

February 9, 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 Secretary Beaton:

We are pleased to submit the following key comments on the above referenced project. With road congestion an increasing problem that adds to workers' daily commutes, we support long-term projects that can relieve that congestion through expanded public transit and/or road upgrades and reconfigurations. The Allston Interchange Project presents a key opportunity for Massachusetts to improve its long-term public transportation infrastructure while providing additional public transportation options for the region's residents. With that in mind, we urge the Secretary to place a greater focus on including transit components in Phase 1 of the project, particularly West Station and crosstown bus service.

Build and Operate West Station Beginning in Phase 1

GBCC-1

To justify the claim that this is a multi-modal project, there should be greater focus on transit components in Phase I.

We support construction and operation of West Station on the Worcester-Framingham rail line as an interim station in the first phase of construction. The station is an important component of the local and regional transportation system in the near term and the longer run. Completing a station with a center platform and two track operations in the first phase of project implementation will provide transportation services for the neighborhoods, business community, and institutions impacted by this project; will support mitigation of construction impacts by supporting robust rail operations; and will jump start support for long run development opportunities at this critical location.

- **Permanent West Station**: We also support completion of a permanent West Station, and we are concerned that current plans for expanded layover tracks will prohibit early construction of West Station. We urge MassDOT to take steps to modify this approach.
- Harvard's Commitment: We are pleased to hear of the commitment of Harvard University to provide funding support for implementation of an interim and permanent West Station, and we encourage MassDOT to take advantage of this opportunity. If this opportunity is missed, a significant amount of money would be left unused.
- **Facilitating Air Rights Development**: Completion of an interim station in Phase 1, and completion of a permanent station sooner rather than later will support initiation of air rights development earlier.
- **Station to North of the Yard**: We support locating the station north of the rail yard, and we believe that the proposed buffer along the residential area is worthwhile to pursue.
- Compatibility with Future Visions: In order to provide a context for the analysis and decisions required in the DEIR and selection of a Preferred Alternative, the report needs to better articulate the potential future conditions that it pledges "not to preclude." Possible components of a larger vision that have been

discussed in the public domain include: an urban rail strategy that includes more frequent service on the Worcester Line as well as service on the Grand Junction line to Cambridge and beyond; Bus Rapid Transit service in the circumferential corridor passing through Allston, Longwood, and Cambridge to Kendall Square and beyond; Institutional Master Plans for Boston University and Harvard University; and an overall vision for the role of the former Beacon Park Yards in the regional economy. These potential components of an overall regional vision cannot be ignored in preparing near term plans, and should not be assigned a lower priority than the urgency of replacing an aging infrastructure.

We urge the Secretary to require an evaluation of a design option that includes an interim West Station to be put in place early in implementation of Phase 1, with cross corridor bus service and pedestrian and bicycle connections at Malvern Street and vertical circulation serving the rail platform.

Support Crosstown Bus Service via Malvern Street

GBCC-2

Crosstown bus access to and through the West Station area, with connections to rail transit at West Station, is essential and must be included in Phase 1.

We support additional analysis of north/south bus service at Malvern Street connecting to West Station, and providing crosstown service between Cambridge, Brookline, Longwood, and beyond. This service has been a key recommendation of the project Task Force. Improved crosstown service is an important part of the Go Boston 2030 recommendations, and it provides a means of reducing traffic congestion and enhancing mobility in a growing corridor. This has been one of the components most frequently cited by the community as an essential element of an acceptable restructuring of the interchange.

- Crosstown Bus Service: Providing this crosstown service via Malvern Street at an interim West Station in Phase I and for the permanent station will enhance ridership and, by eliminating the function of a terminal station, may reduce the need to construct a costly deck over the rail facilities below. A simple bus platform with well designed vertical circulation connecting to the rail platform may be sufficient to support bus operations.
- Use of the Malvern Street Corridor: In response to consistent requests from stakeholders, incorporate
 a bus connection across the tracks and interchange at Malvern Street that will support bus service
 between Harvard Square and Longwood and beyond.
- Reducing West Station Cost: By attributing the costs associated with the bus connection and pedestrian
 and bicycle structures to these facilities, the cost of the station would include that of the platform and
 vertical circulation only.

We urge the Secretary to require in the MEPA Certificate that MassDOT prepare an updated transit demand study for all public transportation elements including West Station, north/south buses operating across the site, and other related elements with a catchment area and land use assumptions for analysis that includes zones north and south of the rail alignment.

Thank you for the opportunity to comment on this transformative transportation project.

Sincerely,

James E. Rovery

James E. Rooney President & CEO

Cc: James Cerbone, MassDOT Highway Division

From:	Gregory Kelly
То:	<u>Strysky, Alexander (EEA)</u>
Cc:	james.cecrbone@state.ma.us
Subject:	Allston I-90 Interchange - Draft Environmental Impact Report
Date:	Friday, February 09, 2018 11:42:50 PM

Dear Secretary Beaton,

As a resident of Brighton, who works in the Seaport, I traverse the city twice a day. I can get to work and back by bus, bike, or car, but regardless of the mode I choose, it takes me through the area under consideration in this project. As such, I urge you to consider making changes that offer improvements regardless of the mode of transportation that each resident of Boston (and beyond) chooses. It is getting late on the night comments are due, so I will try to be brief in my comments

- <u>Build West Station now</u>. We cannot wait until 2040. Harvard has increased their contribution to the project, and to pass it up to save a few million on a nearly \$1bn project is short sighted. If you don't believe me, I implore you to join me on the Silver Line on a rainy day, or on the 501 bus for any evening commute. It does not need to be as difficult to get across town as it is, but I watch commuter rail trains with jealousy, on their way to Newton and beyond, pass me on the express bus.
- Don't build the viaduct. Advocates have offered surface options that will be GPEK-2 more practical and maintain opportunities for multimodal connections
- Improve parkland and trail amenities in the Throat. Every inch of waterfront along the Charles is a gem, and should be recognized as such. This includes the connection between Harvard and the BU bridge.
- Create a network of safe, multimodal, and human-scaled streets in the 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.

Boston has a rare second opportunity to develop a 21st century neighborhood. There are lessons to be learned from the shortcomings of the Seaport neighborhood. A plan that includes West Station is critical in connecting existing neighborhoods, developing a new neighborhood for the city, and for moving residents and commuters to and through Allston efficiently.

Sincerely, Greg, Paulina, and Evelyn Kelly 15 Matchett St, Brighton From: H. Parker James <<u>hpjames423@gmail.com</u>>
Sent: Friday, February 9, 2018 1:37 PM
To: Strysky, Alexander (EEA)
Cc: Will Brownsberger; <u>Jay.Livingstone@mahouse.gov</u>; Rushing, Byron - Rep. (HOU); Josh Zakim; Yissel Guerrero; Michelle Wu; Mayor
Subject: Allston I-90 DEIR

Dear MassDOT:

I am a co-founder of the Charlesgate Alliance, an active member of the LivableStreets Advocacy Committee, and I serve as a director on the board of NABB. I am writing to you now, however, as a 39-year resident and committed citizen and of both the City of Boston and the Commonwealth of Massachusetts. I am submitting these comments in response to the I-90 Allston DEIR.

The I-90 Interchange project affords a golden opportunity to change greater Boston for the better. We should proceed with this in the smartest way possible. Let us not be guided by what is cheap. These sorts of opportunities emerge rarely in the life of a city - maybe once or twice in a century. We need to take full advantage of everything we can leverage here. This may sound like "visionary" thinking to you, but I assure you that I am speaking in practical terms. We can create enormous longterm value here. We must leverage these opportunities to the fullest, and not squander them in the name of financial saving in the short term.

1. We absolutely need West Station. There is nothing "visionary" about this. It is a necessity. West HPJ-1 Station opens the way both to quick gains and long-term transportation innovation. West Station need not be luxurious, but it does need to be designed to accommodate further innovative developments in public transportation, by both rail and bus. This entire area is densely populated and rapidly expanding both in terms of population and as an engine of regional economic growth. West Station will surely become a major transportation hub as well as a catalyst for further economic development. This is a must-do project.

2. Both the Fenway and the LMA areas are burgeoning with development, and there's no end in sight. The I-90 Allston Interchange affords us an opportunity to channel traffic directly from the eastbound lanes of the Mass Turnpike to Audubon Circle, the LMA, and The West Fenway. I think we should implement "temporary" ramps connecting the eastbound Turnpike either to Mountfort St. or to Beacon St. That would provide great relief to the Allston interchange connections that connect the Turnpike to Soldier's Field Road. It strikes me as crazy that people exit from the Turnpike eastbound in order to get to the LMA area. Now is a time to develop rational alternatives.

3. This is a golden opportunity for "the people" of greater Boston to take back our parkland along the Charles. I propose that we "<u>unchoke the throat</u>" moving Storrow Drive roadway inland, away from the river. I also support a "<u>People's Pike</u>" pedestrian/bike connection from Allston to the <u>Charles River</u>. The I-90 Allston Interchange is a transportation project, but it is also an exercise in civic design. Increased access to paths along the river for both pedestrian and bicyclists will displace significant amounts of traffic on our roadways.

If we do this correctly, the I-90 Allston Interchange project can be truly transformative – with effects in the metropolitan area not unlike the filling of the Back Bay. These opportunities are being handed to us. Let's leverage them to the fullest. Please think of this as a long-term investment. The payoffs can be enormous if we do this correctly. So please, let's do this right. Future generations will applaud your actions. H. Parker James

423 Marlborough St., #3 Boston, MA 02115 Matthew Beaton, Secretary of Energy & Environmental Affairs Executive Office of Energy & Environmental Affairs Attn: MEPA Office Alex Strysky, EEA # 15278 100 Cambridge St Suite 900 Boston MA 02114

