

7.0 COMPLIANCE/CONSISTENCY WITH ENVIRONMENTAL LAWS, REGULATIONS AND PROGRAMS

7.1 INTRODUCTION

This section summarizes the project's compliance and consistency with applicable federal and state environmental laws, regulations, and programs.

7.2 FEDERAL LAWS, REGULATIONS AND PROGRAMS

Table 7-1 briefly summarizes the project's compliance with applicable federal laws, regulations, and programs.

7.3 STATE LAWS, REGULATIONS AND PROGRAMS

Table 7-2 briefly summarizes the project's compliance with applicable state laws, regulations, and programs. Section 7.3.1 presents an analysis of the project's conformance with the relevant program policies and management principles of the Massachusetts Coastal Zone Management (MassCZM) Program. Section 6.16 presents a Draft Section 61 Finding for the project.

7.3.1 Massachusetts Coastal Zone Management Consistency

Listed below is a brief summary of the project's conformance to the relevant regulatory policies of the approved CZM program. The MassCZM regulatory policies and management principles are applied to projects subject to federal Consistency Review and Chapter 91.

The proposed activity complies with the enforceable program policies of the Massachusetts approved coastal management program and will be conducted in a manner consistent with such policies.

Water Quality

Water Quality Policy #1 – Ensure that point-source discharges and withdrawals in or affecting the coastal zone do not compromise water quality standards and protect designated uses and other interests.

Conformance: The proposed stormwater management system for the Preferred Alternative has been designed to meet the MassDEP Storm Water Management regulations at 310 CMR 10.05(k) and the MassDEP

Storm Water Management Policy, using appropriate Best Management Practices included in the MassDOT *Storm Water Handbook*. Measures used to comply with the regulation and policy include catch basins, water quality drainage swales, infiltration and extended detention basins. Specifically, the proposed system includes: This system will improve water quality for stormwater discharges to the Merrimack River, Meader Brook, and other project-area surface waters compared to No Build conditions. The proposed stormwater management includes:

- Seven infiltration basins;
- Two wet basins;
- Two extended detention basins;
- An outlet control structure installed over existing drainage located in the Route 110 Loop Ramp;
- Eleven sediment forebays (one per basin);
- Water quality swales (in the median where space is available); and
- Deep sump catch basins.

Water Quality Policy #2 - Ensure the implementation of nonpoint source pollution controls to promote the attainment of water quality standards and protect designated uses and other interests.

Conformance: The Preferred Alternative will not generate any non-point pollution. During construction, Best Management Practices will be implemented to ensure that erosion and sedimentation are minimized.

Water Quality Policy #3 - Ensure that subsurface waste discharges conform to applicable standards, including the siting, construction, and maintenance requirements for on-site wastewater disposal systems, water quality standards, established Total Maximum Daily Load limits, and prohibitions on facilities in high-hazard areas.

Conformance: The Preferred Alternative does not involve any subsurface waste discharges in the Coastal Zone. This policy is not applicable.

Habitat

Habitat Policy #1 - Protect coastal, estuarine, and marine habitats—including salt marshes, shellfish beds, submerged aquatic vegetation, dunes, beaches, barrier beaches, banks, salt ponds, eelgrass beds, tidal flats, rocky shores, bays, sounds, and other ocean habitats—and coastal freshwater streams, ponds, and wetlands to preserve critical wildlife habitat and other important functions and services including nutrient and sediment attenuation, wave and storm damage protection, and landform movement and processes.

Conformance: The Preferred Alternative will avoid direct impacts to salt marsh along the Merrimack River. Impacts to other jurisdictional coastal wetland resources have been minimized to the greatest extent practicable. There are no direct or indirect impacts to salt marsh from the Preferred Alternative. Permanent impacts to permanent loss of 17,100 square feet of Land Under the Ocean (Merrimack River bottom) would result from the construction of six new piers for the two proposed I-95 bridges over the Merrimack River. This impact will be minimized through demolition of the four existing Whittier Bridge piers and restoration of the river bottom at those locations.

The only terrestrial species with special status known to be present in the project area is the bald eagle, which is listed as endangered by the Massachusetts NHESP. Although the bald eagle was recently delisted by the U.S. Fish and Wildlife Service (USFWS), it does remain protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. Based on its state and federal status, a consultation regarding potential impacts and impact avoidance measures will be required with NHESP, but not with USFWS. No impacts to threatened and endangered species are anticipated, except for temporary noise impacts related to constructing the bridge.

