

OAR



Organization for the Assabet River
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July 31, 2009

Ian Bowles, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge St., Suite 900
Boston MA 02114

Attn.: Anne Canaday, MEPA Office

Re: Comments on EOEEA No. 14197 DEIR
Birch Rd. Well Field Redevelopment, Framingham, Mass.

Dear Secretary Bowles,

On behalf of the Organization for the Assabet River (OAR), thank you for the opportunity to review and comment on the above Draft Environmental Impact Report. OAR is a membership organization representing some 1,000 households and businesses in the Concord River watershed. Our mission is to protect, preserve, and enhance the Assabet and Concord rivers, their tributaries and watersheds. OAR is also a member of the Sudbury, Assabet and Concord Wild and Scenic River Stewardship Council. OAR conducts EPA-approved water quality monitoring on the Assabet, Concord and Sudbury rivers and is very familiar with their water quality and flow characteristics and problems.

Significant progress has been made over the past 20 years in improving water quality, recreational use, and aquatic habitat of these rivers, but much work remains to be done in light of significant ongoing and new threats. These include diminishing summer and fall flow caused by loss of recharge due to rapid development of the region, including expansion of sewerage and impervious surfaces. Climate change is also expected to reduce summer flows, further damaging fish populations, recreational opportunities, and the overall health and usability of the rivers.

In this context we are particularly concerned about the proposed major municipal well withdrawals in Framingham, at 4.3 MGD, located near the beginning of the federally-designated Wild and Scenic section of the Sudbury River. The Sudbury River suffers from severe loss of flow, having gone completely dry in Hopkinton in 1999. As stated in your Certificate on the ENF for this project, "The proposed wells should not be allowed to have a significant impact on flows in the Sudbury River." However, the DEIR is inadequate for assessing the impact of the proposed well fields on the river for several reasons.

1. Although the applicant notes that “impacts would be confined to periods of low flow in the River,” the data on flow impacts provided in the DEIR are not for the 7Q10 low-flow period, which is the when the impacts would be most severe.
2. The applicant asserts: “In the [Water Management Act] permitting process MassDEP and the Town will arrive at a sensible approach for adjusting the ratio of local water and MWRA water that the Town receives during these short ‘dry’ periods, thereby significantly minimizing the impacts shown in the analysis.” It is not clear how this could be done, or whether it is even possible to do it given the time of travel of groundwater from the pumping site to the river. This is such a central question affecting impacts on flows in the Sudbury River that it must be examined through the MEPA process.
3. The applicant refers to the “limited nature of the anticipated impacts”, which include loss of flow over the Lake Cochituate spillway into Cochituate Brook, a tributary to the Sudbury River. We disagree that these impacts will be “limited and minor.” The effect of the project on the many valuable resources and uses of the Sudbury River should be properly assessed by authorities in the field, such as fisheries and groundwater experts.
4. We are concerned that since the water pumped from the well field would be discharged to the MWRA sewer system, there would be a transfer of 4.3 MGD of water out of the Concord watershed. The impact of this interbasin transfer must be addressed.

For the above reasons we request that a Final Environmental Impact Report be prepared that provides accurate and useful data on flow impacts, including a plan for ensuring that the “short ‘dry’ periods” caused by the project are eliminated.

Yours sincerely,

A handwritten signature in black ink, appearing to read "A. Field-Juma", with a long horizontal flourish extending to the left.

Alison Field-Juma
Policy Director

Cc: S. Crane, SuAsCo River Stewardship Council
F. Gillespie, Sudbury River Watershed Organization