

From: HANNAH GOFF SPICHER <hannahspicher@gmail.com>

Sent: Wednesday, February 7, 2018 4:46 PM

To: Strysky, Alexander (EEA)

Cc: comments@walkboston.com

Subject: 1-90 Allston, EEA, #15278

Same letter as Hannah Spicher 1

Dear Alex Strysky,

I write today as a concerned Boston resident who values beautiful and safe public spaces for walking, biking, and running. The edge of the historic Charles River, just north of Boston University, presents an opportunity to enhance one of the most unfriendly pieces of the Charles River in Boston. I visit this spot often and, along with Charles River Conservancy and Walk Boston, know this space could be transformed. Options to create safe, welcoming paths for walking and biking include either building a boardwalk or making a modest extension of the shoreline. HS2-1

When weighing in on Massachusetts' billion dollar plan to rebuild the Mass Pike through Allston, I ask that you will include a plan not just for cars, but for pedestrians also.

Sincerely,
Hannah Spicher

From: Hannah Spicher <hspicher@bostonpreservation.org>

Sent: Wednesday, February 7, 2018 4:51 PM

To: Strysky, Alexander (EEA)

Cc: comments@walkboston.com

Subject: 1-90 Allston, EEA, #15278

Dear Alex Strysky,

The edge of the historic Charles River, just north of Boston University, presents an opportunity to enhance one of the most unfriendly pieces of the Charles River in Boston. I visit this spot often and, together with my colleagues at the Boston Preservation Alliance, know this space could be transformed. Options to create safe, welcoming paths for walking and biking include either building a boardwalk or making a modest extension of the shoreline.

When weighing in on Massachusetts's billion dollar plan to rebuild the Mass Pike through Allston, I ask that you will include a plan not just for cars, but for pedestrians also. HS1-1

Sincerely,

Hannah Spicher

--

Hannah Spicher, Communications Manager
Boston Preservation Alliance

The Otis House
141 Cambridge Street
Boston, MA 02114
[617-367-2458](tel:617-367-2458)

From: [Irene Hartford](#)
To: [Stryisky, Alexander \(EEA\)](#)
Cc: [Cerbone, James \(DOT\)](#)
Subject: I-90 DEIR response
Date: Wednesday, February 07, 2018 4:31:11 PM

To Whom It May Concern,

I am writing to express my concerns about the amount of traffic that will most likely effect my neighborhood because of the I-90 reconfiguration project. I live at the corner of Putnam and Western Avenues, a location that already has an almost unsustainable amount of traffic. The residents in my neighborhood are subjected to non-stop traffic for a good 3-4 hours during the evening rush hour commute and there is no end to the honking of cars and people trying to run the red lights which then in turn leads to a clogged intersection. This neighborhood has also seen its fair share of construction over the last decade and has been unduly burdened by this.

IH-1

I am also absolutely not in agreement with any delay of the building of the West Station. The state in general is woefully behind the times as far as public transportation goes. We the public have been basically duped for years when it comes to public transportation initiatives. First, we are told about the building of hard rail and then end up with bus routes. There is absolutely no reason to delay the building of the West Station until 2040. This is ludicrous and for most of the public this is interpreted as never being built at all. We need additional and better public transportation. Harvard University is an extremely wealthy institution that has basically bought up Allston along with owning half of Cambridge. They should be contributing a large amount of funding to help get the West Station built.

IH-2

Sincerely,

Irene Hartford
207 Putnam Avenue
Cambridge, MA 02139

From: [Jacob Mirsky](#)
To: [Strysky, Alexander \(EEA\)](#); projects@livablestreets.info
Subject: DEIR for Allston I-90
Date: Wednesday, February 07, 2018 10:00:28 AM

Dear Mr. Strysky,

I am writing to strongly endorse the Liveable Streets' vision for the I-90 Allston project. As a frequent commuter by bike on the esplanade and a general supporter of improved urban design that benefits all citizens and the environment, I think it is essential to prioritize public transit and environmental well-being in this design.

JMI-1

Specifically, I support the following key points:

- **Transit should be a priority.** We need West Station now, not in 22 years, as a construction mitigation measure and to ensure transit-oriented development.
- **Don't build the viaduct.** A surface option will save millions of dollars, be more practical, and maintain opportunities for multimodal connections to and from the river.
- **We need better accommodations for walking and biking along the Charles River.** Check out WalkBoston's proposal to #UnchokeTheThroat!
- **Design a network of safe, human-scaled streets** in the proposed new neighborhood.

JMI-2

JMI-3

JMI-4

JMI-5

Thank you in advance for your consideration.

Best,
Jacob Mirsky MD MA
Brookline, MA

From: [jeremiah schuur](#)
To: [Strycky, Alexander \(EEA\)](#)
Subject: Comments on Allston I-90 Interchange project
Date: Wednesday, February 07, 2018 1:53:36 PM

Hello - I am a resident of Cambridge and have several comments on the important Allston I-90 Interchange project.

1. Transit should be a priority. We need West Station now, not in 22 years, as a construction mitigation measure and to ensure transit-oriented development. As the region grows and with challenges of global warming it is critically important that multi-modal mass transit be a top priority. JSC-1
2. Don't build the viaduct. A surface option will save millions of dollars, be more practical, and maintain opportunities for multimodal connections to and from the river. JSC-2
3. We need better accommodations for walking and biking along the Charles River. Check out WalkBoston's proposal to #UnchokeTheThroat! JSC-3
4. Design a network of safe, human-scaled streets in the proposed new neighborhood. JSC-4

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Jay

Jeremiah Schuur, MD
300 Walden St
Cambridge, MA
Mobile 401-480-7468
<https://twitter.com/JSchuurMD>
<http://www.bloomberg.com/graphics/carbon-clock/>

From: Jeff <jeff3140@gmail.com>
Sent: Wednesday, February 7, 2018 7:39 PM
To: Strysky, Alexander (EEA)
Subject: EEA 15278 Allston I-90

Secretary Matthew Beaton,
Executive Office of Energy and Environmental Affairs, Attn: MEPA Office
Alexander Strysky, EEA#15278
[100 Cambridge St., #900, Boston MA 02114](mailto:alexander.strysky@state.ma.us)
alexander.strysky@state.ma.us

Dear Secretary Beaton,

The reconstruction of the Mass Pike in Allston will define our region for decades to come. There must be major transformations of Massachusetts' transportation system to make it far more climate-friendly, socially equitable, and suited to the 21st century economy, and Allston must show a bold commitment to these changes. Unfortunately, the project as currently proposed in the Draft Environmental Impact Report (DEIR) fails to do so. I therefore ask that you require MassDOT to submit a Supplemental DEIR to address these deficiencies and study the items described below.

Under the Global Warming Solutions Act, Massachusetts must cut its greenhouse gas emissions by 25% below 1990 emissions levels by 2020 and at least an 80% reduction by 2050. I appreciate that in 2017 you and MassDOT Secretary Pollack held a series of listening sessions to discuss reducing greenhouse gas emissions from the transportation sector. While the Allston DEIR is an improvement over the existing dreadful conditions, it recreates an outdated 20th-century car-centered transportation system incompatible with such a reduction in emissions. JO-1

The DEIR is also inconsistent with the City of Boston's Imagine Boston 2030 and Go Boston 2030 plans and the Boston Planning and Redevelopment Agency's I-90 Allston Placemaking Study. While it is commendable that the MBTA is in the process of launching a Commuter Rail Vision Study, it is unacceptable that MassDOT's Allston DEIR perpetuates out-dating thinking (using valuable acres of urban land for rail layup) while it should instead support better mid-day service, construction of West Station in the first phase, and steps to move forward with passenger service on the Grand Junction. JO-2
JO-3 -5

What the Allston I-90 must do is create a 21st-century network of transit by bus, rail, and bike that also dramatically improves active transportation in the Charles River Parklands. I ask that you require MassDOT to submit a Supplemental DEIR to address these issues:

- 1.
2. Build
3. West Station with two-track service in the first phase of the project JO-6
- 4.

- 5.
6. Rebuild
7. the highway at-grade in the "throat" using the A Better City (ABC) concept JO-7
- 8.
- 9.
10. Reduce
11. the number of lanes in streets throughout the proposed urban grid to create a safer environment more conducive to walking and biking. JO-8
- 12.
- 13.
14. Study
15. how separate paths for biking and walking can be provided in the entire section of Charles River Parkland from the River Street Bridge to the BU Bridge, including the "throat", for all viaduct and at-grade options. This study should include consideration of JO-9
16. a boardwalk (both temporarily during construction and as a permanent structure) and the use of fill, and how to mitigate impacts on the river by restoring today's degraded bank into a "living shoreline" of native vegetation. Consider how this can be done both JO-10
17. as part of the I-90 project or in a subsequent project.
- 18.
- 19.
20. Construct
21. new footbridges near Agganis Way and Amory Street that cross over the highway and link Commonwealth Ave in Boston and Brookline to the Charles River parkland to further encourage commutes by bike. JO-11
- 22.
- 23.
24. Introduce
25. new North-South bus routes that cross over the highway and connect North Allston and Commonwealth Ave, and by extension Harvard Square and Longwood. JO-12
- 26.
- 27.
28. Fully
29. evaluate the possibility of shifting the rail lines away from the abutting homes and creating an at-grade, off-road walk/bike path from the Regina Pizzeria end of Harvard Ave to West Station and over the at-grade highway to the Charles River. A simple barrier JO-13
30. wall is insufficient mitigation for the Environmental Justice community that is so heavily burdened by the air pollution, noise pollution, and vibration impacts of the highway and rail. JO-14
- 31.
- 32.
33. Study

34. how to upgrade the Grand Junction railroad linking West Station, Kendall Sq. and North Station, and enhance the Grand Junction Bridge to become a walk/bike connection between the Charles River parkland in Cambridge and Boston. JO-15
- 35.
- 36.
37. Evaluate
38. increasing off-peak commuter rail service between Worcester and Boston—obviating the need to build a layover area to store idle trains in Allston. JO-16
- 39.

