



**WATER SUPPLY CITIZENS
ADVISORY COMMITTEE**
to the Mass. Water Resources Authority

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July 8, 2021

Secretary Kathleen Theoharides
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
100 Cambridge Street-Suite 900
Boston, MA 02114

RE: MEPA File #16390
Quinepoxet Dam Removal Project

Dear Secretary Theoharides:

The Water Supply Citizens Advisory Committee (WSCAC) to the Massachusetts Water Resources Authority (MWRA) strongly supports the request for a waiver on an Environmental Impact Report (EIR) under 301 CMR 11.11(5) for the Quinepoxet Dam Removal Project to restore fish passage and wildlife habitat. The potential removal of the Oakdale Dam on the Quinepoxet River in West Boylston offers a unique opportunity to consider the intersection of human and ecological benefits from dam removal.

WSCAC has had the opportunity to tour the site and members were able to learn more about the project by attending the Nashua River Watershed Association's webinar with the MA Division of Ecological Restoration staff and MWRA staff on March 4, 2020. It is a project with numerous environmental benefits and no detrimental effects to MWRA infrastructure on the site.

We know that the Secretary may waive an EIR if preparation of the EIR would result in "undue hardship" to the project proponent or would "not serve to avoid or minimize damage to the environment" as described under 301 CMR 11.11(1). Furthermore, we understand that when mandatory EIR review thresholds have been exceeded, the Secretary may grant a waiver of the EIR as described under 301 CMR 11.11(2) based on determination that preparation of an EIR would not provide increased benefit to the project and the environment. Based upon the scientific and engineering analysis included in the ENF, preparation of an EIR for this project would not serve to avoid or minimize damage to the environment, nor would its preparation provide increased benefit to the project and the environment.

This project triggers mandatory EIR threshold under 301 CMR 11.03(3), namely (3.a.4) structural alteration of an existing dam that causes an expansion of 20% or any decrease in impoundment capacity. It also triggers review under (3)b.1.b for alternation of more than 500 linear feet of inland bank and (3)b.1.f alteration of 5,000 or more SF of bordering vegetated wetlands. The dam is a run-of-river dam and does not provide any flood storage. Removal of the dam will restore the natural and historical ecological function of the Quinepoxet River, a MassWildlife-certified Coldwater Fishery Resource. Dam removal has many environmental benefits, including restoration of natural sediment and nutrient transport regimes, improvement to aquatic habitat, and aquatic species passage. While it is

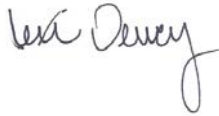
scenic, the dam currently does not support public recreation, nor does the dam provide any flood protection.

The permitting associated with this project will enable additional public and regulator input as well as a mechanism for application of conditions to ensure compliance with MEPA regulations. This project will require a number of environmental permits, including the 401 Water Quality Certificate (Department of Environmental Protection), Wetland Protection Act Notice of Intent/Order of Conditions (West Boylston Conservation Commission), Section 106 Historical Certificate (Mass Historic and other signatories), and Section 404 dredge and fill Permit (U.S. Army Corps of Engineers).

The Quinepoxet Dam Removal Project will have numerous environmental benefits. In support of the MWRA and its restoration partners, WSCAC urges you to favorably consider this waiver request.

Please contact Lexi Dewey at info@wscac.org if you have any questions.

Sincerely,



Lexi Dewey
Executive Director

Jerry Eves
WSCAC Chair

Cc: John Gregoire, MWRA
Nick Wildman, DER