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July 30, 2009

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

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

Dear Secretary Bowles,

We would like thank you for this opportunity to comment on this Draft Environmental Impact Report (DEIR) for the Birch Road Well Field Redevelopment and Water Treatment Plant in Framingham. A new organization formed to protect and restore rivers and streams in our state, the Massachusetts Rivers Alliance brings together organization and individuals throughout Massachusetts who are working together to improve river protection. We seek to apply an effective, unified statewide approach to the critical issues facing our rivers and streams. This project is of interest to the Alliance because the proposed water withdrawal of 4.3 million gallons per day (MGD) could have a very significant impact on flows in the Sudbury River, Cochituate Brook, and water levels in Lake Cochituate and nearby wetlands.

We offer the following comments and recommendations:

**1) The DEIR underestimates the impact of the proposed 4.3 million gallon per day (MGD) withdrawal on flows in the Sudbury River, Cochituate Brook, and water levels in Lake Cochituate, and adjacent wetlands because it does not evaluate the withdrawal under low flow conditions.** Instead, the DEIR measures impacts of the proposed water withdrawal based on the median of monthly average river flows. These flows do not simulate conditions such as 7Q10 flow (the lowest stream flow for seven consecutive days that would be expected to occur once in ten years) where fish, shellfish, aquatic insects, and other aquatic life are most vulnerable.

The DEIR assessment also does not take into account existing registered and water withdrawals in the Sudbury watershed that already affect river and stream flows. The United States Geological

Service (USGS), in cooperation with the state, has been developing a detailed hydrologic model of the Sudbury River for the past several years. If possible, the state should use this model to evaluate the impacts of the proposed 4.3 MGD withdrawal.

Recommendation: The state should require a FEIR that assesses the impacts of the proposed withdrawal on the Sudbury River, Cochituate Brook, Lake Cochituate, and adjacent wetlands **under low flow conditions**, including but not limited to 7Q10 flows in the Sudbury River and Cochituate Brook. This low flow analysis should also take into account the effects of existing registered and permitted withdrawals in the Sudbury watershed.

**2) The DEIR does not assess the impact of a reduced withdrawal alternative on the economic viability of the project.** The DEIR tacitly assumes that the project's withdrawal volume will not be reduced by MassDEP and argues that the Birch Road wells *must* pump 4.3 MGD to generate the necessary economic benefit for the Town of Framingham. At the same time, the DEIR states that storm water recharge and inflow/Infiltration elimination projects can mitigate the impact of a 4.3 MGD withdrawal, yet does not identify specific mitigation projects or quantify the gallons of water each project would return to the aquifer. What would happen to the economic viability of the project if MassDEP lowered the withdrawal volume below 4.3 mgd or 1,570 million gallons per year during the Water Management Act permitting process?

Recommendation:

Mitigation of the proposed water withdrawal on the Sudbury River, Cochituate Brook, Lake Cochituate, and adjacent wetlands could easily require a seasonal or annual reduction in the amount of water pumped from the Birch Road wells. For this reason, the state should require a FEIR that analyzes how reduced withdrawal volumes of 25%, 50% and 75%, impact the economic viability of the project. This analysis should be completed before the state issues final MEPA certificate and millions of dollars of public funds are committed to the project.

Thank you for this opportunity to comment. If you have questions about our comments, please do not hesitate to contact me at 617/850-1747 ([juliablatt@massriversalliance.org](mailto:juliablatt@massriversalliance.org)) or Policy Director Sue Beede at 617-850-1702.

Sincerely,

Julia Blatt  
Executive Director