



The Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Charles D. Baker
GOVERNOR

Karyn E. Polito
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Matthew A. Beaton
SECRETARY

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August 10, 2018

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME : Squannacook River Rail Trail
PROJECT MUNICIPALITY : Townsend and Groton
PROJECT WATERSHED : Nashua
EEA NUMBER : 15876
PROJECT PROPONENT : Squannacook Greenways, Inc.
DATE NOTICED IN MONITOR : June 20, 2018

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G. L. c. 30, ss. 61-62I) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **does not require** an Environmental Impact Report (EIR).

Project Description

As described in the Environmental Notification Form (ENF), the project involves the construction of an approximately 3.7-mile stone dust trail on an abandoned railroad right-of-way (ROW) owned by the Massachusetts Bay Transportation Authority (MBTA). The Proponent (Squannacook Greenways, Inc. (SGI)) has secured a 99-year lease with the MBTA for the development of a rail trail for recreational purposes. An approximately 1,000 linear foot (lf) portion of the rail trail (Section D) deviates from the railroad ROW and runs within the State highway layout (Route 119) to avoid impacts to private property and historical structures.

The trail will extend from the east end of the Massachusetts Division of Fisheries and Wildlife's (MassWildlife) Squannacook River Wildlife Management Area (WMA) in West Groton to the west end of Depot Street in Townsend. The proposed rail trail will be 10 feet (ft) wide, comprised of 4 to 6 inches of compacted stone dust, and will have a 5-foot maintained vegetated buffer area on either side of the trail for a total width of 20 ft. The project includes the development of two parking areas. One is proposed at the west end of the trail at Depot Street

and another is proposed off of Route 119. Both sites currently serve as informal parking areas. The Depot Street site will be regraded and expanded to provide 12 spaces. Up to 11 parking spaces are proposed at the Route 119 parking area. Gravel will be used to stabilize both lots. One of the terminal ends of the proposed trail abuts MassWildlife's unimproved dirt Bertozzi parking area adjacent to the Squannacook River WMA. Comments from MassWildlife indicate the purpose of the Bertozzi lot is to provide access for the public to the Squannacook River, including for hunting and fishing, and that the lot is at capacity. Their comments further indicate that additional users associated with the proposed rail trail would be unsustainable at the Bertozzi lot and that alternative locations should be considered. SGI, in additional information submitted on July 27, 2018 and August 3, 2018, has indicated that alternatives to the Bertozzi lot have been identified (see Alternatives Analysis below) and that consultation with MassWildlife is necessary to address concerns.

Construction activities will take place within the rail bed corridor. Rails will be lifted by excavator and retained for recycling. The value of the rails will be an important revenue stream for the project. Railroad ties will be removed and disposed of at an approved disposal facility. Construction access and staging will take place via the Harbor Village shopping center parking lot as well as on SGI-leased land where the trail intersects Crosswinds Drive and Old Meetinghouse Road.

Project Site

The land owned by the MBTA is comprised of an approximately 80-foot wide 5.75-mile long segment of an abandoned railroad ROW totaling approximately 55 acres. The Proponent is proposing to develop the rail trail on an approximately 3.7-mile long by 20-foot wide section of the leased area. The area to be developed includes intact rail lines and ties as well as informal walking paths which run parallel to the rail bed. The project corridor extends from east to west through the towns of Groton and Townsend and generally runs parallel to the Squannacook River to the south and Route 119 to the north. The project corridor abuts the Townsend State Forest, under the care and custody of the Department of Conservation and Recreation (DCR), and the Squannacook River WMA, under the care and custody of MassWildlife. The entire project is located within the Squannacook Area of Critical Environmental Concern (ACEC). Portions of the rail trail are located within mapped *Estimated or Priority Habitat of Rare Species* according to the 14th edition of the Massachusetts Natural Heritage Atlas.

