more concrete onsite.

The new tank will connect to the existing water distribution system and electrical system from the end of Doublet Hill Road. Alternative 1 requires approximately 410 feet of new water main and electrical wiring and Alternative 2 requires approximately 330 feet while Alternatives 2A and 3 require 360 feet and 370 feet, respectively.

All four alternatives allow for adequate space for laydown and tank erection; however, Alternatives 1 and 3 present numerous challenges since the proposed tanks are located on the slope of the hill. Working with these steep grades means there will be a significant amount of site preparation work to flatten the grades out enough to be able to construct the tank. Tank manufacturers have indicated that the flatter grade at Alternative 2 will make construction easier and less costly. Alternative 2A is similarly located on semi-flat grade. Another concern is that the tank should be constructed on uniform material to reduce the potential for differential settlement. The steep slopes at Alternatives 1 and 3 mean that a portion of the tank base will rest on ledge while another portion rests on fill

material. Alternative 3 presents additional concerns due to the close proximity of the property boundary and the small portion of private land that would need to be acquired to accommodate construction.

4.2.4.4 Cost

The construction of Alternative 2A is estimated to be the least expensive of the options. Alternative 2A is estimated to be approximately $300,000 less expensive than Alternative 2, approximately $770,000 less than Alternative 1 and $1,320,000 less than Alternative 3.

4.2.4.5 Recommendation

In conclusion, Alternative Sites 2 and 2A are the most advantageous sites when considering impacts to preserved land, engineering, construction, and cost. Alternative 2A, which was considered at the request of an abutter is, slightly farther away from abutting residences than Alternative 2 and requires less ledge removal. Although Alternative 2A is located 50 feet closer to one residence than Alternative 1, it will require the least impact to the natural landscape and vegetation. Alternative 2A also has the lowest estimated construction cost.

An additional alternative was considered consisting of constructing a new tank on the existing site which will require demolishing the existing tank first. Due to the small size of the existing site, construction would not be possible without acquiring additional property or both temporary and permanent construction easements would be required. However, the site is entirely surrounded by private residential property and Article 97 conservation land. Secondly, both the Paines Hill and Cat Rock replacement tanks would need to be online prior to taking Doublet Hill offline for demolition. Otherwise, removing the Doublet Hill tank from service without having its replacement online will result in an increase in the storage deficit and leave the community highly vulnerable. For these reasons, this alternative is not recommended.

Alternative Site 2A, as shown on Figure 33, is the preferred site location for the new Doublet Hill tank.

4.2.5 Note on Proposed Conditions

Since completion of the Tank Site Alternatives Analysis, site plans for the preferred tank sites have been further developed as design has progressed. The updated 50% design progress site plans for the replacement tanks at Paines Hill, Cat Rock, and Doublet Hill are included as Figures 34, 35, and 36, respectively. These site plans show the proposed condition upon completion of the new tanks but prior to demolition of the old tanks. Upon demolition of the old tank, that site, except where utilities will be installed, will be re-naturalized with native vegetation.

The Tank Site Alternatives Analysis was completed prior to surveys of the proposed tank sites and the acreages of tank replacement alternative sites presented were based on desktop analysis. A formal survey of the sites was completed in September 2024. Note that the proposed replacement tank sites and remaining conservation parcel indicated in this filing are based on the formal survey data. The certified record plans are provided in Attachment I.

4.2.6 Cat Rock Tank Siting Re-Evaluation

The initial alternatives analysis described above was completed during preliminary design and prior to a detailed hydraulic analysis of the improvements needed to Weston's distribution system to address lack of water storage for the town and low pressures in certain areas. The original concept for improving Weston's water system deficiencies was to construct new tanks approximately 40 feet higher than the existing and, where needed, reduce pressures in the distribution system from the elevation increase using Pressure Reducing Valves (PRVs). This concept was in

keeping with the Town's single zone water system to provide water to the community, noting that parts of the existing water distribution system have existing pressures in excess of 80 psi.

