



February 9, 2018

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

Dear Secretary Beaton:

We at A Better City are pleased to submit the following key comments on the above referenced project. We support the selection of Variation "3K-ABC" (hereinafter "All At-Grade") as the Preferred Alternative for the Allston I-90 Interchange project, and that it be used as the base for further development of the design. We appreciate that this base could be amended and enhanced to more broadly address additional goals of various stakeholders, and we urge MEPA to require that MassDOT go forward with a robust public Task Force process with continued public participation to collaboratively advance design of the All At-Grade and select it as the Preferred Alternative in the Final Environmental Impact Report.

Summary. We recommend that the All At-Grade variant is the best solution based on key factors summarized as follows (and as detailed further herein):

1. A Better City has led design of the All At-Grade since mid-2014, and we believe the DEIR is less than fair and even-handed in its portrayal of the All At-Grade alternative throughout the document.
2. Is the lowest-cost highway option, freeing resources needed to fund a range of necessary and complimentary environmental measures. The DEIR misrepresents and diminishes the cost savings of the All At-Grade as compared to the Highway Viaduct.
3. Minimizes construction disruption and schedule risk.
4. Proposes a safe I-90 highway cross-section which in fact matches exactly that which MassDOT recently constructed on I-90 thru Boston's Back Bay, a fact the DEIR incongruously omits. The DEIR misleads as to the safety and operational characteristics of the proposed I-90 highway cross-section for the All At-Grade option, and MassDOT now concedes the DEIR "could be perceived as overstating the[se] safety issues".
5. Best enhances pedestrian/bicycle connectivity and safety. The DEIR misrepresents and degrades the pedestrian/bicycle benefits of the All At-Grade option as compared to the Highway Viaduct. For example, the DEIR inexplicitly omits two new north-south pedestrian promenades proposed by us in July 2017 that can be readily be part of the All At-Grade but are precluded by the Highway Viaduct. To help MEPA better understand what we proposed back in July 2017 and what the project team omitted from the



DEIR, A Better City partnered the design firm NBBJ to create and publish our own renderings to show how new paths, footbridges, and green-space can be part of an All At-Grade selection as the preferred project alternative. See Attachment A for two renderings labeled “All At-Grade Base” and “All At-Grade w/Added Green-Space”.

6. Supports complimentary river’s edge and other modifications sought by a diverse group of advocacy organizations and stakeholders.

Additionally, we submit the following recommendations and concerns with the DEIR summarized as follows (and as detailed further herein):

7. The DEIR misrepresents railroad (both Grand Junction Railroad and Worcester/Framingham Mainline Branch) impacts due to construction staging of the All At-Grade as compared to the Highway Viaduct.
8. Passenger transit services including an early action Interim West Station and full two-track operations on the Worcester/Framingham Commuter Rail are required to mitigate construction period impacts.
9. MassDOT needs to develop a more detailed construction management plan for both the No-Build, Highway Viaduct, and All At-Grade options.
10. Best supports a permanent full build regional West Station with cross-town bus service that must be included in the overall project and built between 2025 and 2040.
11. Reject consideration of the No-Build option.
12. Additional studies are needed before selecting a Preferred Alternative

Overview. The phrase “once in a generation opportunity” is frequently overused, but pertaining to the Allston I-90 Interchange project, it can be applied with great justification. This project has the potential to be one of the most dynamic, transformational opportunities in decades for Allston and Cambridge, for Boston and Harvard Universities, and for Greater Boston as a whole.

Both from a transportation standpoint for the region and locally, and from a development standpoint, this site provides an opportunity not to be missed by short sighted or narrowly budget minded perspectives. Analysis of this site and the interrelated functions to be accommodate here call for a vision that extends beyond the realm or responsibilities of a single organization. A continued multi-agency effort in collaboration with land owners, neighbors, municipalities, and other stakeholders is required.

Discussion. We recommend that the All At-Grade variant is the best solution based on key factors summarized as follows (and as detailed further herein):

1. **A Better City has led design of the All At-Grade since mid-2014, and we believe the DEIR is less than fair and even-handed in its portrayal of the All At-Grade alternative throughout the document.**

A Better City was appointed to the I-90 Allston Task Force in 2014. We’ve attended all meetings to date, including all community public meetings, special workshops, and technical sessions. We have a thorough understanding of issues pertaining to the site, its context, and the operation of transportation facilities in the area. Starting in mid-2014, A Better City’s team of planners and engineers conceived an All At-Grade alternative in lieu of MassDOT’s “3K-HV” replacement highway viaduct. In our ENF comments submitted to your office on December 15, 2014, we included narrative and engineered drawings for the All At-Grade in our discussion of construction staging alternatives. The Secretary’s MEPA Certificate on the ENF issued December 24, 2014 took particular “note [of] the construction staging recommendations provided in the comment letter from A Better City (ABC) and



request[ed] that MassDOT evaluate the feasibility of these recommendations as of the DEIR.”

We have read through each of the DEIR’s nearly 600 pages of text and 10,000 pages of appendices, and there’s little doubt that MassDOT’s project team worked very hard to identify and describe the extraordinarily sizeable array of topics associated with this multifaceted highway, transit, place-making, and economic development opportunity. That said, however, we believe throughout the DEIR the document is less than fair and even-handed in its portrayal of the All At-Grade alternative as suggested below.

Please note the DEIR uses the anonymous “Highway Viaduct” or “HV” acronym to refer to the option originally conceived by the DEIR authors. At a meeting in Fall 2018 with MassDOT officials prior to the DEIR’s publication, we discussed our strong preference that the two other Throat variants be similarly unidentified as to origin when the DEIR gets published several weeks hence. We used the label “All At-grade” in our DEIR Description submittal to MassDOT dated July 2017, and we have consistently held that personalized labels such as A Better City (“ABC”) and also Amateur Planner Plan (“AMP”) were entirely inappropriate for a document that purports to give fair and equal consideration to the viaduct option overtly proactively sponsored by the DEIR authors and the two at-grade options advanced by others.

At that referenced meeting, MassDOT pledged that the DEIR would introduce each of the so-called Throat variants with a single reference to their origin but thereafter each would be labelled with an impersonal descriptor throughout the remainder of the document. Yet we understood MassDOT’s pledge that the words “A Better City” or acronym “ABC” would show once at the beginning of the DEIR only, a quick search of the DEIR text Adobe PDF shows reference to the “ABC” option on over 1 out of every 4 or over 160 pages of the document’s nearly 600 pages of text.

We believe the DEIR’s violation of MassDOT’s pledge of detachment and impartiality to be completely unacceptable. Subsequently to publication, we requested that MassDOT take corrective action and they agreed that “future public filings will omit any personalized labels or modifiers.” We welcome and thank MassDOT for that renewed commitment to impartiality and fairness.

We request that MEPA: Require a continued robust public Task Force process to provide opportunities for MassDOT to collaborate with all key stakeholders so that the design and development All At-Grade variant can be fairly and equitably progressed.

2. The All At-Grade is the lowest-cost highway option, freeing resources needed to fund a range of necessary and complimentary environmental measures. The DEIR misrepresents and diminishes the cost savings of the All At-Grade as compared to the Highway Viaduct.

The DEIR misrepresents and diminishes the cost savings of the All At-Grade as compared to the Highway Viaduct. The DEIR distorts the cost of the All At-Grade option in several ways, as depicted in but not limited to:

- Chapter 1, Page 8, Table 1.2-2: Additional Factors Differentiating Throat Variants
 - Chapter 1, Page 14, Table 1.5-1: Construction Cost Summary
 - Chapter 5, Table 5.22-1: Conceptual Cost Estimate
- a. Failure to include LCCA analysis. Despite repeated Task Force requests and FHWA Guidance, the Table fails to include Life-Cycle Cost Analysis (LCCA). Going back to 2015, Task Force members specifically requested that cost comparisons go beyond Construction Cost estimates to also include LCCA. However, the Tables include initial costs to construct only. Not only does this distort and lessen the real-world cost savings of an All At-Grade roadway as compared to elevated viaduct, we believe it goes against FHWA guidance which reads, in relevant part: “FHWA promotes Life-Cycle Cost Analysis



(LCCA) as an engineering economic analysis tool that allows transportation officials to quantify the differential costs of alternative investment options for a given project. LCCA can be used to study either new construction projects or to examine preservation strategies for existing transportation assets.”

- b. Failure to Include Little Grand Junction Bridge cost in Highway Viaduct. Embedded in each Table, the so-called Little Grand Junction Bridge (“LGJB”) is proposed to be rebuilt in the All At-Grade variant both to provide for full two-track service restoration as well as to relocate both abutments in order to straighten and widen the Paul Dudley White Path and widen parklands along the river in the east end of the overall Project area. Although the LGJB is also rebuilt under the Rail Viaduct option, the Highway Viaduct option does NOT rebuild it and the cost of that rebuild is not included in the Highway Viaduct tally, and we see two issues with that presentation: (i) Each Table fails to separate out or even note this important difference; and (ii) Therefore, each Table underestimates the cost savings of the All At-Grade option.

