



TOWN OF WAYLAND
MASSACHUSETTS
01778
CONSERVATION COMMISSION

TOWN BUILDING
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July 23, 2009

Secretary Ian A. Bowles
Executive Office of Energy and Environmental Affairs
Attn: Anne Canaday, EOEI No. 14197
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Draft EIR – “Birch Road Well field” Framingham, MA
EOEA No. 14197

Dear Secretary Bowles,

The following comments are being submitted on behalf of the Wayland Conservation Commission regarding the Draft Environmental Impact Report for the Birch Road Well field Redevelopment and Water Treatment Plant in Framingham, Massachusetts.

The Conservation Commission manages a Conservation area to the east of the proposed well field redevelopment – the Pod Meadow Conservation Area (once known as the Richardson Conservation Area). This conservation area contains a large pond, wetlands, and a vernal pool. There is a publication that was created discussing conservation areas that was last revised in 1977. That publication included the following information about the Pod Meadow Conservation Area (and in particular a portion known as the “Richardson parcel”:

"If one examines a topographic map showing conditions prior to New England Sand and Gravel Company changed the local topography, one sees that the low part of the Richardson (now called Pod Meadow) parcel is also a kettle hole, in this case a relatively dry one because its wall has a gap which permits drainage. The hole was originally at least 40 feet deeper than at present, but peat and muck have filled the deepest sections. About two-thirds of the parcel lies within the kettle hole, and one-third is on top of the sand plain. There is a steep ice-contact slope between the two portions."

The redevelopment of these wells will impact the Pod Meadow Conservation Area. The discussion of the Richardson parcel then went on to say:

“As would be expected in such a geological setting, there is an abundant flow of ground water from the sand plain into the kettle hole, and the brook is surprisingly large for such

a small area. However, pumped wells now compete with the brook for the available supply of ground water, and when pumping is heavy the brook flow virtually stops flowing. Framingham has three major wells about 600 feet west of the parcel.”

The text from the publication was prepared by a former Conservation Commissioner who dedicated many years to the protection of open space in Wayland and who had significant knowledge of each conservation area.

There is scant evidence that the Town of Framingham has considered the impact of the re-use of the wells on the conservation area and the resulting alteration of a special wetlands now functioning as both a wonderful area for passive recreation as well as a robust habitat for a multitude of wildlife. In a recent bird count done by participants of the Massachusetts Bird Survey (BBS Framingham 5) 30 species of birds, including two Virginia Rails and two Wood duck, were counted at the Pod Meadow Conservation Area. Given the geology of the area and the shared watershed and aquifer the redevelopment of the Birch Road well fields will undoubtedly have an adverse impact on the Pod Meadow Conservation Area and before these are permitted to be re-activated there should be greater assessment of this impact including an evaluation of recourse should the wells be activated and the wetlands altered. The Town of Framingham should establish at least one pieziometric monitoring point within the wetlands for evaluation of whether pumping of the wells has a measurable, significant, effect to cause alteration of groundwater levels that would impact the wetlands within Wayland. The draft EIR contains information, looking at test data from PZ-3/SG-3 that suggests there is going to be an impact.

Thank you for the opportunity to present these comments.

Sincerely,

Brian J. Monahan,
Conservation Administrator

Cc Conservation Commissioners
Board of Selectmen
Planning Board
Board of Health
Framingham DPW
File