There are two fish species with special status known to use the project area including the shortnose sturgeon (*Acipenser brevirostrum*) and the Atlantic sturgeon (*Acipenser oxyrinchus*). There may be some temporary impacts related to construction noise and activity, which will be minimized with appropriate permit conditions developed in concert with the USFWS, National Marine Fisheries Service (NMFS), and Division of Marine Fisheries (DMF). Based on the listing status of the two sturgeon species, an informal Section 7 consultation regarding potential impacts and impact avoidance measures with NMFS under the federal Endangered Species Act has been initiated. MassDOT is coordinating with NMFS and has requested a "No Effect" determination with no time of year restrictions. A response from NMFS is anticipated shortly. Correspondence with NMFS is included in Appendix E. The FHWA authorized MassDOT to consult directly with the NMFS as its non-federal representative in a letter dated September 8, 2009.

Habitat Policy #2 - Advance the restoration of degraded or former habitats in coastal and marine areas.

Conformance: MassDOT will relocate an existing stormwater outfall on the Newburyport shore of the Merrimack River which has resulted in adverse impacts to an existing salt marsh. The relocated stormwater outfall will be placed in a location under the I-95 southbound bridge in an area with no existing wetlands vegetation and immediately upslope of an area of

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Coastal Beach. To encourage the reestablishment of salt marsh at the location of the existing outfall, MassDOT will place boulders and rock to allow for the natural accretion of river sediments, allowing for the establishment of salt marsh vegetation.

Protected Areas

Protected Areas Policy #1 - Preserve, restore, and enhance coastal Areas of Critical Environmental Concern, which are complexes of natural and cultural resources of regional or statewide significance.

Conformance: There are no ACECs in the area. This policy is not applicable.

Protected Areas Policy #2 - Protect state designated scenic rivers in the coastal zone.

Conformance: There are no designated scenic rivers in the area. This policy is not applicable.

Protected Areas Policy #3 – Ensure that proposed developments in or near designated or registered historic places respect the preservation intent of the designation and that potential adverse effects are minimized.

Conformance: MassDOT proposes to mitigate the adverse effect to the Whittier Bridge through implementation of the measures agreed to by the Section 106 parties (FHWA, MassDOT – Highway Division, Advisory Council on Historic Preservation, Massachusetts Historical Commission, and representatives from Amesbury, Newburyport, and Salisbury) as described in the March 23, 2011, Section 106 Memorandum of Agreement, which is included at the end of Chapter 9 of this document.

Coastal Hazards

Coastal Hazard Policy #1 – Preserve, protect, restore, and enhance the beneficial functions of storm damage prevention and flood control provided by natural coastal landforms, such as dunes, beaches, barrier beaches, coastal banks, land subject to coastal storm flowage, salt marshes, and land under the ocean.

Conformance: The Preferred Alternative will not alter land subject to coastal storm flowage or salt marsh so as to result in adverse impacts to the storm damage and flood control functions. The existing hydraulic opening under the existing Whittier Bridge will be maintained with construction of the new bridge crossing. Bridge piers to be constructed in the river will be designed to minimize potential wave refraction, which could affect adjacent river bank landforms.

Coastal Hazard Policy #2 – Ensure that construction in water bodies and contiguous land areas will minimize interference with water circulation and sediment transport. Flood or erosion control projects only when it must demonstrate no significant adverse effects on the project site or adjacent or downcoast areas.

Conformance: Construction of new bridge piers or other structures in the Merrimack River will be designed to minimize local impacts to water circulation and sediment transport.

Coastal Hazard Policy #3 – Ensure that state and federally funded public works projects proposed for location within the coastal zone will:

1. not exacerbate existing hazards or damage natural buffers or other natural resources,
2. be reasonably safe from flood and erosion related damage, and
3. not promote growth and development in hazard-prone or buffer areas, especially in Velocity zones and ACECs, and
4. not be used on Coastal Barrier Resource Units for new or substantial reconstruction of structures in a manner inconsistent with the Coastal Barrier Resource/Improvement Acts.

Conformance: The Preferred Alternative will be constructed to not exacerbate any existing hazards or damage natural resources so as to cause hazards. No velocity zones or Areas of Critical Environmental Concern are located in the project area.