At a technical workshop session on the DEIR on January 11th, we asked and the project team said it could not provide a cost estimate for this LGJB work. That answer seems misleading given the cost estimate summations depicted in each of the DEIR’s three above-referenced Tables.

We believe the MBTA’s recent reconstruction of the Shore Line Bridge carrying the Fairmount/Franklin Line over the Shore Line awarded to Barletta Heavy Division in late 2015 at a bid price of \$12.5 million provides a comparable (minimal) order of magnitude estimate. Second, even if the Highway Viaduct proponents see the omission of the LGJB from their scope of work as an advantage, the DEIR’s provides the Project’s Design Year as 2040, explicitly. By not including the cost to rebuild the LGJB in the project overall timeline (present to 2040), the Table undercounts the true cost of the Highway Viaduct option because most observers note the LGBJ will need to be rebuilt before 2040 as it was constructed in 1927-1928 and is over 80 years old presently. If done as an isolated, independent construction project in the future, we believe a magnitude cost estimate of \$25.0 million minimally.

At the December 13th workshop, the project team refused to answer any of the repeated questions by Task Force members about the DEIR’s cost estimates. At the January 11th workshop, several Task Force members asked again about LCCA and were told if done it would be performed as part of subsequent NEPA submittals. We believe that response about life-cycle-cost-analysis (LCCA) again misleads, as MassDOT was in fact repeatedly asked for more than two years by the Task Force to undertake LCCA as part of the DEIR and nothing prohibited MassDOT from including LCCA in the DEIR.

Based on the Baker Administration’s high standards of transparency and thorough financial reporting, we remain puzzled about why MassDOT is unwilling to be proactive in providing the Massachusetts public with a comprehensive full vetting of the true financial costs of each project variant. A Highway Viaduct not only costs about \$100 Million (minimally) more to construct than the All At-Grade variant, an impartial and objective full accounting will likely prove taxpayers and toll-payers will save considerable additional monies on a LCCA basis with the All At-Grade as the lowest-cost option.

We request that MEPA: We believe the DEIR failed to present project costs with full objectivity and impartiality. Therefore, we request that MEPA require MassDOT take corrective action in any subsequent public writing or presentation such that the cost of the three Throat variants be presented in identical format and breakdowns, include LCCA, and either include the LGJB in all variants or make explicit where its cost is left out.



3. The All At-Grade minimizes construction disruption and schedule risk.

This project will likely impact over 250,000 people each day, including 150,000 drivers on I-90, the 80,000 motorists on Soldiers Field Road, the 20,000 riders who take the MBTA's Worcester/ Framingham commuter rail, the tens of thousands of drivers who access Harvard Square, Central Square, Kendall Square, and Longwood Medical Area, and the thousands of Allston residents who live nearby.

Compared to the other two options that require constructing elevated highway or extensive elevated railways, the All At-Grade will require a shorter construction schedule for highway elements. It eliminates the need for costly, complex piecemeal reconstruction of the old viaduct and allows for an easier shift of traffic from complex viaduct structures to new simpler roadways built entirely on the ground.

The DEIR estimates the duration of construction for the three variants ranges from 8.0 to 6.5 years, with the Highway Viaduct and All At-Grade at the shorter end of that range. Although it seems obvious that complex piecemeal reconstruction of an old viaduct has much more schedule risk as compared to building a new simpler roadway at-grade, the DEIR does not speak to the risk that reconstructing the Highway Viaduct could snarl and delay the western commute to and from downtown Boston for far longer than currently estimated. Fixing aged roadway viaducts is likely to turn out to be an even bigger challenge than engineers expect, as we have seen from MassDOT's ongoing rebuild of the Longfellow Bridge between Cambridge and Boston. That massive project that began in 2013 was originally expected to wrap up in 2016. Yet MassDOT now expects that work to continue into the second half of this year, increasing what was supposed to be 3-years of construction disruption to nearly 5-years. It seems clear that when the additional risks to schedule from reconstructing an aged viaduct are factored in, the All At-Grade's construction duration will be the shortest and result in the lowest level of economic and social disruption, a pay-off that over a quarter-million daily commuters and others have an important stake in the results.

We request that MEPA: Direct MassDOT to fairly and objectively quantify the total differential construction duration and consequential impacts in both disruption (to motorists, mass transit riders, and neighborhood residents and businesses) and the regional economy under the complex rebuild of the aged Highway Viaduct variant as compared to the simpler construction of all new surface roadway under the All At-Grade variant. This analysis should include realistic updated costs and schedules and involve alternative measures studied for both the Highway Viaduct and All At-Grade to reduce construction costs, simplify construction staging, increase cost reliability, and limit schedule and cost risks borne by MassDOT and the MBTA.

4. The All At-Grade proposes a safe I-90 highway curb to curb cross-section which in fact matches exactly that which MassDOT recently constructed on I-90 thru Boston's Back Bay, a fact the DEIR incongruously omits. The DEIR misleads as to the safety and operational characteristics of the proposed I-90 highway cross-section for the All At-Grade option, and MassDOT now concedes the DEIR "could be perceived as overstating the[se] safety issues".

The DEIR falsely implies that the highway cross-section proposed for the All At-Grade poses unacceptable hazards to public safety, and incongruously fails to mention nor distinguish that MassDOT recently successfully implemented an identical curb-to-curb cross-section in the abutting section of I-90 and as we submitted to MassDOT in *A Better City's DEIR Description for the All At-Grade Option: Design Recommendations* dated July 2017 ("All At-Grade Description"). See Appendix B for copy of our All At-Grade Description dated July 2017.

Specifically, the DEIR fails to acknowledge that the All At-Grade highway curb to curb cross-section matches exactly that which MassDOT recently constructed on the same roadway throughout Boston's Back Bay. The All At-Grade proposes 11-foot wide lanes and 2-foot shoulders on I-90 in the Throat which is flat and straight. Our research confirms that this



proposed curb-to-curb cross-section width of 48.0 feet for each travel direction of I-90 exactly matches that which MassDOT recently implemented in the abutting section of I-90 between Commonwealth Avenue and Dalton Street (MassDOT Project #: 606538) when that ten lane-mile section of highway was rebuilt in 2013-2014. Further, these proposed lane and cross section elements are similar to widths recently approved by FHWA on a short portion of I-94 in Milwaukee and on a much longer section of I-90 in Seattle. The DEIR fails to include any such national context.

Yet despite having the benefit of our research that confirms MassDOT and FHWA support for dimensions proposed for the All At-Grade cross-section, the DEIR not only ignores that research and complementary agency support, it incorrectly declares the proposed All At-Grade Throat cross-section would be a “hazard” and “compromise safety” and would “not satisfy...design requirements....” See Highway and Streets Safety and Operations, Section 5.8.1.2, Chapter 5, page 39.

We were surprised that the DEIR fails to take note of the fact that the proposed All At-grade’s proposed Throat cross-section is identical to that MassDOT itself recently implemented on an abutting—and more extended—section of the same interstate highway.

We reached out by letter dated January 30, 2018 to inform MassDOT that we believe the DEIR’s misleading characterization as to the safety and operational characteristics of the I-90 highway proposed for the All At-Grade to be completely unacceptable, particularly in light that the proposed cross-section duplicates that recently built by MassDOT between Commonwealth Ave. and Dalton Street as presented in our All At-Grade Description dated July 2017.

Specifically, we requested that MassDOT take immediate specific steps to fix the DEIR’s incorrect statements that the proposed All At-Grade highway would be a “hazard” or “compromise safety” or would “not satisfy...design requirements.”

In its February 6, 2018 letter reply, MassDOT told us: “The language used in the DEIR describing the All At-Grade Throat cross-section as a ‘hazard’ that would ‘compromise safety’ ... could be perceived as overstating the safety issues.... We acknowledge that this could have been more carefully worded and described to note that similar cross sections and conditions presently exist on I-90.”

We welcome MassDOT’s post-DEIR admission that its portrayal of the I-90 highway cross-section for the All At-Grade is flawed. Yet we implore MEPA to recognize that this entire discussion in the DEIR evidences why we and so many other stakeholders remain very concerned as to the project team’s capacity to undertake such important project analyses in a fair and objective manner. We accept MassDOT’s February 6th reply as agreeing that the DEIR falsely and inappropriately suggests that the highway cross-section proposed for the All At-Grade poses unacceptable hazards to public safety.

We request that MEPA: Include in its Secretary’s MEPA Certificate a specific note of MassDOT’s February 6th admission that the DEIR “overstat[ed] the safety issues” of the I-90 highway cross-section proposed for the All At-Grade variant.