Environmental Impacts and Mitigation

Environmental impacts associated with the project include the alteration of 9.63 acres of land and impacts to 58,720 square feet (sf) of Riverfront Area. The project is expected to generate approximately 150 new average daily trips (adt). The project is proposed within actual habitat of the Blanding's Turtle (*Emydoidea blandingii*), a species state-listed as Threatened by MassWildlife's Natural Heritage and Endangered Species Program (NHESP).

Measures to avoid, minimize and mitigate damage to the environment include the use of stone dust rather than paving, erosion and sedimentation controls to reduce impacts to resource areas during the construction period and adherence to conditions outlined by NHESP for the

protection of the Blanding's Turtle. In addition, the project will improve bicycle and pedestrian access parallel to Route 119.

Permitting and Jurisdiction

This project is subject to MEPA review and preparation of an ENF pursuant to 301 CMR 11.03(11)(b) because it requires a State Agency Action and involves a project, other than a single family home, within a designated ACEC.¹ The project requires a Highway Access Permit from the Massachusetts Department of Transportation (MassDOT).

The project will require an Order of Conditions from the Groton and Townsend Conservation Commissions or in the case of an appeal, a Superseding Order of Conditions from Massachusetts Department of Environmental Protection. The project may require a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the U.S. Environmental Protection Agency (EPA).

The project is seeking Financial Assistance from the Commonwealth and includes a Land Transfer in the form of a long-term lease with the MBTA. Therefore, MEPA jurisdiction is broad and extends to those aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment as defined in the MEPA regulations.

Review of the ENF

The ENF provided a description of existing and proposed conditions, project plans, and identified measures to avoid, minimize and mitigate project impacts. An addendum to the ENF was sent to the distribution list on July 24, 2018.

The alternative analysis included a No-build Alternative, Paved Rail Trail Alternative, a Wider Rail Trail Alternative, a Longer Trail Alternative and several parking alternatives. The No-Build Alternative was dismissed because the Proponent has already signed a 99-year lease with the MBTA on January 26, 2015 for the sole purpose of developing a recreational rail trail, as specified in the lease agreement. The Paved Rail Trail Alternative involved the use of pavement rather than stone dust. This option was dismissed because it would create approximately 5.5 acres of impervious surface, would have greater construction period impacts due to need for paving equipment within the project area, and would have greater long term maintenance and construction costs. A Wider Rail Trail Alternative was also considered and involved a 12-foot wide trail and 6-foot buffer on either side of the proposed trail. This option was dismissed because expansion of the trail corridor beyond 20 feet (Preferred Alternative) would involve additional land clearing and alteration. The Longer Rail Trail Alternative involved developing the trail along the entire length of the MBTA corridor. This option was dismissed because the required reconstruction of a trestle over the Squannacook River would be cost

¹ Because the project does not require a wetlands Permit, it does not exceed the ENF threshold at 301 CMR 11.03(3)(b)(1)(f) notwithstanding the fact that it involves the alteration of ½ or more acres of any other wetlands (Riverfront Area). If a wetlands Permit (e.g., Superseding Order of Conditions) is required, the project would also exceed this threshold; however it would not alter MEPA review because the project is already subject to broad scope jurisdiction.

prohibitive and the extension of the trail to the east would impact prime Blanding's Turtle habitat. The 20-foot corridor proposed in the Preferred Alternative avoids extensive clearing of trees or other vegetation.

Parking alternatives were presented in response to concerns raised at pre-filing meetings and the site walk on June 29, 2018 by MassWildlife regarding increased use of the Bertozzi parking lot. SGI originally proposed parking at the east terminus of the rail trail adjacent to the existing Bertozzi parking lot. This alternative proposed to remove the gate at the existing Bertozzi parking lot owned by MassWildlife and expand parking into the adjacent MBTA corridor in order to provide adequate parking for both users of the proposed rail trail and the Squannacook WMA. This option was dismissed by MassWildlife. Additional parking proposals include constructing a parking area within the MBTA corridor at Crosswinds Drive, east of the trail terminus and at an area east of the Bertozzi lot. However both options would require additional land and wildlife disturbance. Comments from MassWildlife request that signage be installed to remind users that hunters and anglers may be encountered given the rail trail's proximity to the Squannacook WMA which is open to hunting and fishing.