Sincerely,

Jeffrey Orlin
105 Nonantum St
Newton, MA 02458
jeff3140@gmail.com,
617-964-6872

From: [Jesse Boudart](#)
To: [Strysky, Alexander \(EEA\)](#)
Cc: projects@livablestreets.info
Subject: Draft EIR Comments for Allston I-90
Date: Wednesday, February 07, 2018 9:00:26 AM

Hello,

I'm commenting on the draft EIR for the Allston I-90 Interchange project.

First, don't build the viaduct. Save money and maintain connections to the river.

JEB-1

But, if you have to build a viaduct, construct **undercrossings** to improve access for non-motorized transportation with constructing underpasses. Walking and biking are strenuous enough. Since "Typical" built here in Mass. have been poor, it'll only create another barrier to get to the other side.

JEB-2

Next, Transit should be a priority. Construct that west station immediately.

JEB-3

Lastly, do something to improve walking and biking along the Charles. The river is our greatest un-used amenity. We should build something that will utilize it!

JEB-4

Thank you,
Jesse

108 Elm St, #2
Cambridge, MA 02139

From: [J G Mc Laren](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: EEA 15278 Allston I-90
Date: Wednesday, February 07, 2018 2:48:16 PM

I support the All At-Grade variation as the Preferred Alternative for the reconstruction of the Mass Pike in Allston. JGM-1

--

J. G. Mc Laren

From: John Hawes <jbhawes@gmail.com>
Sent: Wednesday, February 7, 2018 5:56 PM
To: Strysky, Alexander (EEA)
Subject: EEA # 15278

EEA # 15278

JHAW-1

Placing the pedestrian and/or bike pathways over the river on the BU side of the Charles seems like an excellent idea and I imagine could be easily paid for by the large overall Allston interchange project.

John Hawes
Watertown

From: jon.puz@gmail.com <jon.puz@gmail.com> on behalf of Jon Puz <jpuz@mba2008.hbs.edu>
Sent: Wednesday, February 7, 2018 5:30 PM
To: Strysky, Alexander (EEA)
Subject: Preferred Alternative for the reconstruction of the Mass Pike in Allston

Secretary Matthew Beaton,
Executive Office of Energy and Environmental Affairs, Attn: MEPA Office
Alexander Strysky, EEA#15278
[100 Cambridge St., #900, Boston MA 02114](https://www.state.ma.us/100-Cambridge-St.-#900-Boston-MA-02114)
alexander.strysky@state.ma.us

Dear Secretary Beaton,

The reconstruction of the Mass Pike in Allston will define our region for decades to come. There must be major transformations of Massachusetts' transportation system to make it far more climate-friendly, socially equitable, and suited to the 21st century economy, and Allston must show a bold commitment to these changes. Unfortunately, the project as currently proposed in the Draft Environmental Impact Report (DEIR) fails to do so. I therefore ask that you require MassDOT to submit a Supplemental DEIR to address these deficiencies and study the items described below.

What the Allston I-90 must do is create a 21st-century network of transit by bus, rail, and bike that also dramatically improves active transportation in the Charles River Parklands. I ask that you require MassDOT to submit a Supplemental DEIR to address these issues:

- 1.
2. Build
3. West Station with two-track service in the first phase of the project JPUZ2-1
- 4.
- 5.
6. Rebuild
7. the highway at-grade in the "throat" using the A Better City (ABC) concept JPUZ2-2
- 8.
- 9.
10. Reduce
11. the number of lanes in streets throughout the proposed urban grid to create a safer environment more conducive to walking and biking. JPUZ2-3
- 12.
- 13.
14. Study
15. how separate paths for biking and walking can be provided in the entire section of Charles River Parkland from the River Street Bridge to the BU Bridge, including JPUZ2-4

- the "throat", for all viaduct and at-grade options. This study should include consideration of JPUZ2-5
16. a boardwalk (both temporarily during construction and as a permanent structure) and the use of fill, and how to mitigate impacts on the river by restoring today's degraded bank into a "living shoreline" of native vegetation. Consider how this can be done both JPUZ2-6
17. as part of the I-90 project or in a subsequent project.
- 18.
- 19.
20. Construct
21. new footbridges near Agganis Way and Amory Street that cross over the highway and link Commonwealth Ave in Boston and Brookline to the Charles River parkland to further encourage commutes by bike. JPUZ2-7
- 22.
- 23.
24. Introduce
25. new North-South bus routes that cross over the highway and connect North Allston and Commonwealth Ave, and by extension Harvard Square and Longwood. JPUZ2-8
- 26.
- 27.
28. Study
29. how to upgrade the Grand Junction railroad linking West Station, Kendall Sq. and North Station, and enhance the Grand Junction Bridge to become a walk/bike connection between the Charles River parkland in Cambridge and Boston. JPUZ2-9
- 30.
- 31.
32. Evaluate
33. increasing off-peak commuter rail service between Worcester and Boston—obviating the need to build a layover area to store idle trains in Allston. JPUZ2-10
- 34.

Sincerely,

Jon Puz

22H Fairmont Avenue

Cambridge MA 02139

From: Jonathan Bockian <jbockian@bockianlaw.com>
Sent: Wednesday, February 7, 2018 4:26 PM
To: Strysky, Alexander (EEA)
Subject: EEA # 15278

Dear Mr. Strysky,

Regarding the I-90 interchange project, please consider the following:

Public transit: this project should include public transit facilities as a very high priority. Improving the road corridor, while necessary, will only increase the number of vehicle trips on this corridor. Thoughtful public transit facilities and operations can mitigate this impact. Therefore, not only should the West Station be a necessary part of the project, but auxiliary public transit connections to the West Station, such as bus and shuttle routes, should be part of the project too. JBO-1

Paul Dudley White Path: Similarly, the project should improve the walking and cycling options along the Charles Rivers as mitigation. The existing path for pedestrians and cyclists along this stretch of the river is woefully inadequate and actually discourage walking and biking. Substantial improvements must be made. JBO-2

Thank you for your consideration.

Jonathan Bockian
Watertown, MA 02472

From: Lauren Mattison <lauren269@yahoo.com>
Sent: Wednesday, February 7, 2018 9:21 PM
To: Strysky, Alexander (EEA)
Subject: Comments on Mass Pike reconstruction project

Dear Secretary Beaton,

The reconstruction of the Mass Pike in Allston is a valuable opportunity to expand public transit in an area that is already highly congested and growing rapidly, increase safety for those traveling by bicycle and foot, and improve the Allston/Brighton neighborhood and our access to the Charles River, while helping to meet the Commonwealth's greenhouse gas emission reduction commitments.

Unfortunately, the project as currently proposed in the Draft Environmental Impact Report (DEIR) fails to take advantage of these opportunities. I therefore ask that you require MassDOT to submit a Supplemental DEIR to address these issues:

- Build West Station with two-track service in the first phase of the project LMATT-1
- Rebuild the highway at-grade in the "throat" using the A Better City concept LMATT-2
- Reduce the number of lanes in streets throughout the proposed urban grid to create a safer environment more conducive to walking and biking. LMATT-3
- Study how separate paths for biking and walking can be provided in the entire section of Charles River Parkland from the River Street Bridge to the BU Bridge, including the "throat", for all viaduct and at-grade options. This study should include consideration of a boardwalk (both temporarily during construction and as a permanent structure) and the use of fill, and how to mitigate impacts on the river by restoring today's degraded bank into a "living shoreline" of native vegetation. Consider how this can be done both as part of the I-90 project or in a subsequent project. LMATT-4 LMATT-5
- Construct new footbridges near Agganis Way and Amory Street that cross over the highway and link Commonwealth Ave in Boston and Brookline to the Charles River parkland to further encourage commutes by bike. LMATT-6
- Introduce new North-South bus routes that cross over the highway and connect North Allston and Commonwealth Ave, and by extension Harvard Square and Longwood. LMATT-7
- Fully evaluate the possibility of shifting the rail lines away from the abutting homes and creating an at-grade, off-road walk/bike path from the Regina Pizzeria end of Harvard Ave to West Station and over the at-grade highway to the Charles River. A simple barrier wall is insufficient mitigation for the Environmental Justice community that is so heavily burdened by the air pollution, noise pollution, and vibration impacts of the highway and rail. LMATT-8 LMATT-9
- Study how to upgrade the Grand Junction railroad linking West Station, Kendall Square and North Station, and enhance the Grand Junction Bridge to become a walk/bike connection between the Charles River parkland in Cambridge and Boston. LMATT-10
- Evaluate increasing off-peak commuter rail service between Worcester and Boston, obviating the need to build a layover area to store idle trains in Allston. LMATT-11

Thank you for this opportunity to provide feedback.

Sincerely,
Lauren Mattison
2430 Beacon Street #104, Brighton 02467



NIXON PEABODY LLP
ATTORNEYS AT LAW

NIXONPEABODY.COM
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Lawrence S. DiCara
Partner
T 617-345-1210
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100 Summer Street
Boston, MA 02110-2131
617-345-1000

February 7, 2018

Matthew Beaton, Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs
Attn: Alex Strysky, MEPA Office
100 Cambridge Street
Boston, MA 02114

Alexander.Strysky@state.ma.us

Re: I-90 Allston Interchange Project, Boston, MA
Draft Environmental Impact Report ("DEIR"), EEA No. 15278

Dear Mr. Secretary,

I am pleased to submit the following comments on the above referenced project. I fully support the selection of the All At-Grade variation as the Preferred Alternative for the Allston I-90 Interchange project, and that it be used as the base for further development of the design. We appreciate that this base could be amended and enhanced to more broadly address additional goals of various stakeholders, and we urge MEPA to require that MassDOT explore opportunities to collaboratively further design the All At-Grade and select it as the Preferred Alternative in the Final Environmental Impact Report. LD-1

I believe that the All At-Grade variation is by far the best solution because it:

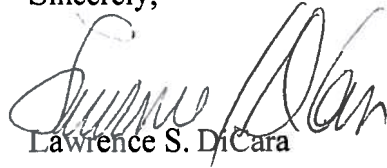
1. Is the lowest-cost option.
2. Minimizes construction disruption and schedule risk.
3. Best enhances pedestrian/bicycle connectivity and safety.
4. Supports complementary river's edge modifications requested by stakeholders.
5. Allows for development and place-making opportunities above the highway.