5. The All At-Grade best enhances pedestrian/bicycle connectivity and safety. The DEIR misrepresents and degrades the pedestrian/bicycle benefits of the All At-Grade option as compared to the Highway Viaduct.

Building the All At-Grade’s new roadways on the ground, it becomes possible to build new footbridges over the highway and rail lines to directly connect Boston University, Commonwealth Avenue, and Brookline to the Paul Dudley White path (“PDW”) along the Charles River.

The DEIR correctly notes the existing lack of direct pedestrian/bicycle north-south connections between Commonwealth Avenue and the Charles River in the region bounded



by Harvard Street and the Boston University bridge. In addition, we believe the DEIR correctly focuses on the need to enhance and expand the Paul Dudley White pedestrian/bicycle path within the Project Limits. However, the DEIR fails to adequately convey the pedestrian/bicycle benefits of the All At-Grade option as compared to the Highway Viaduct in two main respects:

- a) The DEIR fails to include two new north/south pedestrian/bicycle promenades proposed for the All At-Grade.

We concur that a “key goal of the Project is to provide...more direct north-south pedestrian/bicycle connection[s] from the neighborhoods south of the Project area to the Charles River.” See Bicycle/Pedestrian Connectivity, Section 4.7.2, Chapter 4, page 17.

In fact, in our All At-Grade Description submitted to MassDOT in July 2017, we included the concept of two new north-south pedestrian/bicycle promenades that connect Commonwealth Avenue to the Paul Dudley White path (“PDW”) along the Charles River in the vicinity of the outer limits of the Throat. See All At-Grade Description, New Multiuse Paths, Sheet 7, dated 7/12/17. Our proposal included two new north-south pedestrian/bicycle promenades specifically adjacent to each end of the Throat, with proposals for:

- i. A new West promenade overpass adjacent to in alignment with Harry Agganis Way; and
- ii. A new East promenade overpass adjacent to the BU Fine Arts building, between that structure and the Boston University Bridge.

Both of these new promenades are among the most highly desirable features of the All At-Grade proposal. Indeed, the Highway Viaduct option would preclude them because the viaduct would occupy the same space as these connections. These proposed promenade features were presented to the project team and discussed at various Task Force and community meetings, and we believe it’s fair to state that these pedestrian/bicycle benefits under the All At-Grade were widely supported by Task Force, community, and other stakeholders.

Yet despite this prior work and discussions, the DEIR failed to include these two proposed promenades in the descriptions, designs, and determinations related to the All At-Grade option, or even note that these elements could be implemented “by others” if budget constraints were a concern. For example, see Throat Area Variations, 3K-ABC, Section 3.3.3, Chapter 3, page 17.

We reached out by letter dated January 30, 2018 to inform MassDOT of our dismay that the DEIR failed to incorporate these two major advantages of the All At-Grade variant.

In its February 6, 2018 letter reply, MassDOT told us: “Under the proposed [All At-Grade] scheme, bicyclists and pedestrians would emerge from the small, privately owned streets leading through the section of the Boston University’s Campus between Agannis Arena and the College of Arts and Science Building....” “[T]hese bridges and their associated challenges...would require a waiver of Americans with Disabilities Act requirements in order to be built and add width to 3K-ABC.” “Since additional width is problematic for the [All At-Grade] approach given permitting challenges associated with the river bank....”

MassDOT’s February 6th post-DEIR answer quoted above misleads by calling Agganis Way “small”. Indeed, Agganis Way already accommodates large crowds attending events at both Agganis Arena and Nickerson Field. Therefore, Agganis Way will likely support bicycle/pedestrian usage on this new exciting proposed promenade. It’s disingenuous for the project team to state otherwise. The same is true for the similarly new



promenade proposed to connect with Commonwealth Avenue between the BU School of Fine Arts and the BU Bridge.

MassDOT's February 6th reference to ADA violation is the very first time we've heard any mention of such concerns. We provided detailed studies of these proposed promenades in the All At-Grade DEIR Study Report submitted to MassDOT in July 2017. At no time did the project team raise any ADA concerns either with the Task Force or directly with us. To the contrary, the project team stated at the January 11th workshop that it "has not undertaken" any independent detailed analysis of these proposed promenades.

We wish the DEIR did include adequate and open-minded analysis relative to the All At-Grade's proposed two new promenades. To be absolutely clear on what we proposed, and to help MEPA better understand what we proposed back in July 2017 and what the project team omitted from the DEIR, A Better City partnered the design firm NBBJ to create and publish our own renderings to show how new paths, footbridges, and green-space can be part of an All At-Grade selection as the preferred project alternative. See Attachment A for a full-size PDF labeled "All At-Grade Base" prepared by A Better City/NBBJ.

MassDOT's February 6th mention that accommodating these two new pedestrian promenades "requires additional width [into the river]" is an assertion without basis. We point again to the project team's January 11th workshop statement that it "has not undertaken" any such analysis. And we again point MEPA to our July 2017 All At-Grade Description which shows ample space at those locations within existing landside rights-of-way to accommodate these pedestrian promenades at their proposed Cross Section "A-A" and "C-C" locations. See Attachment B, All At-Grade Description:

- "New Multi-use Paths", Drawing Sheet 7;
- "Cross-Section Locus Plan", Drawing Sheet 2;
- "Cross-Section A-A", Drawing Sheet 3,
- "Cross-Section C-C", Drawing Sheet 5.

Further, relative to the issue of MassDOT's February 6th reference to additional "permitting challenges", Task Force members specifically inquired at the January 11th workshop as to the ability for MassDOT to permit the All At-Grade even with the DEIR's alleged 0' to 7' to 10' (the DEIR variously contradicts itself on this point) river intrusion. The project team answered that the relevant permits for the Highway Viaduct would take "about 30 days" to acquire, and "about 9 months" to obtain for the All At-Grade. We are confident that MassDOT can engage suitable project management so as to ensure that 9-months has no impact on progressing the schedule for this critical design/build project.

We request that MEPA: Include within the Secretary's MEPA Certificate a requirement MassDOT take corrective action in any subsequent public filing or presentation to fully describe and impartially evaluate the All At-Grade's proposed two pedestrian/bicycle and promenade new connections between Commonwealth Avenue and the Charles River as portrayed in the A Better City/NBBJ renderings contained in Attachment A.

- (b) The DEIR fails to recognize that the PDW width will be confined to existing width for the eastern portion of the project under the Highway Viaduct, and denigrates PDW benefits under the All At-Grade. Although the DEIR correctly notes the desirability to enhanced and expand the PDW within the entirety of the Project Limits, the document appears to purposely exaggerate the PDW improvements to be obtained in the Highway Viaduct as compared to the All At-Grade:

The DEIR correctly states that for the base version of the All At-Grade "the PDW path width will be [limited in one section to] 8.5' which matches the existing width". We agree



that assertion is true in the Throat section (only) for the version of the All At-Grade as submitted by us to MassDOT in July 2017. For whatever reason, the DEIR repeats that same point many times over in a whole variety of different document sections.

Yet the DEIR fails to acknowledge nor disclose that the Highway Viaduct option similarly restricts the PDW path width in one entire section (between the Throat and Boston University Bridge) to 8.5' as well. A fair and objective DEIR would repeat the 8.5' PDW path width restriction for a section of the Highway Viaduct alternative for every instance in which it states the similar 8.5' restriction in a different section under the current All At-Grade alternative. But the DEIR fails to do that. It repeatedly posits the 8.5' limitation of the All At-Grade but utterly fails to disclose the Highway Viaduct's similar limitation.

We reached out by letter dated January 30, 2018 to request that MassDOT clarify and state explicitly that the Highway Viaduct option maintains the PDW at its existing 8.5' width (i.e. no improvement) between the east side of the Throat and the project limit east end at the Commonwealth Avenue bridge.

In its February 6, 2018 letter reply, MassDOT confirmed to us that: "[The Highway Viaduct scheme] does NOT (emphasis added) make [improvements] to the Paul Dudley White Pathway at the point where it begins to curve out towards the river to connect to the BU Bridge Boardwalk...." We welcome MassDOT's post-DEIR admission that the DEIR omitted facts that the Highway Viaduct option fails to improve the Paul Dudley White Pathway for an important segment of the project.

We request that MEPA: Include within the Secretary's MEPA Certificate a requirement MassDOT take corrective action in any subsequent public filing or presentation to fully describe and acknowledge that the Highway Viaduct fails to improve the Paul Dudley White pedestrian/bicycle path along the eastern location of the project area.

6. Supports complimentary river's edge and other modifications sought by a diverse group of advocacy organizations and stakeholders.

MassDOT deserves credit for the Task Force process they've used to further the conceptual design of this project. We acknowledge and credit the many Task Force members and key Stakeholders who have advanced key suggestions that compliment and build upon the All At-Grade Base variant.