ACEC and Land Alteration

The Squannassit ACEC is a 37,450-acre area within the Nashua River watershed and spans the municipalities of Ashby, Ayer, Groton, Harvard, Lancaster, Lunenburg, Pepperell, Shirley and Townsend. The ACEC includes highly significant drinking water resources which include portions of several medium and high-yield aquifers and eight municipal wells and two public water supply facilities for the Devens Enterprise Zone (DEZ). The ACEC includes the Squannacook and Nissitissit rivers and 16 tributary streams which are classified as cold water fisheries that support trout, including brown, brook and rainbow trout. These rivers are designated Outstanding Resource Waters (ORW) for these fisheries. There are 23 state-listed rare species known to occur within the boundaries of the Squannassit ACEC.

The project will alter approximately 9.63 acres of land through the clearing and construction of the trail and associated parking.

Rare Species

As noted earlier, the project corridor is located within mapped habitat for Blanding's Turtle and several other state-listed species. On June 1, 2018, NHESP issued a "Conditional No Take" determination for the project as proposed. The conditions outlined in the determination include a time-of-year (TOY) restriction between November 7 and March 15 in order to avoid impacts to Blanding's Turtle. If it is not possible to adhere to the TOY restriction, the Proponent must submit a Blanding's Turtle protection plan to NHESP. Signage to direct users to stay on the trail must be installed and coordinated with NHESP. Boulders and fencing must be installed to deter off trail use if necessary. In addition, operation and maintenance activities for the trail besides the use of hand tools shall require additional coordination with NHESP and all erosion and sedimentation controls shall be removed and properly disposed of after the project is completed and surrounding areas are stabilized.

Traffic and Transportation

The project requires a highway access permit for access to the Route 119 parking area. The rail trail is expected to generate approximately 150 new vehicle trips. No significant impacts to traffic operations are expected and MassDOT comments indicate that no additional MEPA review is warranted based on transportation issues.

As noted earlier, a portion of the rail trail (approximately 1,000 feet) deviates from the MBTA ROW to avoid impacts to commercial and residential property and the Townsend Historical Society's Reed Homestead. SGI has secured an easement from the Townsend Historical Commission through the parking lot and driveway of the Harbor Church located at 80 Main Street (Route 119). Trail users will be directed to use the church parking lot to access Route 119 which they will follow until the trail picks back up again near the Route 119 trail parking area. Comments from MassDOT express concerns regarding directing users onto Route 119 as it does not provide accommodations for pedestrians or bicycles. Exploring additional alternatives to provide a safe connection between the Harbor Church and the proposed parking area, such as extending the trail along the existing rail bed so as to avoid direction of users onto Route 119 is recommended. MassDOT comments also remind the Proponent that any proposed mitigation within the state highway layout must be consistent with the MassDOT Complete Streets design approach to provide adequate and safe accommodations for all roadway users, including pedestrians, bicyclists and public transit riders.

Wetlands and Stormwater

The project is expected to impact 58,720 sf of Riverfront Area and a total of 110,760 sf of buffer zone. The project will require the submission of a Notice of Intent (NOI) and the Proponent must demonstrate compliance with the provisions for activities within a Riverfront Area (310 CMR 10.58) and include an alternatives analysis. The project includes stabilization of two areas experiencing erosion along/under the edge of the rail bed which may include the installation of a railing and may include filling within a resource area. The ENF identifies an area immediately adjacent to the Squannacook River that is experiencing significant erosion due to heavy foot traffic to access the River. The Proponent should consider mitigation measures that will stabilize this slope while maintaining access for anglers. The ENF did not disclose potential impacts to Bank or Bordering Land Subject to Flooding (BLSF) associated with this work.

MassDEP recommends that the Proponent develop a protocol for re-vegetation with a diversity of native species as well as a long-term vegetation management plan to maintain the rail corridor. The project is not proposing any new impervious area and existing drainage swales located along the rail bed are proposed to remain in place. Feasible stormwater management Best Management Practices (BMPs) should be incorporated into the project design.