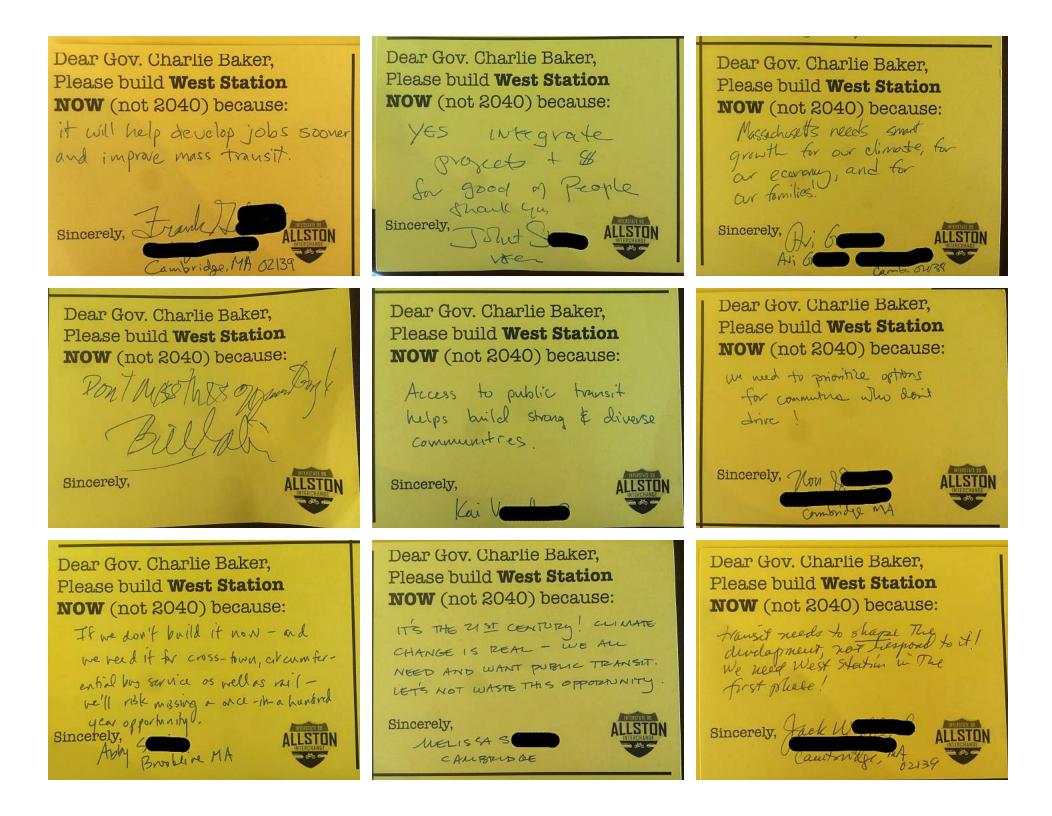
Secretary Beaton,

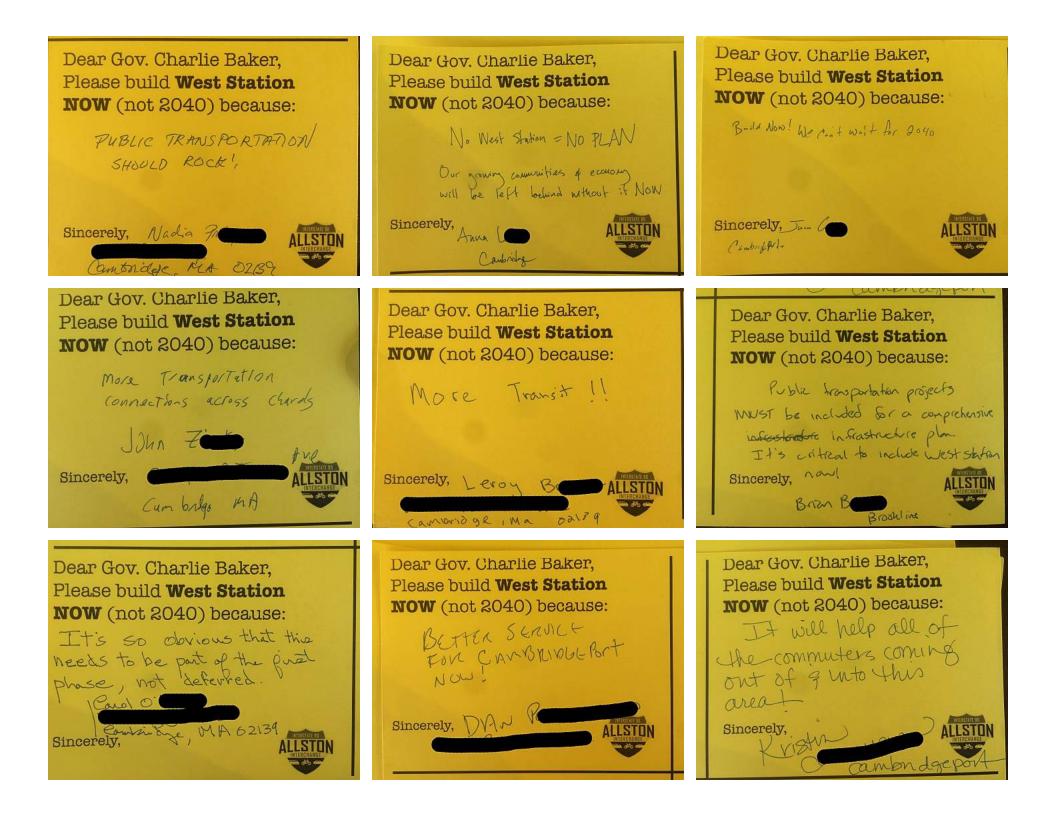
Over the past month, several members of the MassDOT I-90 Allston Task Force and other concerned citizens went door-to-door in our communities and held a series of events to educate and inform people about this project. One result of this outreach was several dozen people writing their support on the following cards.

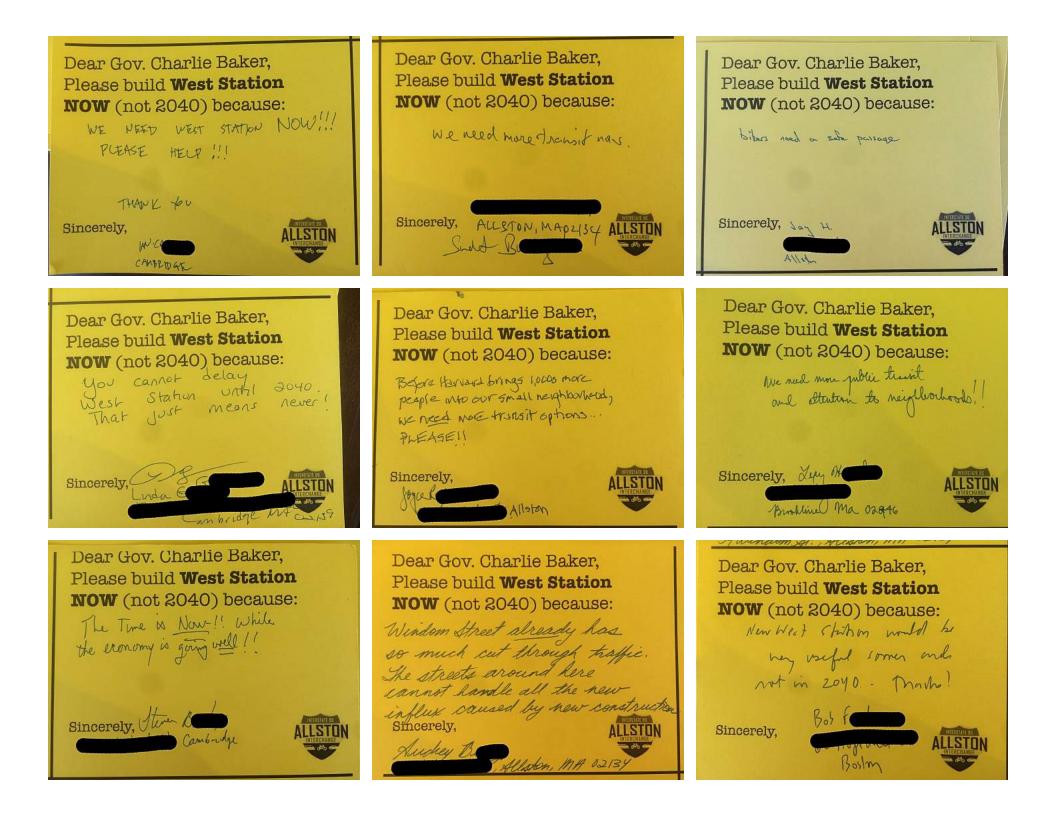
We hope this outpouring of support for the construction of West Station at the start of the project, improving bus TF-1 service, and making a safer neighborhood for walking and biking will be noted as you prepare your reply to the MassDOT DEIR.

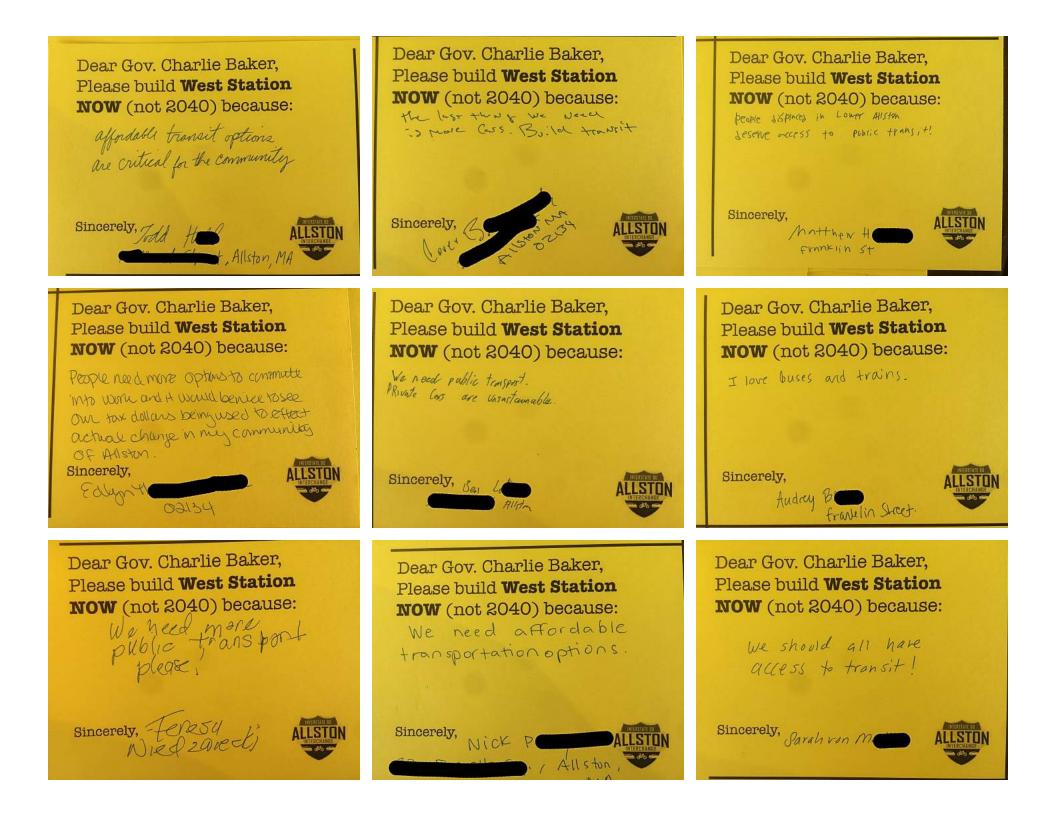
Sincerely,

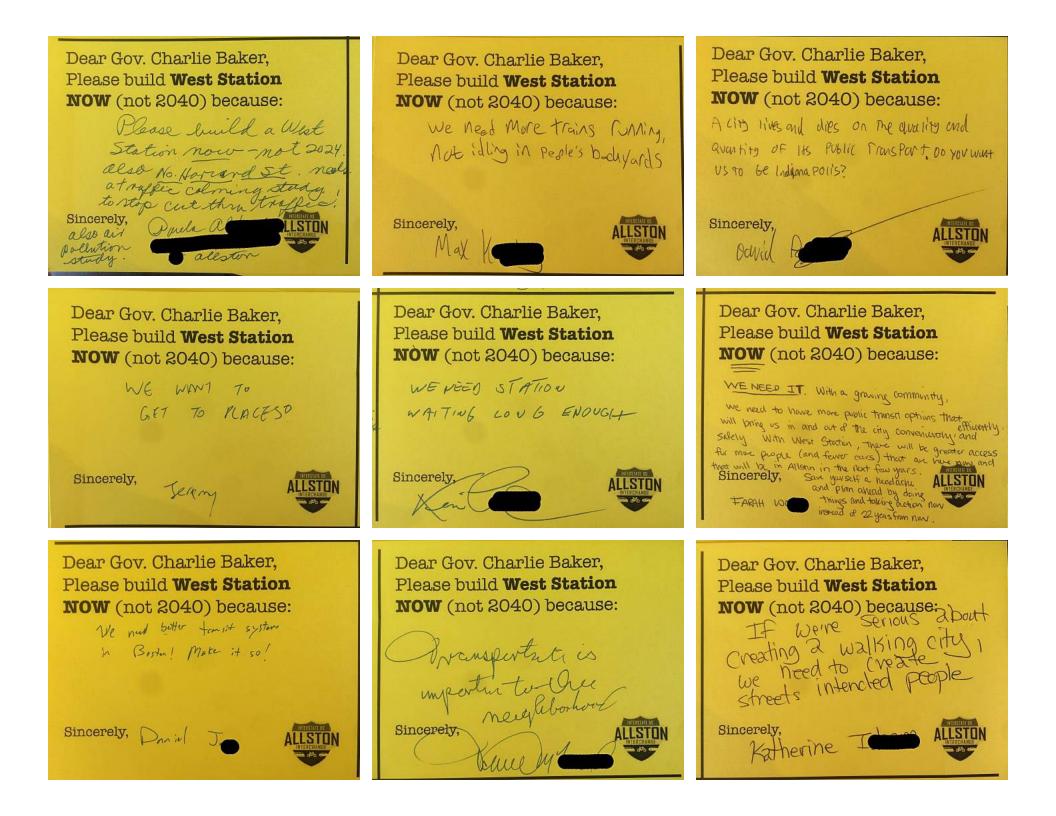
I-90 Allston Task Force members & Allston residents Harry Mattison, Galen Mook, and Emma Walters

