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CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME : Framingham Comprehensive Wastewater Management Plan
PROJECT MUNICIPALITY : Framingham
PROJECT WATERSHED : SuAsCo
EEA NUMBER : 14110
PROJECT PROPONENT : Town of Framingham Department of Public Works
DATE NOTICED IN MONITOR : October 9, 2007

Pursuant to the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62H) and Section 11.03 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **does not require** the preparation of an Environmental Impact Report (EIR).

As described in the Environmental Notification Form (ENF), the project consists of the upgrade, repair, or replacement of existing inadequate sewer infrastructure within the Town of Framingham. The project does not include an expansion in service to areas not presently sewered. Wastewater in the Town of Framingham is ultimately discharged into the Massachusetts Water Resources Authority (MWRA) sewer system and treated at the Deer Island wastewater treatment facility in Winthrop. The project consists of the implementation of the recommended Capital Improvement Plan (CIP), developed in accordance with the draft Comprehensive Wastewater Management Plan (CWMP). The CIP includes the elimination of seven (7) existing pump stations and over five miles of existing force main to improve system efficiency and operations and maintenance costs. Furthermore, the project will include the construction of 0.7 miles of new sewer mains and rehabilitation of 7.7 miles of existing sewer

mains. Approximately 0.53 miles of the total 8.4 miles of new/rehabilitated sewer mains are located within cross-country areas. The CIP presented in the ENF is anticipated to take place over the course of eight year at a cost of just over 92 million dollars.

The project is undergoing review pursuant to Section 11.03(5)(b)(3)(c) because the project requires a State Agency action and will result in the construction of new sewer mains $\frac{1}{2}$ or more miles in length not located in the right of way of existing roadways. The project will require a Sewer Extension Permit from the Massachusetts Department of Environmental Protection (MassDEP). The project will also require several Orders of Conditions from the Framingham Conservation Commission, or in the case of an appeal, a Superseding Order of Conditions from MassDEP.

The project will be financed in full or in part by State Revolving Funds issued by the Commonwealth. Therefore, MEPA jurisdiction for this project is broad and extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment.

Future Projects

The CWMP outlined a CIP that consists of a series of critical improvement projects planned for the next eight years. The majority of these projects are repair or replacement projects within existing roadways and will not require new cross county sewer components. It is possible that during the implementation of the CIP that non-critical projects recommended for the years 2014-2023 in the CWMP may need to be expedited. The proponent should review the MEPA Regulations at 301 CMR 11.00 prior to commencement of any project not explicitly outlined in the ENF to determine if a Notice of Project Change will be required. Additionally, a similar review of the regulations should be conducted at the conclusion of the initial eight year improvement plan if funds are allocated to pursue the subsequent phase of the CWMP in the years 2014 and beyond.

Wastewater

The project includes the upgrade, repair, or replacement of existing inadequate sewer infrastructure within the Town of Framingham. As noted in the MassDEP comment letter, since 2004, the Town of Framingham has reported more than 67 sanitary sewer overflow (SSO) events. Each of the SSO events violates M.G.L. c. 21 §§ 26-53, 314 CMR 12.03(8), and 314 CMR 7.06(1). MassDEP indicated that SSOs are generally attributed to inadequate capacity of the sewer system, sewer system structural failure, excessive infiltration and inflow into the sewer system, and decreased reliability due to exceedance of design life of pump stations.

The Town of Framingham entered into an Administrative Consent Order (ACO) with MassDEP on March 8, 2007, to explore how to reduce SSOs, address street flooding, and reduce corrosion of the sewer pipes due to high hydraulic residence time in some pipes. The CWMP has been developed in response to this ACO and made numerous recommended improvements as outlined in the CIP. The recommended improvements include: eliminating long reaches of force

mains to address chronic sewer system collapses and breaks by reducing hydraulic residence time and the formation and buildup of hydrogen sulfide; SSO mitigation; elimination of identified hydraulic restriction points through the rehabilitation or replacement of existing infrastructure; and the elimination or consolidation of sewage pump stations to reduce energy and operations and maintenance costs.

Information presented in the CWMP has considered the existing capacity and flows generated by adjacent communities that currently have Intermunicipal Agreement (IMAs) with the Town of Framingham (most notably Ashland). The CWMP is primarily directed towards repairing and replacing existing infrastructure, not expanding service capacity. However, the CWMP does note that the hydraulic analysis of the sewer collection system assumed that there would be a modest increase in sewer flows from the Town of Ashland. Under current conditions, Ashland has not reached its full allocation under the existing IMA with Framingham. The proponent should work with the Town of Ashland to determine estimated future flows into the system (based on Ashland's draft CWMP which is being prepared at this time) to confirm that sufficient hydraulic capacity will be available to effectively convey flows and not result in SSOs or surcharging. Should the result of these studies indicate that an increase in capacity is necessary, the proponent is reminded to review the MEPA regulations at 301 CMR 11.00 to confirm whether or not a Notice of Project Change (NPC) would need to be filed prior to project commencement.

