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DETERMINATION OF NATURAL RESOURCE VALUE

PROJECT: Proposed Change in Use of Land in the Town of Lexington for School Purposes
MUNICIPALITY: Lexington
EEA FILE NUMBER: A97_021_155
PROJECT PROPONENT: Town of Lexington
DATE: February 06, 2026

Pursuant to M.G.L. c. 3, § 5A, in order to use for another purpose or otherwise dispose of land or an interest in land subject to Article 97 of the Amendments to the Constitution of the Commonwealth of Massachusetts (“Article 97”), a public entity must, *inter alia*, “identify replacement land or an interest in land, which is not already subject to said Article XCVII, in a comparable location and *that is of equal or greater natural resource value, as determined by the secretary of energy and environmental affairs . . .*” (emphasis added). This document provides the required determination of natural resource value as to the above-referenced proposal (“Project”).

This determination constitutes solely a determination of natural resource value pursuant to M.G.L. c. 3, § 5A(a)(ii) and does not indicate that the Secretary of Energy and Environmental Affairs takes any position on the Project or on whether it complies with the Executive Office of Energy and Environmental Affairs (“EEA”) Article 97 Land Disposition Policy. This determination reflects the independent analysis of EEA for advisory purposes and does not create any right, benefit, or duty, substantive or procedural, enforceable at law or equity by any party in any judicial or administrative matter.

For the purposes of this determination, Natural Resource Value means the benefit that land provides to the public for Article 97 purposes, including but not limited to clean air and water, agriculture, climate change mitigation, wildlife habitat, and recreation.

Project Description:

The Project proposed by the Town of Lexington involves the construction of a new high school on land originally acquired for park and playground purposes. Lexington High School is currently situated within a larger campus that includes land characterized by the proponent as potentially subject to Art. 97 (“Impacted Land”). The Town proposes to construct a new high school on open space within the campus

that currently hosts a football field and baseball field, demolish the current school, construct a new football field, baseball field, and softball field on the current school site to provide comparable natural resource/recreational value, and place the site under Art. 97 to provide Replacement Land as required by the Open Space Act.

The Project is described in more detail in the Alternatives Analysis and Supplemental Materials which are posted on EEA's website¹.

Information Considered:

This determination is based on a review of the Alternatives Analysis, other materials submitted, and an independent analysis by EEA. This analysis included a site visit to view the Impacted Land and Replacement Land on November 13, 2025 and the use of GIS tools.

Characterization of Impacted Land:

The Natural Resource Value of the Impacted Land, which consists of an 8-acre area, can mostly aptly be described as active recreation and open space. The Impacted Land protects outdoor recreational facilities, athletic fields, a portion of the ACROSS Lexington trail network and some areas of natural landscape, including a small isolated wetland. The recreational amenities impacted by the proposed project include a football field, a baseball field, and other areas of open green space.

Characterization of Replacement Land:

The Replacement Land is an 8-acre area that is currently developed and is the site of the existing high school. The Project proposes to demolish the existing building and construct new recreational facilities and athletic fields in its place. The facilities lost on the Impacted Land, including the baseball field and football field, will be replaced on this site. Additional amenities will also be added to the Replacement Land including a softball field.

Determination:

The Replacement Land is of equal or greater Natural Resource Value as compared to the Impacted Land. The public's access to recreational facilities, which is a critical component of the site's Natural Resource Value, will be directly replicated on the Replacement Land. The Replacement Land is proposed directly adjacent to the Impacted Land and remains part of the larger high school campus. While the ACROSS Lexington Trail Network cuts through a portion of the Impacted Land, the project will not result in a loss of this trail. Though the project will impact an isolated wetland on the property, any necessary mitigation for this impact will be determined through the Wetlands Protection Act compliance process. Finally, the Replacement Land will result in newer recreational amenities and an increase of nearly 30% in the amount of land used for recreational facilities as compared to the Impacted Land.

¹ [https://www.mass.gov/info-details/article-97-an-act-preserving-open-space-in-the-commonwealth-mgl-c-3-ss-5a#:~:text=97\)%20establishes%20a%20right%20to,or%20easements%20subject%20to%20Art.](https://www.mass.gov/info-details/article-97-an-act-preserving-open-space-in-the-commonwealth-mgl-c-3-ss-5a#:~:text=97)%20establishes%20a%20right%20to,or%20easements%20subject%20to%20Art.)