Coastal Hazard Policy #4 – Prioritize public funds for acquisition of hazardous coastal areas for conservation or recreation use, and relocation of structures out of coastal high hazard areas, giving due consideration to the effects of coastal hazards at the location to the use and manageability of the area.

Conformance: This policy is not applicable.

Public Access

Public Access Policy #1 - Ensure that development (both water-dependent or nonwater-dependent) of coastal sites subject to state waterways regulation will promote general public use and enjoyment of the water's edge, to an extent commensurate with the Commonwealth's interests in flowed and filled tidelands under the Public Trust Doctrine.

Conformance: The project will be constructed within the limits of existing highway right-of-way and will not result in direct impacts to existing public recreation sites.

MassDOT has committed to constructing a shared-use path adjacent to the I-95 northbound roadway from the park-and-ride lot at Exit 57 in Newburyport north to the intersection of Route 110 and Old Merrill Street/Rabbit Road in Salisbury, east of Exit 58 in Amesbury. Recent pedestrian and bicycle accommodation improvements to this intersection and to Rabbit Road north to the existing Ghost Trail recreational path as part of the MassDOT Route 110 Widening Project will provide a connection between the Salisbury Point Ghost Trail and the shared-use path. Three overlooks will be constructed along the shared-use path at the Merrimack River crossing, enabling greater public access to and enjoyment of the Merrimack River.

Public Access Policy #2 - Improve public access to existing coastal recreation facilities and alleviate auto traffic and parking problems through improvements in public transportation and trail links (land- or water-based) to other nearby facilities. Increase capacity of existing recreation areas by facilitating multiple use and by improving management, maintenance, and public support facilities. Ensure that the adverse impacts of developments proposed near existing public access and recreation sites are minimized.

Conformance: As noted above, MassDOT has committed to constructing a shared-use path adjacent to the I-95 northbound roadway from the park-and-ride lot at Exit 57 in Newburyport north to the intersection of Route 110 and Old Merrill Street/Rabbit Road in Salisbury, east of Exit 58 in Amesbury.

Recent pedestrian and bicycle accommodation improvements to this intersection and to Rabbit Road north to the existing Ghost Trail recreational path as part of the MassDOT Route 110 Widening Project will provide a connection between the Salisbury Point Ghost Trail and the shared-use path. The Ghost Trail connects to US Route 1 in Salisbury, and on-road bicycle trails connect to Salisbury Beach and the Atlantic Ocean.

With the construction of the Whittier Bridge shared-use path and the interconnection to the Ghost Trail, a continuous connection from Route 1 in Salisbury, south to the park-and-ride lot at Exit 57 in Newburyport would be created. This would also enhance connectivity to existing parks, including Moseley Woods and Maudslay State Park in Newburyport, and would provide a safe and efficient crossing of the Merrimack River for alternative modes of transportation.

Public Access Policy #3 - Expand existing recreation facilities and acquire and develop new public areas for coastal recreational activities, giving highest priority to regions of high need or limited site availability. Provide technical assistance to developers of both public and private recreation facilities and sites that increase public access to the shoreline to ensure that both transportation access and the recreation facilities are compatible with social and environmental characteristics of surrounding communities.

Conformance: The Preferred Alternative will be constructed within the limits of existing highway right-of-way and will not result in direct impacts to existing public recreation sites.

Port and Harbor Infrastructure

Ports Policy #1 - Ensure that dredging and disposal of dredged material minimize adverse effects on water quality, physical processes, marine productivity, and public health and take full advantage of opportunities for beneficial re-use.

Conformance: Construction of the proposed Whittier Bridge and demolition of the existing Whittier Bridge will require dredging of a total of 7,150 cubic yards of river sediments. The dredging activities will be conducted entirely within cofferdams to be installed around the locations of existing bridge piers and temporary and permanent piers for the new bridges. Dredging will be conducted with a clamshell excavator located on a barge moored or spudded adjacent to the cofferdam. Dredged material will be allowed to drain much of the entrained water within the confines of the cofferdam before the material is deposited on a barge for transport and offloading onto watertight trucks. The material will be disposed of in an upland location in full compliance with applicable environmental regulations. No open water disposal or side casting of dredged material is proposed.