The reconstruction of the Massachusetts Turnpike interchange in Allston has the potential to be one of the most dynamic, transformational opportunities we have had in decades for Allston and Cambridge, for Boston and Harvard Universities, and for Greater Boston as a whole—but success turns on getting MassDOT to fairly and objectively evaluate the All At-Grade variation for the followings reasons.

Matthew Beaton, Secretary of Energy and Environmental Affairs
February 7, 2018
Page Two

This is a once in a multi-generational opportunity to rebuild our city and prepare for a robust future.

Sincerely,

A handwritten signature in black ink, appearing to read "Lawrence S. DiCara", written over a faint, larger signature that also appears to be "Lawrence S. DiCara".

Lawrence S. DiCara

From: [Lee Biernbaum](#)
To: [Stryisky, Alexander \(EEA\)](#)
Cc: [Cerbone, James \(DOT\)](#)
Subject: Comment Letter on I-90 Allston Project
Date: Wednesday, February 07, 2018 4:22:50 PM

Dear Secretary Beaton,

I join with many others writing to implore the Commonwealth to build a truly livable neighborhood in Allston, centered on a West Station built in the beginning of the project, with North/South bus/bike/pedestrian connections, and human-scaled streets.

LeeB-1
LeeB-2
LeeB-3

I have lived in Lower Allston, Brookline, and Cambridge and I have worked in Kendall Square, the Back Bay, and Newton, and can say from all angles of the project, ensuring high-quality transit connections to, from, and through the project area is essential to maintaining and improving the quality of life for Commonwealth Citizens across many Cities and Towns.

While I wholeheartedly endorse the statements from the Livable Street Alliance and People's Pike (human scaled streets, early West Station, and bus connections), I want to specifically address two additional points.

1. The Justification to Delay West Station is Flawed

There has been plenty of discussion about the model of uncertain quality *fed by incorrect and outdated inputs and assumptions.*

Beyond that, however, MassDOT appears to be trying to "have it both ways" with the model.

a) They claim that demand for the station, including all of the various regional connections it will provide (*not just for people with origins/destinations in Allston Landing*, but Harvard to Longwood, Kendall to MetroWest, etc.) is so great that West Station must be large enough to support many bus routes, bus layovers, rail-to-rail transfers, and significant passenger circulation. It is claimed that this large build-out, *necessitated by high demand, including for transfer passengers and for existing Allston neighborhoods*, drives the costs of West Station to multiple times its original estimate.

b) They also claim that demand is so low for West Station that there is no reason to build it until after Harvard has developed the area, seeming to ignore the very already dense community around the proposed station and the massive potential to introduce new connections in all directions.

Simply put, both of these things cannot be true. There is clearly a large need for the connectivity West Station will provide and there is no reason to delay that by decades until the last Harvard tower is built.

2. MassDOT must lay the Groundwork to Ensure West Station is the Connectivity Hub it needs to be without Encouraging More Traffic

The massive benefits of the Allston Landing neighborhood as well as West Station are dependent on being able to access them from all directions and being able to make connections there to attractive work, shopping, and living destinations in all directions. West Station bus connections, if properly planned for and executed, should drastically improve the ability of people to travel between Harvard Square, Kendall Square, Allston, Brookline, Longwood, the Back Bay, South Station, and Jamaica Plain, as well as many other points. Improved connectivity at West Station would improve my ability to visit family, to see friends, to shop in neighborhoods beyond my own, to spend more time with family (and less commuting), and make it possible to seek out employment in parts of town not currently viable to me.

This relies on:

- Making sure there are great north/south connections from West Station for buses as well as for bikes and pedestrians.
- Those connections *must not* be available to personally owned cars
- MassDOT and the MBTA planning what future service through this area will look like for Regional Rail, Grand Junction Service, new routes such as Harvard to Longwood, as well as impacts on existing service including the 57, 64, 66, 70, and 86. These service changes may be drastic (with the opportunity to

drastically improve mobility and connectivity in the region!) and the MBTA, MassDOT, and the community should have ample opportunity to plan for these changes.

Thank you for your time and care on this project. I look forward to many decades of living in an even better Metro Boston after this project.

Sincerely,
Lee Biernbaum
7 Verndale Street, Unit 3
Brookline, MA 02446

From: Collom, Liberty S <lcollom@bu.edu>
Sent: Wednesday, February 7, 2018 6:00 PM
To: Strysky, Alexander (EEA)
Cc: comments@walkboston.org
Subject: I-90 MASSPIKE Project comment

Dear Mr. Strysky,

I was compelled to comment on MassDOT's plan for reconstruction of I-90/ Mass Pike though Alston after listing to a story on WBUR's Radio Boston today. Listing to the story I was brought back to the first, and practically the last, time I tried to run along "the neck" section of the Charles River Bike Path. Several years ago I was training for a half marathon and needed to put in a lot of miles every week. As a Brookline resident and a BU employee running along the river was a great option for me.

I started by running along both sides of the river between the BU Bridge and the Museum of Science. When I got bored with that I decided to try going the other direction toward Alston/Harvard Square- it looked great on a map!

I only did it once. It was awful; I could not get through the section that is smack up against the highway fast enough (and when you are trying to pace yourself for a long run this is not a great idea). The noise was terrible, the exhaust from the cars made it very unpleasant to breathe and the path got very congested at times, especially if a bike needed to pass. I couldn't believe the contrast between this part of the path and the one just a few miles downriver. Despite taking this run more than 5 years ago, I still remember it like it was yesterday and find it so disappointing.

Today, if I ever have to get from BU to Harvard Sq on foot (which is normally how I go because the public transportation options are inconvenient and crowded), I will take the extra time to cross the river and walk along Memorial Drive rather than take the more convenient Boston side because the Boston side, the "throat", is so unpleasant.

A representative from walkBoston was interviewed as part of the WBUR program today. After reading walkBoston's positions on the project I found I couldn't agree with them more; in fact, I find them really exciting.

Just to reinforce why this is important to me, I have lived in Boston and Brookline for more than 20 years and in that time have never owned a car. I feel very privileged to have lived in cities where this is possible. I use my feet and the MBTA as my main modes of transportation – including taking the CommuterRail or buses to visit family on the Cape or northwest of the city. The facilities the city and state support for public transportation and walkers/bikers impact my everyday life in a profound way.

Please do what you can to amend the I-90/Mass Pike reconstruction plans to include the project priorities set forward by walkBoston (<http://walkboston.org/what-we-do/event/i-90mass-pike-action-alert#Position1>). LSC-1

There is so much potential here for reconnecting my area of the city with the river, an amazing natural resource, and for protecting our environment overall by making alternative modes of transportation more convenient, safer and more appealing.

Thank you for your time and consideration.

Sincerely,

Liberty S Collom

Home: 75 Longwood Ave. Brookline, MA 02446

Work: 881 Commonwealth Ave. Boston, MA

From: [Lisa Ravicz](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: Allston I-90 Interchange Improvement Project
Date: Wednesday, February 07, 2018 3:37:43 PM

Dear Secretary Beaton,

I urge you to include improvements to the Charles River walkway and bicycle path when the Allston I-90 Interchange is improved. These paths are not just for leisure and recreation. These paths form a bicycle commuting pathway. Encouraging safe bicycle riding improves quality of life and lowers the number of commuters commuting by car.

Sincerely,

Lisa Ravicz

40 Pemberton St.

Cambridge, MA 02140

LRAV-1

From: [Louis Gudema](#)
To: [Strycky, Alexander \(EEA\)](#)
Cc: comments@walkboston.org
Subject: I90/Mass Pike
Date: Wednesday, February 07, 2018 12:07:59 PM

Hi -

A decade after the completion of the Big Dig downtown traffic is as congested as before. It's clear that in the long run we need to encourage alternatives to cars.

I urge you to make great, safe bike and walking lanes a **priority** in the Allston Mass LG-1 Pike redesign. The number of bike commuters is growing in Boston and we need to do everything to make that growth possible. Bikes and pedestrians require far fewer resources than cars, so a long-term move in this direction makes tremendous economic, environmental, health and transportation sense.

Thank you,

Louis Gudema
Newton, MA

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P: 617-331-1630

From: Lydia Bunker <lydia.bunker@gmail.com>

Sent: Wednesday, February 7, 2018 7:05 PM

To: Strysky, Alexander (EEA)

Cc: comments@walkboston.org

Subject: #UnChokeTheThroat

To Whom It May Concern,

I have proudly lived in Massachusetts my entire life, and part of why I love it so much is its walkability. Green spaces are dwindling throughout the city, particularly on the waterfront, and I believe it is so important to protect these remaining spaces. We are not New York, full of ugly high-rises and cold sky scrapers. However, if we do not deliberately pay attention to the pedestrian parts of our city, contractors will almost certainly build on every square inch they can buy.

I lived in Cambridge for college, and took many runs along the Charles, and particularly along "The Throat". I didn't know that was its nickname, but it's certainly appropriate. I frequently felt unsafe when bicycles zoomed by me as I walked just feet away from speeding cars.

For both these reasons, the Mass Pike project should absolutely include a new design for expanded pedestrian walkways. A boardwalk in particular would minimally disrupt the river's natural course. Additionally, as rising sea levels become a reality for Boston over the coming century, a boardwalk is more easily modified/elevated. LB-1

Sincerely,
Lydia Bunker
Boston Resident

February 7, 2018

Mr. Matthew Beaton
Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs
Attn: Alex Strycky, MEPA Office
EEA No. 15278
1200 Cambridge Street, 9th Floor
Boston, MA 02114

Re: I-90 Allston Interchange Draft Environmental Impact Report

Dear Secretary Beaton:



Thank you for the opportunity to comment on the critical I-90 Allston interchange project. The Massachusetts Institute of Technology (MIT) has almost 22,000 students and staff on its Cambridge campus. Working with our partners in the City of Cambridge, the MIT community reduced its single-occupancy vehicle rate from 26% in 2006 to 18% in 2016 (when the last commuter survey was done). MIT transit ridership rates have increased from 37% to 41% and biking and walking has increased from 26% to 31% over the same ten-year period. The Institute launched its Access MIT program in 2016 including a 100% subsidy of MBTA passes for all staff, 60% commuter rail subsidy and 50% reimbursement for parking at MBTA stations. MIT is committed to encouraging its community to move towards alternative commuting modes including transit, walking and biking.

