neponset river
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December 1, 2020

Kathleen Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900 (9th Floor)
Attn: MEPA Office
Boston, MA 02114

Via email to Eva.Murray@state.ma.us

RE: EEA No. 16293 Medfield Water Treatment Plant

Dear Secretary Theoharides:

The Neponset River Watershed Association (NepRWA) submits the following comments on the environmental notification form under review for the proposed Water Treatment Plant for Wells 3 & 4 in Medfield. NepRWA is a nonprofit conservation organization working to clean up and protect the Neponset River, its tributaries and surrounding watershed lands.

NepRWA has been fortunate to closely partner with Medfield on a number of key issues, including stormwater management, water conservation, and climate change resiliency. Indeed, Medfield has been a leader on these issues and it is rare for our organization and the Town to conflict on environmental issues. While we understand the need to ensure adequate clean drinking water for a growing town, we have a couple of concerns about this project.

First, we appreciate that the proposed site plan generally seems to protect against stormwater pollution and increases recharge in an area that needs it. However, the construction of a new water treatment plant and increase in pumping capacity at Well 3 (replaced by Well 3A) and Well 4 is likely to negatively impact streamflow in this area, presenting a significant hazard to environmental habitat in the Mill-Mine Brook sub-basin.

We understand that Medfield is not planning to increase withdrawals from these sources over the volume authorized to through their registrations. Nevertheless, under the current withdrawal volumes (which are less than that authorized), groundwater depletion in this sub-basin is significant and the stream experiences extended periods of zero flow during dry weather. This is important because the sub-basin includes a coldwater fishery (CFR). While the designated CFR is located upstream of Wells 3 and 4, past assessments by MassDEP have indicated that coldwater species were formerly found throughout this system.

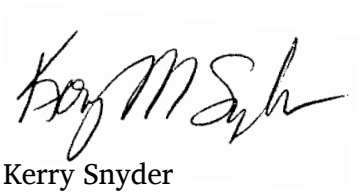
2173 Washington Street, Canton, MA 02021
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Based on this assessment, we would advocate that Medfield optimize its water sourcing by reducing the use of the Mill-Mine Brook sub-basin in order to protect or restore CFR resources. Medfield could do this by reducing pumping from Wells 3 & 4 during the critical summer season. Understandably, this is unlikely to be economically feasible once Medfield invests significant resources in a new water treatment facility. An alternative to the project could include establishing an interconnection with MWRA sources through Westwood. Such an alternative would significantly reduce the stress on critical Neponset River watershed resources while providing Medfield with the safe drinking water it needs.

We understand that our concern would generally be more appropriately addressed through Water Management Act registration and permitting reviews, but recognize it is unlikely that alternatives could seriously be considered once this project moves forward. Thus we ask that MassDEP and Medfield consider alternatives to this project that would both provide the necessary water resources and source redundancy for Medfield in an economically feasible way, while also preserving and protecting water resources and habitat.

Thank you very much for your consideration. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Kerry Snyder
Advocacy Director