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June 2, 2025

Rebecca Tepper, Secretary Executive Office of Energy and Environmental Affairs 100 Cambridge Street, Suite 900 Boston, MA 02114

Re: City of North Adams Mount Williams Reservoir Dam and Notch Reservoir Dam Improvements SEIR, EEA#16835 Dear Secretary Tepper:

The Berkshire Regional Planning Commission (BRPC) hereby submits comments on the Single EIR (SEIR) for the City of North Adams Mount Williams Reservoir Dam and Notch Reservoir Dam Improvements Project (EEA#16835). The Project entails improvements to the Mount Williams Reservoir and Notch Reservoir dams, spillways, and other ancillary dam features. Both Dams are owned and operated by the City of North Adams and function as critical infrastructure for the City's Public Water Supply. The Project has met or exceeded MEPA review thresholds for a Mandatory Environmental Impact Report (EIR) and the proponent's request for a Single EIR was granted.

The Mount Williams and Notch Reservoirs are the primary drinking water supplies for the City of North Adams. The Mount Williams Reservoir Dam was originally constructed in 1914 and has operated as the primary potable water source for the City for over 100 years. The Notch Reservoir Dam was originally constructed in 1895 and is the second principal potable surface water source for the City. Water from the Notch Reservoir directly supplements the Mount Williams Reservoir through the diversion structure via gravity pipe.

The dams are in Poor condition as defined by the Department of Conservation and Recreation's (DCR) Office of Dam Safety. The dams have also been classified as a High Hazard dams per the dam safety standards set forth at 302 CMR 10.00, Dam Safety regulations, meaning they would likely cause loss of life and serious damage to residential or commercial properties or important public utilities in the event of failure. Both dams require replacement of the existing spillways, regrading of the downstream slopes to meet current safety regulations, removal of woody vegetation on the dike and dam embankments, among other improvements.

BRPC believes that the SEIR adequately addresses the Secretary's certificate and BRPC's comments on the EENF. This project is of critical importance as the reservoirs serve as public drinking water reservoirs for the City of North Adams. Due to the extended duration of this project, BRPC does stress the need for Environmental Justice (EJ) communities impacted by the project to be engaged throughout the project. The community needs to be continually engaged as the project moves through design and permitting and as construction onsite activities occur. As this project will take several years to complete it is important to continue to keep the public informed. The duration of this project will offer multiple opportunities to keep the public informed and engaged through a variety of mechanisms. BRPC encourages the proponent to reach out to BRPC as we can be a resource to assist in engaging the community.

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The BRPC Executive Committee endorsed these comments at their meeting on
Sincerely,
Thomas Matuszko

Executive Director