A DEP-approved sampling program was conducted on October 20 and 21, 2011. Five split spoon samples were collected from the Merrimack River in the vicinity of the Whittier Bridge. The collection of a sixth sample was attempted but was unsuccessful due to a very hard river bottom.

According to the March 2007 Joint DEP and CZM publication *Beach Nourishment – MassDEP’s Guide to Best Management Practices for Projects in Massachusetts*, sediment containing greater than 10 per cent by weight of the material passing the No. 200 U.S. Standard Series Testing Sieve is generally unsuitable for beach or dune nourishment. Some dredged material may be suitable for beach nourishment, based solely on analysis of grain size results. Based on the results of the chemical testing, and the fact that the dredged material is from a riverine environment,

MassDOT does not believe that the dredged material will be suitable for beach nourishment.

Ports Policy #2 - Obtain the widest possible public benefit from channel dredging and ensure that Designated Port Areas and developed harbors are given highest priority in the allocation of resources.

Conformance: There are no Designated Port Areas within the Merrimack River. This policy is not applicable.

Ports Policy #3 - Preserve and enhance the capacity of Designated Port Areas to accommodate water-dependent industrial uses and prevent the exclusion of such uses from tidelands and any other DPA lands over which an EEA agency exerts control by virtue of ownership or other legal authority.

Conformance: The project will have no effect on the capacity of DPAs. This policy is not applicable.

Ports Policy #4 - For development on tidelands and other coastal waterways, preserve and enhance the immediate waterfront for vessel-related activities that require sufficient space and suitable facilities along the water’s edge for operational purposes.

Conformance: The proposed bridge is a water-dependent structure. No impacts to river navigation will result from the project.

Ports Policy #5 - Encourage, through technical and financial assistance, expansion of water-dependent uses in Designated Port Areas and developed harbors, re-development of urban waterfronts, and expansion of physical and visual access.

Conformance: The project will have no effect on the capacity of DPAs. This policy is not applicable.

Public Access Management Principle #1 – Improve public access to coastal recreation facilities and alleviate auto traffic and parking problems through improvements in public transportation. Link existing coastal recreation sites to each other or to nearby coastal inland facilities via trails for bicyclists, hikers, and equestrians, and via rivers for boaters.

Conformance: As noted above, MassDOT has committed to constructing a shared-use path adjacent to the I-95 northbound roadway from the park-and-ride lot at Exit 57 in Newburyport north to the intersection of Route 110 and Old Merrill Street/Rabbit Road in Salisbury, east of Exit 58 in Amesbury.

Recent pedestrian and bicycle accommodation improvements to this intersection and to Rabbit Road north to the existing Ghost Trail

recreational path as part of the MassDOT Route 110 Widening Project will provide a connection between the Salisbury Point Ghost Trail and the shared-use path.

With the construction of the Whittier Bridge shared-use path and the interconnection to the Ghost Trail, a continuous connection from Route 1 in Salisbury, south to the park-and-ride lot at Exit 57 in Newburyport would be created. This would also enhance connectivity to existing parks, including Moseley Woods and Maudslay State Park in Newburyport, and would provide a safe and efficient crossing of the Merrimack River for alternative modes of transportation.

Growth Management

Growth Management Policy #1 - Encourage sustainable development that is consistent with state, regional, and local plans and supports the quality and character of the community.

Conformance: The project has been included in the Merrimack Valley Metropolitan Planning Organization FY 2011-2014 Transportation Improvement Program (including July 2011 amendments), released on September 13, 2011.

Growth Management Policy #2 - Ensure that state and federally funded infrastructure projects in the coastal zone primarily serve existing developed areas, assigning highest priority to projects that meet the needs of urban and community development centers.

Conformance: The project has been included in the Merrimack Valley Metropolitan Planning Organization FY 2011-2014 Transportation Improvement Program (including July 2011 amendments), released on September 13, 2011. The goals and objectives stated in the RTP include:

- Maximize the efficiency and quality of the existing highway and transit systems. This includes the repair and/or replacement of the region’s bridges, often located in critical locations on the regional highway system. Also included is the preservation of the integrity of the region’s Interstate and National Highway System highways, which have contributed to the region’s growth in employment and population and link the region to the rest of New England and the nation;
- Undertake efforts to eliminate congestion on the region's transportation system; and
- Ensure that the transportation system supports the region’s continued economic vitality and development.

