



October 21, 2019

Secretary Kathleen Theoharides  
Executive Office of Energy and Environmental Affairs  
Attn:MEPA Office  
Paige Czepiga EEA#15771  
100 Cambridge Street, Suite 900  
Boston, MA 02114  
Via email to [page.czepiga@mass.gov](mailto:page.czepiga@mass.gov)

RE: EEA#15771 – Reservoir Dam Water Storage and Fish Passage Improvement Scituate MA

Dear Secretary Theoharides:

The North and South Rivers Watershed Association (NSRWA) and the undersigned would like to offer the following comments and support of the Town of Scituate's Draft Environmental Impact Report EOEAA #15771 Reservoir Dam Storage and Fish Passage Improvement project. The NSRWA has partnered with the town of Scituate, Division of Ecological Restoration, Massachusetts Bays Program, and multiple other state, federal and nonprofit agencies for over a decade to restore more natural streamflow regimes in the First Herring Brook to support aquatic habitat for migratory, resident fish and other aquatic organisms in the system. This partnership approach has led to the current proposal under review – to raise the town of Scituate's reservoir by 1.5 feet and make necessary changes to infrastructure to allow for fish passage into and upstream of the 75-acre town reservoir.

We believe there are multiple environmental and public safety benefits associated with this project, namely:

- After exhaustive studies, this is the only feasible alternative that physically enables fish passage to be restored to the reservoir;
- Improves public safety and drought resiliency by increasing water storage and providing an additional 25 days of water supply, and
- Improves public safety by making infrastructure improvements that allow the dam to pass flood waters and meet today's dam safety standards.



The NSRWA has been a supportive and integral partner to the town of Scituate by providing technical support, public education and outreach on the need for water conservation and documenting the environmental impact the water supply has had on the First Herring Brook's habitat – namely intermittently dry river beds and lack of flow for outmigration of juvenile herring. In 2011, with our support, the town initiated a streamflow release plan, began operating the fish ladder out of Old Oaken Bucket pond and now there is a small population of river herring that has returned to the lower portion of the First Herring Brook system.

In order to save water for people and maintain minimal flows in the system, the town has implemented outdoor water restrictions that have resulted in reducing demand by 300,000 gallons per day, banned new hookups of irrigation systems to the public water supply and has been aggressively working to remove leaks and replace pipes. The town is currently working to implement their water conservation plan's recommended water banking program to maintain the current water demand and offset any growth in the community. The addition of the new storage will provide an additional margin of safety for the town to weather droughts but the current demand from the existing system must be maintained unless new sources are developed.

The MEPA process identified concerns regarding the alteration of bordering vegetation wetlands that will be inundated more frequently due to the raising of the reservoir. The DEIR studied this extensively and determined that some wetlands will be reclassified under the Wetlands Protection Act but that their functionality will not be changed. We believe this is a unique situation and project with overriding public benefit and no feasible alternatives. The restoration of the river herring and streamflows to the First Herring Brook outweigh and more than mitigate for these alterations that will result in no functional changes to the existing wetlands.

Sincerely,

A handwritten signature in black ink that reads 'Samantha Woods'. The signature is written in a cursive, flowing style.

Samantha Woods  
Executive Director