MassDEP's comment letter noted that given the importance of the proposed project to the protection of the environment, it is supportive of the scope, analysis, and recommendations that were presented in the CWMP. As the design of infrastructure improvements and system modifications are finalized, the proponent should investigate ways to limit environmental impacts to the extent practicable, balanced with improving system efficiencies and complying with the ACO issued to the Town. Furthermore, the MWRA comment letter is supportive of the CIP, as it will assist the community in complying with MWRA sulfide limits and improve the hydraulic performance of the collection system. The proponent should work with MWRA's Toxic Reduction and Control (TRAC) Department to ensure that requirements and goals are met during the implementation of the project.

Wetlands

It is anticipated that the majority of work associated with the replacement or construction of sewer mains will be located outside of wetland resource areas, thereby limiting permanent impact to the 100-foot buffer zone to wetlands. The proponent has indicated that trenchless technologies will be investigated to reduce the likelihood of wetland alteration. The majority of work areas will be located within the existing paved street rights of way, further reducing potential impact to wetland resource areas. Likely wetland resource area impacts will be temporary in nature. A primary goal of final infrastructure location criteria should be to avoid direct wetland resource area impact to the maximum extent practicable. Consideration should be given to maintaining existing flood storage capacities within areas classified as Bordering Land Subject to Flooding (BLSF) during the finalization of infrastructure design and elevations. The proponent should prepare an erosion and sedimentation control plan during each Notice of Intent

filing outlining mitigation measures to be implemented on-site during the construction period to reduce runoff into sensitive resource areas.

Historic Resources

Various individual projects within the CWMP will be located within designated State Historic Districts. The Massachusetts Historical Commission (MHC) has indicated in its comment letter that the following activities may have historical or archaeological impacts: the replacement of the existing Michaud Drive pump station; the replacement of the existing Cypress Drive pump station pump; the installation of 4,500 feet of new sewer line in Ransom Road, Winter Street, and Fountain Street, including the abandonment of the existing Ransom Road pump station and sewer line; the replacement of existing sewer lines and siphons in Concord and School Streets; and the replacement of 90 feet of sewer and culvert at Herbert Street.

The proponent should work with MHC during the final design stages, and in accordance with the MHC request, provide additional information, including a USGS topographic map clearly locating the project area and scaled project plans showing existing and proposed conditions prior to project commencement in designated Historic Districts. The proponent should continue to consider feasible design and locational alternatives that meet the engineering requirements, while also seeking to avoid or minimize impacts to historic and archaeological properties and areas.

Rare Species

A portion of the Eaton/Chalis Pump Station component of the CWMP/CIP falls within *Priority and Estimated Habitat* according to the most recent Natural Heritage and Endangered Species Program (NHESP) Atlas. According to information shared at the MEPA Consultation Session by the Framingham Conservation Agent, it appears that this area contains Blue Spotted Salamander (*Ambystoma laterale*) habitat. The Eaton/Chalis Pump Station project includes the abandonment of the existing Eaton Pump Station and force main and the construction of a new gravity sewer connection to the Chalis Pump Station. Approximately 400 linear feet of new sewer is proposed within the roadway within the priority and estimated habitat area. The proponent should investigate the possibility of abandoning existing cross country force mains located within designated habitat areas to reduce the likelihood of future impacts due to maintenance requirements.


The proponent is reminded that additional review by NHESP may be necessary pursuant to the Massachusetts Endangered Species Act (MESA, MGL c131A) and its implementing regulations (321 CMR 10.00). Additional studies or investigation may be required as part of the Wetlands Protection Act Notice of Intent process or in accordance with the MESA regulations.

Stormwater

The project is not anticipated to result in the creation of new impervious areas. In fact, the project may result in a minor reduction in overall impervious areas through the demolition of several pump station buildings. The proponent should minimize potential stormwater impacts during the construction period by implementing Best Management Practices (BMPs) as described in the Town of Framingham's NPDES Phase II Stormwater Management Plan.

Based on the information in the ENF and after consultation with relevant public agencies, I find that no further MEPA review is required at this time. The project may proceed with obtaining required State permits.

November 8, 2007
Date


Ian A. Bowles

Comments received:

- 10/22/2007 Massachusetts Historical Commission
- 10/29/2007 Massachusetts Department of Environmental Protection – NERO
- 10/29/2007 Water Supply Citizens Advisory Committee
- 11/05/2007 Massachusetts Water Resources Authority

IAB/HSJ/hsj