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Secretary Matthew A. Beaton
 Executive Office of Energy and Environmental Affairs
 Attn: MEPA Office; Page Czepiga, EEA #15334
 100 Cambridge Street, Suite 900
 Boston, MA 02114

Via Email: Page.Czepiga@state.ma.us

Re: EOEEA #15334, I-90/I-495 Interchange Improvements Project, Hopkinton, Westborough, and Southborough

Dear Secretary Beaton,

Thank you for the opportunity to comment on the Environmental Notification Form for the above project. OARS is the watershed organization for the Assabet, Sudbury and Concord River watersheds which make up the Concord Basin. The proposed project is in the headwaters of the Sudbury River which arises from the Cedar Swamp Area of Critical Environmental Concern (ACEC). The Sudbury River suffers from lack of flow during the summer, going completely dry at times in its upper reaches in Hopkinton.

We have reviewed the project documents but find it difficult to make specific comments at this stage without more information. We would, however, like to emphasize a few key point

1. **Sensitivity of project location:** This project is planned in an extremely sensitive location, recognized by the state's designation of the ACEC. State-listed rare species occur in the area, as well as the unusual Atlantic White Cedar swamp. The original highway construction was very destructive of this area, and continued stormwater runoff from the highway is an ongoing problem. The Sudbury River, a federally-designated Wild & Scenic River, depends on recharge of rainfall in its headwaters. The river has very low flows during the summer and periodically goes completely dry. This photo is of the Sudbury River at Fruit Street in Hopkinton, immediately downstream of the Rte. 495/90 interchange (1999, F. Gillespie). This project should seek to restore the natural hydrology where possible and significantly improve stormwater management on site—both removing roadway stormwater pollutants and promoting recharge.



2. **Construction impacts:** Impacts to environmental resources during construction can be severe and unintended, particularly stormwater pollution and erosion by equipment. Every effort needs to be made to avoid and minimize impacts. This should be given due consideration in selecting

which design goes forward, and shown clearly on project plans. It should be non-negotiable that protected resources such as the ACEC be given the highest level of protection possible.

3. Climate change: The increasingly intense precipitation events that we are already experiencing and that are predicted result in loss of recharge and exacerbation of flooding and stormwater pollution. This makes it critically important that a project on this scale in such a hydrologically and ecologically sensitive area gets a thorough and complete evaluation in order to minimize and mitigate its environmental impacts. In addition to studying the habitat impacts, any flooding and groundwater impacts should be quantified. Treating and recharging stormwater and protecting and restoring wetlands are two key ways to adapt to climate change and minimize its impacts on downstream water resources. The project scenarios should all be evaluated on their ability to do this, consistent with State policy of climate adaptation. It should be noted that it is far more valuable to protect existing natural wetlands than to attempt to construct replicate wetlands.

4. Mitigation: Where environmental resources will be damaged and means of preventing that damage have been exhausted, mitigation through permanent land protection, or funding of significant and verifiable ecological restoration should be required. This should be developed in close consultation with stakeholders including DCR, Sudbury Valley Trustees, Mass Audubon, MassWildlife, the Conservation Commissions of the affected communities, and OARS.

We would like to participate in a site visit when one is scheduled, as early in the permitting and design process as possible. Thank you for considering these comments.

Yours sincerely,



Alison Field-Juma
Executive Director

cc: Lealdon Langley, Department of Environmental Protection
Nathaniel Tipton, DCR
Jonathan Regosin, Natural Heritage and Endangered Species Program
Conservation Commissions: Hopkinton, Southborough, Westborough
Heidi Ricci, Mass. Audubon
Lisa Vernegaard, Sudbury Valley Trustees