Hazardous Waste

While the project area has not been regulated under M.G.L c.21E or the Massachusetts Contingency Plan (MCP) (310 CMR 40.0000), the historic railroad use increases the likelihood of encountering hazardous materials during the construction process. If oil and/or hazardous

materials are identified during the implementation of the project, notification to MassDEP pursuant to the MCP may be necessary.

Construction

The Proponent has indicated that the project must comply with MassDEP's Solid Waste and Air Quality Control regulations, pursuant to M.G.L. Chapter 40, Section 54, during demolition and construction. To reduce construction-period air emissions, I encourage the Proponent to require its construction contractors to use equipment manufactured to Tier 4 federal emission standards which are the most stringent emissions standards available for off-road engines. If equipment is not available in the Tier 4 configuration, the Proponent should consider equipment with after-engine emissions controls, such as oxidation catalysts or diesel particulate filters. All construction activities should be undertaken in compliance with the conditions of all State and local permits.

Conclusion

Based on a review of the ENF and comments received, and in consultation with State Agencies, I have determined that the ENF has sufficiently defined the nature and general elements of the project for the purposes of MEPA review and demonstrated that the project's environmental impacts will be avoided, minimized and/or mitigated to the extent practicable. I find that no further MEPA review is required at this time. Remaining issues can be addressed through the local and state permitting and review processes. If changes to the project design increase environmental impacts compared to the project identified in the ENF, or if additional State Agency Actions are required, the Proponent should consult with the MEPA Office regarding whether additional MEPA review is warranted.

August 10, 2018

Date



Matthew A. Beaton

Comments received:

07/06/2018	Massachusetts Board of Underwater Archaeological Resources (BUAR)
07/10/2018	Massachusetts Department of Environmental Protection – Central Regional Office (MassDEP CERO)
07/26/2018	Massachusetts Division of Fisheries and Wildlife - Natural Heritage and Endangered Species Program (NHESP)
07/29/2018	Groton Turtle Conservation
08/06/2018	Massachusetts Department of Transportation (MassDOT)
08/06/2018	Massachusetts Division of Fisheries and Wildlife (MassWildlife)

EEA# 15876

ENF Certificate

August 10, 2018

MAB/EFF/eff



The COMMONWEALTH OF MASSACHUSETTS
BOARD OF UNDERWATER ARCHAEOLOGICAL RESOURCES
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS
251 Causeway Street, Suite 800, Boston, MA 02114-2136

Tel. (617) 626-1141 Fax (617) 626-1240 Web Site: www.mass.gov/orgs/board-of-underwater-archaeological-resources

July 6, 2018

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
Attention: Erin Flaherty, MEPA Unit
100 Cambridge St., Suite 900
Boston, MA 02114

RE: Squannacook River Rail Trail, Groton and Townsend (EEA#15876)

Dear Secretary Beaton,

The staff of the Massachusetts Board of Underwater Archaeological Resources (MBUAR) has reviewed the above referenced project's ENF (EEA#15876) prepared by Squannacook Greenways, Inc. We offer the following comments.

The Board has conducted a preliminary review of its files and secondary literature sources to identify known and potential submerged cultural resources in the proposed project area. No record of any underwater archaeological resources was found. Based on the results of this review and the nature of the project, the Board expects that this project is unlikely to impact submerged cultural resources.

However, the area may be archaeologically sensitive (e.g., mill sites and ancient Native American archaeological sites along the Squannacook River and its tributaries). Therefore, should heretofore-unknown submerged cultural resources be encountered during the course of the project, the Board expects that the project's sponsor will take steps to limit adverse effects and notify the Board, as well as other appropriate agencies, immediately in accordance with the Board's Policy Guidance for the Discovery of Unanticipated Archaeological Resources.

The Board appreciates the opportunity to provide these comments as part of the review process. Should you have any questions regarding this letter, please do not hesitate to contact me at the address above, by email at victor.mastone@state.ma.us, or by telephone at (617) 626-1141.

