

SETH A. PAJCIC
TOWN OF GRAFTON SELECTBOARD
WASTEWATER COMMITTEE
MEMBER

Emily and Lynnette:

I want to thank both of you for all the work you have done on this project. As you both know, I only got involved in this project this summer and have only been the unofficial head of the wastewater committee for about two weeks. Over the past two weeks, I have done my best to talk to my constituents to get a better feel for their thoughts on the wastewater project and, in all candor, the feedback has been remarkably negative. Based on the feedback I have received, I have concluded that, at the end of the day, the system that will be presented in the 90% report is dead on arrival. The reasons for this conclusion are several and listed below.

One, the whole issue of the sewer/fire district. We were under the impression that the creation of a sewer/fire district was a necessity for the implementation of the wastewater system. While there is no state statute that says as much, it was our impression that the need was related to TMF issues. Over the past two weeks, based on my discussions with Emily and the town attorney, I have learned that while there are reasons to create such a district, that it is not a necessity. Given the population within the boundaries of the Sewer District it is a virtual certainty that they do not have the capacity to manage, operate and finance the system. Another issue is that if just the users of the system pay for the proposed system with the available grants, then under the EPA's sewer affordability formula, they would be unable to afford the cost of the system.

Second, as you all know, since the town obtained the grant of \$3.96M, the voters of the town will have to approve the wastewater system. It is highly unlikely that the voters of Grafton will approve a system with a price tag, for construction alone, between \$8-\$10M. It is also highly unlikely that the entire town will agree to pay for a sewer system that only the homes in the village and its buffer are hooked up to. As stated previously, the entire town would have to pay for it because, under the EPA formula, the users would be unable to afford the cost of the current proposed system on their own.

Third, I know from my discussions with the owner of the MKT that she has no desire to be hooked up to the proposed system given that she just paid a substantial sum for a new septic that she believes could be used as part of a cluster type system with additional homes hooked up to her system. She has told me that she will refuse to be hooked up to the system. I have reached out to the management of the Inn for their thoughts on being hooked up to the proposed system, but I have been told by a member of the board of the Windham Foundation, that owns the Inn, that the Inn is not interested in being hooked up to the proposed system.

As such, I believe we need to explore lower cost alternative solutions that only the users of the system would pay for and also be able to afford.

Below are some of the alternative solutions that have been discussed in the past. Of these alternatives, I would like to know whether (1) The alternative would be covered under the grant; and (2) If not, an answer citing sections of the grant and/or state/federal regulations, as to why not. I know that some (if not all) of the below alternatives have been discussed in the past and we have been told the grant would not cover said alternative. However, to satisfy my constituents, I need detailed reasons as to “why not”.

1. A cluster system for the houses only in the village area (excluding the buffer) that would **exclude** the MKT and the Inn. I have attached a report on the Warren system.
2. A smaller distributed treatment system that would exclude the MKT and the Inn.
3. A living machine system. I have attached a document from the EPA about the living machine.
4. Any other feasible lower cost alternative, which I have not listed, that could be supported financially just by the users of the system.
5. If there are no feasible wastewater alternatives then a PFAS/PFOS system that would install, dispose of, and replace point of entry filters at regular intervals without a full-blown wastewater system.

One last issue that we need to address is the issue of management of the system once the system is up and running. Emily mentioned at our last meeting that a utility needs to be created to manage the system and, if not a fire/sewer district, then a sewer commission. Two questions on this issue:

1. Why does a utility need to be created, why can't the town, through the selectboard, manage the system?
2. As I read 24 VSA 3506, it states that the selectboard of the town, shall constitute a board of sewage system commissioners, unless the selectboard votes to create a separate board of sewage commissioners of 3-7 members with 4-year terms, to manage the system. Is there a state regulation that supersedes this statute?

I know we are approaching the 90% report stage, but I am not sure it is wise to rush out a 90% report that will most likely be rejected by the voters of Grafton.

I am sorry if these requests require some “going back to the drawing board” but I believe we need to give the members of the Grafton community some real alternatives, if possible, in the 90% report.

Sincerely,

Seth A. Pajcic