Since the initial alternatives analysis was completed, design has continued to progress and a detailed analysis of system hydraulics was completed. Based on the results of the hydraulic analysis, a new alternative to address Weston's distribution system deficits was developed. This alternative consists of separating the distribution system into multiple pressure zones to increase water pressure where needed while avoiding increasing pressures that are already greater than 80 psi under existing conditions. Under this alternative, the new Paines Hill and Doublet Hill tanks would be constructed to higher water elevations than the existing tanks to improve water pressure and provide water storage in higher ground elevation areas of town. The new Cat Rock tank would be constructed to the same water elevation as the existing tank to supply a new low pressure zone in the northern part of the town. The new Cat Rock tank, therefore, could be constructed as a pre-stressed concrete tank rather than an elevated steel tank. This alternative was recommended because it addresses pressure and storage deficiencies while also limiting pressure increases in areas with already adequate pressure while also limiting impacts to water age. The Town's DPW and Select Board decided to move forward with this alternative on September 25, 2025.

With the change in the type of tank proposed to be constructed at the Cat Rock tank site, an abutter to the site requested that siting the replacement tank in the same location as the existing tank be re-evaluated. The letter dated November 17, 2025 prepared by Tetra Tech and submitted to the Town by the abutter's representatives is included in Attachment O. It is important to note that the modification of the design will not accommodate taking the existing Cat Rock tank out-of-service to construct the new tank on the existing tank footprint. With the creation of two separate pressure zones, the southern high pressure zone served by the new Paines Hill and Doublet Hill tanks, could be used to support the northern zone when the new Cat Rock tank needs to be taken out of service in the future for routine maintenance such as inspections or cleanings. Routine maintenance events are 1 to 2 days at most. Construction of the new Cat Rock tank will take 1 to 2 years. To have the southern high pressure zone completely redundant to the northern low pressure zone, the storage in the Paines Hill and Doublet Hill tanks would need to be increased in volume by 626,000 gallons, equal to the equalization volume in the Cat Rock tank, to serve the northern zone for an extended period. It would also likely require additional distribution piping improvements.

Since it is not feasible to construct the new tank in the footprint of the existing tank, Wright-Pierce conducted an alternatives analysis to re-evaluate siting the tank at Alternative 3, which is located next to the existing tank, based on the updated tank style parameters. This alternatives analysis is provided in the letter prepared by Wright-Pierce dated December 10, 2025 and included in Attachment O.

The alternatives analysis found that constructing a concrete tank at Alternative 1 is anticipated to result in lower costs, easier constructability and reduced risk as compared to Alternative 3. A summary of the evaluation for criteria is provided in the sections below.

4.2.6.1 Impacts to Preserved Land

Alternative 1 will require changing the use of 1.718 acres of land from conservation and recreation to water supply while Alternative 3 will require changing the use of 1.47 acres. For both alternatives, conservation and recreation land will need to be converted to water supply land to accommodate the existing access road, the construction laydown area, the necessary stormwater management system, and new site utilities. When compared to a composite elevated tank, a concrete tank requires a larger area for the larger footprint of the tank and for the

additional construction laydown area needed to cast concrete panels. Therefore, the disturbances to the peak of the Cat Rock hill and lookout point (including flattening the grade of the peak and clearing trees) that would result from construction of a concrete tank at Alternative 3, would be greater than the impacts that would result from construction of a composite elevated tank at that location. Construction of a concrete tank at Alternative 1 would not impact the peak of Cat Rock.

4.2.6.2 Impacts to Abutters

The proximity of a concrete tank to abutters would be similar to the proximity of a composite elevated tank to abutters. A tank located at Alternative 1 would be approximately 150 feet from the closest residence on Bradford Road and 390 feet from the closest residence on Whitney Tavern Road. A tank located at Alternative 3 would be approximately 345 feet from the closest residence on Bradford Road and 195 feet from the closest residence on Whitney Tavern Road. Alternative 1 does not require acquisition of any private property. A geotechnical and structural analysis would be needed to determine if a retaining wall is needed on the southeastern side of a tank at Alternative 3, where the grade drops steeply toward private property. If a retaining wall was needed, it would require the acquisition of private property on Whitney Tavern Road.