Most of the DEIR's substance and subsequent public discourse seems to focus on the project's billion-dollar price tag and the proposed West Station transit hub. But this massive project needs to be more than a highway and transit station. It should also make for a healthier and more usable Charles River esplanade that encourages the healthy, multimodal clean transportation options vital for our well-being and our economy.

Today, if you walk, run, or bike on the PDW in the project area along the Charles River in Boston from the River Street Bridge to the BU Bridge, you find yourself sandwiched between speeding cars on your right and unkempt rip-rap boulders on your left. The rush of cars is unpleasant. And the overgrowth along the narrow, curved path mostly blocks what would otherwise be an amazing view of the Charles River basin. This area where the Pike, train tracks, Soldiers Field Road, and PDW walking/biking path squeeze between the river and Boston University is known as "the throat" because it's where everything comes together. The walking/biking path is both too narrow and too close to the highway.

Additionally, the concept of a buffer zone along the southern edge of the Beacon Park yard site has been suggested. This buffer zone could include uninterrupted pedestrian and bicycle paths that would connect between Cambridge Street in the vicinity of Harvard Avenue eastward to Agganis Way. The route established could connect with the All At-Grade's West Promenade overpass to join the edge of the Charles River and the Paul Dudley White path system.



When the Masspike and Soldiers Field Road are rebuilt under this project, this will be the right time to create safe and welcoming separated paths for walking and biking by making a modest extension of the shoreline. The added green-space would reduce the exposure of walkers/runners/bikers to the pollution generated by all those vehicles and allow exercise that can be enjoyed in urban green space areas away from high density traffic. Boating on the river would continue unimpeded thanks to the river's ample width. A soft, gradual slope could improve wildlife habitat and help to naturally clean storm water before it reaches the river.

The added green-space and enhanced PDW Charles River paths and park should be built regardless of how the existing highway viaduct is rebuilt. But to minimize the project's cost and maximize physical and visual access to the Charles River paths, MassDOT should rebuild the highway at-grade instead of building a new and costly viaduct. With the highway on the ground, as stated earlier, it becomes possible to build new footbridges over the highway and rail lines to connect Boston University, Commonwealth Avenue, and Brookline to the improved river's edge. Indeed, the Highway Viaduct option would preclude these wonderful new footbridges.

In our All At-Grade Description submitted to MassDOT in July 2017, we "encourage[d] MassDOT to acknowledge and support...suggested enhancements...[to the All At-Grade concept]...that were identified in [Task Force] discussions with...key stakeholders." We had hoped MassDOT would pursue and address those stakeholder requests relative to enhancing the All At-Grade concept in Fall 2017, for as stated in our July 2017 All At-Grade Description "we believe that MassDOT will find a strong potential willingness [by stakeholders] to cooperate over the All At-Grade...and that MassDOT can readily turn these [stakeholder requests] into great opportunities for collaboration and collective cooperation."

We wish the DEIR included several Throat sub-options for the All At-Grade variant like it contains for the Highway Viaduct scheme. To be absolutely clear on the collective consensus potential that we believe can readily form by using the All At-Grade as the base for additional enhancements, and to help MEPA better understand that potential, A Better City partnered the design firm NBBJ to create and publish our own renderings to show how additional enhanced new paths, footbridges, and green-space can be part of an All At-Grade selection as the preferred project alternative. See Attachment A for a full-size PDF labeled "All At-Grade w/Added Green-Space" prepared by A Better City/NBBJ.

We ask that MEPA: Require MassDOT to immediately convene the Task Force to study whether a collective consensus can readily form among stakeholders by using the All At-Grade as the base for additional design developments in the manner as depicted in Attachment A's rendering labelled "All At-Grade w/Added Green-Space" prepared by A Better City/NBBJ. We also suggest MEPA include acknowledgment and reference to relevant analogous renderings recently made public by a partnership of the Charles River Conservancy, WalkBoston, Solomon Foundation, and Sasaki Associates, which we presume will be provided to your office under separate cover.

Additionally, we submit the following recommendations and concerns with the DEIR summarized as follows (and as detailed further herein):

7. The DEIR misrepresents railroad (both Grand Junction Railroad and Worcester/Framingham Mainline Branch) impacts due to construction staging of the All At-Grade as compared to the Highway Viaduct. We believe the DEIR unfairly emphasizes impacts of the All At-Grade while overlooking or suppressing impacts of the Highway Viaduct:

- (a) The DEIR inaccurately elevates the importance of Grand Junction Railroad impacts over the Worcester/ Framingham Mainline Branch. While both the Grand Junction Railroad ("GJR") and Worcester/Framingham Mainline Branch ("WFMB") provide important functionality within the MBTA system, the GJR carries no passenger-revenue service



while the WFMB carries more passengers/day than any other MBTA line except for one. However important the GJR is to the handful of locomotive and other non-passenger movements made each week, the WFMB has a far greater role on a daily basis in the successful provision of mass transportation services in the Greater Boston region. Yet throughout the document, the DEIR emphasizes impacts to the little used GJR, and minimizes any such impacts to the WFMB. The DEIR appears to convey a false and contrary presentation as to the relative importance of these two distinct railroads. Thus, in terms of both format and substance, the DEIR exaggerates shutdown consequences under the All At-Grade. For example, Section 1.5.21 Construction Impacts, Chapter 1, Page 14, presents GJR impacts via the usage of “**bold**” text (e.g. “**The [All At-grade] will require closure of the GJR....**”) yet fails to similarly so state the extended closure of one mainline track of the WFMB required by the Highway Viaduct. By exaggerating discussion of impacts to the GJR as compared to the WFMB, the DEIR misrepresents the relative railroad impacts of the All At-Grade as compared to the Highway Viaduct.

- (b) The DEIR underreports Highway Viaduct impacts to the GJR. Although the DEIR implies (see Additional Construction-Related Factors, Table 1.2-2, Chapter 1, page 8) that the Highway Viaduct will result in NO (emphasis added) GJR “closures”, the document contains no supporting documentation for such a finding. In fact, Construction 3K-HV, Stages 1 thru 5, Figures 5.21-1 thru F.21-10 would appear to suggest the opposite: Under the Highway Viaduct option, work activities take place above the GJR in Stage 1 thru 5 of the proposed first five stages of construction. Based on the challenging and complex construction of temporary and permanent elevated roadway segments to be required under the Highway Viaduct alternative, a contractor undertaking this work appears likely to close the GJR for each of these five construction stages. Yet with no basis or documentation to support a contrary finding, the DEIR appears to discount or diminish any such conclusions unfavorable to the Highway Viaduct option.
- (c) The DEIR fails to recognize past practice of GJR shut-downs and workarounds. As the DEIR appears to go to great lengths to point out any All At-Grade impacts to GJR operations, it completely omits any mention of recent past practice in which MassDOT/MBTA successfully closed the GJR due to the poor condition of the GJR Bridge crossing over the Charles River between Boston and Cambridge. This steel plate girder bridge—like its smaller sibling situated above Soldiers Field Road— was constructed in 1927-1928 and at over +80 years old is rated in poor condition. Starting in November 2012 and continuing through June 2013, MassDOT/MBTA undertook a series of long-term GJR closures to perform emergency repairs of the river bridge. MassDOT/MBTA/Amtrak and other agency leaders successfully implemented solutions to ensure the relatively minor locomotive maintenance needs and freight services were handled by other means and movements given that usage on the GJR was not possible. Such interagency and intergovernmental cooperation can similarly be deployed here to support construction of this particular project.
- (d) The DEIR underestimates Highway Viaduct’s greater impacts to the WFMB. See Section 1.5.21 Construction Impacts, Chapter 1, Page 14. The WFMB currently operates with a full two-tracks (one for each travel direction) through the project area. However, the Highway Viaduct will restrict the WFMB to just a single track (operating bi-directionally) for the majority of the construction period. The All At-Grade can maintain the WFMB at two-tracks for most of the construction, and on this item, would result in far less impact than the Highway Viaduct. Yet the DEIR’s substance and format (i.e., no use of **bold** text; yet see GJR in “(c)” below.) appears to gloss over the Highway Viaduct’s greater impacts. Further, the DEIR acknowledges that the Highway Viaduct will force the WFMB down to a single track for Stages 1 & 2 of the proposed first five stages of construction, it seems that the DEIR appears to disregard the fact that Highway Viaduct construction will likely restrict the WFMB to a single track for each of the proposed Stages 1 thru 5. Despite the fact that the WFMB is a most important element of the MBTA’s Commuter Rail system, the DEIR appears to contain no identification nor analysis of the significant and lengthy



impacts to the WFMB passenger operations that would likely occur throughout the Highway Viaduct construction period.

We reached out by letter dated January 30, 2018 to inform MassDOT that we believe the DEIR misrepresents railroad (both Grand Junction Railroad and Worcester/Framingham Mainline Branch) impacts due to construction staging of the All At-Grade as compared to the Highway Viaduct.