Sincerely,

A handwritten signature in blue ink, appearing to read "Victor T. Mastone".

Victor T. Mastone
Director

/vtm



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

July 10, 2018

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

Attention: MEPA Unit – Erin Flaherty

Re: Environmental Notification Form (ENF)
Squannacook Rail Trail
Townsend and Groton
EEA #15876

Dear Secretary Beaton,

The Massachusetts Department of Environmental Protection's ("MassDEP") Central Regional Office (CERO) has reviewed the ENF for the Squannacook Rail Trail Project (the "Project") in Townsend and Groton. The Project is proposed by Squannacook Greenways Inc. (the "Proponent") and is for the construction of a stone-dust rail trail on 3.7 miles of an abandoned rail line. The trail will start at the east end at the Bertozzi Wildlife Management Area in West Groton, and at the west end off of Depot Street, just southwest of Townsend Center.

Along much of the length of the rail trail, the rail bed forms the northern boundary of the Squannacook ACEC. The rail bed also forms the northern boundary of mapped habitats for Estimated Habitat of Rare Wildlife and/or Priority Habitat of Rare Species. None of the proposed work will be performed in a wetland resource area, except for the Riverfront Area. There will be 5,538 feet of trail within the 100-foot buffer zone of Bordering Vegetated Wetlands (BVW), and 2,936 feet of the trail will be in the 200-foot riverfront protection area. Based on a 20-foot trail corridor width, work will occur in 58,720 square feet (sf) of Riverfront Area.

The Project is under MEPA review because it meets or exceeds the following review thresholds for an ENF:

- 11.03(b) - Any Project within a designated Areas of Critical Environmental Concern, unless the Project consists solely of one single family dwelling.

The Project requires the following State Agency Permits:

- Massachusetts Department of Transportation – State Highway Access Permit

MassDEP offers the following comments on the Project:

Wetlands


The Project will alter 58,720 sf of Riverfront Area, including both temporary and permanent impacts. The Proponent estimates that the Project will also alter 110,760 sf of Buffer Zone. In all areas where significant clearing of vegetation is proposed within Riverfront Area the Proponent should consider whether the width of the trail can be reduced to minimize impacts to this resource area.

The Proponent plans to submit Requests for Determination of Applicability (RDA) to the Townsend and Groton Conservation Commissions, and to MassDEP. Upon receipt of the RDA filings, MassDEP may provide informal project specific comments to the Conservation Commissions and the Proponent. MassDEP requests that the RDA filings include documentation verifying how the Project meets the Massachusetts Stormwater Management Standards, particularly for the proposed parking areas. Based on the information provided in the ENF a 401 Water Quality Certification will not be required from MassDEP under 314 CMR 9.00.

MassDEP recommends that the Proponent develop a protocol for re-vegetating areas of temporary disturbance that discourages the growth of invasive species and provides restoration with a diversity of native species. The Proponent should also develop a long-term vegetation management plan to maintain the rail trail corridor.

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

Very truly yours,



Mary Jude Pigsley
Regional Director

cc: Commissioner's Office, MassDEP



MASSWILDLIFE

DIVISION OF FISHERIES & WILDLIFE

1 Rabbit Hill Road, Westborough, MA 01581
p: (508) 389-6300 | f: (508) 389-7890
MASS.GOV/MASSWILDLIFE

June 1, 2018

Squannacook Greenways Inc.
88 South Harbor Road
Townsend, MA 01469

RE: Applicant: Squannacook Greenways Inc.
 Project Location: Parallels Route 119, Groton and Townsend
 Project Description: Construction of a stone dust rail trail and unpaved parking area
 NHESP File No.: 03-13131

Dear Applicant:

The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (the "Division") received a MESA Project Review Checklist, site plans and supporting documentation for review pursuant to the Massachusetts Endangered Species Act (MESA) (MGL c.131A) and its implementing regulations (321 CMR 10.00).

The proposed project includes the construction of a 3.7 mile stone dust trail along an abandoned rail line and a parking area.

