AC

RECEIVED

JUL 3 1 2009

MEPA

Friends of Cochituate State Park

July 31, 2009

Secretary Ian A. Bowles
Executive Office of Environmental Affairs
ATTN: MEPA Office
Anne Canady, EOEA #14197
100 Cambridge Street, Suite 900
Boston MA 02114

Re: Birch Road Wellfield Redevelopment and Water Treatment Plant
EOEA# 14197

Dear Secretary Bowles and Ms. Canady:

Friends of Cochituate State Park, Inc. welcomes the opportunity to submit public comment upon the environmental impact report for Birch Road Wellfield Redevelopment dated June 15, 2009.

1. Invasive Weeds. No environmental impact statement for the Birch Road Wells is complete without addressing the issue of invasive weeds in Lake Cochituate, which if left untreated take over the shoreline – some refer to this phenomenon as a "monoculture" – adversely impacting both the ecosystem and the recreational use of the Lake.

    a. In June 2009, there was a successful treatment of herbicides in North Pond of Lake Cochituate using triclopyr and diquat, at a cost of approximately $44,000 to remove about 80 acres of invasive weeds.

    b. The cost of alternative treatments of invasive weeds using mechanical means are being studied, but estimates vary between $5,000 to $15,000 per acre, which depending upon the treatment area could be well in excess of the cost of the herbicide treatments used in North Pond in June 2009. It is therefore reasonable to expect that treatments like the June 2009 treatment will be an ongoing need for the Lake, as the rapidly growing weeds regenerate.

    c. Accordingly any filtration system for the Birch Road Wells should include at the inception of the project, at a minimum, the ability to effectively filter the herbicide treatments which were applied successfully in June 2009 . This herbicide filtration would be in addition to filtration for the herbicides, pesticides and fertilizer ingredients attributable to the significant amount of storm water runoff which flows into Lake Cochituate.

Friends of Cochituate State Park, Inc
93 Commonwealth Road (Route 30)
Wayland, MA 01778-4330
info@friendsofcsp.org - friendsofcsp.org

d. The monitoring system for the Birch Road Wells should including monitoring the effects of herbicide treatment of invasive weeds in Lake Cochituate.

e. Moreover, since the Birch Road Wells are anticipated to be a long term facility, the filtration system should be effective enough to filter a broad spectrum of herbicide treatments which may be used for the invasive weeds in the future.

2. Recreational Uses. The effect upon recreational uses of Lake Cochituate is not adequately addressed in the environmental impact statement.

a. Lake Cochituate includes at least four public beaches, including Saxonville Beach in Framingham, Wayland Town Beach, the State Park Beach and Camp Arrowhead. Depending upon the slope of the shoreline, a drawdown of 3 inches attributable to the Birch Road Wells could move the shoreline by as much as several feet. The effect of moving the shoreline upon these beach areas should be addressed in the environmental impact statement.

b. Traditionally water sports such as waterskiing, tubing and wakeboarding are undertaken in South Pond, which uses are restricted from Middle and North Ponds. Therefore day users of Lake Cochituate and residents of Middle and North Pond travel to South Pond for these uses. Day users and Middle and North Pond residents may also travel to South Pond for fishing, including the many fishing tournaments held each summer, as well as for canoeing and kayaking.

c. South Pond is accessed by day users of the Park and by residents of Middle and North Ponds through a "keyhole" tunnel at the south of Middle Pond and a Route 9 tunnel at the north of South Pond. These passages are not included in the environmental impact report.

d. Although the summer of 2009 has had an unusual amount of rainfall and the Lake level is high, in most summers due to evaporation, the levels of these two tunnels become increasingly low with little leeway for further drawdown.

e. In most summers a drop of an additional three inches during summer months due to drawdown attributable to the Birch Road Wells could effectively block navigation and isolate South Pond from the other two ponds, having an adverse effect upon these recreational uses of Lake Cochituate.

f. Within South Pond the Pegan Cove area, a shallow cove which is used for waterskiing, would be adversely affected by a 3 inch drawdown of Lake Cochituate attributable to the Birch Road Wells.

g. Surrounding Lake Cochituate are more than 200 abutters, many of whom have docks and permits to swim in the area of their docks. The effect of moving the Lake shoreline, as described above, upon such residential uses should be addressed by the environmental impact statement.

3. Vegetation Buffer. Throughout Lake Cochituate there is a lush and protected vegetation buffer, to preserve the rural character of the Lake. Depending upon the slope of the shoreline, a drawdown of 3 inches attributable to the Birch Road Wells could move the shoreline by as much as several feet. No environmental impact statement for the Birch Road Wells is complete without addressing the effect of this drawdown upon the vegetation buffer of the shoreline of Lake Cochituate.

4. Natick Army Labs Cleanup. Natick Army Labs has been engaged in a superfund cleanup for many years, and it recently announced its plan for treatment of contamination below the water level of South Pond. See http://www.epa.gov/region1/superfund/sites/natcklab/448238.pdf. No environmental impact statement for the Birch Road Wells is complete without an analysis of the effect of a Lake drawdown upon the proposed Natick Army Labs treatment of contamination in its superfund cleanup – for example, if the shoreline is moved by several feet (see 3 above), this could expose some contamination which would otherwise be below the water level or at a minimum necessitate alternative treatment of the exposed contamination.

Sincerely,

Friends of Cochituate State Park, Inc.

By: Robert D. Hall
President
Robert D. Hall