TABLE 7-1: COMPLIANCE WITH FEDERAL LAWS, REGULATIONS AND PROGRAMS

Law, Regulation or Program	Brief Description of Compliance
Clean Water Act of 1977 (Federal Water Pollution Control Act Amendments of 1972); Executive Order 11900: Protection of Wetlands	MassDOT will implement wetlands mitigation in compliance with the mitigation requirements of the U.S. Army Corps of Engineers to fully mitigate the unavoidable impacts to 1,950 SF of vegetated wetlands. Mitigation plans are presented in Section 6.10 in Chapter 6. Full size replication plans are included at the end of the chapter.
National Historic Preservation Act of 1966	MassDOT will mitigate impacts to the historic John Greenleaf Whittier Memorial Bridge through historic recordation of the bridge, consultation with the State Historic Preservation Officer (SHPO) and the public on the structural type and design of the new bridge, and transfer of the decorative and commemorative elements to local repositories. FHWA and MassDOT will ensure that certain ornamental artifacts on the existing bridge are salvaged for reuse on the replacement bridges or along the shared-use path, as determined to be appropriate by FHWA and MassDOT in consultation with the SHPO, the local historical commissions, and the WWG. See Chapter 9 for full details on the Section 106 compliance (including the final Memorandum of Agreement between the FHWA, MassDOT, the Advisory Council on Historic Preservation, Massachusetts Historical Commission, and representatives from Amesbury, Newburyport, and Salisbury, dated March 2, 2011.
Section 4(f) of The Department of Transportation Act	No publicly owned parks or recreation areas affected by the project. MassDOT will mitigate impacts to the historic John Greenleaf Whittier Memorial Bridge through historic recordation of the bridge, consultation with the SHPO and the public on the structural type and design of the new bridge, and transfer of the decorative and commemorative elements to local repositories. FHWA and MassDOT will ensure that certain ornamental artifacts on the existing bridge are salvaged for reuse on the replacement bridges or along the shared-use path, as determined to be appropriate by FHWA and MassDOT in consultation with the SHPO, the local historical commissions, and the Whittier Working Group.
Land and Water Conservation Fund, Public Law 88- 578, 16 U.S.C. 4601-4 (Section 6(f))	There are no parks or open space along the project corridor acquired in whole or in part by Land and Water Conservation Fund funding – not applicable.
Uniform Relocation and Real Property Acquisition Act of 1970	There are no permanent takings of any residential, commercial, or industrial properties along the project corridor – not applicable.
Executive Order 12898: Environmental Justice (EJ)	There are no EJ communities impacted by the project – not applicable.
Endangered Species Act of 1973 (7 U.S.C. § 136, 16 U.S.C. § 1531 et seq.)	MassDOT initiated an informal Section 7 consultation with the National Marine Fisheries Service (NMFS) regarding potential impacts to the listed shortnose sturgeon and the eligible Atlantic sturgeon populations in the Merrimack River. NMFS concluded that the Preferred Alternative is not likely to adversely affect any listed species under NMFS jurisdiction, and that it is not reasonable to anticipate that Preferred Alternative would be likely to jeopardize the continued existence of any distinct population segment of Atlantic sturgeon in the Merrimack River. No further consultation or coordination under Section 7 is required.
Executive Order 11988: Floodplain Management, as amended by Executive Order 12148	There is no reduction in flood storage capacity in existing floodplains resulting from project construction. The project is consistent with the Executive Order.
7 U.S.C. 4201 et seq., Farmland Protection Policy Act of 1981	The project would not affect significant areas of prime farmland or agricultural soils – not applicable.
Executive Order 13186 -- Responsibilities of Federal Agencies To Protect Migratory Birds (January 10, 2001)	There are no project impacts affecting habitat of migratory birds – not applicable.
CZMA of 1972: 16 U.S.C. 145 et seq. (P.L. 92-583) (P.L. 94-310) (P.L. 96-464) and CZMA Reauthorization Amendments of 1990: 6217(g)	The project is consistent with the applicable program policies and management principles of the MassCZM program. See Section 7.3.1 for consistency analysis.
Clean Air Act (as amended), Transportation Conformity Rule: 23 U.S.C. 109(j), 42 U.S.C. 7521 (a), (P.L. 101-549)	The project is included in the latest transportation plan—the Merrimack Valley 2010–2014 Regional Transportation Plan (RTP)—and has been included in the metropolitan organization model. The total emissions from this and other projects, when combined with results from the remainder of the Eastern Massachusetts Nonattainment Area, fell below the budget levels for volatile organic compounds and nitrogen oxides for all milestone years. Accordingly, the project—combined with all the other regionally significant projects—was found to be consistent with the motor vehicle emissions budgets in the Massachusetts State Implementation Plan, meeting the requirements of the conformity regulations.
National Environmental Policy Act: 42 U.S.C. 4321-4335 (P.L. 91-190) (P.L. 94-83); Executive Order 11514, Protection and Enhancement of Environmental Quality, as amended by Executive Order 11991, dated May 24, 1977.	This Environmental Assessment fulfills the statutory and Executive Order requirements.
Section 9 of the Rivers and Harbors Act of 1899, (33 U.S.C. 403; Chapter 425, March 3, 1899; 30 Stat. 1151)	MassDOT is obtaining and will comply with the requirements included in the Bridge Permit to be issued by the United States Coast Guard for the project.
Magnuson-Stevens Fishery Conservation And Management Act, (16 U.S.C. 1801-1882), April 13, 1976, as amended 1978-1980, 1982-1984, 1986-1990, 1992-1994 and 1996	MassDOT has prepared an Essential Fish Habitat (EFH) Assessment and is coordinating with the National Marine Fisheries Service (NMFS) in their review of the EFH Assessment.