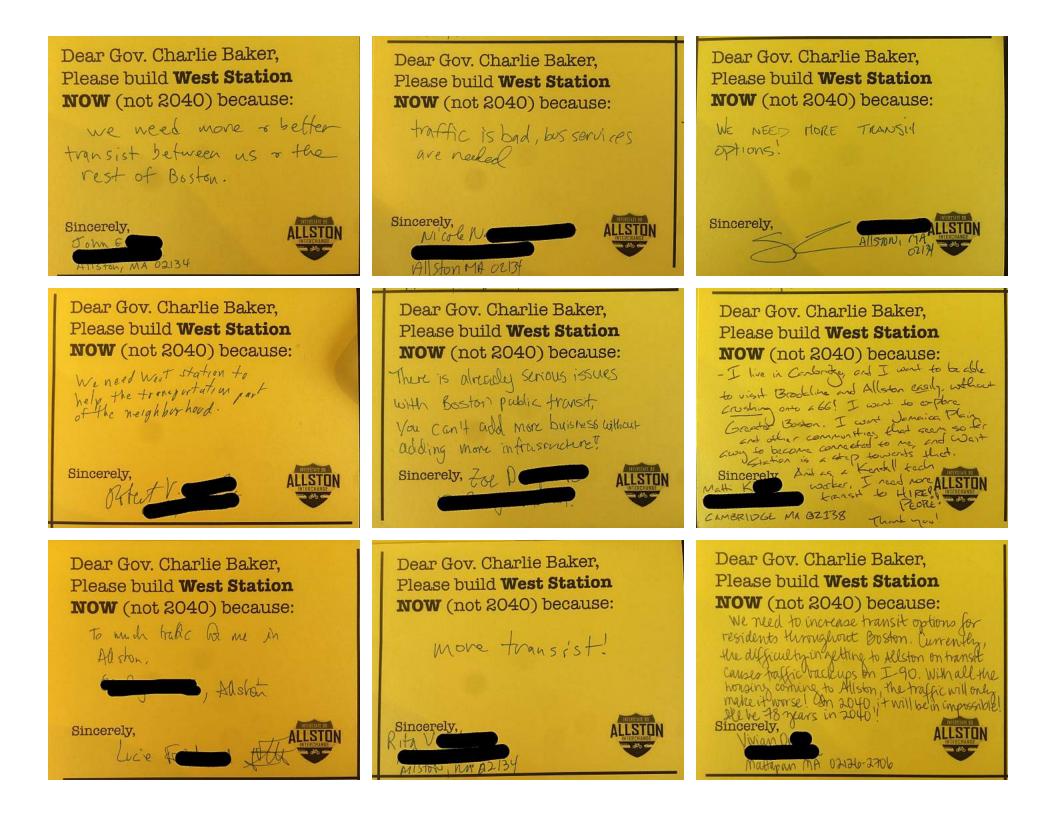


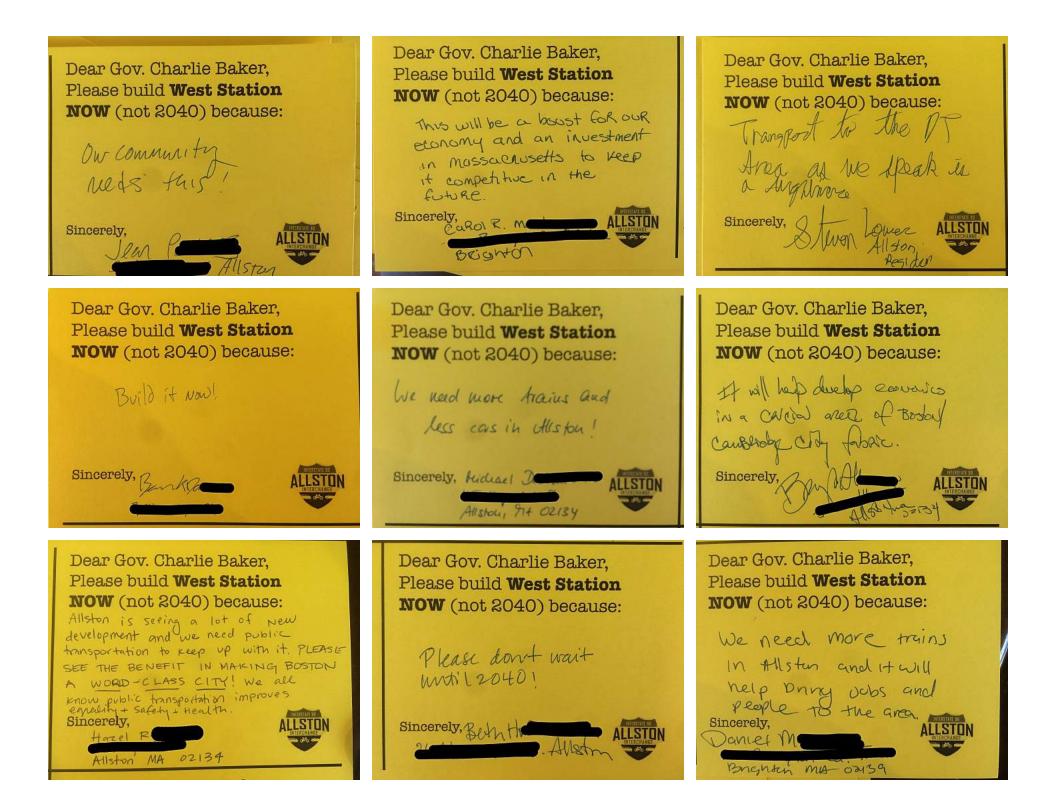












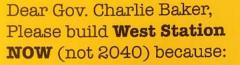
Dear Gov. Charlie Baker, Please build **West Station NOW** (not 2040) because:

Public transportation in this neighborhood is essential



Dear Gov. Charlie Baker, Please build **West Station NOW** (not 2040) because: More jobs are good More housing is good Trying to cram more cars on our clogged streets is bad. Sincerely, Harry Millier Alkton

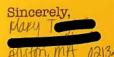
Dear Gov. Charlie Baker, Please build **West Station NOW** (not 2040) because: This would be Very teneficial to our neighborhood !! Sincerely, Roshan B. Allston Krsidert



to get anywhere Istill need to walk a mile a take 2+ trains. Without a car travel is too limited in this heighborhood.

LISTON

ISTON



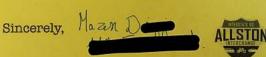
Dear Gov. Charlie Baker, Please build **West Station NOW** (not 2040) because:

public transport is mportant for environmental as well as social travers. These investments are important, now!

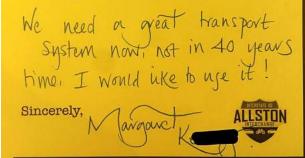
Sincerely, Quelatra The

Dear Gov. Charlie Baker, Please build **West Station NOW** (not 2040) because:

better access to public transit is moded



Dear Gov. Charlie Baker, Please build **West Station NOW** (not 2040) because:

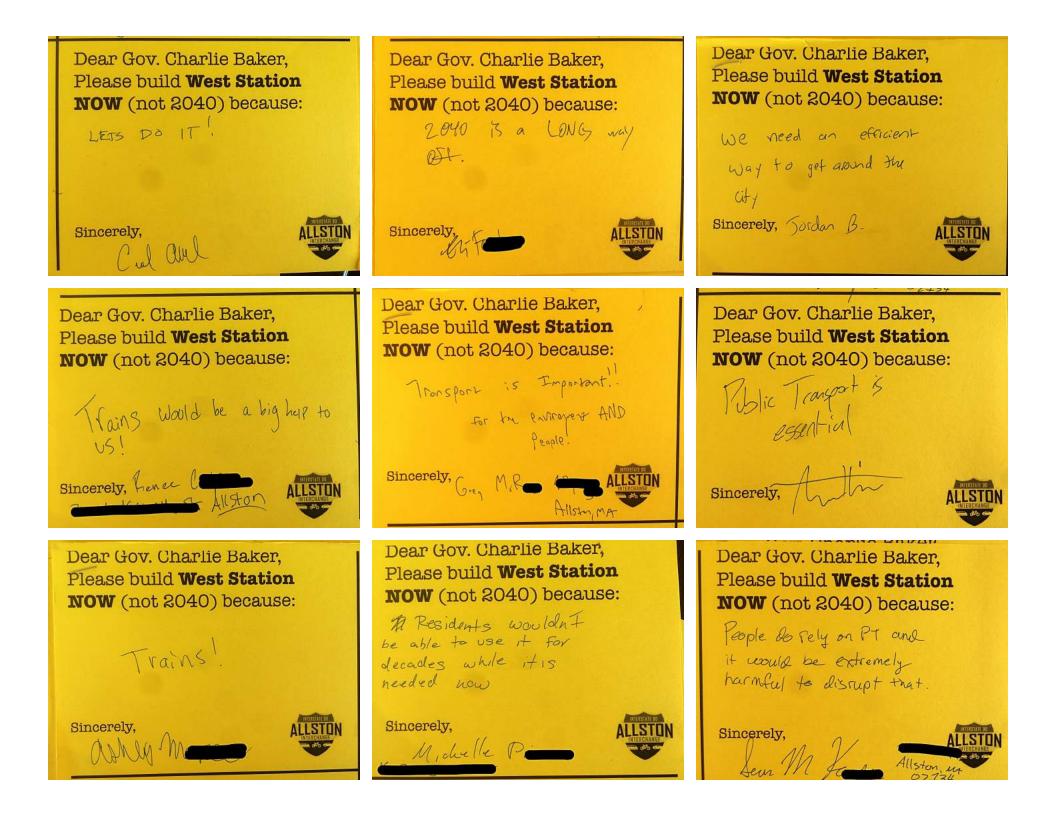


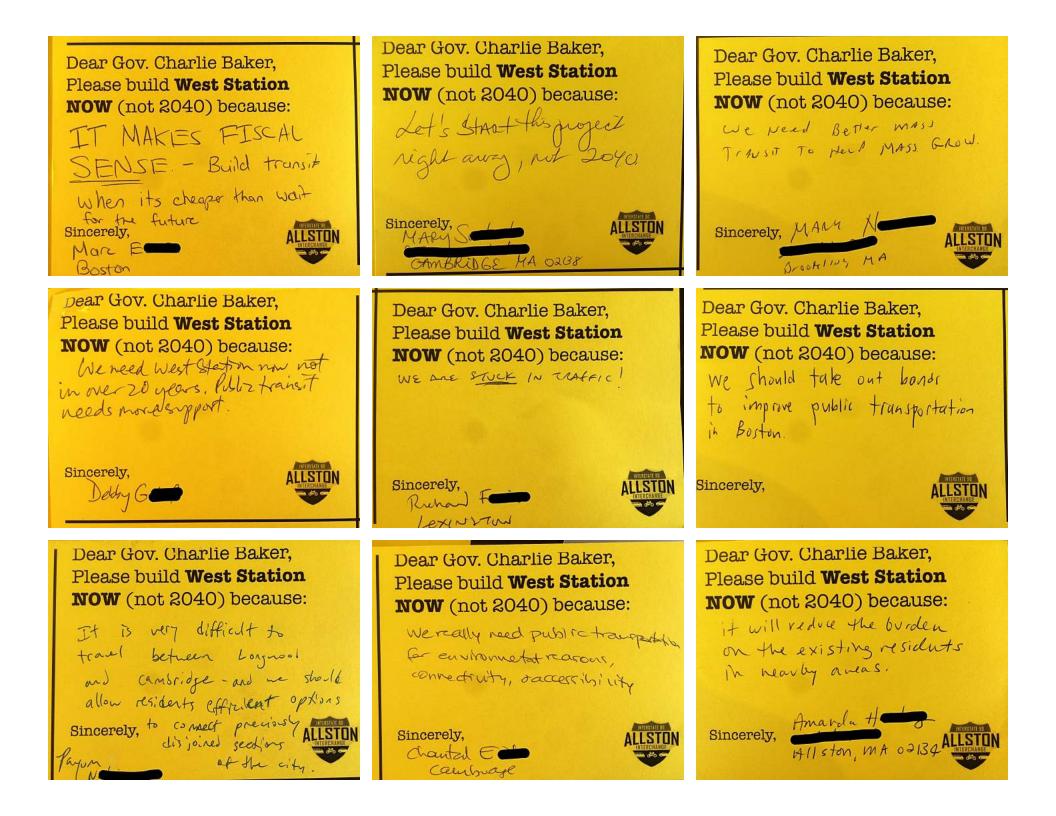
Dear Gov. Charlie Baker, Please build **West Station NOW** (not 2040) because:

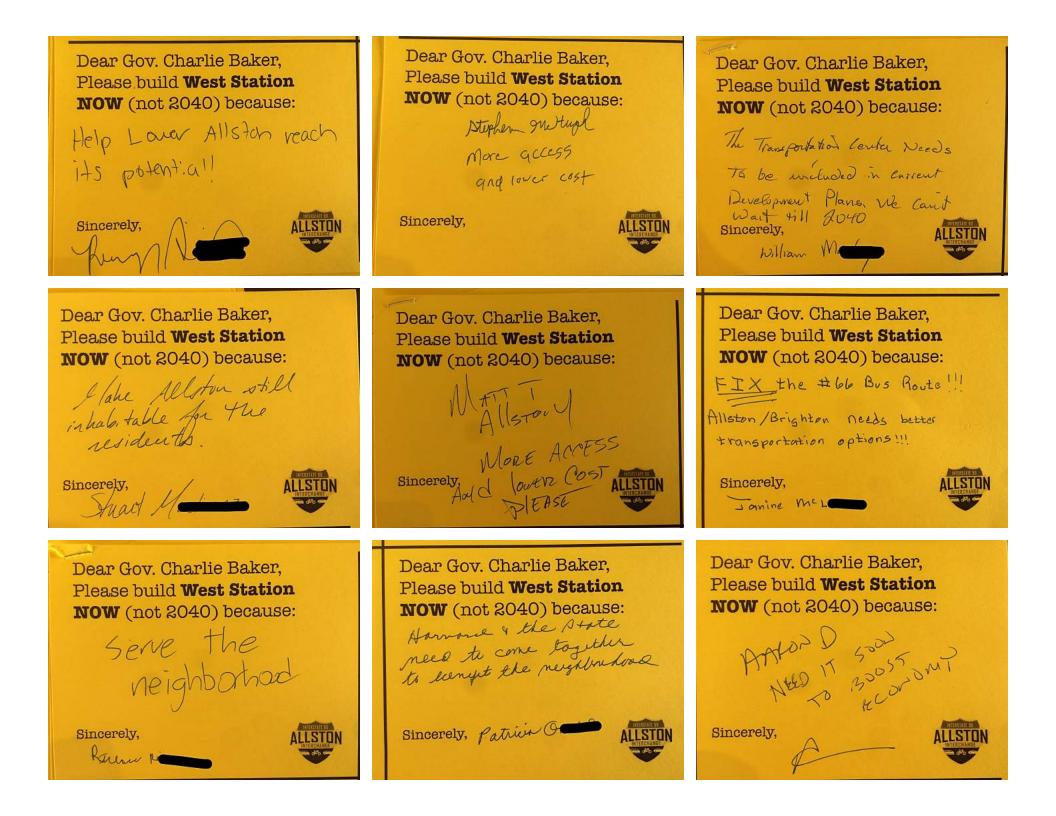
Willing all the my to the green line is a laye moste of time. And time is more of the bruke.