In addition, MIT is a major investor in Cambridge through its Kendall Square Initiative that will bring 1.7 million square feet of commercial office, laboratory and retail space, 290 units of community housing and 450 units of graduate student housing to the heart of Kendall. MIT will also redevelop the 14-acre Volpe site, also in Kendall Square, with an additional 1.7 million square feet of mixed-use commercial space and approximately 1,400 units of community housing. The planning for the transportation needs associated with this investment relies on continuing improvement to regional transportation modes.

We provide this background because we believe that the Commonwealth has the same kind of opportunity in Allston. What began as a necessary highway repair for the deteriorating I-90 viaduct can take the first steps in delivering the essential transportation infrastructure to allow the regional economy to grow. Unfortunately, the preferred alternative with its limited near term scope and sequencing loses a key opportunity to improve the metropolitan transportation system.

West Station

The strength of West Station is its role in connecting across the innovation arc in the metropolitan region. It can immediately facilitate north-south bus routes, connecting Kendall Square and MIT to Allston, Harvard and Boston University to the north and Longwood Medical Area (LMA) to the south. West Station can intercept commuter rail passengers that currently go to South Station only to ride the Red Line back out to Kendall Square, wasting time and taking up space on over-crowded subway trains.

West Station is key to using the Grand Junction rail line as an urban rail connection that can take commuters off regional highways and reduce congestion on local roads. The Grand Junction can accommodate urban rail and a bicycle and pedestrian path that is being designed for construction in Cambridge. West Station is the nearest location to Kendall Square for a switch from bus or commuter rail to the urban rail and community path that can serve commuters going to Kendall Square and MIT, all the way to North Station and Mass General Hospital. Losing this critical piece of regional transportation until 2040 increases the chance of gridlock on regional roads and jeopardizes economic growth. MIT-1

Throat-Area Alternatives

Grand Junction Bridge over Soldiers Field Road - The at-grade and Grand Junction viaduct alternatives require the replacement of the existing single-track Grand Junction Bridge over Soldiers Field Road, whereas the highway viaduct avoids this improvement. This 90 year-old bridge is at the end of its useful life. This replacement is an opportunity to support an urban rail connection at Kendall Square and should have a two-track profile, with an adjacent community path. MIT-2 In addition, the new bridge over Soldiers Field Road provides the opportunity to connect to a difficult portion of the Paul Dudley White Path.

Bicycle and Pedestrian Connections to West Station - The Grand Junction viaduct alternative provides an opportunity to carry the Grand Junction bicycle and pedestrian path directly to West Station. The at-grade solution provides an opportunity for a similar bicycle-pedestrian connection toward Boston University and West Station.

It would be disappointing to see the Commonwealth move forward with the narrowest scope highway project and forgo these improvements to regional transportation and its benefits to our citizens and economy.

Thank you again for the opportunity to provide comments on the important project.

With Regards,



Israel Ruiz
Executive Vice President & Treasurer

cc: Secretary Stephanie Pollack
Mayor Martin Walsh, Boston
Mayor Marc McGovern, Cambridge
City Manager Louis DePasquale, Cambridge
State Senator Sal DiDomenico, Middlesex and Suffolk District
State Senator Joe Boncore, First Suffolk and Middlesex District
State Representative Jay Livingstone, 8th Suffolk District
State Representative Michael Connolly, 26th Middlesex District

From: [Nina Cohen](#)
To: [Strysky, Alexander \(EEA\)](#)
Cc: comments@walkboston.org
Subject: I-90/Mass Pike Transportation Plan
Date: Wednesday, February 07, 2018 1:11:19 PM

Why the MassPike Development Plan Fails Taxpayers AND Transit Users

Dear Alexander Strysky,

The proposed I-90 MassPike project is a significant mistake, a bad use of taxpayer dollars. The development of new transit facilities including the new West Station **must** precede reconstruction of the highway, whether at ground level or as a viaduct.

NVC-1

MassDOT should meet its duty to plan and construct all modes of transportation to serve peoples' different needs.

NVC-2

An urban highway project that proposes to spend \$1 trillion dollars without closely-related transit, walking and biking improvements should not be built. Transit projects should be planned and built first, before highway development, to preserve uninterrupted access for people who have limited use of cars. Living in suburban Essex County with intermittent use of a vehicle, I rely on both highways and transit to get to Allston and Cambridge, to access medical resources, to shop and to visit. Robust transit planning for community members, workers and visitors will have several results:

- 1) Commuting patterns that now exist and that will be developed will ensure the economic viability of the surrounding community,
- 2) Good transit ensures the success of the eventual development that will emerge from the redevelopment of the railyard acreage,
- 3) Ground level transportation strengthens and improves connections between the community and the river. Opportunities for air rights development could emerge from .

Essential commuting paths along the Charles must be strengthened and widened, using innovative designs like the Sasaki plan for selective filling of the Charles, which makes the riverbank more resilient while creating greater access to foot and bike traffic along the "throat" section of the proposed highway. Proposed plans like these are a creative solution, restoring ground-level walking and biking access between the Charles River and the Allston/Cambridge community.

NVC-3

Taking parkland along the river to build new highways must be mitigated by MassDOT providing adequate and attractive replacements. A highway situated in and adjacent to a historic park like the Charles River park should contribute to the park's improvement, instead of degrading pathways. One method of improving the park would be to **increase connections between local streets and river paths.**

NVC-4

NVC-5

I strongly urge MassDOT to take transit into consideration before committing to reconstructing a highway in a way that maximizes its negative impact on the Charles River Basin, its pathways and transportation access.

Yours,

Nina V. Cohen
22 Chestnut Street
Salem, MA 01970
978-744-0117

From: [Ruthann Rudel](#)
To: [Strycky, Alexander \(EEA\)](#)
Cc: projects@livablestreets.info; [Hecht, Jonathan \(HOU\)](#)
Subject: Comments on Allston I-90 Interchange project Draft Environmental Impact Review (DEIR)
Date: Wednesday, February 07, 2018 11:04:50 AM

To: Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs, Attn: MEPA Office
Alexander Strycky, EEA #15278
100 Cambridge St., #900, Boston MA 02114

Dear Secretary Beaton

I have been driving off the I90 allston interchange for over 30 years and, as you must know - it is a nightmare. That's one reason you're doing this big project, I suppose.

I think you also know that the real driver of economic growth in cities NOW is safe walkable bikeable transit-oriented human-scale development. And so I'm really surprised that the plans for this project aren't consistent with what we know about best design for real economic growth now.

If the project is to support Massachusetts' continued growth as a technology hub, it must include West Station as soon as possible (not in 20 years). Transit connections should be a priority. **I spoke with the director of the Kendall Square Association just last week and she told me that transportation - especially transit - is a top priority with Kendall Square businesses, whose employees struggle to get to work in overcrowded transit that is delayed because of the tremendous congestion of too many vehicles clogging our streets.** Delaying West Station until 2040 - MassDOT's proposed construction timeline - will increase congestion, depress economic growth, and limit mobility for all. West Station must be built as soon as possible to improve mobility, mitigate commuter traffic during construction, and ensure transit-oriented development. Construction for this project will disrupt traffic traveling along the MassPike, Soldiers Field Road, and Cambridge Street for at least five years. By not providing transit options, decision-makers are electing for longer commutes, more pollution, and less economic opportunity for employees, residents, and students. West Station is just as important for crosstown connections. A north-south bus corridor at West Station is crucial for making long-desired transit connections to job sectors located in Cambridge, BU, and the Longwood Area.

RRU-1

Again, to build something that is going to contribute to 21st century economic growth, the area has to be rebuilt on a human scale, with safe and pleasant streets for walking and biking, including connections to the Charles River and better bike and pedestrian infrastructure along the Charles. Current streets in the plan are too wide for a safe and pleasant walkable and bikeable city. I also encourage you to allow for the creation of the proposed People's Pike pedestrian and bicycle path between Franklin Street and the Charles River by flipping the rail lay-up yard, as Harvard has proposed. In addition, the Franklin Street footbridge is an essential connection over I-90 for the residents of Allston who are walking and biking and should be built in the first phase.

RRU-2

RRU-3

RRU-4

The DEIR does not fully explore alternatives for improving the Dr. Paul Dudley White walking and biking path near the BU Bridge. There are opportunities to shift the trail away from Soldiers Field Road, onto the river's edge or along an adjacent boardwalk.

RRU-5

This valuable real estate is just steps from Harvard Square and the business school, and close to Kendall Square. Yet it is a wasteland of highway noise and no-one wants to be there. **Human-scale development of this area will support new economic activity. More big roads with lots of cars will not.**

The viaduct is not needed, and there are surface options that will be more practical and maintain opportunities for multimodal connections. Not building the viaduct will save time and tens of millions of dollars in construction costs, which can be better spent to provide new transit, bike, and walking connections. A surface option will also make air rights developments possible at a future date.

Finally, an essential component of a multi-modal transit center at the 190 interchange is increased parking capacity. People driving into the region need a place to leave their car and transition to other modes of transport. A large subsurface parking facility will enable the mode shift that is needed to unclog our city streets.

RRU-6

Thank you for considering my comments,
Ruthann Rudel
205 Rindge Ave
Cambridge, MA 02140

From: [Sanford Goldfless](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: my comment on Allston I-90 DEIR
Date: Wednesday, February 07, 2018 12:33:43 PM

Dear Mr. Strysky,

While I know how challenging the financing is, there is more to the "West Station" plan than construction. To me "West Station" represents a transport vision for Boston. Silence on this point is what hurts in the recent DOT postponement.

Why can't work on a transport masterplan -- or masterplan alternatives -- continue to be funded even though actual construction needs to be delayed?

