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Northern Middlesex Council of Governments

A Multi-Disciplinary Regional Planning Agency Serving:
Billerica – Chelmsford – Dracut – Dunstable – Lowell – Pepperell – Tewksbury – Tyngsborough – Westford

March 25, 2024

Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Eva Vaughan: EOEEA #16801
100 Cambridge Street, Suite 900
Boston, MA 02114-2509

Re: EOEEA MEPA #16801 Yankee Doodle Bike Path – Billerica, Expanded Environmental Notification Form (EENF)

Dear Secretary Tepper:

The Northern Middlesex Council of Governments (NMCOG) routinely assesses MEPA proposal notifications to identify any potential regional impacts. Our responsibility involves examining projects to ensure they align with various guiding frameworks, including the Northern Middlesex Metropolitan Planning Organization's (NMMPO) Envision 2050, the Long-Range Transportation Plan for Greater Lowell and the Complete Streets policies, Massachusetts Priority Climate Action Plan, the Regional Strategic Plan for Greater Lowell, Northern Middlesex's regional policy plan and local master plans. As a regional planning agency, NMCOG promotes sustainable development and environmental stewardship.

The Yankee Doodle Bike Path (YDBP) in the Town of Billerica, MEPA notification #16801, outlines plans for the construction of a non-motorized transportation link between the Minuteman Bikeway in Bedford and the Bruce Freeman Rail in Lowell. The proponent's EENF submission necessitates an MEPA review due to its reliance on funding from MassDOT and the requirement for a Water Quality Certification from MassDEP for work in wetland resource areas. Additionally, the project surpasses the ENF review thresholds at 310 CMR 11.03(b)1.d and f. Furthermore, the project site lies within one mile of communities meeting Environmental Justice (EJ) criteria.

As proposed, the YDBP will be a 4.2-mile non-motorized, ADA-accessible, shared-use path featuring a 10-foot-wide paved surface with 3-foot shoulders. It will extend access to the well-utilized Minuteman Bikeway for Billerica and local EJ communities and connect Billerica High School to the Narrow Gauge Bikeway at the Bedford Town line. Catering to pedestrians, joggers, bicyclists, rollerbladers, and other non-motorized travelers, it's a crucial addition to the Commonwealth's Priority Trails Network, extending the Minuteman Bikeway into Billerica. Recognized by MassDOT for its transportation, recreation, environmental, and economic benefits, the project aims to construct a multi-use path while minimizing impacts on environmental resources like wetlands and historical sites. Key features include a porous pavement parking lot for stormwater recharge, new stream crossings, wetland replication, flood storage areas, boardwalks, and a bridge to support maintenance and emergency vehicles. Additionally,

the 2008 Statewide Bicycle Plan includes the Yankee Doodle Bike Path as an essential link within the Bay Circuit Greenway system, further emphasizing its significance in the region's transportation network.

Notably, the project is part of Envision 2050, NMMPO's TIP. Envision 2050 aims to improve environmental sustainability and livability by increasing bicycle and pedestrian mode share, expanding existing facilities, and closing gaps in the bicycle-pedestrian network. The YDBP aligns with the NMCOG's 2011 regional strategic plan: to bolster economic development by providing an alternative mode of transportation to educational, recreational, and conservation areas, thereby easing pedestrian access and expanding opportunities for the regional workforce. The more recent 2018 Billerica Master Plan Update names the path a critical element to improving access for non-motorized transportation options. Promoting these modes of travel alleviates congestion and reduces the total number of vehicle miles traveled. The shift not only decreases the number of cars on the road but reduces greenhouse gases, specifically cutting over 143,000 kilograms per year of carbon dioxide emissions.

NMCOG requests the project team continue its outreach and engagement efforts, with a particular focus on EJ communities. This includes creating translated Spanish, Portuguese, and Khmer materials to ensure accessibility. We recommend the project team incorporate translated interruptive signage during the construction phases to enhance transparency and provide broad educational opportunities.

Considering the project's goals of wetland reconstruction, stormwater recharge, and flood mitigation, the project team should consider volunteer work parties. These events may include education on the project's flood mitigation aspects and promote community stewardship. Given that a segment of the project falls within the 100-500-year floodplain, NMCOG recommends that the project team explore partnership opportunities to maximize the bike path installation's potential in enhancing flood mitigation efforts through programs such as the Massachusetts Vulnerability Preparedness (MVP) program.

In summary, NMCOG endorses the Yankee Doodle Bike Path project outlined in MEPA notification #16801. This initiative not only upholds NMCOG's dedication to sustainable development and environmental stewardship but also fulfills a project outlined in NMMPO's TIP, as well as aligning with regional plans and policies. Recognized by MassDOT for its manifold benefits, the YDBP project serves as a pivotal addition to the Commonwealth's Priority Trails Network, connecting the Minuteman Bikeway into Billerica. Furthermore, its adherence to the Billerica Master Plan underscores its importance in improving access for non-motorized transportation options. NMCOG recommends sustained outreach efforts, especially to EJ communities, and suggests exploring partnerships to maximize the project's potential in enhancing flood mitigation efforts. Given its multifaceted advantages and strategic alignment, NMCOG stands behind the YDBP project. NMCOG respectfully requests the Secretary to incorporate our feedback into any final communications or certificates issued for this project. We appreciate the opportunity to provide input on this project.

Sincerely,


Jennifer Raitt
Executive Director

cc: Andrew Deslaurier, Secretary, Billerica Select Board and NMCOG Chair
John Curran, Billerica Town Manager