The Division has determined that this Project will occur within the actual habitat of the Blanding's Turtle (*Emydoidea blandingii*), a species state-listed as Threatened. This species and its habitats are protected in accordance with the rare species provisions of the MESA. Fact sheets for state-listed species can be found at www.mass.gov/nhesp.

Based on a review of the information provided and the information currently contained in our database, the Division has determined that this project, as currently proposed, **must be conditioned in order to avoid a prohibited Take of state-listed species (321 CMR 10.18(2)(a)).** To avoid a prohibited Take of Blanding's Turtle the following conditions must be met:

1. As proposed, all work shall be performed between November 7 and March 15 in order to avoid impacts to Blanding's Turtle. If this is not possible, the Applicant shall submit a Blanding's Turtle Protection Plan. Said Protection Plan must be approved in writing by the Division prior to the start of Work. The Division is available for consultation on the development of the plan.
2. The installation and maintenance of signage to direct users to stay on the trail shall be completed as proposed. Further, boulders or fencing shall be installed to deter off trail use if needed. Additional coordination with the Division shall be required for placement and installation of boulders/fencing if they are necessary.
3. Operations and Maintenance of the trail besides the use of hand tools shall require additional coordination with the Division.
4. All erosion and sedimentation controls shall be removed and properly disposed of after the project is completed and as soon as surrounding areas are stabilized.

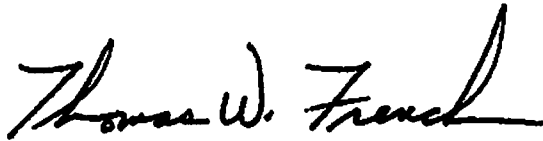
MASSWILDLIFE

Please note that any future expansion or improvements of the trail will require additional coordination with the Division. Further, the Division would have significant concerns with the expansion of the trail eastward along the abandoned rail line.

Provided the above-noted conditions are fully implemented and there are no changes to the project plans, this project will not result in a Take of state-listed species. We note that all work is subject to the anti-segmentation provisions (321 CMR 10.16) of the MESA. This determination is a final decision of the Division of Fisheries and Wildlife pursuant to 321 CMR 10.18. Any changes to the proposed project or any additional work beyond that shown on the site plans may require an additional filing with the Division pursuant to the MESA. This project may be subject to further review if no physical work is commenced within five years from the date of issuance of this determination, or if there is a change to the project.

Please note that this determination addresses only the matter of state-listed species and their habitats. If you have any questions regarding this letter please contact David Paulson, Senior Endangered Species Biologist at 508-389-6366.

Sincerely,

A handwritten signature in black ink that reads "Thomas W. French". The signature is written in a cursive style with a long, sweeping underline.

Thomas W. French, Ph.D.
Assistant Director

cc: Cedwyn Morgan, Squannacook Greenways, Inc.

From: [Darcy Donald](#)
To: [Flaherty, Erin \(EEA\)](#)
Subject: Comment on proposed Squannacook River Rail Trail
Date: Sunday, July 29, 2018 8:42:54 PM

To: Erin Flaherty
From Darcy Donald, Groton Turtle Conservation
Subject: Proposed Squannacook River Rail Trail

Dear Erin,

I am writing in opposition to the proposed Squannacook River Rail Trail.

I have grave concerns about the impact on rare species and critical habitat, as the project area is within designated state priority habitat for rare species. Habitat destruction and fragmentation, along with wetland degradation will result from this project.

The lack of information provided about key elements, such as security, maintenance, insurance, and the procedure for removing old railroad material is disturbing and shows insufficient planning for critical components of the construction plan.

I feel that the width of the designed trail and the bed material may have been planned to accommodate fast, road bike traffic. At least one of the key drivers of this trail is an avid road bike rider. As a former board member Friends of NRRT and a frequent user, I see road bikes on the NRRT traveling at excessive speeds and not slowing for the walkers, horses and young families using the trail. Needless to say, bicycle traffic can be catastrophic for wildlife.

I realize there is tremendous pressure and support for this project. If it must move forward, it would be a vast improvement to have a nature trail for pedestrians only, half the width, and enhanced with viewing platforms, benches, and informational signage.

