



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Central Regional Office • 8 New Bond Street, Worcester MA 01606 • 508-792-7650

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

March 31, 2015

Secretary Matthew A. Beaton
Executive Office of Environmental Affairs
100 Cambridge Street, 9th Floor
Boston, MA 02114

Attention: MEPA Unit – Page Czepiga
Re: Environmental Notification Form (ENF)
I-90/I-495 Interchange Improvements
Hopkinton, Westborough, Southborough
EEA # 15334

Dear Secretary Beaton,

The Massachusetts Department of Environmental Protection's (MassDEP) Central Regional Office (CERO) has reviewed the ENF for the proposed project, I-90/I-495 Interchange Improvements in Hopkinton, Westborough, and Southborough. The proposed project includes the reconfiguration of the existing I-90 / I-495 interchange to improve safety and reduce congestion. The ENF evaluates three conceptual designs that will improve interchange geometry to high-volume interstate-to-interstate highway standards and will eliminate weaving movements through the interchange. The proposed project will impact Bordering Vegetated Wetlands, Bank, Isolated Vegetated Wetlands, Bordering Land Subject to Flooding, Riverfront Area, the Cedar Swamp Area of Critical Environmental Concern (ACEC), 100-year floodplain, Priority or Estimated Habitat of rare species, and conservation land.

This project is under MEPA review because it meets or exceeds the following review thresholds:

- 11.03(11)(b) – Any project within a designated ACEC, unless the project consists solely of a one single family dwelling).
- 11.03(1)(a)(2) – Creation of ten or more acres of impervious area;
- 11.03(1)(a)(3) – Conversion of land held for natural resource purposes in accordance with Article 97 of the Amendments to the Constitution of the Commonwealth to any purpose not in accordance with Article 97;
- 11.03(3)(a)(1)(a) – Alteration of one or more acres of bordering vegetated wetlands;
- 11.03(3)(a)(2) – Alteration requiring a variance in accordance with the Wetlands protection Act;
- 11.03(6)(b)(1)(b) – Widening of an existing roadway by four or more feet for one-half or more miles.

The project requires the following State Agency Permits:

- MassDEP – Section 401 Water Quality Certification, a Variance from the Wetland Protection Act regulations, and Orders of Conditions from the Westborough and Hopkinton Conservation Commissions.

MassDEP offers the following comments:

Wetlands

The Wetlands Program understands that the proposed project involves improvements to the I-90/I-495 interchange. The project location is surrounded by areas of Priority Habitat, Estimated Habitat as delineated by the Natural Heritage & Endangered Species Program (NHESP), Outstanding Water Resource Wetlands (ORWs), the Great Cedar Swamp ACEC, the Sudbury River and its Floodplain and Riverfront Area. The proposed project will increase the impervious area by 14.6 acres. Direct impacts to wetland resource areas are proposed in a conservative range between 2-6 acres depending on what configuration/project design is ultimately chosen. The project will require a 401 Water Certification Regulations from MassDEP and a Variance under 310 CMR 10.05(10) from the Wetlands Protection Act Regulations. The ENF states that the project will conform to the Stormwater Management Regulations when a final design is chosen. The following comments are offered:

- Impacts to wetland resource areas are difficult to quantify given the fact that the project is only in the conceptual design phase with three (3) preferred alternatives identified. In addition, it is difficult to determine how the project, in whatever design is ultimately selected, can or will meet the requirements of all applicable environmental regulations, the Massachusetts Wetland Regulations, including the mitigation of impacts to jurisdictional wetland resource areas.
- More detailed engineered plans will be required to depict existing and proposed conditions and topography, wetland resource area boundaries, endangered species habitat, stormwater structures, project phasing and construction schedules, and the like to best review and assess total project impacts.
- MassDEP recommends that an Abbreviated Notice of Resource Delineation (ANRAD) be submitted to accurately establish wetland resource area boundaries so that project planning, design alternatives, avoidance and mitigation of wetland resource areas are evaluated to the maximum extent possible.
- After the boundaries of wetland resource areas and endangered species habitat are established in the field, MassDEP recommends that the proponent consult with the Department of Fisheries and Wildlife Natural Heritage and Endangered Species Program to best determine how the project can be designed with maximum avoidance to said habitats. An Appendix B - Detailed Wildlife Habitat Evaluation will be required pursuant to the Massachusetts Wildlife Habitat Guidance for Inland Wetlands dated March 2006, and extensive habitat mitigation may be required.
- The ENF does not reference any anticipated temporary impacts to wetland resource areas. Given the projects scope and magnitude, additional temporary impacts associated with construction staging areas, storage of equipment, access to construction areas, and related activities should be identified in detail.
- MassDEP recommends that the proponent explore those wetland resource areas that may have historically been impacted with sediment and/or invasive species and determine the feasibility of restoration of these areas as part of the overall mitigation plans that are ultimately selected and implemented.

- MassDEP recommends that at as much wetland replication/restoration or other wetland mitigation plan(s) include re-creation of altered white cedar swamp habitat to the maximum extent feasible.
- MassDEP recommends that the proponent organize and tabelize impacts to wetland resource areas as temporary and permanent (e.g. temporary wetland fill versus permanent wetlands fill).
- Proponent must first look to avoid, then minimize and mitigate proposed impacts to wetland resource areas when evaluating alternative roadway layouts as referenced in the ENF. Examples include, but are not limited to, use bridges or spans, retaining walls, or acquiring adjacent parcels for possible wetlands replication/creation,
- MassDEP recommends that the proponent retain the services of an environmental monitor, erosion control specialist for the duration of the project.
- Specific information demonstrating how the project conforms to the Stormwater Regulations must be addressed in future permit application submittals.

The MassDEP appreciates the opportunity to comment on the proposed project. If you have any questions regarding these comments, please do not hesitate to contact Stella Tamul, MEPA Coordinator, at (508) 767-2763.

Sincerely,



Marielle Stone

Deputy Regional Director, Bureau of Resource Protection

cc: Commissioner's Office, MassDEP