SG-1

Sanford Goldfless
192 Fuller St
Brookline, MA 02446

From: [Sarah Fields](#)
To: [Strysky, Alexander \(EEA\)](#)
Cc: projects@livablestreets.info
Subject: Draft Environmental Impact Review public comments
Date: Wednesday, February 07, 2018 11:55:08 AM

Dear Alexander Strysky,

I'm writing to comment on the Draft Environmental Impact Review (DEIR). I am a resident of Somerville, MA who takes public transit to work in Burlington, MA. I am extremely grateful that I do not need to drive every morning to get to work. I strongly support the following initiatives.

Build West Station now because we need #TransitNotTraffic

SFI-1

- Boston and the region are growing at an unprecedented rate. Delaying West Station until 2040 - MassDOT's proposed construction timeline - will increase congestion, depress economic growth, and limit mobility for all. **West Station must be built as soon as possible to improve mobility, mitigate commuter traffic during construction, and ensure transit-oriented development.**
- Construction for this project will disrupt traffic traveling along the MassPike, Soldiers Field Road, and Cambridge Street for at least five years. By not providing transit options, decision-makers are electing for longer commutes, more pollution, and less economic opportunity for employees, residents, and students.
- West Station is just as important for crosstown connections. A north-south bus corridor at West Station is crucial for making long-desired transit connections to job sectors located in Cambridge, BU, and the **Longwood Area**.

Don't build the viaduct

SFI-2

- Advocates have offered surface options that will be more practical and maintain opportunities for multimodal connections.
- Not building the viaduct will save time and tens of millions of dollars in construction costs, which can be better spent to provide new transit, bike, and walking connections.
- A surface option will also make air rights developments possible at a future date.

Improve parkland and trail amenities in the Throat

SFI-3

- The DEIR does not fully explore alternatives for improving the Dr. Paul Dudley White walking and biking path near the BU Bridge.
- There are opportunities to shift the trail away from Soldiers Field Road, onto the river's edge or along an adjacent boardwalk.
- Support WalkBoston and the Charles River Conservancy's **#UnchokeTheThroat** campaign, and check out their video **here** to learn more.

Create a network of safe, multimodal, and human-scaled streets in the

SFI-4

proposed neighborhood

- Improve neighborhood connectivity for walking, biking, and transit between North and South Allston. Current plans for the proposed street grid are too wide and pose safety challenges for people walking and biking.
- Allow for the creation of the proposed People's Pike pedestrian and bicycle path between Franklin Street and the Charles River by flipping the rail lay-up yard, as Harvard has proposed.
- The Franklin Street footbridge is an essential connection over I-90 for the residents of Allston who are walking and biking and should be built in the first phase.

Thank you very much,

Best regards,

Sarah Fields
4015240254

29 Quincy St., Apt 1
Somerville, MA
02143

Stephen H. Kaiser
191 Hamilton St.
Cambridge Mass. 02139

To : Secretary Matthew Beaton, Executive Office of Energy & Environmental Affairs
Attention : Alex Strysky, MEPA Unit

From : Stephen H. Kaiser

Comment #3 : Draft EIR for I-90 (EEA #15278) : Traffic, Highway Design and AASHTO Standards

This is the third in a sequence of four comments on the Draft EIR for the Turnpike (I-90) Interchange reconstruction in Boston. The focus will be on highway-specific aspects of design and impact, and not on transit or traffic modeling. As I noted in earlier comments, the Highway Administration within MassDOT has undertaken responsibility for the design, EIR submissions, and replacement of the deteriorating structures for the Turnpike interchange and the viaduct. Highway-related issues are a highway agency's responsibility and MassDOT highway is the authorized entity to make such improvements.

The highway engineers can take credit for devising an interchange system that is primarily at-grade and uses signalized intersections rather than elevated highway ramps to distribute traffic. They have designed a way to reduce severe congestion on the Boston side of the River Street Bridge and permit additional exclusive WALK time for the Paul Dudley White path. Internal service roads within Harvard property may reduce the traffic using access roads along Soldiers Field Road, with a reduction in the pavement along the riverfront between River Street and Western Avenue. The option for a boardwalk over the river will allow for a wide path that is not tight against highway guardrails.

Four major issues related to highway design remain to be resolved.

- * How many travel lanes are needed on the Turnpike – six or eight ? SK3-1
- * What credibility can be ascribed to so-called AASHTO “Standards” and the DEIR recommendation to widen the viaduct section through the throat area? SK3-2

* Do the *Highway Capacity Manual* and its related Synchro Computer program SK3-3 accurately estimate how traffic circulates and congests?

* Are pedestrians properly accommodated at numerous intersections SK3-4 in the study area?

GOALS of the TURNPIKE to INCREASE CAPACITY and AID GROWTH

Chapter 2 elaborates on the purpose of the interchange project. Reconstruction is the key priority. As a multimodal report, the EIR properly focuses on the following :

- * "Without centralized options for accessing regional and local transit, the Allston/Lower Allston neighborhood will not be able to fully support the adoption or growth of multi-modal or non-vehicular transportation." p. 2-1
- * "As this newly vacated area develops, public transportation demand will continue to rise to support new residents, businesses, university facilities and other neighborhood amenities." p. 2-1
- * "MassDOT is developing the Project in a manner to further the following general goals : topromote the healthy transportation options of walking, bicycling and public transit, and support Smart Growth development." p. 2-1
- * "Rail operations: Ability to support MBTA commuter rail operations now and in the future." p. 2-2

These admirable goals may conflict with more traditional highway goals of increasing capacity to meet societal goals of increased growth, mobility and capacity :

- * "... "infrastructure to support active transportation modes and economic development within the Project Area" p. 2-4
- * "Capacity: Ability of existing facility to meet present and projected demands" and "Social demands or economic development benefits: Relationship to land use

plans, recreation facilities, and economic development/land use changes that indicate the need to improve or add to the highway capacity." p.2-2

These latter mid-20th century goals do not reflect what we have come to understand to be the role of the highway in the city, especially when multiple highway bottlenecks restricting capacity are taken into account. These inaccurate perspectives also assume that Allston capacity can be increased when the turnpike is capacity-limited on both sides by the Prudential Tunnel and Newton Center. These bottlenecks are the controlling factors : MassDOT could build twenty Turnpike lanes in Allston and it would make no difference to usable capacity. SK3-5

The DEIR does not review these bottlenecks and does not assess the traffic data that indicates that already the bottlenecks are restricting flow to less than half the capacity potential of an eight-lane highway. Detailed data available from state traffic counters (see Attachment A) indicates that existing peak hour traffic speeds are reduced to 12-20 mph in the peak hour during weekdays, and traffic volumes are reduced by 5 to 20 percent. Turnpike flows in the peak and off-peak sampled for 28 days show an average daily maximum of 5,616 vehicles per hour can be served by three lanes with a capacity of 7,200 vph according to the *Highway Capacity Manual*. Based on the bottleneck constraints the Turnpike is already two lanes wider than it needs to be. To rebuild the interchange and viaduct for eight lanes is unduly expensive and wasteful when six lanes will handle the capacity-limited traffic flows.

The two video clips attached to this comment are each only a minute long, but they illustrate the conditions of afternoon congestion and low speeds on the Turnpike. This reality should have been recognized and explained in the DEIR. The cause of the problem can be traced to the need to do better traffic planning during the early 1960s when the Turnpike Extension was built during the Bill Callahan era. It was Callahan's call to put in the two extra travel lanes, apparently with the goal of maximizing toll revenues.

The Final EIR should assess the alternative of three lanes each way as being sufficient to handle today's and tomorrow's traffic as it is constrained by existing bottlenecks. These bottleneck limits appear to no proposals or plans for the future. No one is proposing to expand and correct the "functional obsolescence" of the Turnpike extension. No one is considering the possibility that fixing old bottlenecks will expose new bottlenecks that again limit road capacity. SK3-5 (con't)

The Draft EIR was never proposed as a document to solve all of the structural, geometric and bottleneck problems of the entire Turnpike Extension. It had a certain fixed set of goals applied to a limited area, and the duplication of existing capacity conditions is a reasonable goal and the designs achieve that goal. However, the designs do not achieve the goal of increasing capacity above current levels, and do not admit that two lanes of the current eight lanes are not needed to provide for today's traffic loads in Allston. SK3-6

Cost-benefit analysis is a useful method of identifying the most productive alternative of any public or private project. The traffic goal is to achieve some level of practical or desirable movement of vehicles, and to do so for the least cost over the lifetime of the highway. If the same objectives can be achieved with two alternatives, and one of them costs more, the proper public choice is to seek the option that costs less. Public bidding of construction projects is intended to meet the same objectives. If the Allston highway project were to be built using design-build principles, the likely winning bidder would propose a six-lane project, not eight.

The DEIR lacks the larger context of a plan for the Turnpike's future. Suppose there were a grand plan to widen the Turnpike and remove every bottleneck. Would this be in the interest of society if the health of the city is at stake, in terms of air pollution, noise and climate change? The DEIR may discuss the environmental concerns subject to MEPA, but in part it retains the 1960s values of an expressway age. Highway engineers are still preferring to build more and wider highways, not narrower ones. SK3-7

The highway priority issue was decided in 1970, with the highway moratorium and the decision to base Boston's future on better transit. The fact that there has been deterioration in regional transit in the past 25 years should not detract from the merit of the 1970 decisions. The limits of highway growth and expansion were recognized then, and should ideally be recognized today with greater awareness and understanding. Bottlenecks represent capacity limits. It should be the duty of engineers to recognize and respect them. Overloading of bottlenecks actually reduces capacity and vehicle flows. Worse conditions of Level of Service F traffic represent a loss of capacity judgment.

Neither highways nor transit have infinite capacity. In a recent MEPA review for the Seaport District, a proponent presented a transportation analysis that assumed the capacity

of the Silver Line buses was infinite. We cannot make similar errors in highway analysis and design. Mere hoping will not create more capacity. Engineers must work hard to achieve capacity goals, whether it be transit or highways. Part of the goals of the MEPA review process is to assure integrity in planning.