TABLE 7-2: COMPLIANCE WITH STATE LAWS, REGULATIONS AND PROGRAMS

Law, Regulation or Program	Brief Description of Compliance
Massachusetts Clean Waters Act: M.G.L. c. 21, §§ 26-53 and regulations at 314 CMR 3.00 (Surface Water Discharge Permit Program), 314 CMR 4.00 (Surface Water Quality Standards), 314 CMR 9.00 (Water Quality Certification).	The project would comply with the storm water performance standards of the Massachusetts Wetland Regulations with the construction of an engineered drainage system. The project would not result in the exceedance of any surface water quality standard. A Water Quality Certification will be obtained from the Department of Environmental Protection.
Massachusetts Office of CZM: M.G.L. c. 21A, § 4A and regulations at 310 CMR 20.00 – 26.00.	The project is consistent with the applicable program policies and management principles of the MassCZM program. See Section 7.3.1 for consistency analysis.
Areas of Critical Environmental Concern M.G.L. c. 21A, § 2(7) and regulations at 301 CMR 12.00.	The project is not located within a designated Area of Critical Environmental Concern – not applicable.
Massachusetts Contingency Plan (MCP): M.G.L. c. 21E and regulations at 310 CMR 40.000.	Construction specifications will be prepared to ensure that any oil and hazardous materials contamination encountered during construction is properly addressed in compliance with the MCP.
MEPA: M.G.L. c. 30, §§ 61-62H and regulations at 301 CMR 11.00.	This DEIR partially fulfills the statutory and regulatory requirements.
MWPA: M.G.L. c. 131, § 40 and regulations at 310 CMR 10.00.	The project would conform to the relevant performance standards of the MWPA Regulations. Mitigation for 4,960 SF of permanent and unavoidable wetland impacts will be implemented. A total of 6,450 square feet of replication will be implemented in two locations, one in the Town of Amesbury and one in the Town of Salisbury. See Section 6.10 in Chapter 6
Massachusetts Public Waterways Act: M.G.L. c. 91, §§ and regulations at 310 CMR 9.00.	The project conforms to the relevant regulatory performance standards of the Waterways Regulations. The construction of the new Merrimack River bridge crossing would maintain existing navigational clearances and would not adversely affect navigation in the river.
Executive Order 149: FEMA and Floodplain Use	There would be no reduction in flood storage capacity in existing floodplains resulting from the project. The project is consistent with the Executive Order.
EJ Policy of Massachusetts EOEA, October 9, 2002	No EJ communities as defined in the Executive Office of Energy and Environmental Affairs EJ Policy would be affected by the project – not applicable.
Massachusetts Greenhouse Gas Emissions Policy and Protocol	The Preferred Alternative would increase emissions of greenhouse gas in the project area, compared to existing conditions, primarily caused by the predicted increase in traffic levels. The difference between the Preferred Alternative and the No Build Alternative values was below the detection limit. As such, the project would not measurably increase greenhouse gas emissions in the region.