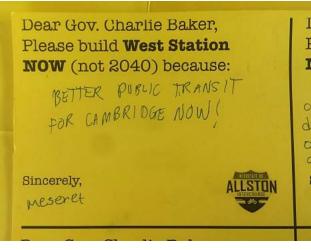
Dear Gov. Charlie Baker, Please build **West Station NOW** (not 2040) because: Most of us living in this neighborhood rely solely on public transportation and to not own cars. I need accessible transit in order to get to my jobs. Wailong 22 years for this reasonable intrastructure to be built is not a fair nor Sincerely, your constituents like me.











OFFICE OF THE EXECUTIVE VICE PRESIDENT



February 9, 2018

Secretary Matthew A. Beaton Executive Office of Energy and Environmental Affairs Attention: MEPA Office 100 Cambridge Street, Suite 900 Boston, Massachusetts 02114

Re: I-90 Allston Interchange Project, a Multimodal Transportation Project Draft Environmental Impact Report, EEA Number 15278

Dear Secretary Beaton:

The I-90 Allston Interchange Improvement Project (the Project) is a unique opportunity to knit together pieces of Boston separated by the construction of rail infrastructure in the 19th century and the Massachusetts Turnpike extension over a half-century ago. The President and Fellows of Harvard College (Harvard) applaud the Baker Administration for pursuing a Project that will maximize public benefits by (1) improving the pedestrian, bicyclist and motorist experience in and around the Interchange; (2) introducing new public transit infrastructure serving the Project's neighborhoods of Boston, Cambridge, and Brookline, as well as the Commonwealth; and (3) creating a transit-oriented development node centered at the convergence of new north/south public transit routes and enhanced east-west rail service. Harvard looks forward to partnering with the Massachusetts Department of Transportation (MassDOT) on a Project that successfully achieves these benefits and it is in the spirit of partnership that Harvard offers the following comments on the Draft Environmental Impact Report for the Project dated November 30, 2017 (the DEIR).

Background

This project, with all of its associated benefits, would not be possible without collaborations and investments by both MassDOT and Harvard in the years preceding it. Harvard purchased Allston Landing North and South from the Massachusetts Turnpike Authority. Harvard later negotiated an agreement with CSX Transportation, Inc. (CSXT) to vacate both Allston Landing North and South. That agreement required substantial payments by Harvard to CSXT and required that CSXT remove the remnants of its rail operations, and investigate and remediate any contamination. Most of that work is now complete and, with the cooperation and support of MassDOT and the City of Worcester, CSXT was able to successfully relocate its Beacon Park Yard operations to Worcester.

This relocation of operations by CSXT provided the opportunity to expand the single track passenger service bottleneck in Allston that has plagued passenger rail operations on the Worcester Branch since the construction of the Turnpike. In a complementary and coordinated action, MassDOT purchased from CSXT the ownership of rights to a multitrack passenger corridor on the Worcester Branch, the ownership of land rights in Cambridge to the Grand

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Junction Railway, and the control of dispatching and scheduling of all passenger and freight service on these lines, enabling the MBTA to significantly improve the reliability of rail passenger service in the western corridor. It now provides the opportunity for MassDOT to replace its structurally and functionally deficient Turnpike interchange with a new, straighter, and safer alignment.

Harvard will now, at no cost to the Commonwealth, provide the easements necessary to construct and maintain the Project, and contribute the land upon which Soldiers Field Road will be located, creating new parkland along the Charles River. Harvard hopes its material private investment in the Project will facilitate the sort of state and federal financing provided for public-private partnerships. We also hope that the Project can capitalize on Harvard's willingness to provide substantial staging space for contractors in order to minimize project complexities and disruption while shortening the construction period.

Harvard recognizes the balance of services that MassDOT must achieve in contemplating any new project. Such a balance had been largely achieved in the latest public plan that preceded the filing of the DEIR (Concept 3K-4 Refined). Through a series of improvements over the past two years, that Project plan evolved to truly be, as the cover page of the DEIR indicates, "a multimodal transportation project", including a new urban interchange, an MBTA rail layover facility, and a regional multimodal West Station. The many iterations leading to the Concept 3K-4 Refined resulted in a plan that preserves air rights development that is both economically viable and technologically feasible in order for the full benefits of the Project to all parties—public and private—to be achieved. As the owner of most of the Project site, Harvard submits these comments in support of such a project.

Outline of Harvard's Comments

IV.

- I. Harvard Supports the Soldiers Field Road Realignment and Associated Open Space
- II. West Station Must Be A Regional Multi-Modal Transportation Facility
 - A. Harvard Funding for an 'Early Action' West Station
 - B. Elements of Permanent West Station Require Modification
 - C. The Location of the Permanent West Station Requires Further Evaluation
 - D. The "Flip" Creates the Opportunity for a Buffer Park Next to the Neighborhood
- III. Harvard Does Not Support MassDOT's Project "Phase 2"
 - Harvard Supports the Urban Street Grid with Certain Modifications
 - A. Enhancements to the Day-of-Opening Street Grid
 - B. Inclusion of Cambridge Street Bypass Road
 - C. Further Study of North-South Transit Corridor
 - D. Street Design
 - E. Traffic and Transit Ridership Forecasts
 - F. Parcel Access
- V. Harvard Does Not Support the No Build Alternative
 - A. No Build Alternative Cannot Include Construction of a New Railyard
 - B. The No Build Alternative Does Not Improve Existing Conditions
 - C. The No Build Alternative Creates Unacceptable Safety and Construction Impacts



- D. Harvard Has Not Agreed to a Land Transaction for a No Build Alternative
- VI. Stormwater Design, Construction, and Maintenance
- VII. Timing of MassDOT Removal of Existing Infrastructure
- VIII. Protection of Development Potential
- IX. Future MassDOT Property Interests
- X. Construction Management of the Build Options
 - A. Ramp and Street Grid Reconstruction
 - B. Grand Junction Rail
 - C. Worcester-Framingham Line
 - D. Construction Vehicle Routes
- XI. Considerations for Selecting a Preferred "Throat" Alternative
- XII. Other Topics Requiring Further Collaboration

I. Harvard Supports the Soldiers Field Road Realignment and Associated Open Space

Harvard enthusiastically supports the modification in the Concept 3K-4 Refined that further realigns Soldiers Field Road away from the Charles River, yielding over two new acres of riverfront park, including a widened Dr. Paul Dudley White Path (PDW Path). This Project modification will materially improve conditions along the river for pedestrians and bicyclists in addition to providing significantly increased recreational and event opportunities for all in this reach of the Charles River Reservation. In particular, Harvard supports the depression of a section of Soldiers Field Road to allow a landscaped at-grade overpass for vehicles, pedestrians and bicyclists. Both of these elements are critically important to improving pedestrian and bicyclist conditions in the vicinity of the Project Site and facilitating connections to the Charles River, including on the improved Cambridge Street that is an essential element of the Project. This modification will also provide a more direct connection for regional westbound Soldiers Field Road traffic to reach I-90 entrance ramps without experiencing the congestion that these movements encounter today at the Cambridge Street/River Street Bridge intersections, thus improving local Allston and Cambridge traffic.

Because we believe this element of the Project to be a critically important, unique opportunity to improve the Charles River Reservation and reduce the scale of Cambridge Street, Harvard will work with MassDOT to contribute the real estate rights necessary for the relocated Soldiers Field Road and the associated connections which will allow for the creation of additional riverfront park as part of an overall Project. Harvard is pleased that its direct discussions with Houghton Chemical Company resulted in a financial arrangement leading to the eventual discontinuance of the Houghton Rail Spur which served as a major impediment to this design refinement.

We are pleased that this feature is included as a Phase 1 component.

II. West Station Must Be A Regional Multi-Modal Transportation Facility

Harvard's partnership with MassDOT on the Project has always been predicated on the commitment that West Station will be a regional multi-modal facility that not only serves the

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Project Site, but also provides connectivity for public transit customers travelling through the new transit hub. Harvard envisions a future that includes the existing east-west commuter rail service in addition to urban commuter rail service at a greater frequency, including self-propelled passenger cars on the Grand Junction rail line and the Worcester-Boston commuter rail line, as well as expanded regional bus service. The permanent West Station must accommodate this future and should not be contemplated as simply a "neighborhood" station.

A. Harvard Funding For An "Early Action" West Station

Understanding that early commitments to the full multi-modal facility may be challenging to MassDOT given uncertainty related to the ultimate development of an area whose availability is a decade away, Harvard has introduced the option of an "early action" West Station and offered to provide up to \$8 million for its construction. A similar "early action" station was constructed at Yawkey Station in 1988 and provided years of service to the adjacent Fenway and Kenmore Square neighborhood and the Longwood Medical and Academic Area until the construction of an upgraded station by the MBTA in 2014.

On the path to regional transportation improvements that the Project will deliver, the North Allston community will endure many years of disruption and inconvenience related to the construction of the Project. A primary element of this Project is the eventual introduction of commuter and regional service to this area. It is Harvard's hope that by providing funding for an early action West Station, this option for potential Phase 1 rail service to the Project Site may be considered even as the specific timing of the full West Station remains under review. Harvard fully recognizes that the decision as to when rail service will be introduced at the Project Site, and at what levels, is one that belongs to MassDOT after an assessment of projected regional development, area ridership demand, as well as impacts to existing service. We hope that the years of construction inconveniences endured by the local community in furtherance of this regional project might also be considered along with ridership and financial implications in any evaluation of the factors relating to the introduction of an early action facility.

B. Elements of Permanent West Station Require Modification

To meet the needs of the City of Boston, the Allston-Brighton neighborhood and other stakeholders, including Harvard, the elements of the permanent West Station to be evaluated in the Final Environmental Impact Report (FEIR) will require some modification. These improvements are consistent with creating the type of regional multi-modal station that is needed to serve the Project's neighborhoods of Boston, Cambridge and Brookline as well as the Commonwealth at large. Because a regional multi-modal transportation facility at West Station is so critical to the Project, Harvard is increasing its contribution to the cost of the permanent West Station to up to \$50 million.

Consistent with Harvard's past understanding with MassDOT, the permanent West Station	HU-1
should be constructed as part of an air rights development plan that would also include a	
Cambridge Street Bypass Road to connect Cambridge Street with West Station and Cattle	HU-2
Drive. The Cambridge Street Bypass Road should be included in the 2040 condition of the	
Project as a "by-others" roadway. Harvard encourages MassDOT to plan for the Malvern Street	HU-3
north-south bus connection proposed by Boston University as a key component of this	
commuter node. We further discuss this provision in IV(c) below. Harvard is concerned that the	

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current plan for West Station has an insufficient number of bus bays and lacks sufficient expansion space to accommodate future growth in bus service. These deficiencies of the permanent West Station as described in the DEIR should be addressed in the FEIR.

Harvard encourages MassDOT to reconsider and lower the 50 mph speed limit proposed for rail transit in the DEIR. We believe that this proposed design criterion is inconsistent with the rail service envisioned for this corridor including the recent completion of Boston Landing Station, the future introduction of West Station, the proximity of Yawkey Station and horizontal restrictions within the Throat area.¹

HU-4

HU-6

C. The Location of the Permanent West Station Requires Further Evaluation

Harvard urges further evaluation of locating the permanent West Station north of the Rail Lavover Facility rather than the current configuration in the plan and, for the reasons stated here, looks forward to a more substantive review of this option. This "tlip," which has been the subject of preliminary discussions between MassDOT and Harvard, is generally depicted in Figures 16 and 17 of Appendix A to the DEIR and Harvard sees significant advantages to flipping the location of West Station and the Rail Layover Facility while moving West Station slightly to the west. This further refinement of moving the permanent West Station to the west under the "flip" option takes full advantage of the geometry of the highway alignment by tucking West Station in the most northerly location to more efficiently utilize available real estate and to deliver maximum benefits. These benefits include moving the Rail Layover Facility and providing the opportunity for a larger bus facility on the air rights deck.