In its February 6, 2018 letter reply, MassDOT confirmed to us that: “The approach taken in the DEIR to phasing is consistent with the Project Manager’s presentation before the MassDOT and MBTA Boards and at the discussion at the December 13, 2017 Task Force meeting.” “Each option is presented as maintaining ... one Worcester/Framingham Line track throughout construction.” “[I]mplementing [the All At-Grade]... would require ... a total closure of the Grand Junction Bridge for approximately three years, during which time the MBTA would expend additional scarce operating funds to deadhead trains via Ayer....”

We ask that MEPA take note: The Worcester Line is one of the busiest Commuter Rail corridors in the Commonwealth, with nearly 20,000 daily riders, yet MassDOT’s February 6th answer appears to admit that the project team failed to inform the Task Force until AFTER publication of the DEIR of any such huge impacts to the Worcester Line. Maintaining full Worcester Line service is far more difficult under the complex piecemeal rebuilding of the Highway Viaduct than for the much simpler construction of all new roadways at ground level, yet the DEIR contains no such analysis nor discussion.

When the Worcester Line’s second track was finally put into service in Allston last year, it led to significantly faster and more reliable service. Yet the DEIR assumes that a single-track bottleneck will be acceptable during construction, and does not analyze the differences between the proposals in this regard. This must be addressed, especially considering that the highway will have reduced capacity because of construction during this time.

We believe that the All At-Grade variant could be built with minimal disruption to Worcester Line service, while the Highway Viaduct option would require several years of reduced, single-track operation. This must be fully addressed as a major construction impact—on par with, if not ahead of the Grand Junction—in any further discussion and analysis.

The DEIR failed to consider fast-track and other innovations to rebuild bridges that MassDOT has so successfully implemented statewide. We are confident that such innovations and other staging options will greatly reduce any Grand Junction closures under the All At-Grade. Furthermore, the DEIR and the Answer above mislead as to requirement that the MBTA deadhead trains via “Ayer” or use “scarce operating funds” to implement Grand Junction mitigations. MassDOT and the MBTA worked with AMTRAK to successfully perform light maintenance at AMTRAK’s South Side facilities. Freight operations would have minimal detour as they by definition originate no further east than Worcester and would utilize nearby Pan Am trackage. Lastly, any Grand Junction detour costs would be paid for with construction monies—not operating funds—as part of mitigations required to support and facilitate construction.

We request that MEPA: Require that MassDOT fully acknowledge and discuss with the Task Force (among others including MetroWest officials and stakeholders) the contemplated and differing impacts to the Worcester Line under the Highway Viaduct scheme compared to the All At-Grade variant. We also request that MEPA require MassDOT undertake a public collaborative design and constructability review process with the Task Force to assess whether reduced impacts to the Grand Junction Railroad can be productively achieved as part of further design review and development.



8. Passenger transit services including an early action Interim West Station with cross-town bus routing, and full two-track operations on the Worcester/Framingham Commuter Rail are required to mitigate construction period impacts.

Several measures including an early action interim Commuter Rail station in Allston Landing South (aka “Interim West Station”), early action cross-town bus routing between Cambridge Street and Commonwealth Avenue, and preservation of two-track Worcester/Framingham Line Commuter Rail service must be maintained throughout construction. We commend Harvard University’s recent announcement to provide up to \$8M to fund an early action Interim West Station within Allston Landing South.

We support construction and operation of an Interim West Station on the Worcester/Framingham rail line as an early action in Phase 1. An early action station with a center platform and two track operations in combination with north-south bus connectivity will provide appropriate transit mitigation for motorists, the neighborhoods, business community, and institutions impacted by this project. Not only will these actions support mitigation of construction impacts by supporting robust rail operations, they will also jump start support for long run development opportunities at this critical node of important residential, commercial, and institutional neighborhoods in Allston, Brookline, Brighton, and Cambridge.

The extensive reconstruction of the I-90 Allston interchange will disrupt both highway traffic and operations on the Framingham/Worcester Line. Therefore, appropriate early-action MBTA bus service improvements must be included as a construction mitigation strategy to serve commuters traveling from West Station to destinations of the Longwood Medical Area, Boston University, Harvard University, and Kendall Square.

We request that MEPA: Require MassDOT to open an Interim West Station for early Phase 1 service, together with two-track Worcester Line service and north-south bus connectivity. By doing so, we hope that MEPA formally recognizes the role for expanded transit options and reduced environmental impacts to support and help mitigate a lengthy 6 to 8-year or more construction period, especially considering that the I-90 highway and related affected Allston/Brighton/Cambridge Interchange will all have reduced capacity because of construction-related long-term roadway and ramp lane closures and detours.

9. MassDOT needs to develop a more detailed construction management plan for both the No-Build, Highway Viaduct, and All At-Grade options. MassDOT also needs to demonstrate the constructability of a preferred alternative.

- **Demonstrate Constructability:** While the construction staging in the DEIR is intended to prove that the project can be built, the future Design/Build team will prepare and propose a construction staging strategy that works for their approach. That approach may differ from that presented in the DEIR; however, the DEIR approach needs to be convincing. It needs to illustrate reasonable trade-offs and implications for those choices.
- **Grand Junction Rail Service:** We believe that the importance of maintaining service on the Grand Junction rail line during construction is too highly valued. In order to simplify construction staging and reduce risk, the Design/build team is likely to discontinue Grand Junction service and include the cost of substitute service in their proposal as construction is underway all around the existing track.
- **Freight Service Route:** Freight service currently on the Grand Junction line originates in the CSX yard in Upstate New York, and passes through the Worcester yard. From there freight service can easily be rerouted via the Providence and Worcester Line to Pan Am tracks to reach Eastern Massachusetts destinations. No back tracking is required to continue this service.



- **Locomotive and Passenger Coach Service:** Locomotives on the MBTA South Side operations require multiple day visits to the Somerville facility for six and 12 month required inspections or for significant maintenance. Access for this service can take place via Worcester and the Pan Am track route. Inspections, maintenance, or wheel truing for passenger coaches can take place in Readville or Pawtucket yard or through arrangement with Amtrak, which provides service in the previous closure.
- **Construction Stage Durations:** The DEIR does not provide adequate information on the possible duration of each construction stage that would suggest the severity of this planned disruption.
- **Construction Stage Impacts:** The DEIR misrepresents railroad (both Grand Junction Railroad and Worcester/Framingham Mainline Branch) impacts due to construction staging of the All At-grade as compared to the Highway Viaduct.
- **Explore Construction Alternatives:** Construction options to reduce impacts should be more thoroughly explored. For instance, replacement of the “Little Grand Junction Bridge” may provide more flexibility for reconstruction of Soldiers Field Road, making more space for construction in the Throat area.

We request MEPA to: Require in the MEPA Certificate that MassDOT:

- a. Provide an estimate of the duration for each phase of construction for each variation, including the no-build option;
- b. Account for the construction duration and impacts under the Highway Viaduct variation compared to other options;
- c. Conduct a more thorough analysis of constructability of alternatives;
- d. Provide more analysis of construction and post-construction mitigation strategies; and
- e. While not required for the DEIR, the report does not provide significant information on the funding sources and finance methods that can be used to implement the phases of construction, let alone a larger strategy for execution of a plan that goes beyond the perimeter of the project area. MassDOT should share such funding and finance requirements and opportunities in a public process with the Task Force and other stakeholders.

10. A permanent full build regional West Station with cross-town bus service that must be included in the overall project and built between 2025 and 2040.

To justify the claim that this is a multi-modal project, there should be greater focus on transit components both as early actions in Phase I and continuing unabated in all project phasing.

- **Permanent West Station:** We 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.
- **Fix the Flawed Methodology:** We believe that the methodology and assumptions of the analysis in the DEIR of potential ridership for West Station to be flawed, and that this analysis needs to be repeated with new assumptions.
- **Selection of TAZs:** The catchment area assumptions (radius of distance from the station) used and the TAZ data chosen to generate ridership projections for West Station are not a good match to likely future user populations. The TAZs used do not include any areas south of the rail line such as Boston University facilities, and users living or working in the neighborhoods of Allston or Brookline along Commonwealth Avenue.



- **North/South Bus Corridor:** DEIR analysis does not assume north-south cross bus corridor connections serving the station for intermodal connections that would generate ridership at West Station.
- **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.
- **Variable Layover Capacity:** The DEIR does not provide an explanation for the increase followed by the decrease of layover capacity in this location, nor any explanation or evidence of how any such layover capacity will be removed to build the permanent West Station.
- **Station to North of the Yard:** MassDOT should consider locating the station north of the rail yard (so-called "Yard Flip"), and we believe that the proposed buffer along the residential area is a worthwhile element to evaluate.
- **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 Yard 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 request that MEPA: Require MassDOT to:

- a) Publicly review with the Task Force its assumptions used to calculate ridership at West Station;
- b) Prepare design options that include 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; and
- c) Prepare an explanation of the rationale for the layover yard phasing and location strategy for Task Force and other public review.