Highway planning and design in this DEIR may well be of better quality than the transit planning, but this conclusion in no way reduces the obligation to tell the highway story as truthfully as possible. Fifty years ago the Master Plan for the Inner Belt and radial expressways was produced, without the accompanying benefits of essential transit improvements. Traffic engineers told the truth when they declared the Inner Belt would be an operational failure because its design limitations overloaded key downtown Boston bottlenecks with too much traffic. The Coverdale and Colpitts report of 1957 courageously made the point, that to fix the worst bottleneck would mean widening a six-lane road to twenty-four lanes -- an extremely radical and destructive "solution."

MassDOT's highway project must do the job of distributing traffic with the least damage and inconvenience, and if capacity gains are needed, they must come from transit, : the inevitability of highway bottlenecks gives us no other rational choice. Yet we remain at Allston with the absence of a state transit plan, although Harvard has promised to help.

The extensive traffic data from the Turnpike -- how traffic volumes in the peak hours decline by nine percent and cruising speeds can drop from 65 mph to 10-20 mph -- is available to anyone, including MassDOT. The Final EIR should include a review of this data and its clear evidence of limited bottleneck capacity. Purposes stated in the Draft EIR to seek greater highway capacity must be modified. SK3-8

Part of the problem at Newton Center is that traffic flows are affected by an alternate route -- from Storrow Drive to Soldiers Field Road to Nonantum Road, and then to Charlesbank Road through a Newton residential neighborhood and onto the turnpike on-ramp at Newton Center. The Turnpike merge at the bottom of the ramp is a major contributing factor to low speeds and reduced flow on the outbound turnpike.

A legitimate question is whether or not a large traffic generator like the Harvard properties will place additional pressures on the Turnpike system in such a way that SK3-9

congestion is increased. Will speeds be reduced even further, and with lower speeds will Level-of-Service F traffic flows be decreased beyond their already diminished levels? SK3-9 (con't)

The benefits of a six lane road -- carrying the same traffic load -- are less cost, less pavement, less parkland takings, reduced travel speeds (and excessive speeding), reduced noise, and probably fewer severe accidents. Over the years Turnpike maintenance has shown that reduction of Turnpike width by two lanes has virtually no effect on traffic flow. Examples include the successful use of six-lane operations during the July-August 2017 reconstruction work on the Commonwealth Avenue bridge. Congestion problems (such as last summer's reduction to four lanes) did arise for more radical lane reductions, but six lanes created no problem.

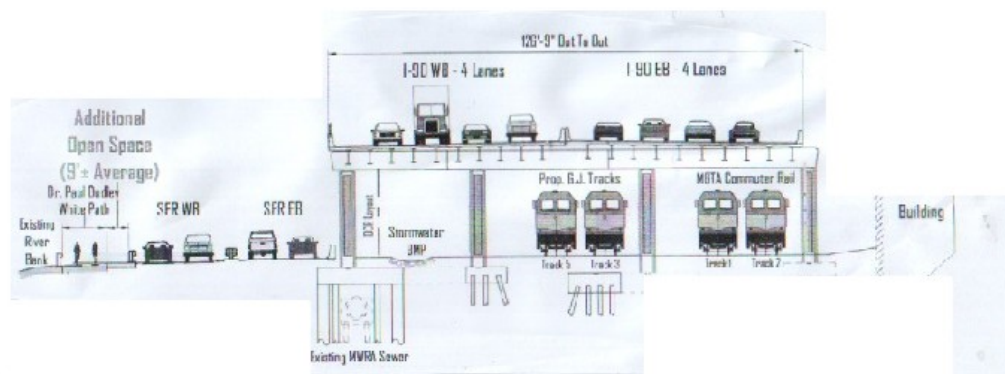
VIADUCT DESIGN and PROPOSED ROAD WIDENINGS

The "throat" area near Boston University presents a very tight corridor to include all of the functions intended : the Paul Dudley White path, riverfront vegetation, Soldiers Field Road, possible additional planting space, the Turnpike and potentially four tracks for commuter rail and freight. In addition, the DEIR proposed adding breakdown lanes -- the equivalent of two additional lanes to the eight-lane viaduct. This widening will result in expanding the viaduct into DCR parkland and squeezing the throat area even more tightly.

The practicality of a six-lane Turnpike means that 23 feet of extra space can be opened up in the throat cross-section. The primary beneficiary would be the ABC alternative. On the next page the recommended DEIR plan HV-3 is shown, with its heavy presence of elevated structure, and for comparison, the modified ABC option, with enough space now for a 15-foot planting strip between SFR and the Turnpike. This plan would also benefit from the Charles River Conservancy plan for a boardwalk or expanded parkland into the river within the throat section.

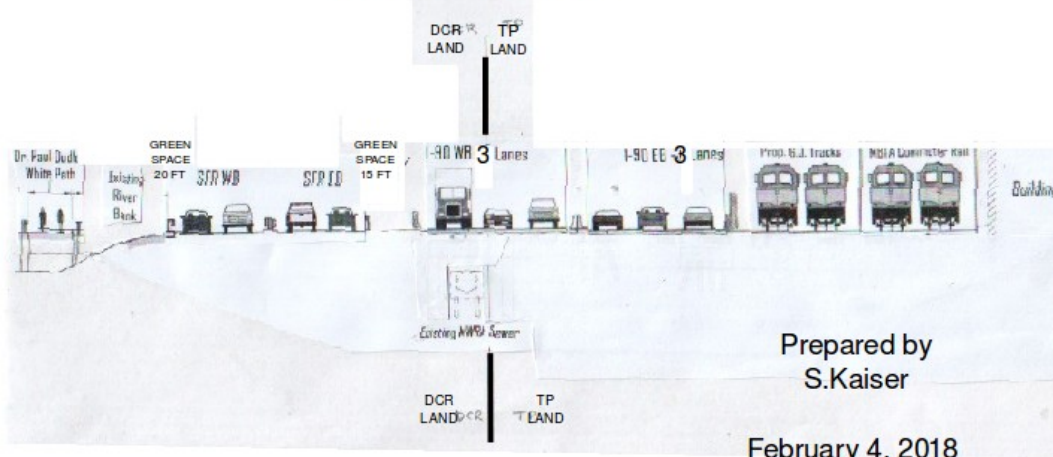
Draft EIR Plan HV-3 as Recommended with
viaduct extending 15 feet into DCR parkland.
25 feet of added breakdown lanes to meet "AASHTO
Standards")

MWRA Sewer Line requires careful excavation and
construction of pier footings and piles.



ALTERNATE VERSION OF ABC PLAN

Plan of Throat Area for a Six-Lane Turnpike, no
breakdown lanes, no viaduct, all construction at
ground level. Includes CR Conservancy proposal
for a boardwalk over the river. Total width of green
space about 35 feet.



Prepared by
S.Kaiser

February 4, 2018

AASHTO "STANDARDS" AND RELEVANCE TO ACCIDENT REDUCTION

As part of the stated purposes of the project, the DEIR claims that "The conditions in the interchange, like much of the Boston Extension, do not meet current interstate highway design standards." p. 2-2 Later reference is made to "AASHTO Standards," referring to the American Association of State Highway and Transportation Officials. The objective of this citation is to support the recommendation to add continuous breakdown lanes to this one short section of the Turnpike. It implies there is a safety justification for such a claim.

Federal Highway Officials have assured me there never was something called AASHTO standards : they have always been guidelines. Some of the guidelines are reasonable and have safety benefits. But on the vital issue of road-widening, especially for breakdown lanes, available safety studies have shown inconsistent results. Sometimes accidents go down, in other cases they go up.

The AASHTO standards debate became a key arena of disagreement between MEPA and the state highway department thirty-five years ago. This history is summarized in an historical letter I submitted to MEPA relative to the Route 20 widening project in Oxford (see separate Attachment C). The AASHTO standards argument should be abandoned.

I agree with the concept of design consistency as a safety objective. As Henrietta David has stated, "We question the 'safety' justification for increased width in the limited project area, since the rest of the Turnpike from Route 128 to downtown Boston has a consistently narrower design, with occasional pull-out areas for breakdowns." I support this thought as accurately reflecting good highway design practice and proper consideration of safety.

Design consistency means the designer should not insert a design feature that tends to increase speeds, such as wider roads -- then abruptly return to lower speed design elements. Breakdown lanes will have this effect of visually opening up the road and resulting in higher speeds. The added hazard comes from encouraging drivers to drive faster, followed by a lower speed design. For the inbound Turnpike, this lane drop would occur on a double S-curve in the vicinity of Commonwealth Avenue. Normally a tangent or straight section of road would be preferred for a lane drop.

There is an alternative to the continuous breakdown lane, and that is the discontinuous or intermittent lane that occurs at several locations along the Turnpike and along Soldiers Field Road between the BU Bridge and River Street. When Soldiers Field Road was widened and underpasses were built in 1956, a new hazard was introduced by the long, uninterrupted breakdown lanes. The potential and actuality of rear-end collisions made enforcement and driver assistance more hazardous for state police. During the summer of 1973, a resurfacing contract was used as the opportunity to replace continuous breakdown lanes with intermittent and protected breakdown slots.

On another safety issue, the installation of any design feature that tends to increase vehicle speeds should be questioned. Urban roadways with cars traveling over 70 mph and exiting onto city streets have a special obligation to allow for driver adjustment when entering onto local streets, with slower cars, bicycles and pedestrians.

The stated purpose of the highway reconstruction is to "replace the functionally obsolete" viaduct. 2-1 The viaduct may be structurally obsolete, but is it functionally obsolete? If so, is the entire length of Turnpike extension also obsolete? How long into the foreseeable future will Boston drivers be using such an "obsolete" roadway facility? Or will the Turnpike become tolerable – although judged "functionally obsolete" – like DCR parkways and local city streets? SK3-10

Where breakdown lanes were thought to have safety merit, they could easily have been obtained by painting three travel lanes and a breakdown lane. Another option is three travel lanes with intermittent breakdown lanes. Such simple changes were never made. In conclusion, I believe that the EIR invocation of safety benefits from road widening is both unsupported and unsupportable. The assertions never should have been claimed. SK3-11

The environmental obligation to demonstrate safety values lies with the highway engineers. The DEIR refers to the provisions of Section 4(f) of Federal law as well as Article 97 of the state Constitution. Section 4(f) requires that no taking of parkland occur when there is a "prudent and feasible alternative." It is a challenging barrier to the DEIR proposal. Even if some taking of parkland is required, as in the modified ABC plan above, it would be less than the easement over parkland required by the widened viaduct -- with or without breakdown lanes.

