



September 10, 2025

Rebecca Tepper, Secretary  
Executive Office of Energy and Environmental Affairs  
Attention: MEPA Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114-2509

Re: EOEEA MEPA # 16983– Jersey Wells PFAS Treatment Facility, Pepperell, Massachusetts  
Environmental Notification Form

Dear Secretary Tepper,

The Northern Middlesex Council of Governments (NMCOG) appreciates the opportunity to comment on the Environmental Notification Form (ENF) for the Jersey Wells PFAS Treatment Facility Project in the Town of Pepperell (the Project). As the regional planning agency serving nine communities in Greater Lowell, NMCOG evaluates MEPA proposals to determine their regional implications for environmental sustainability, public health, and infrastructure resilience.

This Project represents an essential investment in public health and water infrastructure. It involves razing the existing water treatment facility and constructing a new per- and polyfluoroalkyl substances (PFAS) treatment facility with a design capacity of approximately 1.06 million gallons per day (GPD), along with associated utility upgrades, stormwater improvements, parking, and conversion of the gravel access road to asphalt. Importantly, the Project does not increase Pepperell's permitted water withdrawals, which remain capped at 1.06 MGD. The new facility will provide enhanced treatment capacity and resiliency designed to accommodate higher flows in the future, should regulatory approvals be obtained.

Although geographically limited to Pepperell, the Project has regional significance. PFAS contamination is a pressing challenge that many Greater Lowell communities are facing. In the case of Pepperell, the contamination can limit future housing and economic development opportunities and impact long-term water infrastructure planning. NMCOG supports the Town of Pepperell's proactive efforts to address PFAS exceedances through this new facility. The Project is scoped as a standalone initiative and, as the ENF notes, is not part of the Pepperell–Dunstable–Groton Interconnection Project. The expanded treatment capacity may provide resiliency benefits to neighboring communities if future interconnections proceed.

Because the facility is located within a Designated Geographic Area serving an Environmental Justice (EJ) population, NMCOG encourages careful attention to potential construction impacts such as dust, noise, and truck traffic, as well as the long-term affordability of water service for households with fewer resources, given repayment of the Drinking Water State Revolving Fund loan. Robust mitigation measures and clear public outreach will be essential to ensure EJ residents fully share in the benefits of this investment.

NMCOG supports the Jersey Wells PFAS Treatment Facility Project as a critical step in protecting public health and ensuring safe drinking water for Pepperell. We also urge MEPA to consider its broader relevance for the region as municipalities grapple with PFAS contamination and its potential implications for housing, economic development, and infrastructure resilience.

We appreciate the opportunity to provide these comments and look forward to continued collaboration with EEA and our municipal partners on advancing water quality and public health goals. Should you have any questions regarding these comments, please contact Meghan Tenhoff, Principal Planner – Sustainability, at [mtenhoff@nmcog.org](mailto:mtenhoff@nmcog.org).

Sincerely,



Jennifer Raitt  
Executive Director

cc: Andrew MacLean, Town Administrator, Town of Pepperell