11. Reject consideration of the No-Build option. The DEIR proposes a 'No-Build' option that was never discussed with the Task Force or the public and is totally unacceptable

We oppose further consideration of the No-Build alternative as an acceptable solution to the issues and opportunities presented at the Allston site. This alternative would keep in place the existing ramp system connecting the turnpike to the local street network that generates the current congestion that can be expected to become worse in the future. Reconstruction of the deteriorating viaduct structure in place is a stop gap measure at best, and a very challenging operation at worst.

From a larger perspective, implementing a No-Build solution as an immediate measure precludes an enormous missed opportunity to use transportation elements to facilitate



transformation of this unique site into a regional asset that takes advantage of the infrastructure investment to support future redevelopment.

The No-Build alternative is described with little detail in the DEIR and has not been presented to the public or the project Task Force in the past, unlike the other options in the report. This alternative has not received the attention or evolutionary development that has benefited the other options.

12. Summary of additional studies needed before selecting a Preferred Alternative

We request that MEPA: Require in the Secretary's MEPA Certificate that MassDOT complete and report to the Task Force and public the following additional studies prior to selection of a Preferred Alternative:

- a. Present the cost of the Highway Viaduct and All At-Grade Throat variants in identical formats and breakdowns.
- b. Quantify the total differential life-cycle cost savings that MassDOT will accrue under the All At-Grade variation as compared to the Highway Viaduct.
- c. Provide additional analysis of actions required to mitigate the impact of the All At-Grade option on the Charles River.
- d. Accurately portray the proposed two-new north-south pedestrian/bicycle promenades as shown in the rendering above (labelled "All At-Grade Base Concept", A Better City/NBBJ dated 2/5/18) to be incorporated into all future work product. Properly note the Highway Viaduct variant precludes these promenades.
- e. Recognize requests and complimentary river's edge modifications requested by stakeholders, including the better river's edge, added greens-space, and safe and welcoming PDW paths as shown in the rendering above (labelled "All At-Grade w/ Added Green-Space Concept", A Better City/NBBJ dated 2/5/18) and incorporate into all future work product.
- f. Fully assess options in further studies that support and evaluate the wide range of additional development and place-making opportunities that are unlocked under the All At-Grade but are precluded by the Highway Viaduct.
- g. Review the assumptions used to calculate ridership at West Station using appropriate catchment area assumptions and in light of current ridership at Boston Landing and analysis of potential bus service crossing the interchange noted above.
- h. 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.
- i. Evaluate a design option that includes an Interim West Station to be put in place early in the implementation of Phase 1, with will include through bus service via Malvern Street, connections across the rail tracks and interchange area, and a bus platform with vertical circulation to the rail platform to serve through buses but with no layover berths for buses. Prepare an itemized cost estimate of an interim and permanent station with these connections.
- j. Explain the rationale for the increase followed by the decrease in the number of layover tracks in proximity to the proposed site of West Station.
- k. Since the duration of impacts can be very significant, provide an estimate for the length of each stage of the construction process for each variation, including the no-build alternative.



- l. Adequately account for the total construction duration and impacts under the complex rebuild of the aged Highway Viaduct variant as compared to the simpler construction of all new surface roadways under the All At-Grade variant.
- m. Conduct a more thorough analysis of constructability of alternatives and construction staging.
- n. Provide more analysis of mitigation strategies during and after construction and for the multiple phases of construction.

We thank you for this opportunity to comment on the DEIR of this important project which holds such promise as truly a “once in a generation opportunity”. This project has the potential to be one of the most dynamic, transformational opportunities in decades for Allston and Cambridge, for Boston and Harvard Universities, and for Greater Boston as a whole.

Both from a transportation standpoint for the region and locally, and from a development standpoint, this site provides an opportunity not to be missed by short sighted or narrowly budget minded perspectives. Analysis of this site and the interrelated functions to be accommodate here call for a vision that extends beyond the realm or responsibilities of a single organization. A continued multi-agency effort in collaboration with land owners, neighbors, municipalities, the existing Task Force, and other stakeholders is required.

We continue to believe that the All At-Grade option enables the Commonwealth and City of Boston to best achieve numerous transportation, open-space, development and land-use, constructability, and fiscal objectives.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard A. Dimino', written in a cursive style.

Richard A. Dimino
President & CEO

Appendix A: Architectural renderings prepared by A Better City/NBBJ labeled “All At-Grade Base” and “All At-Grade w/Added Green-Space”.

Appendix B: *A Better City's DEIR Description for the All At-grade Option: Design Recommendations* dated July 2017 (“All At-grade Description”) as submitted to MassDOT.

cc: Secretary Stephanie Pollack, Secretary & CEO, MassDOT
(stephanie.pollack@state.ma.us)

Jonathan Gulliver, Highway Administrator, MassDOT
(jonathan.gulliver@state.ma.us)

James Cerbone, MassDOT Highway Division, Environment Services Section
(James.Cerbone@state.ma.us)



Appendix A:

Architectural renderings prepared by A Better City/NBBJ labeled
“All At-Grade Base” and “All At-Grade w/Added Green-Space”



ALL AT-GRADE BASE CONCEPT



02/05/2018



ALL AT-GRADE W/ ADDED GREEN-SPACE CONCEPT



02/05/2018



Appendix B:

*A Better City's DEIR Description for the All At-grade Option:
Design Recommendations dated July 2017
("All At-grade Description") as submitted to MassDOT*

Please see Adobe PDF for document included separately with filename:
"All At-grade Description July 2017"

From: Adam Castiglioni <acastigl_99@yahoo.com>
Sent: Friday, February 9, 2018 3:43 PM
To: Strysky, Alexander (EEA)
Subject: Please build West Station now

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

Dear Secretary Beaton,

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

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

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

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

1. Build West Station with two-track service in the first phase of the project AC-6
2. Rebuild the highway at-grade in the "throat" using the A Better City (ABC) concept AC-7
3. Reduce the number of lanes in streets throughout the proposed urban grid to create a safer environment more conducive to walking and biking. AC-8

4. Study how separate paths for biking and walking can be provided in the entire section of Charles River Parkland from the River Street Bridge to the BU Bridge, including the "throat", for all viaduct and at-grade options. This study should include consideration of a boardwalk (both temporarily during construction and as a permanent structure) and the use of fill, and how to mitigate impacts on the river by restoring today's degraded bank into a "living shoreline" of native vegetation. Consider how this can be done both as part of the I-90 project or in a subsequent project. AC-9
5. Construct new footbridges near Agganis Way and Amory Street that cross over the highway and link Commonwealth Ave in Boston and Brookline to the Charles River parkland to further encourage commutes by bike. AC-10
6. Introduce new North-South bus routes that cross over the highway and connect North Allston and Commonwealth Ave, and by extension Harvard Square and Longwood. AC-11
7. Fully evaluate the possibility of shifting the rail lines away from the abutting homes and creating an at-grade, off-road walk/bike path from the Regina Pizzeria end of Harvard Ave to West Station and over the at-grade highway to the Charles River. AC-12
8. A simple barrier wall is insufficient mitigation for the Environmental Justice community that is so heavily burdened by the air pollution, noise pollution, and vibration impacts of the highway and rail. AC-13
9. Study how to upgrade the Grand Junction railroad linking West Station, Kendall Sq. and North Station, and enhance the Grand Junction Bridge to become a walk/bike connection between the Charles River parkland in Cambridge and Boston. AC-14
10. Evaluate increasing off-peak commuter rail service between Worcester and Boston—obviating the need to build a layover area to store idle trains in Allston. AC-15

Sincerely,
Adam Castiglioni
20 Henschman Street # 5
Boston, MA 02113.