4.2.6.3 Engineering Evaluation

A concrete tank constructed at Alternative 3 would have a diameter 11+ feet larger than a concrete tank at Alternative 1 and the diameter of the foundation will increase by approximately 32 to 38 feet in diameter as compared to an elevated tank at the Alternative 3 location. To maintain clearance from the existing tank to protect the existing tank during ledge removal and placement of concrete panels during tank construction, a concrete tank at Alternative 3 would need to be constructed at the very peak of the Cat Rock hill. This location presents numerous constructability challenges. The existing access road at the top of the hill cannot accommodate equipment and trucks as-is, due to the steep grade and lack of space for truck turnaround near the new tank. There is not sufficient space next to the proposed tank location to accommodate the concrete wall casting beds unless the site is extended closer to the Cat Rock lookout point. Otherwise, the walls will need to be cast at a location near the bottom of the access road and a crane would need to pick them up and track them to the top of the hill. A larger diameter tank will require more ledge removal than is required at Alternative 1. While the length of water main needed to connect the tank at Alternative 1 would be greater than that of Alternative 3, the Alternative 1 water main would be installed within an existing cleared and graded gravel road that provides the DPW access existing sampling station and water main easement located west of the existing tank. Installing new water main to Alternative 3 would require cutting into the slope of the hill to maintain clearance from the existing tank. Due to its close proximity to the existing tank, construction of a tank at Alternative 3 presents significant risk to the existing tank and the town's ability to provide water to the community.

Section 5 Impacts and Mitigation Measures

5.1 Public Health and Safety

Replacing the Town's water storage tanks will provide significant benefit to the community. These benefits include replacement of aged critical municipal infrastructure and improving the function and reliability of the Town's water system by increasing substandard service pressures and available storage capacity for fire protection.

The replacement of the three water storage tanks will improve the water system that serves the Town of Weston by providing adequate storage to meet peak demand, fight fires and sustain pressures throughout the system. The City of Waltham is not served by the Weston water system and therefore, will not benefit from these system improvements. However, as noted above, additional land will be put into conservation status as Article 97 land swap that will be a benefit to the community of Waltham.

No other public health and safety impacts are anticipated.

5.2 Open Space

All three tank replacements will impact portions of land preserved for conservation. This is because the existing tanks must remain online while the replacement tanks are constructed, and the existing tank parcels are too small to accommodate a new tank. Figure 9 shows an overview of Weston's Article 97 lands and the three tank locations. A total of 4.501 acres of Article 97 land currently preserved for conservation and/or recreation would be changed to Article 97 land preserved for water supply. This change in use will result in a slight reduction in the area sizes of the Highland Town Forest, Cat Rock & 80 Acres Conservation Area, and Doublet Hill Conservation Area. The replacement tanks were sited such that they minimize if not avoid impacts to important features of these parks including the Cat Rock lookout point and the Doublet Hill peaks.

Construction of the replacement tank will require changing the use of 1.268 acres of the Highland Town Forest from conservation use to water supply use. Figure 10 shows Article 97 land at Paines Hill and the Town-approved tank replacement site. The new site will need to be cleared of trees and vegetation to accommodate construction activities while maintaining the existing tank in service. Efforts will be made to maintain the vegetative screening along the southern, northern and western property boundaries with abutting residences. Regrading of the new site will be needed to provide a somewhat flat working area for casting the tank panels and constructing the tank foundation and accessway. Regrading will require extensive cutting and filling including ledge removal and import of additional fill materials. Approximately 400 feet of new water main will be installed to connect the new tank to the distribution system. The existing water main will also be replaced from the existing tank to Highland Street.

Construction of the new Cat Rock tank will require changing the use of 1.718 acres of the Cat Rock & 80 Acres Conservation Area from conservation/recreation to water supply. Figure 11 shows Article 97 land at Cat Rock and the Town-approved tank replacement site. The accessway to the existing tank traverses the Cat Rock & 80 Acres Conservation Area. This accessway will be incorporated into the water supply land and will be used to access the new tank. Based on the topography of the potential available land, significant leveling and filling will be required to provide a level base for the tank foundation and staging of equipment and materials. This will require clearing of trees and vegetation between the northwest side of the Cat Rock lookout and the Bradford Road cul-de-sac. The replacement Cat Rock tank will be located approximately 140 feet northwest of the popular Cat Rock lookout point. Approximately 380 feet of new water main will be installed to connect the new tank to the distribution system. The existing water main will also be replaced from the tank site to North Avenue.

Construction of the new Doublet Hill tank will require changing the use of 1.515 acres of the Doublet Hill Conservation Area from conservation to water supply use. Figure 12 shows Article 97 land at Doublet Hill and the Town-approved tank replacement site. The new tank would be located approximately 240 feet northwest of the Doublet Hill peaks. Earthwork including ledge removal would be required to construct level areas for the tank foundation and storage of materials and equipment. Like the other sites, portions of the new tank site will need to be cleared of vegetation but upon completion of construction, portions of the site, including the old tank site, will be re-naturalized after construction and demolition are completed. Hiking paths that currently traverse the proposed site will be modified to allow for construction. Approximately 430 feet of new water main will need to be installed to connect the new tank to the distribution system.

