



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Eastern Massachusetts National Wildlife Refuge Complex
73 Weir Hill Road
Sudbury, MA 01776-1420

October 20, 2009

Secretary Ian A. Bowles
Executive Office of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
Attn: Anne Canaday, MEPA Analyst

Re: EOEEA No. 14197, Birch Road Well Field Redevelopment and Water Treatment Plant

Dear Secretary Bowles:

Thank you for the opportunity to comment on the Final Environmental Impact Review (EIR) for the Birch Road Wellfield Redevelopment and Water Treatment Plant in Framingham. The U.S. Fish and Wildlife Service (FWS) is reviewing this project because the Great Meadows National Wildlife Refuge (NWR) lies directly downstream from the location of the proposed re-activated wellfield.

The Great Meadows NWR is the largest block of conservation land along the Sudbury River. It is part of the National Wildlife Refuge System, whose mission is "to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans." Established in 1944 for the protection and management of migratory birds, the FWS protects all wildlife and habitat within the boundaries of the Great Meadows NWR and provides opportunities for wildlife-dependent public use as well.

The Great Meadows NWR has the potential to be significantly impacted by the re-activation of the Birch Road wells. We raised a concern about the insufficient analysis of these impacts in the Draft EIR, and the Certificate issued for the Draft EIR requested information that, had it been included in the Final EIR, would have enabled us to better understand the potential impacts of the well field operation on water flows in the Sudbury River. The applicant has not provided the information requested in the Certificate and has not addressed the concerns we raised in our original comment letter.

Additionally, we have been working with municipalities, the State, and the Environmental Protection Agency to protect water quality in the Sudbury River. We are greatly concerned that reduced water flows in the Sudbury River will impact downstream water quality especially as some of the waters in the river are impacted by wastewater treatment plant discharges.

We respectfully request a permit not be issued for this project until the information required in the Certificate and an analysis is completed showing that the amount of water withdrawal will not negatively impact wildlife in the Sudbury River.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth A. Herland". The signature is written in a cursive style with a long, sweeping underline.

Elizabeth A. Herland
Project Leader