As envisioned by Harvard, the refinement to the DEIR version of the "flip" would result in three rail tracks utilizing the northernmost bay of the Cambridge Street Bridge instead of four rail tracks with two tracks in each of the two bays of the bridge. This configuration is consistent with the current track layout at Boston Landing and would free the southern bay for other beneficial uses that are described below.

The "flip" would also put the Rail Layover Facility south of and adjacent to the Worcester-Framingham commuter rail tracks, eliminating crossings of the Grand Junction Rail line during daytime service hours. This would facilitate the future use of the Grand Junction Rail corridor for passenger service.

The "flip" also makes the Project easier to implement while minimizing construction-related disruption. It accomplishes this by allowing the foundations and decks for West Station and accompanying the interim Rail Layover Facility to be built at grade. It would then allow the permanent Rail Layover Facility to be relocated to the north below the newly constructed deck, allowing for a convenient "ground-up" construction methodology. The remainder of the "air-rights/West Station" foundation, the deck and Cambridge Street Bypass road, and permanent Rail Layover Facility would be constructed to the south. Some elements of the buffer park described below would be reconstructed in this last phase.

¹ Harvard's letter dated January 23, 2018 regarding Harvard's financial commitment to West Station is attached to the end of this letter.



D. The "Flip" Creates the Opportunity for a Buffer Park Next to the Neighborhood

This "flip" results in another material benefit without significantly affecting rail operations. As described above, Harvard's proposed refinement to the DEIR "flip" would move the permanent station and Rail Layover Facility to the north away from the neighborhood. This would provide the opportunity to create a new buffer park on the south side of the Project with the following advantages:

- A new bicyclist and pedestrian path that would connect West Station with Harvard Avenue and a reconstructed Franklin Street pedestrian bridge to the west and Babcock Street to the east;
- Simplification of the Franklin Street pedestrian bridge ramp system, the current design of which requires property takings along Harvard Avenue;
- The anticipated twenty-foot high Project noise barrier would no longer be on the boundaries of the residential properties on Pratt Street and Wadsworth Street; and
- Easier access to BWSC utilities within the corridor.

Harvard requests that MassDOT consider the development and implementation of this buffer park as part of an evaluation of the "flip." with an eve towards potential implementation during Phase 1._____

Because the "flip" provides these material benefits without any increase in Project cost and with no significant impact on rail service, Harvard is not in a position to support the location of the permanent West Station specified in the DEIR without the benefit of a full analysis of the costs and benefits of the "flip," discussed above.

HU-8

III. Harvard Does Not Support MassDOT's Project "Phase 2"

Phase 2 is a new element to the Project with significant impacts that have not been subject to public discussion previously. Harvard is concerned that this new Phase 2 introduces a significant new variable that will undermine the implementation of key individual components of the Project, including the permanent West Station, the continuity of rail service throughout Project construction, and the economic viability and technological feasibility of decking over the permanent Rail Layover Facility with air rights development. It also specifically precludes consideration of the "flip" described above by constructing the permanent Rail Layover Facility in a location incompatible with the "flip."

The Project has always included a significant MBTA rail layover facility and mitigated this component by planning for the eventual decking above the rail layover facility that would occur along with the construction of the permanent West Station. The 3K Refined plan reduced the footprint of the rail layover facility, simplifying the Project and unlocking improvements that were directly responsive to the City of Boston Placemaking Study and comments from members of the Task Force, the City of Cambridge, Harvard, and others. This single revision in the Concept 3K Refined plan simultaneously locked in MBTA layover capacity while improving the urban condition created by the Project and street grid, simplifying the engineering and construction of the permanent West Station and other air rights projects, and introducing an enhanced realignment of Soldiers Field Road. It did so by siting an interim rail layover facility that would

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later be moved to make room for West Station in a process that maximized the construction of the decking above the permanent Rail Layover Facility, the highway and West Station.

The Concept 3K Refined envisioned the permanent West Station, the permanent Rail Layover Facility, and air rights infrastructure to be constructed simultaneously. As this occurs, the "early action" West Station and the interim Rail Layover Facility could continue to operate in a modular approach that minimizes disruption of rail operations, including on the Worcester Commuter line, and maximizes the constructability of the entire Project, including the associated air rights development. It assured that all of the desirable elements to stakeholders were delivered simultaneously.

In the DEIR, MassDOT proposes Phase 2 which would temporarily double rail layover capacity by building the permanent Rail Layover Facility while the interim Rail Layover Facility remains in place and prior to the introduction of West Station. This effectively disconnects the construction of West Station and the permanent Rail Layover Facility in ways that undermine the timing and constructability of West Station.

Specifically, the expanded rail layover facility would be constructed sometime after completion of Phase 1 of the Project – 2026-2028 – only to be removed when the permanent West Station is constructed. Once in place, removing this freshly introduced layover capacity would be a consequential decision for the MBTA but a necessity for the construction of the permanent West Station. Therefore, Phase 2 will likely delay the construction of a permanent West Station and possibly to beyond the 2040 timeframe discussed in the DEIR. Not only does Phase 2 complicate construction by breaking apart the elements of layover, West Station and air rights construction, but it also puts a new and temporarily expanded layover facility in direct conflict with the permanent West Station.

Phase 2 disturbs the balance between the elements of this Project by prioritizing layover capacity and introducing a significant impediment to the introduction of the transit element of the Project that is most important to a range of stakeholders. It will also preclude the "flip" of West Station which, as discussed above, has significant benefits. For these reasons, Harvard opposes Phase 2 of the Project as we understand it and urges MassDOT to revert to the Concept 3K Refined plan contemplated prior to the DEIR. At a minimum, all of the impacts of the proposed Phase 2, including those discussed above, should be evaluated in the FEIR and compared to the Project as presented prior to the DEIR.

IV. Harvard Supports the Urban Street Grid with Certain Modifications

Harvard appreciates the lengths to which MassDOT has gone to respond to recommendations of the City of Boston's Placemaking Study, comments made during Task Force deliberations and concerns raised by Harvard. The currently proposed street network responds to many of Harvard's concerns expressed during the Study, including:

 Integration of the Allston Landing North/Enterprise Research Campus (ERC) street grid and the Allston Landing South roadways. The current Build option provides continuity of the three proposed north-south streets in the ERC – East Drive, Cattle Drive and Stadium Way – which improves traffic distribution; HU-9



- Relocation of Soldiers Field Road, discussed above;
- Improvements to the alignment of Cambridge Street South between the Cambridge Street/North Harvard Street intersection and the Soldiers Field Road ramps, enabling the inclusion of the Lincoln Street Connector; and
- Inclusion of the Lincoln Street Connector, a new westbound connection improving the distribution of traffic to points west on Cambridge Street by allowing traffic exiting I-90 westbound to bypass Cambridge Street and Cambridge Street South.

The street network improvements have the cumulative effect of reducing the impact of regional traffic volumes on existing roadways within Allston, including Cambridge Street, Western Avenue, North Harvard Street, and the SFR frontage road. For example, as compared to the 2040 No Build, the Build options reduce traffic volumes on Cambridge Street between North Harvard Street and Soldiers Field Road by an average of approximately 30 percent and 35 percent during the morning and evening peak hours, respectively. These reductions are largely attributable to the design refinements that are described above.

A. Enhancements to the Day-of-Opening Street Grid

Harvard is concerned about the significant amount of traffic that the DEIR assumes will use the Enterprise Research Campus (ERC) roadways. The ERC roadways are local streets that provide access and circulation for abutting land uses and create the opportunity to reduce traffic volumes in the residential neighborhood to the west of the ERC. They are not intended as alternative routes for through traffic that belong on regional roadways like Soldiers Field Road. We are particularly concerned about the volume of regional through-traffic traveling southbound from the Soldiers Field Road/Western Avenue Bridge intersection through the ERC and Allston landing South to the new I-90 on-ramps and its impact on the size and quality of the new local street grid.

The DEIR traffic analysis assumes that a significant portion of this traffic will opt to use ERC roadways like Cattle Drive, East Drive, and the so-called North Connector Road instead of the southbound Soldiers Field Road service road, a regional traffic facility. These routes may have made sense prior to the inclusion of the new Soldiers Field Road ramp system to Cambridge Street South in the Project. Because of this design improvement, the current DEIR plan has created significant excess capacity at the Cambridge Street/Soldiers Field Road intersection that we believe can and should be used to accommodate traffic currently assigned to the North Connector Road and the north-south ERC roadways.

Proposed Modifications to Street Grid

Some of the modifications Harvard suggests here result from the significant opportunities presented by the enhanced realignment of Soldiers Field Road in the plan. Harvard respectfully requests modifications to the day-of-opening street network to encourage a shift of this regional traffic out of the ERC and onto the southbound Soldiers Field Road service road, including:



- 1. Eliminate the North Connector Road. Harvard no longer supports the construction of the North Connector Road as part of the Project and believes that Hotel Lane is better located to accommodate these traffic flows.
- 2. Construct Hotel Lane. Hotel Lane should replace the North Connector Roadway as the primary east-west distributor for traffic movements identified above. A portion of this street is already needed to provide access to the Doubletree Hotel and Houghton Chemical. We recommend extending the street to Cattle Drive.
- 3. Construct a new two-way roadway ("Stadium Road Connector") to extend and turn Hotel Lane from its Cattle Drive intersection to the westbound service road. The roadway would form a new "T" intersection with the westbound service road to provide access from the I-90 westbound off-ramp and to the I-90 westbound on-ramp.
- 4. Eliminate the West Connector Road. This connection to the I-90 westbound on-ramp attracts traffic to cut diagonally through the ERC and Allston Landing South roadway network to and from I-90 westbound. This movement could be accommodated at the proposed Stadium Road connector.

Benefits of Modified Street Grid

These changes to the roadway network would better accommodate the strong desire line for traffic from the north and east that is destined to I-90 westbound than the street grid described in the DEIR. They would also significantly reduce regional traffic volumes on the proposed ERC and Allston Landing South roadways, as well as on Cambridge Street with the following benefits:

- Opportunities to reduce the number of travel lanes along Cambridge Street and on key roadways in Allston Landing South, improving conditions for pedestrians and bicyclists.
- Improved traffic operations on Cambridge Street and Cambridge Street South because there would be fewer closely spaced signalized intersections along these roadways. Smaller local circulation streets would be developed as part of the future build-out of these parcels.
- Better access and development parcel flexibility in the ERC and western section of Allston Landing South.
- Opportunities to create dedicated transit roadways and/or lanes in place of general traffic lanes.

Harvard urges additional analysis of these enhancements in the FEIR.

B. Inclusion of Cambridge Street Bypass Road

HU-12

Harvard has concluded that, in order to develop air rights over West Station and the Rail Layover Facility, a new roadway, the so-called Cambridge Street Bypass Road, is needed to provide access to the adjacent parcels. The roadway would be a two-way street between the Cambridge Street Bridge over I-90 and the new elevated eastbound service road between Seattle Street and Cattle Drive, preferably at the Cattle Drive intersection. The Cambridge Street Bypass Road is included in the City of Boston's Placemaking Study and has been supported by members of the Task Force.

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The Cambridge Street Bypass Road would create the opportunity to shift traffic from Cambridge Street, Seattle Street, and Cambridge Street South. Harvard estimates that approximately 500 vehicles that would otherwise use Cambridge Street during peak hours to travel from the west to the I-90 eastbound on-ramp would shift to the Cambridge Street Bypass Road. This shift would create the opportunity to reduce roadway cross-sections, substitute transit lanes for general traffic lanes, and improve operations on the proposed Allston Landing South roadways.

Harvard anticipates that the Cambridge Street Bypass Road would be constructed at the same time as the permanent West Station. Therefore, we request that MassDOT evaluate the traffic impacts of the Cambridge Street Bypass Road in the FEIR, and in the context of the proposed West Station "flip" discussed above.

C. Further Study of North-South Transit Corridor

Harvard is concerned that the DEIR does not take advantage of the proposal forwarded by Boston University for the Malvern Street bus corridor and the Harvard-proposed Stadium Way transit corridor in the "Build" option. These elements should be fully evaluated in the FEIR after consultation with other stakeholders, including Boston University and the City of Boston. In addition, MassDOT should consider how these elements could be connected by bus lanes between West Station and Cambridge Street and ensure that investments in the proposed bridge structures do not preclude the installation of bus-only lanes in the future. Harvard believes this approach is consistent with a Harvard Square to West Station to Longwood Medical Area route that also would be consistent with local and regional desire lines as well as more responsive to existing overcrowding and operational challenges on the Route 66 bus route.