Cat Rock & 80 Acres Conservation Area, Doublet Hill Conservation Area, and the Highland Street Forest are protected spaces open to the public (both residents of Weston and non-residents) which are primarily used for hiking. The existing accessways for the water tanks on each site also serve as accessways to the hiking trail systems. A portion of the protected conservation land would be converted to water supply land to construct the replacement water storage tanks. The transfer of the Article 97 lands to facilitate the construction of the Paines Hill replacement tank, the Cat Rock replacement tank, and the Doublet Hill replacement tank would result in the destruction or impairment of open spaces and natural areas which is considered "Damage to the Environment" as defined in 301 CMR 11.02. As a result of the replacement tanks construction, hiking trails through the tank sites will need to be redirected during and after construction. Users of these recreational spaces will be impacted in that the hiking areas contained within Cat Rock & 80 Acres Conservation Area, Doublet Hill Conservation Area, and the Highland Street Forest will be reduced, and hiking paths will be modified. After construction of the tanks and demolition of the old tanks, it is anticipated that accessways to the conservation areas will be open for use by the public and hiking paths will continue to traverse the tank sites.

This transfer of protected conservation and recreational spaces will be mitigated by an Article 97 Land Swap such that an equivalent area of currently unprotected land will be rendered protected for conservation and recreational use. Considering that these conservation areas are located in Weston and open to residents and non-residents of Weston, it is not expected that changes to the conservation areas will disproportionately impact the EJ neighborhoods in the DGA. It is the Conservation Commission's intention for the proposed land swap parcel at Case Estates Parcel 9 to be used a walking path to connect multiple trail systems in Weston which will also be open to residents and non-residents.

5.2.1 Land Swap

The subsections below describe how the Town identified and selected a land swap parcel that provides the greatest benefit to the community.

5.2.1.1 Selection Process

The Town identified all parcels potentially suitable for the land swap by searching Massachusetts GIS databases for parcels that meet some or all the following criteria:

- Town-owned
- Approximately 5 acres
- Located adjacent to Article 97 land
- Contains wetlands
- Existing trail system present

- Located outside 0.5 miles of train stations (to exclude land that could potentially be used to meet MBTA Communities Act [Section 3A] requirements)
- Located within 1.0 miles of Environmental Justice (EJ) Populations (to replace Cat Rock and Doublet Hill conservation areas which are located within 1.0 miles of EJ Populations).

Cemeteries as well as recreational fields associated with schools were excluded from consideration. Parcels meeting some or all the above criteria were placed on a shortlist for further evaluation. These parcels included the following:

- Lamson Park
- Soldiers Field Town Park
- Weston Town Common
- Land's Sake Farm
- Green Power Farm Community Garden
- Case Estates Parcel 7
- Case Estates Parcel 9

The Weston Town Commons was excluded from consideration due to its heavy use by the public for municipal and school functions which the Conservation Commission is not prepared to manage.

This shortlist was presented to the Select Board on June 25, 2024. Based on feedback provided by the Select Board, the search criteria were adjusted such that parcels would not be excluded based on their size, proximity to train stations, or existing use as recreational fields. The Select Board indicated that they were willing to propose multiple parcels that add up to the +/- 5 acres and that Town-owned land will not be used to meet MBTA Communities Act requirements.

The updated shortlist of parcels for consideration in the land swap included:

- Land's Sake Farm
- Green Power Farm Community Garden
- Case Estates Parcel 7
- Case Estates Parcel 9
- Lamson Park
- Soldiers Field Town Park
- Cherrybrook Road Recreational Fields
- Brook Field
- Bogle Ball Field

These parcels were presented to the Conservation Commission on July 30, 2024. The Conservation Commission indicated a preference for a single parcel that meets the size requirement and one that could be contiguous with or in close proximity to already-existing conservation land and/or trails. Land's Sake Farm, Green Power Farm Community Garden, Case Estates Parcel 7, and Case Estates Parcel 9 meet these preferences. The Conservation Commission discussed that since Land's Sake Farm is currently leased for agricultural purposes, Green Power Farm Community Garden is likewise used for agricultural purposes, and Case Estates Parcel 7 is adjacent to a school and may be needed for future school or municipal developments, these parcels are not their ideal candidates for the

land swap. They indicated that Case Estates Parcel 9 could be subdivided in such a way as to provide a continuous protected hiking trail from Wellesley Street to the Ash Street Reservoir and would therefore provide the most benefit to the community if entered into Article 97.