A non-parklands issue is the future of the MWRA trunkline sewer near the DCR property line. Plans for a widened viaduct show extensive construction work, with bridge footings and piles close to the sewer line. There is an increased potential for damage.

OTHER GEOMETRIC ISSUES

Years ago, I spoke with the design engineer for the Quincy extension of the Red Line. The original Old Colony railbed had been built at ground elevation, but the engineer found that if he partially depressed the railbed for the Red Line, the cost for bridges to cross over the transit line was trimmed sufficiently that the new design was less expensive and saved money. A similar concept could be applied to the turnpike and rail yard at West Station.

Could the Turnpike mainline and commuter rail tracks be dropped in elevation by 5 to 10 feet? Both could be at basement elevation and not at the first floor elevation -- level with surrounding homes, businesses and institutions. Noise would likely be reduced, as well as visual impacts on the surrounding neighborhood. The rise and length of pedestrian overpasses could be shortened, and it would be easier to make a bus connection between the station and Commonwealth Avenue. SK3-12

I support the DEIR design for closing off the outbound exit ramp at the River Street Bridge. The signal time now given over to the ramp phase should be transferred to the crosswalk for the PDW path. The result would be a much-needed exclusive WALK phase for bikes, joggers and pedestrians. This path has existed unchanged since 1975, yet for over forty years the crosswalk at River Street had no WALK lights and no pedestrian phase. It now has a very short concurrent phase that overlaps the exit ramp phase. SK3-13

It is time to give some quality time to the users of path, after 40 years of not serving the needs of bikes and pedestrians. The Final EIR should include photos of difficulties encountered by bikes, runners and pedestrians trying to make this crossing, even after recent WALK lights have been added. Few elderly citizens make this crossing.

For those critics who would oppose a detour through the interchange area, there is a second route. From Storrow Drive exit to the Harvard Bridge turn left from the bridge onto Memorial Drive, and proceed to Brookline Street or River Street.

Another valuable relief for stressed parkland along SFR could be made at Soldiers Field Road and Western Avenue. Is it possible to provide for a left turn from Western Avenue in Allston onto the Soldiers Field Road outbound on-ramp? If so, that would allow drivers from Allston generally (and from the Turnpike) to be able to get onto Soldiers Field Road outbound. The movement is not very large, about 150 cars an hour, but if the new interior Harvard roads running parallel to Soldiers Field Road can bring this traffic to Western Avenue, it would be possible to remove not only the outbound River Street off-ramp but also the entire outbound service road between River and Western. No one would need then anymore, and the pavement could be removed and returned to grass and trees. It would also take 150 cars and hour out of the intersection at the River Street Bridge. SK3-14

PROBLEMS WITH THE USE OF THE HIGHWAY CAPACITY MANUAL and SYNCHRO

The Synchro computer program model does not accurately explain the River Street Bridge bottleneck. Signals at both the Memorial Drive and SFR ends of the River Street Bridge today are coordinated and interact with each other. The reality is that the right turn lane from the bridge is right-turn-only, and is the only lane for right turns. Routinely in almost every peak hour, this single lane queue backs over and across the River Street bridge up into the Soldiers Field Road intersection, blocks the PDW crosswalk, and extends across the entire intersection.

Often a two-lane queue starts within the intersection, and these two lanes block access to the bridge. The SFR intersection can have thirty seconds of lost time because the intersection is blocked and nothing is moving. The Synchro description of the queuing is hardly precise : “Volume exceeds capacity, queue is theoretically infinite. ” Such a queuing condition is achieved after two signal cycles, less than five minutes of traffic modeling.

Photographs (better yet video clips) should be taken during peak periods to show how this queuing blocks the SFR intersection and interferes with traffic flow from Cambridge Street and the Turnpike. Past simulations with the SimTraffic model have also failed to represent the traffic queuing accurately. The Synchro model may not be at fault, since it must duplicate the *Highway Capacity Manual*. The flaw may lie in the *Manual*. SK3-15

The DEIR strangely used two different versions of Synchro -- versions 8 and 9. Version 8 was used for the 2015 and No-Build scenarios, while Version 9 was used only for SK3-16


the Build options. Why was the mix of models chosen? Did it have anything to do with limited options for pedestrian phases in the 2010 Highway Capacity Manual? SK3-16 (con't)

The Synchro printouts show evidence of substandard WALK times for at least five locations. Pedestrian phases Harvard Avenue were reduced from twenty-five seconds to six seconds with 2040 Build. All intersections in the "quartet" of crossings at River/Wester and Memorial/Soldiers Field Road show evidence of minimalist seven-second WALK times (for concurrent phasing) or less. Western and Memorial has a 5-second WALK display (concurrent).

Western and SFR today has a pushbutton to cross stopped traffic from the bridge. That pushbutton should be taken away and the exclusive WALK should come on automatically. River and Memorial has a concurrent 7 seconds of WALK on the bridge crosswalk and extended time if the button is pushed. Again, remove the pushbutton for the bridge crosswalk. The pushbutton to cross Memorial Drive is there today and has thankfully been retained. Any concurrent crossings should extend throughout the vehicle phase and not be limited by 5 or 7 seconds. Any WALK display less than 7 seconds is a violation of the stipulations within the *Manual of Uniform Traffic Control Devices*.

Overall, the DEIR has attempted to show active consideration for pedestrian circulation -- except at intersections and for WALK timing. Goals and Objectives of providing quality pedestrian and bicycle infrastructure "to promote the healthy transportation options of walking and bicycling" p. 2-5 must be clarified to include favorable signal timing at intersections, where vehicular conflicts with other modes are most prominent. I hope more attention can be given to pedestrians at intersections, even if it is not the case today.

Sincerely,



Stephen H. Kaiser, PhD

Two attached one-minute videos :

<https://youtu.be/DqM841hFepw>

<https://youtu.be/mRZCXtJRB7Q>

Courtesy of Harry Mattison

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ATTACHMENT A : CONGESTION on the TURNPIKE from DOWNSTREAM BOTTLENECKS

In the days before electronic tolling, many people were aware of traffic backups on the Turnpike, but usually associated them with delays at toll booths. Since the toll booths have been removed it is now possible to witness the levels of congestion caused simply by traffic flows and bottlenecks inherent in the Turnpike design.

The pair of one-minute videos attached to this comment illustrates slow travel during a Friday afternoon in January. The videos show outbound traffic as stop and go --just west of the Interchange near the Cambridge Street bridge. Traffic on the right is heading towards the next exit : Newton Center, the key bottleneck. The effect of the Newton bottleneck is to slow traffic down, occasionally causing it to come to a complete stop.

Another way to understand the Turnpike traffic flow is to use MassDOT traffic records on the web at <http://mhd.ms2soft.com/tcds/tsearch.asp?loc=Mhd&mod=> I selected 28 days of sampled data from July and August 2017 (when the lane reductions on the Turnpike were in effect for the Commonwealth Avenue construction) as well as this past December and January. The focus was on the four hours between 3 PM and 7 PM, so that 112 hours of traffic flow were sampled. Mondays and Fridays tended to be lower volume days, so my sampling concentrated on the three higher volume days of each week : Tuesday, Wednesdays, and Thursdays. The electronic Turnpike traffic counter AET12 in Allston gives the volume of traffic (number of vehicles moving past in one hour) and also the distribution of speeds during the peak hour.

The July and August months were selected because these were the times when the Turnpike was narrowed down to six lanes near Commonwealth Avenue. My expectation was that the construction schedule would cause the most disruption over the past 7 months. Instead, traffic results were surprisingly stable, with few examples of hourly speeds dipping into the 20 and 30 mph range. The most unstable periods occurred in December.

Peak hour traffic counts can vary from good (when average travel speeds are 40 to 50 miles an hour) or bad (when speeds drop as low as 12 mph). For comparison, average travel speeds on the Green Line are 9 miles an hour. Typically, when speeds are less than 30 or 40 mph, less speed means less traffic is getting through.

Turnpike traffic data tells us that the number of cars moving along the road in an hour (the “volume”) -- can drop by ten or twenty percent as traffic squeezes through the bottleneck of off- and on-ramps at Newton Center. There is nothing new about this situation. It probably has been occurring for many decades. It is called Level-of-Service F effect, when the quality of flow not only is given a failing grade of “F” but results in a reduction in volume or flow during the peak hours. Usually more traffic is moving through between 3 and 4 PM than between 5 and 6 PM. This dip in 5 PM traffic flow is about nine percent during the sampled trips.

The traffic flow varies from day to day and hour to hour. It appears random but can be caused by weather, bright sun, season of the year, drivers changing routes because of congestion elsewhere, breakdowns, accidents, driver behavior at merges and lane changes, etc. The important result is that there are variations in flow, from day to day. The traffic counts do not tell us why the numbers are different from day to day -- only that they are.

