

Sudbury River Watershed Organization

www.sudburyriver.org

July 31, 2009

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

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MEPA

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

Dear Secretary Bowls,

This project is of concern to the Sudbury River Watershed Organization (SRWO) due to the environmental impacts it will cause to the Sudbury River and its watershed.

In 1999 SRWO documented that the Sudbury River had dried up at Fruit Street, Hopkinton (see attached photos). SRWO advocated for answers for why this had happened when there was no documentation of it ever happening before. A joint DCR and USGS funded study was performed and the USGS created a model for the Upper Sudbury River Basin, with SRWO participating in data collection. While the results have not been officially published, as a member of the Technical Advisory Committee I am aware that the model proves that municipal well water withdrawals in Hopkinton and Westborough are the reason the river went dry, that although 1999 was a dry year, without the well withdrawals the river would not have dried up.

This situation may only become worse in the upper Sudbury basin as more municipal wells are planned in the towns of Ashland and Hopkinton as well as commercial withdrawals in Southborough. And now with Framingham's proposed wells the problem may be moving down river. We believe that a thorough investigation into the safe yield of the entire Sudbury River is needed, but most importantly a thorough analysis of the impacts from the Birch Street wells (which is lacking in the DEIR) needs to be undertaken before this project moves forward.

These proposed wells could possible dewater the Sudbury River during low flow conditions as the proposed 4.3 MGD withdrawals represent 93% of the flow at 7Q10. Under Global Warming scenarios that level of reduced flow may be more common than once every 10 years as increased droughts are one of the scenarios projected to happen. The impacts to aquatic habitat could be disastrous if adequate mitigation for these wells is not required. In fact adequate mitigation may not be economically feasible. We strongly urge that a FEIR be required to address the many issues not considered in the DEIR.

1. An Inter-Basin Transfer Act (IBTA) review is required and cannot be grandfathered, as a new treatment plant is required; the system was not built before passage of the act as required.
2. The water taken from the Winter Street pump station included water from out of basin, contributed by MWRA reservoirs from outside of the SuAsCo watershed, and therefore is not applicable to grandfathering under the IBTA.

3. Thorough analysis of the withdrawals is needed in an FEIR to adequately analyze impacts of the wells on the Sudbury River during 7Q10. The DEIR only estimates impacts using median of monthly average flows, a condition that is not relevant to assessing impacts to the river when it is most vulnerable – during low flows.
4. Reduced withdrawal alternatives must be thoroughly vetted in the FEIR for both the environmental and economic impacts. If reduced withdrawals are required to protect the environmental integrity of the river and its watershed, then those reduced withdrawals must be shown to be economically feasible.
5. There is no evidence in the DEIR that the impacts to the river can be adequately mitigated under low flow situations, such mitigation must be based on knowledge of actual flow times to the river that could be as high as six months. Reduced withdrawals could conceivably be required for a period of 5 or 6 months. Global Warming scenarios need to be considered as well.
6. While it would be beneficial for the town of Framingham to receive Federal Economic Recovery and Reinvestment Act Funds (ERRA) for this project, that possibility should not be the driver of the Environmental Impact Review process. A FEIR is needed to address the many unaddressed issues of the DEIR, and that requirement needs to be made independent of the possibility of the ERRA timeline. We believe there is a high probability that this project cannot be properly mitigated and remain economically feasible. Federal Stimulus money is not intended to shortchange thorough environmental review of projects not proven to be environmentally sound.
7. Complete economic analysis is needed in the FEIR to account for costs of operation, maintenance and delivery of the water, including anticipated increases in energy costs to supply these services. These costs seem not to have been included in the DEIR when they projected a \$50 million dollar savings over 20 years.
8. Impacts to the regionally, statewide and nationally important resources of the Great Meadows National Wildlife Refuge, the federally designated SuAsCo Wild and Scenic River and Cochituate State Park need to be vetted in the FEIR

The Sudbury River Watershed Organization is concerned that Framingham is trying to obtain water from an already overstressed basin when that town already has adequate water supplies available through the MWRA. MWRA is trying to sell its water elsewhere because they state they have more than enough to go around. Framingham has no plans to return any of the withdrawn water to the Sudbury Watershed instead sewerage it all out to Boston Harbor. The impacts to the Sudbury River from this project are potentially catastrophic. The driving force for this project is to save money, but the economic analysis has not adequately proven the amount that can be saved or if the project is even economically feasible if mitigation measures are required. And what is the cost of destroying an environmental resource?

Sincerely,

Frederica Gillespie
Sudbury River Watershed Organization

Attached photos compare family canoeing up the river at the same location they are shown walking the dry river bed