5.2.1.2 Proposed Land Swap Parcel

Case Estates Parcel 9 (parcel ID 032-023-020) is a 10.59 acre parcel located at 0 Ash Street and owned by the Town of Weston. Case Estates Parcel 9 was included in the Town's 2017 Open Space and Recreation Plan with an objective to permanently protect Parcel 9 as conservation land.

During the joint Select Board and Conservation Commission meeting held on August 27, 2024, the Select Board voted to propose for the land swap a +/- 5 acres L-shape area on Case Estates Parcel 9 configured in such a way as to connect the trail system from Wellesley Street to the Ash Street Reservoir. The Conservation Commission voted to accept the language of the article prepared by the legal counsel for the disposition of the new tank parcels from Article 97 conservation land contingent upon the Town entering an L-shape area of Parcel 9 into conservation under Article 97. A preliminary drawing prepared by the Town showing the subdivided parcel and designated land swap area is included in Attachment J.

Property information for Case Estates Parcel 9 is summarized below in Table 5-1.

Table 5-1 Property Information for Case Estates Parcel 9

Address	0 Ash Street
Map/Block/Lot	32/23/20
Use Code and Description	930V Municipal
Total Acreage	10.59
Book and Page	68039/0075
Owner	Town of Weston

The 62.5-acre Case Estates land was historically operated as an experimental farm, practical school, and horticulture center. In 2002, Case's Corner Historic District was listed as a National Register District. The Town worked for over 10 years to acquire the Case Estates, officially purchasing 62.5 acres of land in 2016. In the 2017 Open Space and Recreation Plan, the Conservation Commission set an objective to permanently protect Parcel 9 as conservation land. Parcel 2, which is directly adjacent to Parcel 9, has been put into protection under Article 97. In 2019, the Town established a trail through Parcel 9 to connect their Legacy Trail to Ash Street. As of Fall 2025, the Town is in design of the Ash Street Trail and Walkway Project which will connect the hiking trail on Parcel 9 to the Ash Street Reservoir trail system.

Parcel 9 is approximately 1.35 miles from the closest EJ community and the trail system will be open to residents and non-residents alike.

Additional information on Case Estates Parcel 9 is provided in Attachment J.

An Appraisal Report for the three tank sites and the land swap parcel was completed by Hunneman Appraisal & Consulting Services in June 2025 and is included as Attachment L. The Appraisal Report determined that the monetary value of the land swap parcel consisting of a 5-acre portion of Case Estates Parcel 9 is greater than the value of the three proposed replacement tank parcels combined.

5.3 Natural Resources

Construction of the tanks will require clearing trees and vegetation within the footprint of the new tank, in the footprint of the new accessway, in a buffer area around the new tank to allow for crane access during construction and future maintenance, and in the contractor's laydown area. Tree removal will be limited to the extent practicable. The old tank site and parts of the construction laydown areas where utilities will not be installed will be re-naturalized once construction and demolition are completed. A tree inventory and survey of the proposed tank sites was completed in June 2025. The tree inventory documented the location, species, diameter at breast height, the arborist's conditions rating, canopy radius, approximate height and condition notes of all trees greater than 4 inches caliper within the proposed tank sites. The goal of the re-naturalization plan will be to allow the landscape to grow with native plant species that are already present in the surrounding forest. The benefits of reclaiming the existing water tank area for re-naturalization will maintain carbon sequestration, reduce the hazardous risks of soil erosion, reduce stormwater management requirements, and restrict the spread of invasive species. The re-naturalization plan will be implemented upon completion of construction of the new tank and demolition of the old tank.

5.4 GHG Emissions

This project will result in minimal greenhouse gas (GHG) emissions. Sources of GHG emissions will include indirect emissions from construction/heavy equipment during construction and . All alternatives, except for the no-build alternative, will produce similar amounts of GHG emissions as they will all require the use of heavy equipment during construction. During construction, the project will require contractors to be held to a no-idle restriction to mitigate impacts and construction equipment will comply with the MA Diesel Retrofit program.