The numerical data also tells us that there is a complex relationship between speed and volume. The best description is contained in the 1965 edition of the *Highway Capacity Manual*, as shown in the graph below :

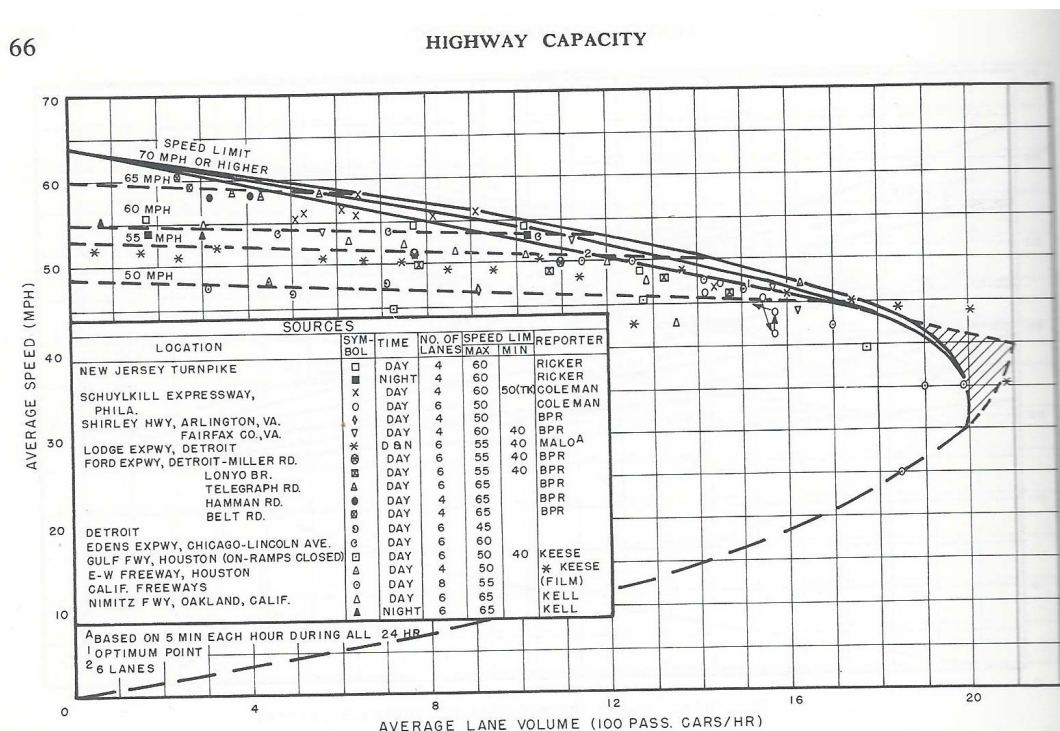


Figure 3.44. Specific reported speed-volume relationships per lane in one direction of travel under uninterrupted flow conditions on freeways and expressways.

Off-peak travel speeds can be at their highest, with less dense traffic. As the volume increases, speeds drop to about 40 mph, when the volume in an expressway lane reaches a maximum capacity of 2100 vehicles an hour in each lane (Figure 3.44). The 2010 edition of the *Manual* shows more recent experience is 2,400 vph or more.

The situation changes as highways are pressured “beyond capacity” and begin to show congestion. The actual flow volumes go down and the speeds go down. This is exactly what we are seeing in the two videos and the state traffic count data. Figure 3.44 of the 1965 *Manual* shows this Level of Service condition as a dotted line because the counts vary considerably. In later editions (Third, Fourth and Fifth), the *Manual* presented the Level-of-Service F area as entirely blank, with no representation between speed and volume.

Measured counts demonstrate that the Turnpike cannot reach full capacity of 2,400 vph per lane or 9,600 vph for four lanes. The cause is the Newton bottleneck. The videos show traffic at its most congested state, moving at a rate of less than 3,000 vehicles per hour (vph). The lowest flow over a full hour is 3,880 vph. The average flow is 4,670 vph. Maximum flow is 5,616 vph. Even the maximum flow of 5,616 is only 60% of the 9,600 capacity and the average flow of 4,670 vph is less than half. The bottleneck has the effect of partially disabling the Turnpike.

Level-of-Service F is a condition generally judged to be undesirable by traffic engineers and barely tolerated by commuters. There may be no transit alternative for many commuters, so they are locked out of other choices. No one seems to be protesting in the streets about the fact that sometimes one can drive the Turnpike at 65 miles an hour, and other times at 12 miles an hour. The range of a trip time to get through a bottleneck between fast to slow can be as high as a factor of five. The average range for the 30 days of sampling was 2.8 or almost 3 : equivalent to 60 mph travel dropping to 20 mph.

The top ten hours of traffic flow as sampled for high volumes were :

| | |
|----------------------------|-----------------------------|
| 5,616 July 25 3 PM | 5,415 August 10 3 PM |
| 5,452 August 18 3 PM | 5,313 August 17 3 PM |
| 5,434 August 16 5 PM | 5,246 July 26 3 PM |
| 5,425 August 16 3 PM | 5,240 January 10 3 PM |
| 5,423 August 15 3 PM | 5,208 July 20 3 PM |

Of the ten highest volumes only one occurred at 5-6 PM, the others at 3-4 PM. Nine of the ten occurred during the Commonwealth Avenue construction of July-August 2017.

The lowest sampled volumes were :

| | | | |
|-------------|------------------|-------------|------------------|
| 3,748 | December 21 4 PM | 4,053 | July 1 5 PM |
| 3,850 | December 20 4 PM | 4,123 | December 13 4 PM |
| 3,939 | December 21 4 PM | 4,128 | July 11 4 PM |
| 3,985 | December 20 5 PM | 4,152 | December 21 5 PM |
| 4,050 | December 19 5 PM | 4,155 | January 11 3 PM |

Six of the ten lowest volumes were recorded during a heavy snow period in mid-December. No low volume days were recorded in August.

The ten lowest speeds recorded for any hour were :

| | | | |
|------------|------------------|------------|------------------|
| 12.0 | December 13 5 PM | 12.8 | December 13 4 PM |
| 12.3 | January 9 5 PM | 13.7 | December 13 4 PM |
| 12.6 | December 19 5 PM | 14.4 | December 21 5 PM |
| 12.8 | December 20 4 PM | 14.7 | January 10 4 PM |
| 12.8 | December 21 4 PM | 14.9 | July 12 3 PM |

Again, no days in August made the list, and the snow storm in mid-December was an important factor.

Because the basic data contained so many variations, a statistic analysis was appropriate to measure how the actual performance of the road varied from the average speeds and flows. I used a simple arithmetic variation from the average, as compared to the average. The average variation (drop) in volumes during the 5-6 PM house was 9% compared to the the 3-4 volumes. The average statistical variation for speed was 21% and for volume 5%.

Another method of assessment is to define a speed rating, which counts the number of hours out of 12 in a three-day week when the average speeds were less than 60, 50, 40, 30

and 20 mph. Appropriately a speed of 10 mph is penalized several times, while a speed of 50 is penalized only once. The sum of such hours in a three-day week was then subtracted from an assumed perfect score of 100, with the result that there were three hours with scores of 97, 99 and 99, including two instances of only one hour out of 12 having a speed under 60, and that was in the 50s. At the other end of the scale there were two instances of scores of 51, where typically nine hours out of twelve had average speeds of less than 30 mph. On some days the Turnpike works fine. On other days it works poorly.

The Newton Bottleneck was a major contributor to the variability of the data. Occasionally, the traffic would flow at 5 PM with speeds over 60, at moderate volumes. The next day or hour the average speed would be 12 mph. Thus the selection of 112 hours of data must be seen as a relatively small sample, and ideally a more extensive and statistically valid assessment should be made for a whole year or two worth of data. Unfortunately, the review period for the EIR limited the investigation to the 30 days selected.

The comparison with the 9,600 HCM capacity calculation is revealing, because this is the unobstructed capacity for four lanes in each direction. Applying the 2400 vph per lane criterion to a six-lane road, the outbound capacity in the afternoon would be 7,200 vph, and the peak measured flow of 5,616 vph would be only 80% of capacity. On an average day with 4,670 vph, a six-lane option would be at 60% capacity.

In term of future traffic from development, one thing is clear. If the ramp activity at Newton is increased, due to route diversions or traffic growth, the Newton bottleneck could easily become worse and speeds would be reduced even further. General development in the Boston area has the potential to contribute to such traffic increases, whether the vehicles come from Alewife, Kendall Square, Harvard's development in Allston or any combination of large and small development around Boston.

Any traffic trying to get on at Newton could increase , as it might because of the alternate route of Soldiers Field Road to Nonantum to Charlesbank Road to Newton Center. Such a future of more traffic on the ramps at Newton Center would likely produce decreased flows on the turnpike, with lower speeds. There is nothing in the EIR to indicate that the Turnpike has the capacity to handle this growth traffic, and I do not believe that the EIR even makes such a claim.

The obvious and rational conclusion to this traffic dilemma is that only mass transit -- in all forms and capabilities, but adding up to an effective movement of passengers -- will be able to handle the consequences of growth. The roadway system cannot make a major contribution to improved capacity. It would make no difference to add two lanes of four lanes to the Turnpike or twenty lanes in Allston. The bottleneck remains unchanged.

How many of the sample hours could be handled by a four-lane Turnpike? The answer is about 55% or a little over half. Clearly, for half the time, a four-lane Turnpike would become the bottleneck, which is not a viable choice for today's users. It might be if a vastly improved transit system gave drivers an alternate mode of transportation. But such a plan does not seem in today's political climate.

In conclusion, the evidence of the data is that the eight-lane Turnpike is used far under its technical capacity and its operation is determined by downstream bottlenecks. It would still be under-capacity by 20 % if two lanes were removed. In other words traffic conditions would not be changed if two lanes were removed.

For this reason, given the tightness of the throat condition on the turnpike and the controversial nature of the viaduct, this section of road should not be proposed for eight-lanes in the future but should be reconstructed as six lanes in width. The effectiveness of six-lane operations has been demonstrated during several maintenance projects that reduced the number of operating lanes to six. Four lanes is quite difficult and is thinkable only for the month for early August with extensive publicity and transit mitigation, as was applied in July-August 2017.

ATTACHMENT B – CALCULATION SHEETS for TRAFFIC COUNTS and ANALYSIS

Calculation Sheets for this traffic attachment have been included in Attachment B, a separate submission related to Comment letter #3. These ZIP files are intended only to provide technical support for the calculations and are not to be subject to the MEPA obligations of comment response.

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ATTACHMENT C – HISTORY OF THE AASHTO STANDARDS DEBATE : EOEVS MDPW

Attachment C is adopted by reference as a part of this comment for another MEPA project, Route 20 in Oxford and Charlton :

Draft EIR for Route 20 – Oxford and Charlton EEA #15355 / 15449

COMMENT #1 History re MEPA and Road Design

To Secretary Matthew Beaton

Dated January 5, 2018