Thank you for your consideration.
Darcy Donald
Groton Turtle Conservation



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Stephanie Pollack, MassDOT Secretary & CEO

massDOT
Massachusetts Department of Transportation

August 6, 2018

Matthew Beaton, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2150

RE: Townsend/Groton: Squannacook Rail Trail – ENF
(EEA #15876)

ATTN: MEPA Unit
Erin Flaherty

Dear Secretary Beaton:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the Environmental Notification Form for the Squannacook Rail Trail project in Townsend and Groton, as prepared by the Office of Transportation Planning. If you have any questions regarding these comments, please contact J. Lionel Lucien, P.E., Manager of the Public/Private Development Unit, at (857) 368-8862.

Sincerely,

David J. Mohler
Executive Director
Office of Transportation Planning

DJM/jll

cc: Jonathan Gulliver, Administrator, Highway Division
Patricia Leavenworth, P.E., Chief Engineer, Highway Division
Neil Boudreau, Assistant Administrator of Traffic and Safety Engineering
Barry Lorion, P.E., MassDOT District 3 Highway Director
Lori Shattuck, MassDOT District 3 Traffic Engineer
Planning Board, Town of Townsend
Planning Board, Town of Groton



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Stephanie Pollack, MassDOT Secretary & CEO

massDOT
Massachusetts Department of Transportation

MEMORANDUM

TO: David Mohler, Executive Director
Office of Transportation Planning

FROM: J. Lionel Lucien, P.E., Manager
Public/Private Development Unit

DATE: August 6, 2018

RE: Townsend/Groton – Squannacook Rail Trail: ENF
(EEA #15876)

The Public/Private Development Unit (PPDU) has reviewed the Environmental Notification Form (ENF) for the Squannacook Rail Trail project in Townsend and Groton. The project is proposed to be located on a portion of an abandoned rail trail between the Bertozzi Wild Life Management Area in West Groton and the west end of Depot Street in Groton. The project consists of the construction of a stone dust rail trail for approximately 3.7 miles. According to the ENF, the project is expected to generate 150 unadjusted vehicle trips per day. Parking will be provided for approximately 23 vehicles in two parking areas located in Townsend, with approximately 12 parking spaces located off of Depot Street at the western end of the trail and 11 parking spaces located off of Route 119, between Spaulding Street and Edward Road.

The project will require a MassDOT Vehicular Access Permit to access a proposed parking area located on the south side of Route 119 (a state-owned roadway), just east of Townsend Harbor. Any proposed roadway improvements associated with the project that will occur within Route 119 will also require a permit. The project does not meet MEPA review thresholds based on transportation, but is located within an Area of Critical Environmental Concern (ACEC).

The ENF includes a brief transportation section noting that the trips generated by the project will have a negligible impact on existing traffic operations on Route 119. The project includes a $\pm 1,000$ foot section that deviates from the rail trail between the Harbor Church, located approximately 750 feet west of the Route 119/South Road intersection, and the proposed parking area, located approximately 250 feet east of the Route 119/South Road intersection. Users of the trail will be directed to use Route 119 in this section, with access provided via an easement granted by the Townsend Historical Society on the church property and the parking area driveway.

MassDOT has concerns regarding directing users onto this section of Route 119 as it does not provide accommodations for pedestrians or bicycles. Shoulder widths along Route 119 are between 1 and 3 feet and do not include continuous, paved sidewalks. MassDOT recommends exploring additional alternatives to provide a safe connection between the Harbor Church and the proposed parking area, such as extending the trail along the existing rail bed so as not to direct users along Route 119, or widening along Route 119 to provide for safe pedestrian and bicycle accommodations.

The Proponent is reminded that any proposed mitigation within the state highway layout must be consistent with a Complete Streets design approach that provides adequate and safe accommodations for all roadway users, including pedestrians, bicyclists, and public transit riders. Guidance on Complete Streets design is included in the MassDOT *Project Development and Design Guide*. Where these criteria cannot be met, the proponent should provide justification, and should work with the MassDOT Highway Division to obtain a design waiver.