After construction of the replacement tanks and demolition of the old tanks are completed, vehicular traffic to the tank sites will be the same as existing conditions. The DPW visits the tanks once per day to inspect the sites and monitor operation of the tank. Additional vehicle trips to the site may occur in the event of an emergency or when repairs or maintenance are needed.

For these reasons, the Town respectfully requests a waiver from compliance with the MEPA GHG Policy based on the de minimis exemption.

5.5 Climate Change

The RMAT Climate Resilience Design Standards Tool determined that all three sites are considered to have high risk ratings for urban flooding and extreme heat but low risk ratings for sea level rise/storm surge and riverine flooding. The Weston Storage Tanks Replacement project will include stormwater management systems at each site designed such that there is no net increase in surface runoff. The tanks are also located at the highest elevations in Weston and therefore, these sites are far less likely to be affected by flooding than lower elevation areas. For these reasons, the replacement tanks are not expected to contribute to additional flooding risk nor are they expected to be susceptible to the impacts of urban flooding.

One of the main goals described in the Weston Climate Action and Resilience Plan (2021) is to enhance Weston's infrastructure to be resilient to the impacts of climate change. The existing tanks were constructed over 70 years ago and are reaching or are already at the end of their useful lives. The replacement tanks will be constructed in accordance with the latest design standards and will therefore be much less vulnerable to damage from extreme weather including falling trees from windstorms and extreme heat and cold than the existing outdated infrastructure.

The proposed storage capacity of the new tanks includes equalization storage for projected future peak-hour fluctuation, fire protection, and emergency storage. Under existing conditions, the Town is at risk of emptying their storage tanks during periods of high demand or drought when the pumps at the Wellesley Street Booster Pump Station and the system piping cannot keep up with the demand. These risks will be reduced by the Project since the proposed tanks will provide active storage for the system, which will greatly improve Weston's ability to fight fires and supply water to residents during periods of drought. The new tanks are expected to reduce the demands on the pumps at the Wellesley Street Booster Pump Station which will reduce energy usage at this facility.

Climate change risks associated with urban flooding and extreme heat are expected to affect the region as a whole. It is predicted that the Town of Weston and much of Massachusetts will experience increased precipitation and flooding, more intense storms and more heat waves and drought. The proposed tank sites are located at the highest elevations in the town and therefore offer the best protection against flooding. The new tanks are expected to improve the resiliency of Weston's water system during periods of drought.

5.6 Stormwater

The project will be designed to adhere to the standards of the Massachusetts Stormwater Handbook and will therefore not result in any net increase in surface runoff.

During construction, the contract documents will require the contractor to implement stormwater best management practices (BMPs). These will include installation of temporary sediment and erosion control fencing around the entire construction site and temporary detention basins to mitigate runoff. These measures will be implemented prior to the start of earthwork. Additionally, the contractor will be required to obtain a NPDES General Construction Permit. As part of the NPDES permit, the contractor will prepare, implement, and maintain a Stormwater Pollution Prevention Plan (SWPPP).

Post-development stormwater controls will consist of a subsurface system to treat, store, and mitigate on-site stormwater. Proposed permanent stormwater BMPs for each site as of the 50% design progress are shown on Figures 34, 35, and 36. The post-development stormwater controls were developed as detailed in the Stormwater Modeling and Analysis memo included as Attachment M.

5.7 Waste Management

Solid waste is expected to be generated during the project. Solid waste from demolition will include concrete from the existing Paines Hill tank and painted steel and concrete foundation from the existing Cat Rock and Doublet Hill tanks. Lead and PCB paint sampling has been performed at Cat Rock and Doublet Hill sites to determine the presence of hazardous waste. Sample results did not indicate the presence of hazardous waste. Design drawings from 1958 indicate that the overflow piping encased in the existing Paines Hill tank is constructed of asbestos cement. The construction contractor will be required to handle and dispose of asbestos materials in accordance with 310 CMR 7.15. Any additional hazardous waste identified during demolition will be disposed of at an approved

waste facility and in accordance with all applications regulations. For non-hazardous materials that cannot be recycled, the contractor will be required to dispose of these materials at an approved waste facility per applicable regulations.

Construction activities will generate waste typically associated with construction projects including packaging materials, excess construction materials, scrap lumber and excess excavated soils. The contractor will be required to dispose of all waste generated in conformance with all application regulations and recycle material to the extent that is practical.