The Malvern Street bus corridor was adequately studied in the DEIR and supported by the Task Force and Boston University. We request that MassDOT make this bus connection part of Phase 1 of the Project presented in the FEIR.

D. Street Design

Harvard has worked closely with the City of Boston through its public processes for the 2013 Institutional Master Plan (IMP) and the ongoing ERC Planned Development Area (PDA) Master Plan to develop design guidelines for streets in the IMP and ERC areas that conform to the City's Complete Streets Guidelines. Harvard looks forward to coordinating with MassDOT on compatible street design guidelines for the Project, including:

- Street lights. The City of Boston has approved a dual-height lighting strategy with a modern LED fixture for new streets Harvard is constructing in Allston. This approach provides enhanced safety for all modes of travel.
- Tree plantings and furnishing zones. After assessing recent Harvard streetscape projects, the size of furnishing zones on new streets that will be constructed around the Science and Engineering Complex was increased to six feet in width, inclusive of the curb, to ensure adequate soil conditions that will create a robust tree canopy.

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- Interim conditions. Most streets in the Project will and should be designed for a high quality permanent condition. Certain streets, however, like the proposed Hotel Lane, could be in an interim condition until development occurs and full utility system requirements are determined.
- Bicycle accommodations. Harvard continues to work closely with the City of Boston to develop bicycle accommodations on its IMP and ERC streets. We recommend that MassDOT consider using these layouts in the Project area to ensure that a cohesive bicycle network is established. In particular, we wish to coordinate bicycle accommodations on the north-south streets. For example, Harvard has proposed a twoway side path on the east side of Cattle Drive from Western Avenue to Cambridge Street and would support similar bicycle accommodation continued to Cambridge Street South and West Station.

Harvard looks forward to working with MassDOT, the City of Boston and the community as these important street design issues are advanced and further evaluated in the FEIR.

E. Traffic and Transit Ridership Forecasts

Harvard asks MassDOT to provide an updated traffic model after review and re-calibration of traffic model assumptions with the affected municipalities to ensure that the proposed traffic volume assignments are consistent with their planning. The CTPS traffic model should be calibrated to account for traffic flows in a constrained network with limited planned transit services. In particular, further analysis is required regarding the increased traffic flows projected on the Western Avenue and River Street bridges and Cambridge Street and Harvard Avenue west of the Project.

Harvard also asks that MassDOT gather data and survey ridership at the new Boston Landing commuter rail station. Existing ridership estimates appear to significantly exceed 2040 ridership forecasts in the DEIR. It would be helpful to understand the nature of the ridership at the Boston Landing station to calibrate the model for evaluation of West Station. Key issues of interest include the percentage of the ridership attributable to walk-ins from the neighborhood, the percentage of the ridership attributable to "reverse commuting" to the station, the catchment area of the station, the origins and destinations generating the trips, and whether the riders at Boston Landing are shifting from other transit modes like the Green Line or the Route 57 bus to Commuter Rail.

F. Parcel Access

MassDOT has made significant progress to improve access to the new parcels that will be created by the Project and to identify options to access the existing uses at the Doubletree Hotel and Houghton Chemical. Harvard has proposed refinements to the local street network that work to address parcel access in the western section of Allston Landing South by future development of smaller local circulation streets instead of proposed regional roadways like West Connector Road.



Other parcels along the edge of Cambridge Street South and East Drive will need additional coordination with MassDOT, and in some cases DCR, to ensure that future access needs are addressed. There are similar issues with the proposed air rights parcels. In both cases, it will be important to ensure that the "No Access Limit" does not preclude curb cut locations at appropriate locations for private streets or driveways that would accommodate service, vehicular access, and fire protection requirements of the parcels.

V. Harvard Does Not Support the No Build Alternative

The DEIR suggests the viability of a "No Build" alternative that replaces the existing Turnpike Viaduct as well as the construction of a permanent Rail Layover Facility on the Project Site. Discussions between Harvard and MassDOT regarding a Project that would lead to the land transfers necessary for construction of the I-90 project have never included the No Build option and have always centered on the full multi-dimensional Project discussed above. Indeed, the No Build option ignores the significant opportunity to take advantage of access to Harvard land for such a multi-dimensional outcome. Harvard has never agreed to a transaction resulting in only the "No Build" project elements, as this option has never directly been discussed.

The DEIR does not adequately analyze the enormous risks the "No Build" alternative poses, including the loss of useable lanes on I-90 and the interference with the Worcester branch rail service during construction. Consistent with the requirements of MEPA, we request that a serious evaluation of these auto and rail service issues be provided for public comment if MassDOT does not agree that the "No Build" alternative should be abandoned altogether in the FEIR.

Given that Harvard does not support the "No Build" alternative, this option would face considerable constructability issues not evaluated in the DEIR. We understand that, due to the compromised condition of the Viaduct, intervening events related to its safety could alter the course of discussions based upon an emergency situation, but short of such an event, we respectfully request that MassDOT abandon it as an alternative.

A. No Build Alternative Cannot Include Construction of a New Railyard

As a procedural matter, construction of a new rail layover facility on the Project Site is not properly an element of the "No Build" alternative. Any impacts of the construction or operation of a new rail layover facility must be evaluated as part of a "Build" alternative.

B. The No Build Alternative Does Not Improve Existing Conditions

The No Build Alternative does not improve conditions for pedestrians and bicyclists – a condition which the DEIR reports in Section 5.7.1, "will continue to be challenging for pedestrians and bicyclists alike."

This alternative does nothing to address the current traffic conditions at the I-90 Interchange, let alone the anticipated increases in traffic at the Interchange. As is reported in Section 1.5.8 of the DEIR, "existing traffic operational deficiencies . . . will be exacerbated in the future under the 2040 No Build Alternative." This is most evident at the intersection of Cambridge Street and



the Interchange. The volume of traffic at this intersection is projected to increase by nearly 20 percent in the peak hours under the No Build alternative. The No Build alternative also does not address other aging infrastructure, including several bridges, in the Interchange, or the impacts of repairing or replacing that infrastructure.

C. The No Build Alternative Creates Unacceptable Safety and Construction Impacts

As discussed in Section 4.8.1.6 of the DEIR, the No Build alternative does not implement the recommendations of MassDOT's I-90 Road Safety Audit (RSA), which recognizes several current and serious safety deficiencies of the Viaduct, nor does it address current safety issues on Cambridge Street, particularly at its intersection with the I-90 Interchange.

The DEIR does not provide the same level of detail regarding the construction impacts of replacing the Viaduct under the "No Build" alternative as it does for "Build" alternatives. However, it is apparent from the discussion of the "Build" alternatives that the Viaduct replacement will reduce I-90 capacities from four lanes to three lanes in each direction for the duration of the Project. The DEIR does not describe how this impact could be mitigated or how commuter rail service will be impacted during construction of the No Build alternative.

Even without these details, it is clear that the "No Build" alternative will result in significant motorist delays, unacceptable diversions of traffic onto local streets, and degradation of commuter rail service over the duration of its construction. The DEIR does not provide sufficient information about the construction schedule for the "No Build" alternative.

D. Harvard Has Not Agreed to a Land Transaction for a No Build Alternative

The DEIR seemingly assumes that Harvard would provide the same construction-related access to the Project Site for the "No Build" alternative as it would for the "Build" alternatives. Because Harvard is unlikely to facilitate the "No Build" alternative to the same degree as it would facilitate a Project it supports, MassDOT would need to evaluate the impacts associated with off-site laydown to replace the Viaduct in the FEIR if it retains the "No Build" alternative.

VI. Stormwater Design, Construction, and Maintenance

As the primary landowner of the Project Site, Harvard has a vested interest in ensuring that the Project complies with all applicable federal, state and city requirements relating to the design, construction, and maintenance of the Project's stormwater management systems. Harvard appreciates MassDOT's recognition in the DEIR of Harvard's appropriate "role [] in the development of the stormwater management system" as well as MassDOT's recognition in the DEIR that "[t]he stormwater BMPs are subject to the land owners' approval."

Harvard has not yet been involved in MassDOT's stormwater management evaluations and the conceptual design efforts reported in the DEIR and was not aware of the substance of these efforts until the DEIR was released to the public. Harvard looks forward to working with MassDOT to fulfill those stormwater management evaluation requirements of the Secretary of Energy and Environmental Affairs in the Certificate on the Environmental Notification Form for

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the Project not addressed by the DEIR, including that MassDOT provide: (a) analysis to substantiate that the State stormwater standards are met to the maximum extent practicable; and (b) evaluation of the stormwater management system for consistency with I otal Maximum Daily Loads (TMDLs).

Harvard looks forward to collaborating with MassDOT on a stormwater management system design in time for MassDOT to present a design acceptable to Harvard in the FEIR. Harvard has concerns about whether certain elements of the conceptual design are consistent with the future "overbuild" redevelopment of the Project Site, which we will share in the course of that collaboration. For example, the elements of the stormwater management system that will receive stormwater associated with the post-Project redevelopment of the Project Site will need to be designed and constructed in compliance with the applicable requirements of the Boston Water and Sewer Commission. Harvard does not support stormwater retention areas that will impair future air rights development on the Project Site as suggested in section 5.2.2.1 of the DEIR. Such elements are generally inconsistent with urban redevelopment.

Harvard and MassDOT have had significant and encouraging discussions related to stormwater and a public-private partnership related to implementation. We look forward to continued discussions with MassDOT and the Boston Water and Sewer Commission to advance these plans.

Harvard acknowledges and appreciates MassDOT's acceptance of responsibility for any federal, state or local permits required in connection with the operation of the stormwater management systems for the Project, including the Rail Layover Facility. Contrary to suggestions in Sections 4.17.1 and 5.17 of the DEIR, Harvard is not responsible for the operation or maintenance of any part of the stormwater management system on the Project Site and holds no permits related to that system.

Finally, in response to MassDOT's statement that "[t]he proposed highway and street grid HU-19 infrastructure will include water, sewer, power, and gas that will be sized and funded by the landowner to accommodate future development; the infrastructure will be installed by MassDOT." Harvard confirms its intention to fund the difference between the cost of the infrastructure necessary to support the Project and the infrastructure necessary to support the Project and "future development."

VII. **Timing of MassDOT Removal of Existing Infrastructure**

The DEIR references the removal by MassDOT of the embankments that support the existing I-90 Interchange and ramp system. Harvard understands that these embankments will be removed as part of Phase I of the Project but can find no statement in the DEIR to that effect. HU-20 Harvard expects that MassDOT will commit to remove all infrastructure associated with the existing I-90 Interchange and ramp system within a mutually agreeable time interval following the opening of the new I-90 Interchange. The infrastructure to be removed by MassDOT includes the embankments mentioned in the DEIR as well as the replaced roadway and all associated ramps, equipment and appurtenances, including utilities and utility pipes.

HU-16

HU-17





VIII. Protection of Development Potential

Harvard appreciates MassDOT's commitment that "[t]he Project will not preclude accommodation for future development over the shifted I-90 highway section, the layover yard and the commuter rail tracks;" nor, according to MassDOT, will it preclude the construction of a "East-West Transportation Link to [the] Cambridge Street Bridge." It is essential to Harvard that the Project maximize the technical feasibility and economic viability of air rights development, including through the introduction of work zones, horizontal spacing, and vertical clearances within the Project, and MassDOT has committed to that objective. Of course, land development within the Project Site must also be technically feasible and economically viable. Harvard acknowledges MassDOT's repeated commitments in the DEIR to coordinate with Harvard to this end.

The DEIR also suggests the technical feasibility and economic viability of air rights development is secured "by aligning the rail tracks, rail facilities and access roads to accommodate columns 42-feet-on-center between the track pairs spaced at 20-foot intervals east to west" but that any "future developer will be responsible for maintaining existing commuter rail and freight operations and vehicular access to the railroad facilities." The DEIR also indicates that a future developer will be responsible for avoiding or relocating utilities within the Project Site, as well as any stormwater retention areas. Harvard looks forward to working with MassDOT to ensure that the railroad facilities, the vehicular access to those facilities, and any utilities (including for stormwater management), are constructed in such a way as to not interfere with future development, including the "east-west transportation link" and other decking, and that the necessary processes are established to modify those facilities as appropriate.

As is discussed in Section III above, Phase 2 of the Project as we understand it would place permanent rail infrastructure within air rights development work zones, impeding air rights development and limiting flexibility to shift mainline commuter rail tracks. For these reasons, Harvard opposes Phase 2 of the Project as we understand it.

