

# NEPONSET RIVER WATERSHED ASSOCIATION

---

490 Chapman Street, Suite One B • Canton, MA 02021  
phone 781-575-0354 • fax 781-575-9971  
www.neponset.org

October 15, 2002

Secretary Bob Durand  
Executive Office of Environmental Affairs  
MEPA Office, Bill Gage, EOEPA No. 12871  
251 Causeway Street, Suite 900  
Boston, MA 02114

RE: Environmental Notification Form, EOEPA No. 12871  
I-95/I-93/University Avenue and Dedham Street Interchanges Project

Dear Secretary Durand:

**The Neponset River Watershed Association (NepRWA) would like to submit these comments for the I-95/I-93/University Avenue and Dedham Street Interchanges Project (“the project”).** We are appreciative of the opportunity to work with the Massachusetts Highway Department (MHD) and other local stakeholders to develop a sound plan to restore the wetlands surrounding the project site as well as ways to incorporate ecologically sound practices and designs into the newly proposed work.

It is our hope that a collaboration between all parties will effectively achieve the result of a restored wetland area to replace the I-95 “stub,” reduced impact on intact wetlands near sites where new construction will take place and new highway routes and overpasses will be built, and protected access to the Neponset River, surrounding wetlands, and Blue Hills Reservation lands for nearby residents and outdoor enthusiasts, as well as wildlife. **As the entire project area is within the Fowl Meadow/Ponkapoag Area of Environmental Concern, it is essential that detailed plans by MHD for any work associated with the project be brought to the attention of all stakeholders and State agencies so that necessary protection of the area be ensured.** Therefore, it is important that meetings, such as those already held, between MHD, NepRWA, Friends of the Blue Hills, and other stakeholders be continued to ensure that the best possible design for the “stub” area be realized and that other environmental concerns are discussed up front so as to avoid any lengthening of the process that would otherwise delay restoration efforts in this area.

NepRWA would like to first discuss the issue of the I-95 “stub.” This area originally contained wetlands that were later filled to construct Interstate 95. Immense amounts of first-grade fill were deposited in the wetlands pursuant to the plan to utilize this area for the highway. When this area was abandoned and no road was constructed on the site, the fill remained, forever altering the natural function of the wetlands as drainage for the surrounding area and habitat for various wetlands species. MHD has the opportunity to return this area to its natural state and recreate the functioning wetlands that have long been missing. **NepRWA will advocate for the complete removal of the fill that has been present at the “stub” area for years in order to fully, or to the maximum extent possible, restore the wetlands to their natural state.**

Representatives of MHD have stated that complete removal of the fill from the “stub” area will depend on the cost of such an effort related to the overall budget of the entire project. We find that **the removal of the fill from the wetlands is a component of the project that *must be completed*** to the maximum extent possible, with funding considerations given great deference. We also contend that the most appropriate and economically sound way to ensure that the fill is removed in its entirety is to coordinate the process of removal of the fill from the wetlands with other MHD projects requiring high-quality fill. The cost of the fill is substantial and could be used in several ongoing and new MHD projects. Removing the fill as soon as possible, so as to reserve the fill for other projects as well as ensure that this phase of the current project be completed, is an economically sensible method to achieving the complete removal of the materials that stand in the way of complete wetland restoration with the “stub” area. A plan for restoration must be in place before such removal and alteration begins in order to prevent any occurrences of invasive species. Therefore MHD should work closely with Wetlands Restoration/EOEO to ensure that the area is properly restored without creating undue environmental harm to the area.

Furthermore, in regards to the restoration of this area, **NepRWA will advocate for the transfer of this land from MHD to the Metropolitan District Commission (MDC) so that maintenance and public access can be implemented and established.** However, in order for NepRWA to endorse such a transfer of land, *it needs to be initially agreed upon by the stakeholders involved that this land be restored and kept as wetlands.* The concept of letting the area evolve into meadows is not something that NepRWA would be likely to support. The reasoning for this is that the area was historically wetlands, provided drainage for the surrounding area as well as valuable habitat for unique species, and is essential to maintaining adequate water levels within the Neponset River and nearby drinking water wells for the town of Dedham. While meadows also provide needed habitat for wildlife and represent a disappearing terrain within the Neponset River Watershed, this specific area requires restoration of what was originally in existence, not creation of a new habitat. Additionally, the cost and maintenance requirements for the MDC will be lessened if the area is restored to wetlands.

Another element of the proposed project that NepRWA would like to comment on is access to the Neponset River once Greenlodge Street is removed. First, there is not enough information that has been made available as to the details of the removal of this road. We know now that the Greenlodge Street bridge over I-95 will be removed as will the existing pavement on the road from Elm Street to the proposed University Ave/I-93 connection ramps. However, what is unclear at this point is whether or not the fill from the Greenlodge Street roadway will be removed. **In keeping with the restoration potential of this project, it would be ideal, and NepRWA will advocate for, the removal of the fill along the Greenlodge Street roadway.** Such removal will restore an additional section of wetlands and habitat that will not be able to be utilized by wildlife otherwise.

**As an alternative to total removal of the fill from the Greenlodge Street roadway, we would also be interested in seeing the remaining portion of this road maintained as a pedestrian/equestrian path that would provide access to the Neponset River and existing trail system that is west of Interstate 95.** A pathway such as this would ensure that Canton residents have access to the Neponset River, the restored wetlands, and the trail system, and

additionally that current horseback riders could continue to use the roadway as cross-country riding terrain. The Greenlodge Street bridge over the interstate would need to be kept in place or a pedestrian/equestrian bridge built in its place.

NepRWA would also like to see the reduction of fill at the current I-95 Northbound ramp to University Avenue at the same time that the pavement is removed from this exit ramp. **In keeping with the effort to restore much of the wetlands that were destroyed or damaged when the I-95/I-93 Interchange was constructed years ago, the removal of fill from this particular section of the project would also greatly advance the total square footage of wetlands that could be restored to their natural state.** Improvements could also be made to this area in order to connect the Dedham neighborhood northwest of the interchange to the Neponset River and the Greenlodge Street pathway, if it is created. The remnants of this exit ramp could be reduced and altered to form a pedestrian pathway or trail for the Dedham residents to utilize.

Additional issues that NepRWA would like to see addressed in the EIR include: relocation of the salt shed to a location that will not interfere with wetland restoration opportunities; details of the future detention pond off I-93; more detailed information about the square footage of fill that exists presently in the entire project are, and in particular the amount in existence in the “stub” area; and a detailed discussion of the alternatives to the proposed recommendations regarding enhancement and restoration opportunities.

NepRWA is anxious to see restoration of the wetlands in this area and we are willing to work closely with MHD and all concerned stakeholders in order to achieve the best possible outcome for this area. We are in support of this project for the most part and hope to see the realization of the restoration and enhancement opportunities. We are available to continue to meet with all agencies and organizations involved in this process in an effort to pursue a well-planned and swift completion of the project.

We appreciate to opportunity to submit these comments. Please do not hesitate to contact me if you have any questions or would like further clarification of our comments.

Sincerely,

Jessica Stephens  
Water Resource Analyst  
Neponset River Watershed Association