



THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF TRANSPORTATION
MASSACHUSETTS HIGHWAY DEPARTMENT



DEVAL L. PATRICK
GOVERNOR

TIMOTHY P. MURRAY
LIEUTENANT GOVERNOR

BERNARD COHEN
SECRETARY

LUISA PAIEWONSKY
COMMISSIONER

September 3, 2008

Ms. Lucy Garliauskas
Division Administrator
FHWA Massachusetts Division
55 Broadway, 10th Floor
Cambridge, MA 02142

Attn: Damaris Santiago

Re: I-93/ Route 110/ Route 113 Methuen Rotary Interchange Modification
NEPA Class Of Action Determination

Dear Ms. Garliauskas:

I am writing to request official guidance from the Federal Highway Administration (FHWA) regarding the class of action under the National Environmental Policy Act (NEPA) for the I-93/ Route 110/ Route 113 Methuen Rotary Interchange Modification Project.

Background

The Massachusetts Highway Department (MassHighway) is proposing to improve the I-93 /Route 110 /Route 113 Methuen Rotary Interchange in the Town of Methuen.

All approaches to the Route 110 and 113 rotary operate at a failing Level Of Service (LOS) during either the AM or PM peak hour or during both. The areas immediately east and west of the rotary experience high traffic volumes and consequently are the most congested. All approaches entering the rotary experience congestion and unacceptable delays during one or both of the peak hours. Delays are encountered for vehicles entering the rotary as a result of high volumes on an approach to the rotary and /or as a result of high volumes in the rotary. In addition, at unsignalized intersections, vehicles turning left from the minor streets experience high delay during peak travel periods.

In comparison to the statewide average crash rate of 0.63 for unsignalized intersections, the rotary had a crash rate 4.5 times greater than the statewide average. This indicates that the Route 110 and 113 rotary interchange has a safety problem. Further, the two adjacent signalized intersections also have crash rates that are slightly higher than the statewide average, which indicates that there could be a safety concern.

To evaluate traffic conditions and make recommendations for improving traffic operations on I-93 and the Methuen Rotary MassHighway undertook the *Interstate 93 Corridor Study* and the *Route 110 & Route 113 Methuen Rotary Interchange Study*. The *Route 110 & Route 113 Methuen Rotary Interchange Study* considered 12 total alternatives. MassHighway plans to bring



three alternatives (Alternative 2B – Modified Single Point Urban Interchange, 3A-Partial Cloverleaf, and no-build) to the NEPA process. Alternative 3A is the preferred alternative.

Alternative 2B eliminates the rotary and realigns Routes 110 and 113 under I-93. Realignment of Routes 110 and 113 would allow for continuous through movement to better accommodate projected growth in traffic along Route 113 in Dracut. Alternative 2B requires construction of two bridges, one of which is under I-93 over the central intersection that would require considerable length and width resulting in a significant cost for construction.

Alternative 3A eliminates the rotary and realigns Routes 110 and 113 under I-93. Realignment of Routes 110 and 113 would allow for continuous through movement to better accommodate projected growth in traffic along Route 113 in Dracut. All movements to and from the south would have unrestricted right-turn movements. This alternative would require only one bridge (under I-93) and has the lowest anticipated construction cost. Alternative 3A is the preferred alternative.

Public participation was a key part of the Methuen Rotary Study. A public involvement plan was developed to support civic engagement in the study. In addition to the six SAC meetings and two public informational meetings, the study was covered by local newspapers and public access television. Additionally, an informational website (www.methuenrotarystudy.org) was maintained throughout the study to provide updates on the study progress, receive comments, and post review materials for the general public. MassHighway did not encounter significant public controversy for this project during preparation of the feasibility study. In fact, the community has been very supportive of the project and the preferred alternatives. No public controversy is anticipated as the project progresses through the design stages.

Three residences will need to be displaced in order to construct the preferred alternatives. Two of the residences are single family dwellings and the third residence is a rental property.

The estimated impacts to Bordering Vegetated Wetlands and/or Isolated vegetated wetlands are approximately 24,000 square feet. Therefore this project will require a variance from the Massachusetts Wetlands Protection Act. This project does not impact Rare and Endangered species habitat.

Based on the continued public support, improvements to safety and congestion, and lack of significant environmental impacts, we propose for this project to be reviewed as an Environmental Assessment under NEPA.

If you have any questions, please call me at (617) 973-7484.

Sincerely,



Kevin Walsh

Director, Environmental Services Division