Harvard will also require the following elements of any Project to accommodate air rights HU21a-f development:

- Adjacency of air rights parcels to suitably sized surface parcels to accommodate elevator and utility cores;
- Unencumbered work zones for air rights development and the construction of the permanent West Station, including a Cambridge Street Bypass road compatible with a Malvern Street bus connection;
- Work zones enabling shifting of mainline rail tracks to minimize disruption of East-West rail service during development of air rights and construction of the permanent West Station;
- Sufficient ability for construction vehicles and laydown for development of air rights;
- Sufficient width and layout within the rail yard to support air rights columns; and
- Sufficient vertical clearances to accommodate necessary ventilation equipment.

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Harvard looks forward to collaborating with MassDOT between now and the completion of the FEIR to incorporate in the Project those elements that are necessary to secure the technical feasibility and economic viability of air rights and land development on the Project Site.

IX. Future MassDOT Property Interests

It is our understanding that MassDOT and Harvard agree that the property interests MassDOT will acquire from Harvard to allow the construction of the Project will be easements similar to the MassDOT easements allowing the current I-90 Interchange and four layover/layup rail tracks on Harvard property. However, Harvard notes at least one reference in the DEIR to the acquisition of fee interests from Harvard. Harvard has not yet agreed to convey any fee interests in connection with the Project but welcomes a discussion with MassDOT about its needs consistent with the Project goals and legal requirements. More specifically, Harvard is prepared to contribute the real estate rights necessary for the relocated Soldiers Field Road and associated connections which will allow for the creation of additional riverfront park as part of an overall Project plan to be agreed upon between MassDOT and Harvard.

X. Construction Management of the Build Options

Section 5.21 of the DEIR summarizes the construction impacts of the Build options and describes general staging plans to build each of the three Throat options. We note that Harvard's efforts to secure the discontinuance of the Houghton rail spur simplified construction management and reduced construction costs by eliminating the need to maintain rail access through the Project's work zone to Houghton Chemical. Furthermore, a key benefit of Harvard's agreement with CSXT is the creation of an area in Allston Landing South that allows significant portions of the Project to be built off-line with ample space for construction laydown. We are concerned, however, that the current staging plan does not take full advantage of these benefits, unnecessarily complicating construction activities and increasing the risk of delays to the completion of the Project. We request that MassDOT provide additional information to adequately evaluate and mitigate the impacts to different modes during construction, with particular attention to staging and construction management approaches that could reduce the magnitude and duration of disruption and delays to project completion.

A. Ramp and Street Grid Reconstruction

We recognize that the shift from existing ramps and streets to the new ramp and street grid is one of the more challenging aspects of the project. Section 5.21 and its accompanying graphics indicate that this shift occurs in the last phase of Phase I of the Project. The DEIR does not provide sufficient information to understand the impacts of this particularly sensitive construction activity which includes completion of the street grid, grounding Cambridge Street, relocating Soldiers Field Road, and constructing the new ramps to Cambridge Street South. We request that MassDOT provide additional information about the sub-phases required to complete this phase of the Project, including duration of each sub-phase, anticipated diversion routes for all modes, and levels of services criteria that MassDOT will strive to achieve on key arterial roadways.



B. Grand Junction Rail

The Highway Viaduct Option keeps the Grand Junction Rail line open during construction while the at-grade options shutdown rail service during construction. We believe that MassDOT should consider more fully the impacts of shutting down service on the Grand Junction Rail corridor during construction for any alternative and investigate potential mitigation measures such as re-routing trains on the PanAm tracks to the north and/or using a reciprocal agreement with Amtrak for maintenance of MBTA coaches. This approach would likely be considered by a Design-Build contractor, since it would reduce impacts within the Throat work zone and, as a result, reduce the risk of delays in the construction schedule.

C. Worcester-Framingham Line

Each of the Throat options restricts service on the Worcester-Framingham line to one track during different construction stages. We note that the Highway Viaduct option reduces the Worcester-Framingham line to a single track with poor operating characteristics during the early years of construction when the mainline capacity has been reduced, a time period when transit mitigation would be most beneficial, while the at-grade options maintain two tracks on the Worcester-Framingham line until the highway is functionally complete. We encourage MassDOT to appropriately mitigate the construction impacts to riders on the Worcester-Framingham line if the Highway Viaduct option is selected as the Preferred Alternative.

D. Construction Vehicle Routes

The DEIR does not provide information about truck routes, access points or construction vehicle HU-27 volumes. MassDOT should provide this information for each stage of the Project construction.

XI. Considerations for Selecting a Preferred "Throat" Alternative

We reviewed the three options to replace the existing I-90 viaduct structure in the area known as the "Throat." We are pleased that MassDOT has refined the Viaduct alternative to reduce its footprint from previously discussed versions of this alternative. Harvard is pleased that direct discussions with Houghton Chemical Company resulted in a financial arrangement leading to the eventual discontinuance of the Houghton Rail Spur which served as a major impediment to advance the two at-grade concept plans in the DEIR.

We appreciate the challenges of selecting one of these three alternatives as the Preferred Alternative and encourage MassDOT to ensure that the selected option is compatible with the West Station/Rail Layover Facility "flip" that is described earlier in this letter. If MassDOT decides to choose the Highway Viaduct option as the Preferred Alternative, we recommend that MassDOT consider replacing the rail bridge over Soldiers Field Road as part of that option. This would eliminate a barrier to the potential for urban rail service on the Grand Junction Rail corridor, improve the PDW Path, and reduce disruption to park users and motorists. If MassDOT decides to choose one of the at-grade alternatives as the Preferred Alternative, we would support the selection of the A Better City at-grade option, which MassDOT indicates has a

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shorter construction schedule than the alternative at-grade option and has the lowest cost estimate of the three options.

Other Topics Requiring Further Collaboration XII.

As the owner of most of the Project Site, Harvard looks forward to collaborating with MassDOT on aspects of the Project of material interest to Harvard. In addition to the topics discussed above, Harvard also looks forward to collaborating with MassDOT prior to the submission of the FEIR on the following topics or, at a minimum, to establish the appropriate ground rules that could be described in the FEIR:

HU29a-g

- Development of a detailed materials/soils management plan;
- Development of a site-specific grading, drainage and sediment and erosion control plan for each remainder parcel:
- Definition of specific roles and responsibilities related to the development of air rights over the Project;
- Definition of the horizontal and vertical limits of the Project; •
- Definition of appropriate cross section for each of the major roadways constructed by the Project in both their interim and permanent conditions;
- Definition of the bicyclist and pedestrian elements of the Project: and
- Development of a utility master plan specifying the capacity, location and time of implementation of each of the utility systems necessary for the Project and for the development of air rights and resulting development parcels.

Harvard has benefited greatly from interactions with various stakeholders, including the I-90 Task Force, the City of Boston, the City of Cambridge, the City of Brookline, Boston University, the Harvard-Allston Task Force, and the Enterprise Research Campus IAG, in addition to leadership in related advocacy organizations as well as neighbors in our host communities. We also continue to appreciate our regular interactions with MassDOT officials and we look forward to further collaboration as the process continues.

Sincerely,

Katherine N. Lapp Executive Vice President Harvard University

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Stephanie Pollack Secretary and Chief Executive Officer Massachusetts Department of Transportation 10 Park Plaza, Suite 4160 Boston, MA 02116-3969

January 23, 2018

Dear Secretary Pollack:

It was a pleasure speaking with you to discuss the I-90 Allston Interchange project and alert you to some of the key issues Harvard University will be raising in our more detailed comment letter on the Draft Environmental Impact Report.

Importantly, we were pleased to be able to outline for you two additional contributions Harvard is prepared to make to financially support the introduction of an "early action" interim West Station as a new element of the Project, along with an increased contribution for the permanent West Station. Specifically, Harvard is prepared to make the following contributions to the project to ensure its success:

- Up to \$8M to fund an "early action" commuter station in Allston Landing South.
- An increased commitment to the funding of the full build regional West Station from the current one-third of an estimated \$90+ million facility to a \$50 million contribution, representing over half of the current estimate.

These additional contributions will support both an early neighborhood transit service (that may serve as a bridge to full service) and the introduction of the regional, multi-modal West Station. Together, these contributions will enhance the significant public-private partnership between Harvard and the Commonwealth that is already reflected in this project, as outlined below. These investments also represent Harvard's deep commitment to the Commonwealth's long-term economic growth, the University's longstanding and constructive partnership with its neighbors, and the objectives we all share for the future of a connected and economically vibrant community in Allston-Brighton.

This project represents a generational opportunity not only to repair and replace the compromised viaduct, but also to modernize neighborhood circulation, address long-standing traffic impacts, and introduce new mass transit infrastructure in service of the neighborhood, the City of Boston, and the Commonwealth. These improvements would capture the opportunity to create a transit-oriented development node centered on the convergence of new north-south transit routes and enhanced east-west rail service while strengthening the

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desired synergies between emerging and existing neighborhoods. I appreciate your taking an approach that seeks to capture this opportunity and also want to recognize your team for adapting the project over time in ways that have improved and enhanced the associated public benefits.

Harvard's direct contributions to the Project thus far

Harvard recognizes that it is a beneficiary of this project, as land that Harvard owns will become more readily developable after the project is complete. The new transportation network will be accessed by the University community alongside other regional institutions as well as the community at large.

It is significant to note, however, that this project, with all of its associated benefits, may not have been possible absent Harvard's significant investments over the past fifteen years in the area of the I-90 Interchange. Harvard first purchased the underlying rights to Allston Landing North and South in 2000 and 2003, respectively, from the Massachusetts Turnpike Authority. With the property still in the control of CSXT through permanent easements, Harvard later negotiated terms with CSXT leading to their vacating both Allston Landing North and South. The conditions of that agreement included substantial payments by Harvard to secure the easements from CSXT and required that CSXT remove all structures on the property, conduct environmental studies, and execute appropriate remediation before transferring the easements. Most of that work is now complete.

The end result of these fifteen years of investment and activity is the largely vacant rail yard that is now available for MassDOT to consider as part of this project. Certainly Harvard would have made these investments in support of the University's own institutional goals, but were these steps not taken, the rail operations that would exist in the yard today under easements in control of CSXT would present a potentially immovable obstacle to the options being considered by the Commonwealth.

We hope that these investments (currently amounting to well over \$400 million) serve as private contributions to public projects that may be leveraged in financing instruments accessed to pay for this significant project.

When the challenges of the failing viaduct came to light, Harvard was asked by the Commonwealth in 2013 to engage in a partnership to ensure the advancement of the critical I-90 Interchange project. Early concepts for the interchange focused on the highway's infrastructure and options to reconfigure the street grid in an urban setting. Harvard was among the early voices calling for the addition of West Station to the plan. Harvard's financial

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commitment for that aspect of the project was ultimately a major factor in the 2014 announcement that added West Station as a prominent feature in the project.

It was in that spirit that the University made the following commitments to the project:

- Harvard would provide, at no cost to the Commonwealth, access to the land upon which the Project will be built—in addition to adjoining space to be utilized for the Project's construction staging; and,
- Harvard agreed to fund one third of the cost of the permanent West Station—a projected contribution of \$30-\$35 million based on current estimates for the Station.

Since those commitments were made, and while the public process on the I-90 Interchange project was advancing over the last few years, Harvard made further contributions to advance the project, including:

- Financing the removal of the Houghton Chemical rail spur—tens of millions in engineering and construction mitigation savings with an even more favorable contribution to the at-grade options under consideration; and,
- Contributing land upon which the new Soldier's Field Road will be located, opening up new parkland along the Charles River. This contribution itself largely offsets any parkland lost during construction of the project, assisting or fully satisfying compliance with federal 4(f) parkland requirements.

Harvard's Support of West Station and the I-90 Interchange Project

Of the many important components and details contained in the DEIR, significant concerns have been raised by the Harvard community, neighbors, city leaders, and civic organizations regarding the timing of West Station's introduction.

Harvard recognizes that some of this uncertainty regarding the timing of West Station relates to future demand that will only become clear when the University's development plans advance – while the I-90 Interchange project will be largely under construction for the better part of the next decade.

On the path to regional transportation improvements, the North Allston community will have endured a significant period of disruption and inconveniences related to the construction of the new I-90 Interchange and related infrastructure. A primary outcome of this Project for neighbors and Harvard is the eventual introduction of commuter and regional service to this area. It is the University's hope that by providing funding for an interim West Station facility, serious consideration can be given to an additional option for early phase 1 service even as the

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specific timing of the full West Station remains under review. As we discussed, Harvard fully recognizes that the decision as to when service should be introduced at an interim or full multimodal West Station, and at what levels, are determinations that would need to be made by the MassDOT after an assessment of projected regional development, ridership demand as well as impacts to existing service. In doing so, Harvard also hopes that as MassDOT considers taking advantage of the University's financial commitment to an "early action" station, it will consider the years of construction inconveniences endured by the local community in furtherance of this regional project in addition to assessing ridership and finances.

