

Town of Southborough
PLANNING BOARD

SOUTHBOROUGH, MASSACHUSETTS 01772

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Mr. Matthew Beaton
Secretary Of Energy & Environmental Affairs
Attn: MEPA Office
Page Czepiga, EEA#15334
100 Cambridge St., Suite 900
Boston, MA 02114

Re: EEA #15334 I-90/I-495 Interchange Project

Hopkinton, Westborough, Southborough

Dear Secretary,

Your Office conducted a Scoping Session on March 19, 2015 at the 495/MetroWest Partnership offices in Westborough. The Vice Chair of Southborough's Planning Board, Kathleen Bartolini, attended on behalf of the Board and reported back to the Board's March 23, 2015 meeting at which the project was discussed. We offer the following comments and requests regarding this project's redesign of the I90/I-495 interchange.

I. State/Federal Relationships Regarding this Project

The Environmental Notification Form (ENF) was weak in explaining why MA DOT has taken the lead on this much needed project, when both highways are part of the federal interstate highway program. Although I-90 is also known as the Mass. Turnpike and is a toll funded highway, I-495 is completely a federal highway. State's receive Interstate Maintenance funds (IM) to conduct normal maintenance activities, such as resurfacing, median upkeep, shoulder improvements and signage; the major redirection of entrance and exit ramps are beyond IM funding. The Draft Environmental Impact Report (DEIR) should better discuss how MA DOT and the Federal Highway Administration (FHWA) have and will be in coordination: the next steps in designing and selecting the final project design for the FEIR, the coordination of the MEPA and NEPA review process; scheduling and funding project implementation; and the coordination of this project with other I-495 projects already in the queue.

II. Implications of this project on the design, funding and scheduling for the I-495/Rte.9 interchange improvement project.

MA DOT has been working on alternative designs for the above cited interchange one mile north of the MA Pike/I-495 interchange. These projects were to be designed together, because they fall within the one mile limit for Federal interchanges. The ENF describes today's poor traffic conditions along I-495 but it fails to address the bumper-to-bumper conditions which exist daily at the Rte9/I-495 interchange during both AM and PM peak journey to work time slots. While the electronic tolling project provides an opportunity to

dismantle toll gates and create flyovers, this project should not put the solution to Rte9/I-495 interchange problems on the shelf. The capacity of this interchange will not be able to handle higher and faster volumes of traffic generated from MA Pike/I-495 improvements. Today's traffic queues from Westborough to Framingham are seven miles of California Freeway style congestion. This must be resolved now and cannot wait until 2026 when this ENF project is scheduled to be completed. A report was already issued for preferred designs for I-495/Rte9, so the State cannot say this project was not the first in the queue.

III. Traffic Mitigation required as a result of I90/I-495 Interchange Project.

It will be impossible to conduct work at either interchange without having negative impacts during construction. They must be designed together, including phased implementation in order to ensure the interchanges will work together and that construction mitigation plans work for Hopkinton's, Westborough's and Southborough's local and state roads.

Presently, whenever there is any problem on I-495, traffic starts to get off in Milford at the I-495/Rte85 interchange and travels along Route 85N (a local roadway through the center of Hopkinton) then through the center of Southborough and it Rte85/Rte30 intersection on through Marlborough centers' Rte85/Rte20 road network and through Hudson's Center of Rte85/Rte62 onto Route 117 in Bolton where it meets up to I-495/Rte117 interchange.

Overall, this ENF project can impact nine interchanges from Milford to Bolton and yet the ENF never mentions those impacts. The DEIR must be scoped to address traffic mitigation for the 3 options to be analyzed at this MEPA stage, with special attention given to Hopkinton, Westborough and Southborough. Construction impacts were never addressed in the ENF.

IV. Please designate this Project a Major and Complicated Project.

As Secretary you have authority under MEPA regulations to designate a project a Major and Complicated Project based on:

1. number of communities directly involved with project design and/or impacts;
The major and complicated steering committee does not have to be manned by community officials solely given the wide ranging number of environmental issues (see below) but it should include some local chief elected officials, planning board members, conservation commission members, local safety (police, ambulance and fire) and DPW directors. There should also be some representation from private non-profit environmental organizations.

2. Number of state agencies and state programs involved in approving permits.

The ENF did an excellent job of identifying the many, many State environmental reviews needed for this project to move on such as the ACEC Program, Wetlands and bordering vegetated wetlands, Endangered Species Program, Wildlife Habitat issues, Water Quality impacts, SCR lands, Sudbury Valley Trustees Chapter 97 issues, floodplains, River Protection Act decisions, right of way approvals, 10 bridges needing repairs, alterations or demolition, and Army Corps of Engineers permitting.

All of these have State, local and regional impacts that are better discussed with representatives meeting together. MetroWest has had the opportunity to effectively participate in Major and Complicated projects. For example the expansion of commuter rail from Framingham to Worcester, the construction of the MetroWest Water Supply Tunnel from Marlborough to Weston, and the expansion of the Marlborough West Technology park resulting in Rte20 improvement and the construction of new I-495 interchange. Interchange 23C Communities have always participated in a positive manner enabling the project to be implemented with a collaborative approach.

The Southborough Planning Board thanks you for this opportunity to comment on this very important transportation project. We have focused our remarks on non-environmental issues, because at the Scoping Session there was very little said about the important issues we have outlined above. This should not be misinterpreted as our not being concerned about the huge number of environmental issues, but rather highlighting topics being overlooked regarding project coordination and construction mitigation within host and neighboring communities. We hope to remain very involved with this project as it moves forward through your MEPA reviews.

Yours truly,

A handwritten signature in black ink, appearing to read "Donald Morris". The signature is fluid and cursive, with a large initial "D" and "M".

Donald Morris

Chair Southborough Planning Board