MassDOT recommends that no further environmental review be required based on transportation issues. The details of the above and any other access-related issues can be addressed through consultation with the Highway Division District 3 Office during the permitting process for the project. If you have any questions regarding these comments, please contact me at (857) 368-8862.



DIVISION OF FISHERIES & WILDLIFE

August 6, 2018

Secretary Matthew Beaton
Executive Office of Environmental Affairs
Attention: MEPA Office, Erin Flaherty
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Squannacook River Rail Trail
Environmental Notification Form (ENF) and Amendment
EEA No. 15876

Dear Secretary Beaton,

The Massachusetts Division of Fisheries & Wildlife (MassWildlife) has reviewed the ENF and Amendment for the proposed Squannacook River Trail in Groton and Townsend and would like to offer the following comments. The proposed Squannacook Rail Trail abuts the Squannacook River Wildlife Management Area (WMA), which MassWildlife manages for state-listed and other wildlife species, as well as wildlife-dependent recreation. The proponent received a separate letter (via email) from MassWildlife's Natural Heritage & Endangered Species Program (NHESP) on July 6, 2018, which provided comments specifically related to state-listed species and their habitats pursuant to the Massachusetts Endangered Species Act and its implementing regulations (321 CMR 10.00). This letter covers additional interests and concerns of MassWildlife as the abutting owner and manager of the Squannacook River WMA.

MassWildlife is charged by statute with the biological protection and management of all inland fish, wildlife, and rare species as well as providing wildlife-dependent recreational opportunities for the citizens of the Commonwealth including hunting, fishing and trapping. The Squannacook River WMA, at over 1,600 acres, is an important ecological area providing vernal pool, riverine, wetland, and terrestrial habitats for a large number of wildlife species and fish. This WMA supports an important trout fisheries that provides exceptional recreational opportunities for anglers. The Squannacook River WMA is also a popular area for hunting deer, turkey, and pheasant.

GENERAL:

Project Site - According to the ENF, Squannacook Greenways, Inc. (SGI) proposes to construct a stone dust rail trail on 3.7 miles of an abandoned rail line out of a total segment of 5.75 miles identified in the 2015 Lease Agreement between the Massachusetts Bay Transportation Authority and SGI. The Squannacook River WMA directly abuts the proposed project. We support a feasibility study that identifies 20 culverts within the 3.7 mile corridor that need to be further evaluated to avoid impacts to resources. Recreational OHV use of the rail trail should be prohibited and signage posted accordingly.

MASSWILDLIFE

Northeast Wildlife District | 85 Fitchburg Road | Ayer, MA 01432 | mass.gov/masswildlife

PARKING:

Bertozzi Parking Area, Townsend Road, Groton –MassWildlife owns this unimproved parking area and does not support SGI’s proposal to include it as the trail start-terminus. It would impact the current needs and uses of the parking area beyond its purpose which is to provide many area residents with ready available access to the Squannacook River that is very specific to this particular location. MassWildlife has determined that the current usage of the parking area is already at capacity and additional user pressure unsustainable. The proponent needs to identify other alternative parking areas to the Bertozzi Parking Area.

HUNTING AND FISHING ACCESS:

The proposed Squannacook River Rail Trail is being located adjacent to MassWildlife’s Squannacook River WMA which is open to hunting and fishing. All members of the general public, bicyclists, pedestrians, hunters, anglers, have a right to use the public bike path. Therefore, users of the proposed bike path may encounter hunters and anglers as they walk along the public bike path to access the WMA. To ensure compatibility among all users, DFW requests that signage be a condition of the MEPA certificate indicating that this are is open to hunting, fishing and trapping.

Thank you for giving MassWildlife the opportunity to attend the site visit and submit comments on the proposed Squannacook River Rail Trail. Please do not hesitate to call Trina Moruzzi (508-389-6318) if you have any questions regarding these comments.

Sincerely,



Trina L. Moruzzi
Assistant Director of Operations