



August 12, 2024

The Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
Attn: Rebecca Tepper, Secretary
Attn: Tori Kim
100 Cambridge Street, Suite 900
Boston, MA 02114

Project Name: South Weymouth Naval Air Station Redevelopment Project
Project Municipality: Abington, Rockland. And Weymouth
Project Watershed: Weymouth & Weir, North & South Rivers, Taunton
EEA Number:11085R
Project Proponent: BPD Union Point LLC c/o New England Development
Date Noticed in Monitor: December 22, 2023

Dear Secretary Tepper and Director Kim,

As President of the Back River Watershed Association, I am writing in response to the June 14, 2024 Draft Supplemental Environmental Impact Report (DSEIR) regarding the South Weymouth Air Station Redevelopment Project, submitted by Turquoise Southfield NR LLC c/o New England Development.

There are existing environmental impacts to the Weymouth Back River and estuary designated an Area of Critical Environmental Concern (ACEC), this proposed increased withdrawal would significantly impact flows in the Weymouth Back River Watershed and certainly Weymouth's primary drinking water reservoir at Great Pond and Weymouth's secondary source at Whitman's Pond, and the Weymouth Herring Run, and the Mill River. Weymouth's water supply serves a population of approximately 57,437 according to 2020 census.

The 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 the water levels for historic Weymouth Herring Run, one of the most productive herring runs in Massachusetts according to the Massachusetts Division of Fisheries. Increasing Weymouth's withdrawal for this project even on an interim basis, will have a detrimental, and possibly permanent negative effect on the viability of Weymouth's Herring Run.

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.

Visit us on Facebook @ <https://www.facebook.com/pages/Back-River-Watershed-Association>



The proponent's proposal for an interim water supply solution for the project to meet the demands of the 2023 Modified Development Program would increase withdrawal from Weymouth's drinking water system. As stated in the report Chapter 4.2.2 the analyses estimates that 450,000 gpd would be consumed by the redevelopment at the Base prior to securing a new, permanent water supply (MWRA). Permitting and construction of the MWRA permanent water supply is a long, complex process that must undergo numerous regulatory reviews and would take many years to complete. The Back River Watershed Association does not support the proponent's proposal for an interim water withdrawal solution from the Weymouth Drinking Water System.

“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 out-migration periods is coordinated with the Weymouth Herring Wardens, the Division of Marine Fisheries and the Weymouth DPW. 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.”ⁱ

There is a history of problems with excessive pumping of the South Cove at Whitman's Pond to divert water to supplement water levels at the Great Pond Reservoir. The operation of the Washington Street Pumping Station has caused major problems with adequate water flow for the historic Weymouth Herring Run, especially during drier conditions in summer months when out-migration occurs. It is during these months when sufficient water flow in the run is needed to allow the herring to navigate the six herring ladders, the Iron Hill Dam culvert, and tunnel system to reach the Weymouth Back River and beyond. **The water demands of the proponent's interim solution would exasperate this problem causing further harm to the Herring Run.**

River Herring are small forage fish and 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. The National Oceanographic and Atmospheric Administration has proclaimed herring “overfished” and their population below target limits. The historic Weymouth Herring Run is one of the most productive herring runs in Massachusetts. Weymouth is working with DMF to produce a scope study that would remove obstructions, dams, and other infrastructure to create safe passage for River Herring for their migration route to their historical spawning nursery up to the Great Pond. The Weymouth Herring Wardens work faithfully along with help from the Weymouth DPW to maintain correct water levels, and clear obstructions for safe passage of hundreds of thousands of herring annually. The Massachusetts Division of Marine Fisheries also oversees conditions and operations of the Weymouth Herring Run. It is imperative to increase River Herring populations. **Protecting Herring Runs, like the one in Weymouth, must be taken into consideration.**

Whitman's Pond surface waters include the Main Body, and West Cove at Middle Street, and the South Cove at Washington Street. Whitman's Pond in East Weymouth is also a vital spawning nursery for the historic Weymouth Herring Run, and other diadromous fish species in route to Herring Brook, Old Swamp River, and Mill River during Spring and Fall migration periods. Whitman's Pond also provides habitat for other aquatic life, wildlife, and rare species of birds.

It should be noted that the town of Weymouth is currently treating Whitman's Pond's massive, invasive vegetation problem with herbicides that has plagued the pond for decades. Whitman's Pond is a limited recreational resource. Power/non-power boating and fishing are allowed but there is no swimming allowed due to poor water quality issues. There is an advisory regarding fish consumption. The competing uses for the pond combined with problems caused by eutrophication, pollution, runoff, poor storm water management, invasive vegetation, and climate change, impact water quality and quantity have adversely impacted Whitman's Pond for decades.

It is important to note that these environmental impacts pose a serious threat to the life of Whitman's Pond. The town of Weymouth does not have an adequate water supply for the interim solution for this project. Weymouth must not risk our drinking water supply to supplement the Base Project or risk the ecosystem and flows at Whitman's Pond or its vital Herring Run.

Weymouth must protect its drinking water sources as well as managing a healthy herring run which requires thousands of gallons of water throughout the year especially during both in Spring and Fall migration periods. A copy of *The Ecology of the Weymouth Back River – A Monograph*, will be forwarded for your reference. Thank you for the opportunity to comment on this project.

Sincerely,



Linda J. DiAngelo
President, Back River Watershed Association, Inc.
lucyblue@comcast.net
781-337-8085

ⁱ *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.