5.8 Site Access

During construction, the project sites will be protected using construction fencing, which will temporarily impact hikers' use of the conservation areas. A lockable gate will be installed at the entry to the access driveway which will be closed and locked after hours. Posted notices and warning signs will be displayed on fencing to establish construction site boundaries and to warn of non-authorized entry. The existing hiking trails that traverse the construction sites will be re-routed to outside the construction zone. The Town of Weston Conservation Commission has stated that hiking trails are not protected resources and are commonly rerouted. After construction, the public water infrastructure will be secured by 8-foot tall fencing with barbed wire at the top and hiking trails will be routed around the fenced area.

5.9 Dust Control

During construction, earthwork activities will produce dust. The contractor will be required to wet impacted areas to control and reduce dust.

5.10 Noise

As a direct short-term impact, construction noise is unavoidable. Some sound attenuating devices can be added to temporary generators used to power equipment but are impractical on larger equipment such as trucks and excavation equipment. Work hours will be limited to 7 AM to 5PM to limit disturbance to neighbors.

Once construction and demolition are complete, noise at the site will be limited to the operation of the emergency generator in the event of a power outage.

Section 6 Proposed Section 61 Findings

M.G.L. c. 30, § 61 requires that "[a]ll agencies, departments, boards, commissions and authorities of the commonwealth… review, evaluate, and determine the impact on the natural environment of all works, projects or activities conducted by them and… use all practicable means and measures to minimize damage to the environment… Any determination made by an agency of the commonwealth shall include a finding describing the environmental impact, if any, of the project and a finding that all feasible measures have been taken to avoid or minimize said impact.

Therefore, each state agency that issues a permit for the Weston Water Storage Tanks Replacement project shall issue a Section 61 Finding in connection with permit issuance, identifying mitigation that is relied upon to satisfy the Section 61 requirement. A proposed Section 61 Finding is provided for the Storage Tank Replacement project, and a table of mitigation measures related to each Agency is included as part of each Section 61 Finding. All mitigation will be the responsibility of the Proponent.

6.1 Anticipated State Permits and Approvals

Table 6-1 identifies the Agencies that are expected to take Agency Action on the proposed project and, therefore, issue Section 61 Findings. It also identifies the Agency Actions anticipated to be required.

Table 6-1 State Agency Actions Required

Agency	Approval
Massachusetts Department of Environmental Protection	BRP WS 32: Distribution System Modifications for System that Serves More Than 3,300 People
Massachusetts Executive Office of Energy and the Environment	MEPA Environmental Notification Form and Environmental Impact Report
Massachusetts Historical Commission	Project Notification Form

6.2 [Agency] - Proposed Section 61 Finding Pursuant to MGL Chapter 30, Section 61

Project Name: Weston Storage Tanks Replacement
Project Proponent: Town of Weston Department of Public Works Water Division
Project Municipality: Town of Weston
Project Location:
Paines Hill Tank: 150 Highland Street (existing site) & 0 Chestnut Street (proposed site)
Cat Rock Tank: 0 Overlook Drive (existing site) & 0 Drabbington Way (proposed site)
Doublet Hill Tank: 85 Doublet Hill Road (existing site) & 0 Doublet Hill Road (proposed site)
EEA Number: TBD
Date Noticed in Monitor: December 10, 2025

The potential environmental impacts of the Project have been characterized and quantified in the ENF dated November 2025 and this Proposed EIR, which are incorporated by reference into this Section 61 Finding. Throughout the planning and environmental review process, the Proponent has been working to develop measures to mitigate significant impacts of the Project. With the mitigation proposed and carried out in cooperation with state agencies, the _____ [Agency] finds that there are no significant unmitigated impacts.

The Proponent recognizes that the identification of effective mitigation, and implementation of that mitigation throughout the life of the Project, is central to its responsibilities under the Massachusetts Environmental Policy Act (MEPA). The Proponent has accordingly prepared the annexed Table of Mitigation that specifies, for each potential state permit category, the mitigation that the Proponent will provide.

Now, therefore, _____ [Agency], having reviewed the MEPA filings for the Project, including the mitigation measures itemized on Table 6-2, finds pursuant to M.G.L. C. 30, S. 61 that with the implementation of the aforesaid measures, all practicable and feasible means and measures will have been taken to avoid or minimize potential damage from the Project to the environment.

