



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Eastern Massachusetts National Wildlife Refuge Complex
73 Weir Hill Road
Sudbury, MA 01776-1420



July 24, 2009

Secretary Ian A. Bowles
Executive Office of Environmental Affairs – MEPA Office
100 Cambridge Street
Boston, MA 02114

RECEIVED

JUL 24 2009

Attn: Anne Canaday, MEPA Analyst

MEPA

Dear Secretary Bowles:

Thank you for the opportunity to comment on the Draft Environmental Impact Review (EIR) for the Birch Road Wellfield Redevelopment and Water Treatment Plant in Framingham.

The Great Meadows National Wildlife Refuge (NWR), which lies directly downstream from the location of the proposed re-activated wellfield, is part of the National Wildlife Refuge System administered by the U.S. Fish and Wildlife Service. The mission of the National Wildlife Refuge System is “to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans.” The Great Meadows NWR was established in 1944 for the protection and management of migratory birds, although we have a strong emphasis on all wildlife and we provide opportunities for wildlife-dependent public use as well. The refuge is one of eight refuges within the Eastern Massachusetts National Wildlife Refuge Complex.

The U.S. Fish and Wildlife Service is also one of the Congressionally-legislated partners in the Sudbury-Assabet-Concord National Wild and Scenic River. The Great Meadows NWR is the largest block of conservation land along the Sudbury River.

Both the Great Meadows NWR and the Sudbury portion of the National Wild and Scenic River have the potential to be significantly impacted by the re-activation of the Birch Road wells. Analysis of these impacts in the Draft EIR is insufficient, particularly on wildlife during low flow periods. Removing water from the watershed will not support sustainable water flows in the Sudbury River and will exacerbate already frequently

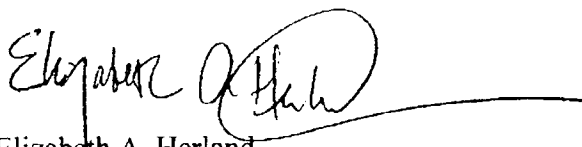
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stressed conditions. There are questions about the accuracy of the analysis in the Draft EIR about impacts of groundwater withdrawal on the Sudbury River and its associated riverine wetlands; this needs to be addressed in the Final EIR.

I understand there is interest in considering this Draft EIR as a Final EIR in order to expedite the re-activation of these wells. This is not a prudent action given the failure to adequately address the above concerns in the Draft EIR. A Final EIR should be required to allow for a more complete review of this project.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth A. Herland", with a long horizontal line extending to the right.

Elizabeth A. Herland
Project Leader