Check out my blog:

<http://www.bostonhospitalityindustry.com/>

Follow me on Twitter:
@Conciergeboston

From: Adam Towvim <atowvim@gmail.com>

Sent: Friday, February 9, 2018 4:29 PM

To: Strysky, Alexander (EEA)

Cc: projects@livablestreets.info

Subject: Fwd: I-90 Plans: WE CAN DO BETTER

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

Dear Secretary Beaton,

Regarding the I-90 Interchange rebuild, please seriously consider these key points:

- **MULTI MODEL Transit should be a priority.** We need West Station now, not in 22 years, as a construction mitigation measure and to ensure transit-oriented development. ATO-1
- **Don't build the viaduct.** A surface option will save millions of dollars, be more practical, and maintain opportunities for multimodal connections to and from the river. ATO-2
- **We need better accommodations for walking and biking along the Charles River.** [Check out WalkBoston's proposal to #UnchokeTheThroat!](#) ATO-3
- **Design a network of safe, human-scaled streets** in the proposed new neighborhood. ATO-4
- Create REAL, safe, **connection for pedestrians and bikes** from Allston Village/Cambridge St to the river as well as from Babcock St. ATO-5
- Enable **rail and bike traffic** on the rail spur to **Kendall Square.** ATO-6

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

Under the Global Warming Solutions Act, Massachusetts must cut its greenhouse gas emissions by 25% below 1990 emissions levels by 2020 and at least an 80% reduction by 2050. I appreciate that in 2017 you and MassDOT Secretary Pollack held a series of listening sessions to discuss reducing greenhouse gas emissions from the transportation sector. While the Allston DEIR is an improvement over the existing dreadful conditions, it recreates an outdated 20th-century car-centered transportation system incompatible with such a reduction in emissions. ATO-7

The DEIR is also inconsistent with the City of Boston's Imagine Boston 2030 and Go Boston 2030 plans and the Boston Planning and Redevelopment Agency's I-90 Allston Placemaking Study. While it is commendable that the MBTA is in the process of launching a Commuter Rail Vision Study, it is unacceptable that MassDOT's Allston DEIR perpetuates out-dating thinking (using valuable acres of urban land for rail layup) while it should instead support better mid-day service, construction of West Station in the first phase, and steps to move forward with passenger service on the Grand Junction. ATO-8 ATO 9-11

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

1. Build West Station with two-track service in the first phase of the project ATO-12
2. Rebuild the highway at-grade in the "throat" using the A Better City (ABC) concept ATO-13
3. Reduce the number of lanes in streets throughout the proposed urban grid to ATO-14
create a safer environment more conducive to walking and biking.
4. Study how separate paths for biking and walking can be provided in the entire ATO-15
section of Charles River Parkland from the River Street Bridge to the BU Bridge,
including the "throat", for all viaduct and at-grade options. This study should
include consideration of a boardwalk (both temporarily during construction and as ATO-16
a permanent structure) and the use of fill, and how to mitigate impacts on the river
by restoring today's degraded bank into a "living shoreline" of native vegetation.
Consider how this can be done both as part of the I-90 project or in a subsequent project.
5. Construct new footbridges near Agganis Way and Amory Street that cross over ATO-17
the highway and link Commonwealth Ave in Boston and Brookline to the Charles
River parkland to further encourage commutes by bike.

6. Introduce new North-South bus routes that cross over the highway and connect ATO-18
North Allston and Commonwealth Ave, and by extension Harvard Square and
Longwood.
7. Fully evaluate the possibility of shifting the rail lines away from the abutting homes ATO-19
and creating an at-grade, off-road walk/bike path from the Regina Pizzeria end of
Harvard Ave to West Station and over the at-grade highway to the Charles River.
A simple barrier wall is insufficient mitigation for the Environmental Justice ATO-20
community that is so heavily burdened by the air pollution, noise pollution, and
vibration impacts of the highway and rail.
8. Study how to upgrade the Grand Junction railroad linking West Station, Kendall ATO-21
Sq. and North Station, and enhance the Grand Junction Bridge to become a
walk/bike connection between the Charles River parkland in Cambridge and
Boston.
9. Evaluate increasing off-peak commuter rail service between Worcester and ATO-22
Boston—obviating the need to build a layover area to store idle trains in Allston.

Let's take this epic opportunity to improve our living conditions, not replate 1950's highway mentality!

Sincerely,

Adam Towvim

61 Islington Road

Auburndale, MA 02466

P.S. ***Much*** thanks to **The People's Pike and LivableStreets** for the great work bringing a welcome perspective to this conversation.

--

Peter G. Leis

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Peter G. Leis

617-302-6896

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From: Alan Moore <alan@pathfriends.org>

Sent: Friday, February 9, 2018 5:03:45 PM

To: Strysky, Alexander (EEA)

Cc: GrandJunctionPath; Bourassa, Eric; Wendy Landman; Friends of the Community Path; denise.provost@MAHouse.gov; Wig; Ellin Reisner; patricia.jehlen@masenate.gov; citycouncil@cambridgema.gov; Becca Wolfson; richard@massbike.org; tobrien@hyminvestments.com; info@eastcambridgeplanningteam.org; bostongreenroutes@somervillebikes.org; Steven Miller; Galen M. Mook; John Sanzone

Subject: I-90 Allston DEIR Comment Letter due today Feb. 9, 2018

Dear Sec. Beaton via Mr. A. Strysky,

I am writing to express grave concerns on the Draft Environmental Impact Report (DEIR) for Massachusetts Department of Transportation's (MassDOT) Allston Interstate 90 Interchange project.

This \$1 BILLION DOLLAR TRANSPORTATION PROJECT MUST DO MORE THAN MOVE CARS. MassDOT should meet its duty to plan and construct all modes of transportation to serve differing people's needs.

WEST Station needs to be included now, not in 2040!

AMO-1

The Charles River paths must be widened!

AMO-2

A ground level highway instead of rebuilding the viaduct for \$100 million more!

AMO-3

Restore the two-track capacity to the Grand Junction rail line by rebuilding the Grand Junction bridge as it crosses over Soldiers Field Road

AMO-4

Build the People's Pike over the Charles River to connect West Station in Allston to the Grand Junction Path to Cambridge

AMO-5

This project is a once-in-a-lifetime opportunity to re-build I-90 through Allston with a people- and transit-oriented neighborhood on what is now railyards and highway infrastructure, and to create new street and bike/ped path connections to existing neighborhoods and to the Charles River that are cut off by I-90 and adjacent rail lines.

Rail and bus transit service will be required for the area, but are postponed for many years in MassDOT's plan, in fact, all transit proposals are postponed – some until after 2040, leaving the entire community served only by roads that will be as crowded by vehicular traffic as they are now. MassDOT is focused only on the highway.

This project, which will reconfigure the I-90 Allston Interchange and Worcester commuter rail tracks, affords MassDOT the opportunity to restore two-track capacity to the Grand Junction rail line

by rebuilding the Grand Junction bridge as it crosses over Soldiers Field Road, as well as connecting the Grand Junction Path

- Regional rail and crosstown bus connections are essential.
- People must have walking and biking access to the river and across the project area.
- Charles River paths must be safe and separated for walkers/runners/cyclists.
- TRANSIT SHOULD BE A PRIORITY
- GREAT & SAFE PATHS MUST BE A PRIORITY

The existing ½ mile long highway viaduct is proposed to be reconstructed and widened at great expense. This reconstruction will cost at least \$107 million more than tearing down the viaduct and replacing it with highways on ground level. A ground level highway will improve long term opportunities to walking and biking access between the community and the river, and may ultimately create opportunities for air rights development.

Riverfront paths are required and should be integral elements of the project. MassDOT plans for a single narrow walk/bike path along the river directly adjacent to the highway, separated only by a guardrail. This does not meet the needs of people walking and biking.

West Station as a transit hub. Long range plans show that we need West Station to serve commuter rail connections to South Station, the western suburbs, Worcester, and North Station. It would be connected to all nearby bus lines. West Station will NOT be built until “demand builds”; an unacceptable conclusion of MassDOT's DEIR.

Safe commuting and recreational paths. Only a narrow strip of unlandscaped riverfront—very similar to what exists today – is provided on the shoulder of the highway. Paths allow walkers and bikers to move efficiently, and are a major responsibility of MassDOT. For a half mile along the Charles River, better more accommodating paths are NOT included as part of MassDOT's DEIR. The riverfront walk/bike infrastructure that has been proposed is inadequate and unacceptable. Residents and visitors deserve a plan for the banks of the Charles River commensurate with the setting and 21st century planning standards:

The “throat” is left in its current, inadequate condition. One half mile of the Charles River is the narrowest part of the riverbank, and is known as the “Throat”. In DEIR plans it remains an unattractive and unsafe 8-foot narrow path, shared by people walking and biking. It is separated from the high-speed, extremely busy Soldier’s Field Road traffic by a single guardrail. There is no landscaping, trees or resting place along this area.

Junction Path to Commonwealth Avenue and the BU Bridge so that it connects to the Grand Junction Path being built in Cambridge. These off-street connections, called the “People’s Pike”, should be required as mitigation of highway impacts along the riverbank, as they will immediately provide safe and attractive paths for walkers/runners/bikers in this heavily used active transportation corridor (and also set up the transportation network for future Grand Junction rail service). When the Grand Junction path is built, bikers and walkers will be able to travel from the Somerville Community Path and East Cambridge to MIT and Allston. However, as presented in DOT’s DEIR,

the preferred alternatives put forth by MassDOT offer neither of these crucial elements. Nor does it include the needed West Station on the Worcester commuter rail line.

