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Conservation, Collaboration, and Community since 1953

March 31, 2015

Secretary Matthew A. Beaton
Executive Office of Energy & Environmental Affairs
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: MassDOT I-90/I-495 Interchange Improvements Project (Environmental Notification Form)

Dear Secretary Beaton,

Sudbury Valley Trustees respectfully submits the following comments on the above-referenced Environmental Notification Form for the proposed I-90/I-495 Interchange Improvement Project.

Due to the fact that our organization was not notified directly of this project or of the ENF, we have not had time to fully investigate the potential impacts of the three project scenarios. Our comments are thus regrettably general because of the inadequate notice. We were notified recently by conservation partners that our organization was referenced in the ENF under its Land Section, in Section II.D., where the report states "There are potential impacts to Commonwealth-owned properties under the stewardship of the Department of Conservation and Recreation (DCR) as well as properties owned by the Sudbury Valley Trustees (SVT)." Having discovered this, we are especially disappointed that we were not contacted earlier in the process.

Sudbury Valley Trustees is a regional land trust that conserves land and protects wildlife habitat in the Concord, Assabet, and Sudbury river basin for the benefit of present and future generations. As such, the perpetual protection and care of our reservations is core to our mission. The Cedar Swamp region has been identified by our organization as one of eight Land Protection Priority Areas within the 36 communities that make up the watershed. These areas were created as a result of the Sudbury, Assabet, and Concord River Watershed Biodiversity Protection and Stewardship Plan, written in 2000 by Frances Clark, and they have guided our land protection efforts since. SVT's Cedar Swamp Reservation, along with a complex of DCR lands near this project site, helps protect the area that was described in Clark's plan as one of the SuAsCo's priority Biodiversity Sites. The main biodiversity concern to this site is the division and isolation of the swamp caused by the railroad, interstate highways and industrial development. Further compromises at this site should be looked at very carefully with regards to hydrology and other impacts to the Inland Atlantic White Cedar Swamp that Massachusetts Natural Heritage & Endangered Species Program (NHESP) has identified at this site as a natural community of biodiversity conservation interest in the Commonwealth. As the ENF states, this area is also designated as an Area of Critical Environmental Concern as well as NHESP Priority Habitats of Rare Species. These designations reflect the swamp's special, valuable and most importantly, fragile characteristics.

Because of these reasons, as well as the typical concerns when projects of this scale take place within wetland habitats and along our rivers, we would expect that much more detail be provided regarding



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the impacts that the three scenarios will have on the land and water resources within and beyond the project area. Specifically, referencing the maps in the ENF, we are unable to determine how the three scenarios differ on where or to what extent existing protected open space will be impacted; indeed, the plans shown in the ENF call into question the analysis of the potential impacts to conservation land as we are unable to see where the project area overlaps any SVT parcel.

We respectfully request that the Secretary build a scope requiring DOT to show there are no alternatives being left on the table that would preclude taking any designated conservation land. Further, additional details in tables and maps, quantifying and locating the specific square footages of conservation land that would be taken for each alternative, as well as square footages of potential mitigating land protection for each alternative would give a much clearer picture and enable us to comment better on the alternative scenarios.

Further, the ENF states on page 25 in the Historical and Archaeological Resources Section that there has been no consultation with Massachusetts Historical Commission. We believe this is a critical oversight. We have records in our reservation files that indicate there are many valuable historical sites throughout Cedar Swamp. These can be found in the W. Elmer Ekblaw Chapter of the Massachusetts Archaeological Society's Archaeological Quarterly Volume 9, Number 1 from Spring 1987. We would be happy to provide copies of this or an additional report by Dr. Curtiss Hoffman, Principal Investigator in an excavation of Cedar Swamp study, which detail evidence supporting a conclusion that Cedar Swamp was an "intensely occupied site used during the Middle and Late Woodland periods by a small group of people."

Thank you for your careful review of these proposed project scenarios and for your consideration of our requests. We hope that a careful solution can be found that ensures the protection of the fragile resources that comprise this very special portion of our Commonwealth. With respect to this point, we recommend that the Secretary request an Expanded ENF in accordance with 301 CMR 11.05(7) or require an EIR in accordance with 301 CMR 11.06(7). This would allow the issues we have raised, and likely those brought forth by our conservation partners, to be thoroughly addressed. We request notification of any forthcoming public meetings where the project details are discussed, so that we may continue to be informed about and comment on the potential threats to the habitats in and around Sudbury Valley Trustees' and DCR's conservation lands in Cedar Swamp.

Sincerely,


Lisa Vernegaard
Executive Director