

TOWN OF FRAMINGHAM

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Town Manager
Julian M. Suso

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18 June 2009

Secretary Ian A. Bowles
Executive Office of Energy & Environmental Affairs
100 Cambridge Street - Suite 900
Boston, Massachusetts 02114

REF: EEA # 14197 - Town of Framingham - Birch Road Wellfield Re-Activation & Water Treatment Plant

Dear Secretary Bowles:

The Town of Framingham Board of Selectmen (Board) is very pleased to provide this Letter of Support on the Draft Environmental Impact Report (EIR) for Framingham's Birch Road Wellfield and Water Treatment Plant project (the Project). We would like to take this opportunity to outline several important aspects of the Project, the work that has been done to address your Certificate on the Expanded Environmental Notification Form (EENF) and the comments raised by state agencies - particularly the Department of Conservation and Recreation (DCR) and the Department of Environmental Protection (MassDEP).

The Town initiated this Project more than five years ago and at that time notified the Massachusetts Water Resources Authority (MWRA) of its intention to explore the possibility of restoring the Birch Road Wells water supply. This fact is noted in the current ten year water supply continuation agreement with the MWRA. The Birch Road Wells water supply was a significant source of drinking water for Framingham from the 1930's into the 1980's and has continued to serve as an emergency backup water supply since the 1980s. Over the last five years, the Town and its consultants have spent a considerable amount of time and effort analyzing the viability of restoring this valuable resource, including the productivity of the aquifer and the potential impacts that the Project may have within the watershed.

Following up on your EENF Certificate, the Town redoubled its efforts to develop information, meet with state agencies to discuss their comments and concerns and to develop a comprehensive Draft EIR to address all of the issues that have been raised. In addition to meeting with state agencies, a meeting was held with the United States Geological Survey (USGS) to discuss the work that is currently being undertaken within the watershed and to discuss the hydrologic modeling that the Town's consultants (SEA) developed, including the water budget and the assumptions that were built into the modeling efforts.

The Draft EIR comprehensively addresses these matters and we are confident that the aquifer is one of the most productive in the state and can support the restoration of the wells to withdraw 4.3 million gallons per day (mgd), on average, in a safe and sustainable manner. We believe that, consistent with the Secretary's Certificate on the EENF, the Draft EIR provides a complete and stand-alone description and analysis of the project, project alternatives and environmental impacts, and adequately addresses mitigation and comments, which the regulations indicate would allow the Draft EIR to be reviewed as a Final EIR.

The Town has taken seriously its responsibility to restore the water supply in a manner that will minimize impacts on resources within the watershed, including Cochituate State Park, which is an important recreational resource for residents of the Town and the entire region. After meeting with EEA, DCR, and MassDEP staff, the Town finalized the Draft EIR to address the issues of concern and has gone to great lengths to analyze the Project to ensure that all impacts are minimized. The

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Town has applied for the applicable state permits and believes that the Water Management Act permitting process can appropriately condition the water withdrawal to minimize any impacts, including the management of the Wellfield during periods of anticipated low flows within the watershed. Interested parties, including state agencies, will have the opportunity to review and have input into the Water Management Act permitting process. Accordingly, we respectfully request that you find the Draft EIR adequate and that you furthermore allow it to serve as the Final EIR.

In addition to the comprehensive and responsive analysis that has been undertaken in the Draft EIR, the context of our request that the Draft EIR be treated as the Final EIR – in particular, the time constraint that we are currently faced with – is as follows:

- During the past several years the Town has taken great efforts to plan the Project consistent with MassDEP's guidelines and as a result the Project has received one of the top rankings (#4) on the State Intended Use Plan and Project Priority List for Calendar Year 2009 under the State Revolving Fund Loan Program for Drinking Water Projects.
- Framingham Town Meeting recently voted overwhelmingly to support the Project, appropriating more than \$40 million for the project just a few weeks ago.
- The projected timelines for this project to be eligible to receive federal funding pursuant to the American Recovery and Reinvestment Act (ARRA) are extremely tight. We are hopeful that our upfront efforts to plan the Project and score well on MassDEP's Intended Use Plan for Drinking Water Projects reflects a concerted commitment to the Project and that we will be eligible for ARRA funding.
- The Town is including several important clean energy components in this Project (efficient lighting, geothermal exploration, and photo voltaic cells) and is seriously considering additional related clean energy investments on other parcels.


In summary, the Board believes that the restoration of the Birch Road Wells can be accomplished in an environmentally sensitive and sustainable manner, providing several benefits to the Town and the region including 1) the Town will realize significant economic benefits over the life of the Project and the savings can be dedicated to other important infrastructure projects; and 2) redundant water supply capacity will be an important resource in the future in the event of an emergency or periods of extended droughts throughout the Commonwealth.

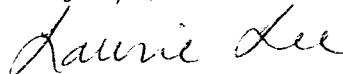
The Town has pursued this Project diligently over the past several years and has comprehensively addressed the engineering and environmental aspects of the Project to restore the water supply while protecting public health and sensitive resources. With all of the efforts undertaken to date, we think that this Project is responsive to MassDEP's priorities under the State Revolving Fund for the development of public water supplies and is consistent with the ARRA by investing in public infrastructure and promoting economic development and job creation.


We thank you for the opportunity to comment on the Draft EIR submittal. The Town of Framingham respectfully requests your favorable consideration in the determination that the Draft EIR is adequate and that it should also serve as the Final EIR, thus enabling the Project to move forward expeditiously to final design and permitting.

Sincerely,

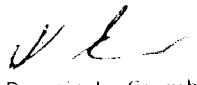
Board of Selectmen:


A. Ginger Esty, Chair

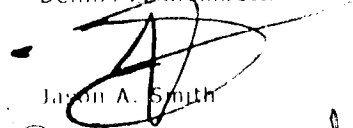

Laurie Lee, Vice Chair



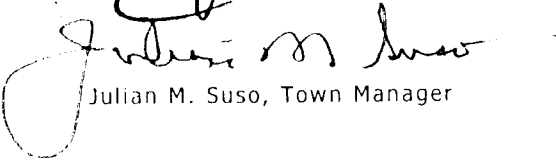
Charles J. Sisitsky, Clerk



Dennis L. Gombetti



Jason A. Smith



Julian M. Suso, Town Manager

Cc: US Congressman Edward Markey
MA Senator Karen Spilka
MA Representative Pam Richardson
MA Representative Thomas Sannicandro
Peter A. Sellers | DPW
Eric Johnson | DPW
Linda Lowe | Town Counsel Office
Jon Beekman | SEA
Peter Newton | SEA