_____
[Agency]

_____
By:

_____
[Date]

Table 6-2 describes the measures to be implemented to mitigate the effects of the Project related to the required _____ [Agency] permits and the schedule for implementation.

Table 6-2 Summary of Impacts and Mitigation Measures

Subject	Agency	Impact	Mitigation Measures	Schedule
Open Space	EEA	• Change in use of 2.783 acres of Article 97 land preserved for the primary purpose of conservation and 1.718 acres of Article 97 land preserved for the primary purpose of recreation to the primary purpose of water supply	• 5.0 acres of unprotected land of greater value, as determined by appraisal, will be rendered protected for conservation and used for passive recreation	Prior to Project
Natural Resource Value	EEA	• The new sites will be cleared of trees to construct the replacement tanks	• Tree clearing will be limited to the extent practicable • The old tank sites and portions of the new sites will be re-naturalized with native plant species	During and Post-Project Construction
Recreational Value	EEA	• Highland Street Forest will be reduced by 1.268 acres • Cat Rock & 80 Acres conservation area will be reduced by 1.718 acres • Doublet Hill conservation area will be reduced by 1.515 acres • Hiking trails will be re-routed during and after construction	• Limit temporary site disturbance to the maximum extent possible. Maintain passive recreation throughout construction through temporary relocation of trails with minimal periods of closure to protect public safety. • Significant landscape features will remain open during and after construction • The selected replacement land protects walking trail that connects multiple trail systems in Weston	During and Post-Project Construction
Historical and Archaeological Resources	MHC	• The Paines Hill tank site is located within the Chestnut Street Historic Area	• Project Notification Forms were submitted for all 3 tank sites • MHC determined that the project is unlikely to affect significant historic or archeological resources at any of the sites • The PEIR and EENF will be submitted to the MHC	Completed Prior to Project
Environmental Justice	--	• Public outreach	• Advance notification provided to community-based organization (CBOs) and tribes listed in the Project-Specific EJ Reference List, posted	Prior to and During Project

Subject	Agency	Impact	Mitigation Measures	Schedule
			to the Town's tank website, posted on social media and hard copies posted at the Waltham Library • Project updates and documents will continue to be posted to the Town's tank website as well as emailed to anyone who requests to be on the mailing list • The change in use from Article 97 Conservation/Recreation to Water Supply results in 5 acres of additional conservation land (land swap) being preserved for the benefit of the public, including EJ populations. The land swap parcel is located approximately 1.35 miles from the nearest EJ population.	
Construction	MassDEP	• Temporary noise, dust, and traffic during construction • Generation of solid waste	• Work hours limited to daytime only • Contractor will be required to wet construction area to control dust • Adhere to MA Anti-Idling Laws and MA Diesel Retrofit Program Requirements • Generators on site will be required to have sound attenuating exhaust systems • The contractor will be required to handle and recycle or dispose of demolition materials in accordance with applicable laws and regulations.	During Project Construction
Stormwater	MassDEP	• Surface runoff during construction • Permanent increase in impervious area	• Drawings and specifications will require the contractor to install straw wattles and silt fencing around the entire construction site and install temporary detention basins at a minimum • Drawings and specifications will include regulatory standards that the contractor must comply with such as the NPDES and Storm Water Pollution Prevention Plans (SWPPP) • Design includes permanent stormwater management systems for no net increase in	During and Post-Project Construction

Subject	Agency	Impact	Mitigation Measures	Schedule
			surface runoff from the new tank sites in accordance with the Massachusetts Stormwater Handbook	

Attachment A
Distribution List

Attachment B
List of Local and Federal Permits Required

Attachment C
Figures

Attachment D
Natural Heritage and Endangered Species Program Correspondence

Attachment E
Massachusetts Historical Commission Reviewed Project Notification Forms

Attachment F
RMAT Climate Resilience Design Standards Tool Reports

Attachment G
Environmental Justice Community Outreach

Attachment H
Tank Site Alternatives Analysis Updated Final Report (June 2024)

Attachment I
Surveyor Certified Plans for Proposed Tank Replacement Sites

Attachment J
Land Swap Parcel

Attachment K
Warrant for March 2025 Special Town Meeting

Attachment L
Appraisal Report

Attachment M
Federal Aviation Administration Forms and Aeronautical Studies

Attachment N
Stormwater Modeling and Analysis Memorandum

Attachment O
Cat Rock Tank Siting Re-Evaluation

Attachment P
Public Notice of Environmental Review

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