Additional Considerations

As Harvard provides this new funding, I also want to underscore our concerns regarding Phase 2 of the DEIR. The University will comment more extensively in its formal DEIR comment on this matter, but I raise it briefly here because of its specific relationship to the timing of West Station. In Phase 2, MassDOT proposes to temporarily double the lay-up capacity by building the permanent rail facility prior to the introduction of the final full West Station. This feature, which will not be introduced until after the highway and related infrastructure are completed, alters the sequence of construction in the plan contemplated over the course of the last year, pursuant to which the permanent West Station and the permanent rail facility were constructed at the same time, simplifying logistics for both.

Under the new sequence contemplated in the DEIR, infrastructure and lay-up capacity that is built as late as 2028 must then be removed before West Station in its final condition can be constructed. This scenario presents either a very short-term infusion of lay-up capacity reliant upon its elimination, or a longer-term impediment to the construction of West Station. In either case, it would make construction of the permanent West Station conditioned upon consequential decisions by the future MBTA.

The University understands that, in considering any transportation facility, MassDOT must have a balanced program in mind that serves all of the many functions of transportation service, including lay-up facilities. Harvard believes that such a balance has been achieved through a consistent lay-up program that had been the subject of public discussion for the past year. On balance, the University thinks that the advantage of a short-term temporary increase to layup capacity, beyond what had already been a part of the plan, is offset by these significant negative impacts. Perhaps there are ways to create milestones over the course of Phase 1 construction that may allow Phase 2 to be revisited before its implementation. While Harvard urges the reconsideration of Phase 2, we would certainly participate in any discussions aimed at identifying such milestones.

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Therefore, Harvard would strongly urge MassDOT to consider the following:

- Revisit Phase 2 of the DEIR;
- Initiate steps among the relevant stakeholders, including the City of Boston, which will take advantage of the north-south bus connection utilizing Malvern Street in Phase 1, as proposed by Boston University; and,
- Consider the relocation of West Station to the north of the rail yard in the final condition. The so-called "flip" would unlock considerable low-cost to no-cost public amenities, including:
 - A greater buffer between the neighborhood and the Project sound wall—a feature that could be introduced in Phase 1.
 - Creation of a protected, uninterrupted pedestrian/bicycle trail through the buffer.
 - Providing an opportunity to simplify the design of the Franklin Street bridge, enhance its utility to bicyclists, and eliminates the need to acquire private property to construct the ramps at Harvard Street.

As always, it was a pleasure to discuss this project with you earlier this week and I look forward to continuing the dialogue. Harvard will be sharing our new proposal with neighbors, elected officials, and others in the coming days. The University looks forward to continuing our work together on these and other consequential issues related to this important project. I thank you and the MassDOT team for the important improvements to this project that have already occurred throughout the public process.

Sincerely,

Katherine N. Lapp Executive Vice President Harvard University

From: Herb Wagner <<u>HWagner@finepointcap.com</u>> Sent: Friday, February 9, 2018 3:31 PM To: Strysky, Alexander (EEA) Cc: <u>comments@walkboston.org</u> Subject: I-90 Allston EEA # 15278

Alexander,

I am a Cambridge resident and 10+ year bike commuter. I support the ideas presented in the "#Unchoke the HW-1 Throat" video by WalkBoston regarding the bike/walking path between Western Avenue and the BU

Bridge.

Anything that can be done to improve this part of the bicycle path is appreciated. It is unhealthy and dangerous and anything that can be done to improve it is important.

Please let me know if you have any questions.

Best regards,

Herb Wagner

hwagner@finepointcap.com

Cambridge resident

Jared Alves Master of Civic Design and Urban Planner 222 North Street #1 Boston, MA 02113 (774) 498-8077 Jared.Alves6@gmail.com

February 9, 2018

Matthew Beaton Secretary of Energy & Environmental Affairs Executive Office of Energy & Environmental Affairs Attn: MEPA Office Alex Strysky, EEA #15278 100 Cambridge Street, Ste. 900 Boston, MA 02114

RE: I-90 Allston Interchange Project

Dear Secretary Beaton:

Massachusetts must strive to achieve the Commonwealth's goal of reducing greenhouse gas emissions by 25 percent below 1990 levels by 2020 and by 80 percent by 2050. Governor Baker and Mayor Walsh have committed to these goals and both have signed onto the Paris Climate Agreement. I welcome their support. This project to reconstruct the Mass Pike in Allston is a tremendous opportunity to advance their commitment to the Agreement and our goals to reduce emissions.

According to a November 2017 article in the Boston Globe, transportation emissions now account for 40 percent of our Commonwealth's greenhouse gas emissions. The recent flooding in the Seaport, North End, and West End in Boston as well as in communities to the north and south demonstrate that climate change is occurring today and that words without action are no longer enough. As outlined in the Draft Environmental Impact Report (DEIR), the Allston Interchange project ignores this reality and prioritizes cars over all other modes of transportation. Doing so not only abdicates our duty to address climate change, but also undermines Imagine Boston 2030 and Go Boston 2030 as well as the Boston Planning and Redevelopment Agency's I-90 Allston Interchange Placemaking Study.

JAL-1 JAL-2

At least 12 lanes of highway and hostile, high-speed surface road pass through the project area. At a time when cities—like Paris along the quays of the Seine—are reclaiming their riverfronts for people not roads, this project aims to leave Soldiers Field Road untouched—as the same uninviting barrier to access the sliver of remaining riverfront parkland. The eight travel lanes of the Pike, themselves a historic mistake born of removing a pair of railroad tracks along the Framingham/Worcester line right-of-way, would be straightened, increased, and widened. Compounding these failures of imagination to reclaim this tremendously valuable land for people not cars is a half-hearted nod toward multi-modality by promising West Station in the distant, unfunded future of 2040. We must do better.

Let's learn from Brighton, where the New Balance-funded, Boston Landing station is surpassing ridership expectations and fostering transit-oriented development. Last month, the adjacent Stop & Shop unveiled plans to transform the site into a walkable street grid, 1,050 homes, 300,000 sq. ft. of office space, a 67,000 sq. ft. grocery store, 50,000 sq. ft. of restaurant/retail space, and a community park. This development will replace an existing one-story, 100,000 sq. ft. building and 207,000 sq. ft. of impervious pavement. The current site is inhospitable to walking and provides less retail space and no housing, office, or park space. Most importantly, this project was not envisioned during the planning of Boston Landing.

Instead of learning from the sustainable development booming around Boston Landing, the Massachusetts Department of Transportation (MassDOT) has preferred to derail West Station. MassDOT claims that ridership would not justify the expense until development in the former railyard is already well underway. However, the ongoing transportation challenges in the Seaport expose this delay as folly, with the unimproved Silver Line unable to cope with the transportation demands from new residents, visitors, and commuters. Harvard University recognizes the value of investing in sustainable transportation now. The University is pledging \$58 million towards the construction of a multi-modal transportation hub at West Station, including funding for a barebones interim station. Boston University has offered support in the past, and would likely commit funding again if asked today.

I am well acquainted with the value of commuter rail. I was born in Framingham and lived in Ashland for the first 18 years of my life. My dad commuted and still commutes to Boston along the Framingham/Worcester Line. With my family and as an adolescent I relied on the train to visit Boston. In college, I commuted to a downtown internship by train and today I reverse commute using the Lowell Line. Our region is fortunate to have purchased these lines and to have the bones of a mass transit system that many other parts of the United States could never imagine building de novo today. Sadly, our region still bears the trauma of evicting residents to clear homes and businesses to construct I-93, to widen the Pike, and more. This project presents an opportunity to bolster our existing transportation system without following the same car-oriented mistakes of the past.

To move forward, I fully support the nine recommendations outlined by the People's Pike in the organization's comments on this draft DEIR—to build West Station now and reconstruct 1-90 at grade (among others)—and the advocacy by the Charles River Conservancy and Walk Boston to improve access to the Charles River. Beyond their recommendations, I urge you to compel MassDOT to consider alternatives to managing congestion on the highways and roads that devastated Boston when they were first widened and remain a scar on the urban landscape. Preserving, let alone expanding the number of travel lanes for cars, is not acceptable.

MassDOT must evaluate the potential for congestion pricing and/or dynamic tolling to manage demand while improving traffic flow. Existing lanes should not be deemed sacrosanct and eternal. The tiny park space along the Charles at the throat could just as easily be expanded by reclaiming land from Soldiers Road versus building boardwalks or adding infill to the Charles River. New streets built in this developable land must be at a human scale: no wider than two travel lanes with on-street parallel parking and street trees lining ample sidewalks. Plans should also accommodate the reactivation of the Grand Junction Railroad to provide better access to Cambridge and North Station from rail service along the Framingham/Worcester Line. We must envision and then deliver a project that will facilitate sustainable transportation choices: on foot, bike, bus, or train.

Your office must ask MassDOT to submit a Supplemental DEIR to address and resolve these deficiencies. Squandering this moment is unacceptable.

Sincerely,

Cal

Jared Alves

February 9, 2018

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

Delivered as a pdf to: alexander.strysky@state.ma.us

Re: Allston I-90 Interchange DEIR

Dear Secretary Beaton,

I am a signatory to a letter signed by a number of organizations and Task Force members that outlines a comprehensive list of issues that are inadequately addressed in MassDOT's DEIR on the Allston I-90 Interchange Realignment Project. In addition, I would like to add a few more detailed comments on the proposed "interim" West Station that sould be constructed in Phase I of the project.

The proposal for an interim West Station was first raised by Task Force members at the October 2016 Task Force meeting. In contrast to the large, complicated West Station that MassDOT has described in the DEIR, the interim West Station that is desired is the most basic design that can provide access to the commuter rail and a north-south through bus connection. In terms of the design elements, this includes platforms for people to embark and disembark the commuter rail, vertical circulation to connect to the bike/pedestrian overpass that MassDOT has already committed to building in Phase I of the project, and a widening of that bike/pedestrian overpass in order to accommodate a north-south through bus connection.

A few additional notes about cost and construction of these elements:

- As MassDOT has already committed to building in Phase I of the project a bike/pedestrian JROB-1
 overpass that would connect from Cambridge Street South to Malvern Street, this should not be
 included in the cost of West Station.
- This bike/pedestrian overpass is designed with a size and structure that can accommodate emergency vehicles. Expanding this structure to allow buses would represent an incremental increase in the size and strength of the structure. Only the incremental cost of expanding this JROB-2 overpass to accommodate buses should be included in the cost of West Station.
- Similarly, the Phase III design in the DEIR includes a second bike/pedestrian connection from West Station to Agganis Way. This structure is also designed to accommodate emergency vehicles and would require only an incremental increase in size and strength to accommodate buses.
- Multiple options for bus connections should be analyzed, including but not limited to two-way JROB-4 bus travel connecting to Malvern Street, and a one-way pair utilizing Malvern Street for northbound buses and Agganis Way for southbound buses.

Thank you for the opportunity to provide comments on this complex and important project. I look forward to a continued open dialogue between the Commonwealth, residents, and stakeholders as the project advances.

Sincerely,

Jessica Robertson Allston resident MassDOT Allston I-90 Task Force member From: Joél Carela <<u>joel.carela@gmail.com</u>> Sent: Friday, February 9, 2018 4:24 PM To: Strysky, Alexander (EEA) Cc: <u>projects@livablestreets.info</u> Subject: Comments on I-90 Allston, EEA #15278

Dear Secretary Beaton (c/o Mr. Strysky)

,

I am submitting these comments in response to the I-90 Allston Interchange DEIR.

My name is Joel Carela, I am a resident of Cambridge and I currently work in Newtonville.

I take public transportation everyday to get to work and back home, so I pass the I-90 Allston Interchange everyday. It is a stressful commute, to say the least. Since learning of the proposed I-90 Interchange project, I have been worried about the impact this will have not just on my daily commute, but of

my fellow citizen's ability to travel across the region. I am a firm believer in safe, equitable, and multi-modal transportation options for all. It is possible to achieve this during the renovation of I-90.

The first step would be to build <u>West Station immediately</u>. J^{C-1} Construction on I-90 is unavoidable, but attempts to mitigate severe disruptions to transit is not. This station would offer commuters an alternative to the Pike during construction and it will set a precedent for more transit-oriented development. The saying "If you build it, they will come" would ring true here. The second step would be to replace the viaduct with a surface option. This is a much faster and JC-2 cheaper option which would reduce traffic congestion and free up funds for even more transit related projects. It would also leave more

space for development through the use of air rights that are currently nonexistent. Finally, please allow for the construction of

the

JC-3

People's Pike pedestrian and bicycle path between Franklin Street and the Charles River . Allston is a dense neighborhood and its residents deserve safe passage through their neighborhood.

I appreciate the opportunity to have my voice heard and I look forward to a more connected Boston region.

Best, Joel Carela

934 Massachusetts Ave , Cambridge, MA 02139