



January 16, 2024

To Whom it May Concern,

Re: MEPA Comments – Notice of Project Change, South Weymouth Naval Air Station  
Redevelopment Project

### Summary

As President of the Back River Watershed Association, I am writing on behalf of our organization to oppose the BPD Union Point LLC's suggestion that Weymouth seek DEP approval for short-term interim relief from its 5 mgd withdrawal permit as a potential solution to their water supply issues as outlined in the South Weymouth Naval Air Station Redevelopment Project - Notice of Project Change.

Increased demands on Weymouth's water supply due to numerous large-scale, smart growth development projects, many of which have been approved but have yet to come online, have already taxed Weymouth's ability to provide adequate water supply to its residents while maintaining a thriving Herring Run, one of the most productive herring runs in Massachusetts. Increasing Weymouth's withdrawal permit by 5 mgd, even on an interim basis, will have a detrimental, and possibly permanent negative effect on the viability of Weymouth's Herring Run.

### Background Information on the Importance of Weymouth's Herring Run

The Weymouth Back River, an ACEC is approximately 950 acres, and is part of the Boston Harbor and Weir River Watersheds. The Back River watershed is located largely in the coastal communities of Weymouth and Hingham, and extends into portions of the towns of Braintree, Abington, Rockland, and Holbrook Massachusetts. The Back River is distinguished as being one of Massachusetts' Special Places, Local Scenic River, and Wildlife Refuge, and most importantly as an Area of Critical Environmental Concern in 1982. These designations were the accomplishments of the Back River Watershed Association, founder Mary F. Toomey. It is approximately ten miles south of Boston. Weymouth Back River consists of 180 acres of tidal waters. The Back River is a coastal, tidal river running a mile and a half through wide saltwater marshes and receiving water from upland ponds, swamps, rivers, lakes, tributaries that create a confluence.

The Back River estuary is a mix of part freshwater and saltwater and its water distribution system flows north into Back River from water sources from Weymouth's Mill River, Great Pond, Old Swamp River, which enter Whitman's Pond. In Hingham, Fresh River, and Tucker's Swamp/Hockley Run Complex enter Back River thus creating a highly productive estuary which empties into Hingham Bay. Within the valuable estuary of Weymouth Back River and its surrounding watershed there are over 100 acres of salt marshes and wooded wildlife preserves. Together they support many forms of aquatic life

The Back River Watershed Association is a 501(c) (3) tax exempt organization organized to preserve, protect, and promote the Back River and its watershed in Weymouth, Hingham, and parts of Abington, Rockland & Braintree.

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including 31 native species of fin fish, shellfish beds, herring, smelt and eel runs. Over 150 species of birds, including osprey, feed on live fish such as herring, flounder, and perch and shellfish. Its forested habitat sustains many forms of wildlife, mammals, ducks, reptiles including painted and snapping turtles, wildflowers, and unique plants. Dr. Mary Sears, U.S. Naval Reserves Commander, Scientist Emeritus of Wood's Hole Oceanographic Institution stated *"The estuaries controlled the nursery for the offshore fisheries, Back River Estuary being one of the most important ecological food resources in the region and that its resources were limitless providing an important food source."*

The Weymouth Herring Run in East Weymouth is one of the most productive herring runs in Massachusetts. Historically, Weymouth town records of 1648 state that the herring run provided an important food source for its citizens, and for Native and European people for thousands of years. A Weymouth Herring Committee was then formed and appointed a warden to oversee the care and count of the herring, and maintain correct water levels, and clear obstructions for the safe passage of hundreds of thousands of herring in the Spring migration, and the Fall migration. Today these important duties are more complex. They are faithfully performed by Phil Lofgren, Board Member of the Back River Watershed Association and George Loring, Weymouth Conservation Commission Member for the past thirty Years. Weymouth DPW also supports the run. Please note important MEPA comments by Phil Lofgren. The Weymouth Herring Run requires thousands of gallons of water throughout the year.

The importance of River Herring today cannot be overstated. Herring are a small forage fish that feed marine mammals, birds, bluefin tuna, sharks, and whales. Groundfish, like cod and haddock, eat herring eggs, juveniles and adults. River Herring are considered the keystone species supporting the marine food web and play a vital role, both environmentally and economically, in restoring many depleted fisheries in the Gulf of Maine. They are a protected species under Massachusetts law, although their historically large population has decreased significantly. Herring are also used as bait for lobster and crab.

The National Oceanic and Atmospheric Administration has proclaimed herring "overfished" and their population below target limits according to a *Patriot Ledger* news article, October 31, 2023 Atlantic herring are "overfished". The question is why. One reason is overfishing by midwater trawlers, loss of spawning habitat from industrial and urban development, illegal fishing, and the negative impacts of Climate Change.

"Great Pond is Weymouth's primary drinking water source. Weymouth's inadequate water supply due to low water levels, lack of precipitation, and historical drought periods has led to pumping from surface waters at Whitman's Pond in the Back River system to provide supplemental drinking water. In 1966, a pump station was installed at Whitman's Pond South Cove, adjacent to Washington Street the culvert that connects the South Cove to the main body of Whitman's Pond. South Cove is a spawning ground for river herring and also is the town's secondary water source which is fed by the Old Swamp River. Pumping from South Cove during herring spawning, juvenile development and outmigration periods is coordinated with the Weymouth Herring Wardens and the Division of Marine Fisheries. The goal of this coordination is to ensure that water supply needs are met while also ensuring that herring have access to their spawning grounds, that juveniles are not entrained in the pumps, that outmigration of adults and juveniles are not blocked, and that there is sufficient outflow from Whitman's Pond to provide safe passage for juveniles down the fish ladders and into the Back River system."<sup>i</sup>

In 2022, during a drought, Weymouth allowed excessive pumping at the South Cove Washington Street, transferring water to Great Pond in order to meet its water supply demand. The over-pumping left the South Cove of Whitman's Pond essentially dry during the Fall out-migration cycle of the herring, causing critical problems for their survival. Increasing Weymouth's withdrawal permit by 5 mgd, as suggested by BPD Union Point LLC, will result in more frequent pumping of South Cove (and Whitman's Pond) reducing the water flow necessary for a healthy Herring Run.

Weymouth river herring continue their annual Spring migration into the Back River Estuary and Herring Brook swimming over five fish ladders in Jackson Square and the Iron Hill Dam to spawn at Whitman's Pond, but in far less numbers than in previous decades when herring were allowed to migrate to both Whitman's Pond and onto Great Pond. At present, the migration of River Herring is limited to their spawning habitat at Whitman's Pond, which also serves as the Weymouth's secondary source of drinking water. The dam at Great Pond, Weymouth's primary drinking water supply, prevents River Herring access to one of their historical spawning habitats. Other dams at the Mill River and the Old Swamp River SNUP Dam at Weymouth Libbey Industrial Parkway all adversely affect natural waterflow of the rivers. Furthermore, urban development coupled with significant increase water demand have resulted in a great loss of spawning healthy habitat for River Herring and other fish.

Respectfully Submitted,



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<sup>i</sup> *The Ecology of the Weymouth Back River - A Monograph* prepared for the Town of Weymouth and the Back River Watershed Association by Coastal Systems Group School of Marine Science & Technology, University of Massachusetts Dartmouth.