



Advocacy Department

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March 31, 2015

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:

On behalf of Mass Audubon, I submit the following comments on the Environmental Notification Form (ENF) for the proposed reconfiguration of the I-90 (MassPike)/I-495 highway interchange. This is a major project intended to improve safety and reduce congestion. The project also has major environmental implications, as it is located in the Cedar Swamp Area of Critical Environmental Concern (ACEC) and abuts wetlands, rare species habitat, and protected conservation lands. The project will alter up to an estimated 25 acres of new land, create up to 14.6 acres of new impervious surfaces, and alter nearly 6 acres of wetlands. The project requires a Variance under the Wetlands Protection Act, legislative approval for disposition of conservation lands protected under Article 97 of the State Constitution, and possibly a Conservation and Management Permit under the Massachusetts Endangered Species Act (MESA). The ENF may not have fully identified all of the Massachusetts Environmental Policy Act (MEPA) regulatory thresholds triggered and/or permits required (e.g. widening of an existing roadway by four or more feet for one-half or more miles, alteration of more than two acres of state-listed rare species habitat resulting in a taking and needing a MESA permit). The ENF indicates that no increase in transportation trips will result from the project. However, it should be acknowledged that removing chronic congestion constraints at this location may well induce additional traffic to utilize the area. A full Environmental Impact Report (EIR) is required, as acknowledged in the ENF.

Alternatives, Mitigation and Restoration

A major project of this scope offers opportunities to plan carefully and creatively in order to create a result that improves not only the transportation system but also environmental conditions. The existing interchange destroyed significant wetland and habitat features at the time it was constructed, and continues to cause environmental degradation in a sensitive area due to highway runoff, altered hydrology, and ecological fragmentation. The alternatives analysis and mitigation should be guided by a goal of net improvement to both the transportation network and the environment.

The scope for the EIR should require more than a mere numeric approach to evaluation of impacts and mitigation to wetlands and water resources, rare species habitat, and conservation lands. It should include an analysis of the existing conditions and how the interchange and associated roads as well as railroads (which are also cited as important, related transportation assets) are impairing the natural systems. Opportunities for restoration should be evaluated based on this systems approach, rather than simply looking for the square footage of mitigation space required for project permitting.

For example, the ENF indicates that of the three general design approaches under consideration, Concept 22-3 has the greatest amount of impact both overall and in relation to sensitive resources. It also indicates that this design offers the opportunity for wetlands restoration within the existing loop ramps which presently contain highly degraded wetlands. These areas contain invasive plants such as Phragmites and are also heavily impacted by highway stormwater runoff and trash. However, this does not necessarily mean these areas are the best opportunities for restoration. The feasibility of truly functional restoration needs to be evaluated, along with other potential restoration work and enhanced protection of adjoining lands that may have greater benefits to the overall system. We also note that shading and runoff from bridges may significantly degrade wetlands; the ENF seems to downplay the impacts of bridges. This is of particular concern for any new bridge alignments over previously unaltered wetlands.

Mass Audubon does not support any particular design or mitigation at this time; we simply urge that an ecological systems approach be applied rather than simple square footage comparisons.

Stormwater

The ENF acknowledges that much of the project will involve new roadways in new alignments that do not qualify as redevelopment for purposes of the Department of Environmental Protection's Stormwater Management Standards. We urge that the entire project be designed and built in a manner that will bring the entire interchange into full compliance with the standards. Given the scope of the project and the existing degradation of sensitive wetlands within an ACEC, this is an appropriate goal. Wetlands impact minimization and mitigation also needs to be planned in conjunction with the best approach for long-term water quality in the ACEC. It is conceivable, for example, that utilizing some of the highly degraded loop ramp wetlands for new stormwater management systems might be worthwhile to consider, especially if other, more functional restoration opportunities exist to provide necessary wetlands mitigation.

Project Design and Review Process

Because the project involves work within natural resources across several municipalities, it is important for the Department of Transportation (DOT) to establish clear and meaningful opportunity for input and discussion by all interested parties. The Department of Environmental Protection should also work with DOT to ensure coordinated input from all the affected communities through the Wetlands Variance process. MassWildlife should also be actively engaged to ensure that the design analysis benefits from their expertise.

Thank you for considering these comments.

Sincerely,



E. Heidi Ricci
Senior Policy Analyst

cc: Lealdon Langley, Department of Environmental Protection
Jonathan Regosin, Natural Heritage and Endangered Species Program
Nathaniel Tipton, Department of Conservation and Recreation
Conservation Commissions: Hopkinton, Southborough, Westborough
OARS - For the Assabet, Sudbury, and Concord Rivers
Sudbury Valley Trustees

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