We therefore ask that MEPA require MassDOT to select an at-grade option for the "Throat" which will allow for the possibility of pedestrian and bicycle overpasses **over** the commuter rail tracks, I-90, and Soldiers Field Road, thereby connecting Commonwealth Avenue and the BU Bridge to the Paul Dudley White Pathway and a future Grand Junction multi-use path, including its connection to the proposed West Station.. If MassDOT rebuilds the highway as a viaduct, as it is currently designed and proposed in the DEIR, we will have missed a once-in-a-100-year opportunity to connect the neighborhoods of Boston and Brookline to the Charles River and this crucial connection along the Grand Junction line. This bridge should be replaced in the scope of this project, at a time when construction and costs are least impacting. I-90 should be designed in such a way that the Charles River parkland could be expanded as part of the project as well so that pedestrians and bicyclists will have more room on the river paths, and so that a bigger green buffer between the path and the adjacent roadways can be provided.

Also, please require MassDOT to build West Station NOW. The ridership projections provided by MassDOT for West Station seem unrealistically low, especially based on the experience of the new Boston Landing Station in Brighton, which has already surpassed ridership projections with only partial build-out of the neighborhood and limited commuter rail service. The failure to build adequate transit in the Seaport has led to massive traffic congestion and a Silver Line that is maxed out in capacity at rush hours, and employers having to run their own bus shuttles. Let's learn from these two experiences and build West Station NOW, even if it's just a basic station to start off with and designed for future enhancement and expansion by Harvard or MassDOT. Furthermore, with talk of converting the commuter rail to regional or urban rail, using smaller and more frequent trains, West Station would become even more useful than just with the commuter rail service that would serve it today. AMO-6

Thank you for considering my comments as this project moves forward.

Sincerely,

Alan Moore

Somerville, MA

alan@pathfriends.org

617-455-2103

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

Dear Sir,

Thank you for allowing us to write to you in reference to the I-90/Beacon Yards DEIR that MassDOT has recently been submitted to your agency.

We, the Allston Landing Design Team, are a group of seasoned architects, landscape architects, urban designers and engineers, who have developed, pro-bono, a Vision for Allston Landing from the community and the river's point of view (See attached). In particular, our team has looked at this development and its impacts with the intent of preserving and enhancing our river, its parklands and connections to it to the maximum extent possible. Due largely to funding restrictions, internal state politics and priorities, the hard working people at DCR are unable to properly address the host of environmental and open space issues found here. Thus we step up.

Simply put, despite hundreds of pages of draft EIR, the Charles River, (with nearly one mile of riverfront affected by this project), its parklands and the connections to it are treated as an afterthought... something to be dealt with to reach MassDOT's narrow transportation goals. These resources constitute civic infrastructure every bit as important as their roads and railways that cross the area. They merit equal attention, given their environmental and historical significance, their role as movement corridors and the joy they bring us. Their thoughtful planning, protection and enhancement should have highest priority. We need to rethink and build a truly holistic plan and ultimately, a better place at Allston Landing.

Our intent is to help you insure that development of this complicated site is done in an integrated way and that all issues and opportunities are heard, addressed and result in better environmental protection, wildlife habitat, water quality, park and river users' enjoyment and not just highways.

Our first step has been to develop an illustrative vision to open both public and private sector eyes to the incredible opportunity found here for all and to make people aware that the plan as currently being developed is too narrow in its scope and evaluation and consequently, will result in harm and lost opportunities. We build on the efforts and passion of many people vested in the work to date, and over the past year we have spoken at length with many informed parties in the Allston and Cambridgeport communities, most I-90 Task Force members, city and state agencies and various public interest groups and have synthesized their ideas and concerns into this vision, illustrative of what, properly planned, the area might become... MassDOT's current plan would diminish opportunity for all parties.

There are moments in the history of a city when decisive actions, regarding urban form, infrastructure and the natural environment, if taken can lead to immediate and long term benefits to the city and its inhabitants. Now is such a time for action for Boston's Allston Landing.

To not act boldly and critically with regard to what is possible in this district will be remembered by future generations as a last opportunity at best, and more regrettably as a failure of environmental imagination.

Right out of the Box... Five Core Recommendations-

Already, the Vision has identified five big ideas. With a few key adjustments, the Phase One, I-90 Improvement Project can set the stage, assuming Harvard and MassDOT's collaboration, for insuring eventual realization of a much richer result:

1. **Realign Soldiers Field Road, even further away from the River than currently proposed-** to make room for a broad, new 6+acre, multi-purpose river-side park node with mitigation as necessary to insulate the park and river from highway impacts, to engage the river and to improve the water's edge for strollers and boaters. While this may require reconstruction of a sewer connector pipe, the reward in terms of both increased values of abutting development parcels and public benefit would far outweigh that expense. ALDT-1
2. **Reconsider Storm water Treatment options-** At both Salt Creek Park and the length of the Throat, weave day-lighted, storm water treatment with dedicated bike and foot pathways into a pleasant linear park tapestry, from Allston to and along the river. ALDT-2
3. **Support early construction of a multi-modal West Station Transportation Center in PHASE ONE-** Given its strategic location, a primary guiding principle of this project should be to make it a Transit-Oriented-Development (TOD) district. A strong TOD strategy should lead (not follow) the infrastructure planning and its core, the development parcels immediately around West Station Plaza, should be an integral part of the very first phase of work. ALDT-3
4. **Make Allston Esplanade a safe, pleasant and engaging activity corridor the length of the water's edge-** Particular attention should be paid in the Throat Area, at Grand Junction Bridge and at River Street to insure that these are made attractive and pleasant segments of the Paul Dudley White Bikeway. ALDT-4
5. **Rethink the overall street network-** Provide alignments, connections, scale, hierarchy and well-landscaped pathways to ensure a compact, pedestrian friendly urban center, one that maximizes the Transit-Oriented Development (TOD) potential around West Station and makes strong connections to the river Parklands. Make East Street the primary urban access way up onto the Air Rights area. Make Cattle Drive, with its superior exit characteristics, the major conduit through the development and north to Western Avenue and into Cambridge. ALDT-5

One Possible Implementation Strategy-

Review of the DEIR documents confirms our concerns that while the MassDOT process may work well for small projects, it's inadequate in this case given the depth and breadth of issues, opportunities and the broad diversity of interests in this community. MassDOT's view that this enormous area is just another highway and rail improvement project that deals with the host of other issues on the margins, is just wrong.

So let's rethink the schedule and phasing of planning and final design to allow time for a comprehensive plan review of the site before key opportunities are lost forever

MassDOT and Harvard hold most of the cards and have priorities that differ from those of the Allston, Cambridgeport and river-user communities, making a comprehensive and inclusive master plan all the more necessary.

We are told that there are funding issues. Given the seriousness of community concerns and desires, this Vision recommends consideration of a staggered approach. We propose that you consider Phase 1 to be further divided into an 1a and 1b phase, with only the core transportation improvements funded in Phase 1a, and then in Phase 1b, with the funding secured, proceed further to complete the total project. ALDT-6

Phase 1a-Core Elements only

For example, allow the following project improvements to continue per the current schedule:

1. **Reconstruction of I-90 and mainline railways-** per the less costly 'Throat' configuration, i.e. the ABC all-at-grade solution, with adequate space provided for future air-rights development along the length of the 'Throat'. Interim repairs to the existing viaduct can be economically done to allow time to meet permitting requirements.
2. **Development of West Station and plaza complex-** This facility would include the initial air-rights platform and the central plaza leading to the river, with bus, bike and pedestrian connections to Commonwealth Avenue. At a minimum this includes a new connecting ramp to Malvern Street and potentially to either Alcorn or Babcock Streets. Requests for proposals for development of the air rights immediately around the plaza could be issued upon completion of the master plan, thus coordinating initial development.
3. **Sound wall(s)-** Fully landscaped engineered sound barriers along any abutting residential properties and exposed riverside parklands.
4. **Mass Pike Off Ramps-** Make Cattle Drive, and not East Drive, the main exit from I-90 WB and Stadium Way the main exit from Mass Pike EB.
5. **Storm water system-** Develop an interim storm water treatment strategy that allows a more innovative, day-lighted storm water solution in the future.

Phase 1b- The rest of the Project

Again, assuming insufficient time or funds to do comprehensive planning and permitting now, we propose, rather than lump all work into a single tightly constrained phase, that final construction of three items of the present scope be delayed to a later phase and implemented when the results of the proposed master plan are known:

1. **Realignment and reconstruction of Soldiers Field Road west of the 'Throat'**
2. **Any streets within the development zone that are not critical for Mass Pike access and egress**
3. **Essential storm water treatment only**

On a final note, the DEIR's computer rendering of the new riverside parkland appears much wider than in their own layout plan. Even with that configuration, most of the new park area falls within an unprotected noise impact zone. The river and its parklands deserve much better, and together, we can do it.

As head of EEA, Secretary Beaton, we hope that you embrace this supported and well-considered effort to preserve and enhance the river, its parklands and the pathways to it... for all of us... for now and tomorrow

Sincerely,



Foil **The Allston Landing Design Team**

Richard (Skip) Burck, FASLA

Frank M. Costantino, FAIA

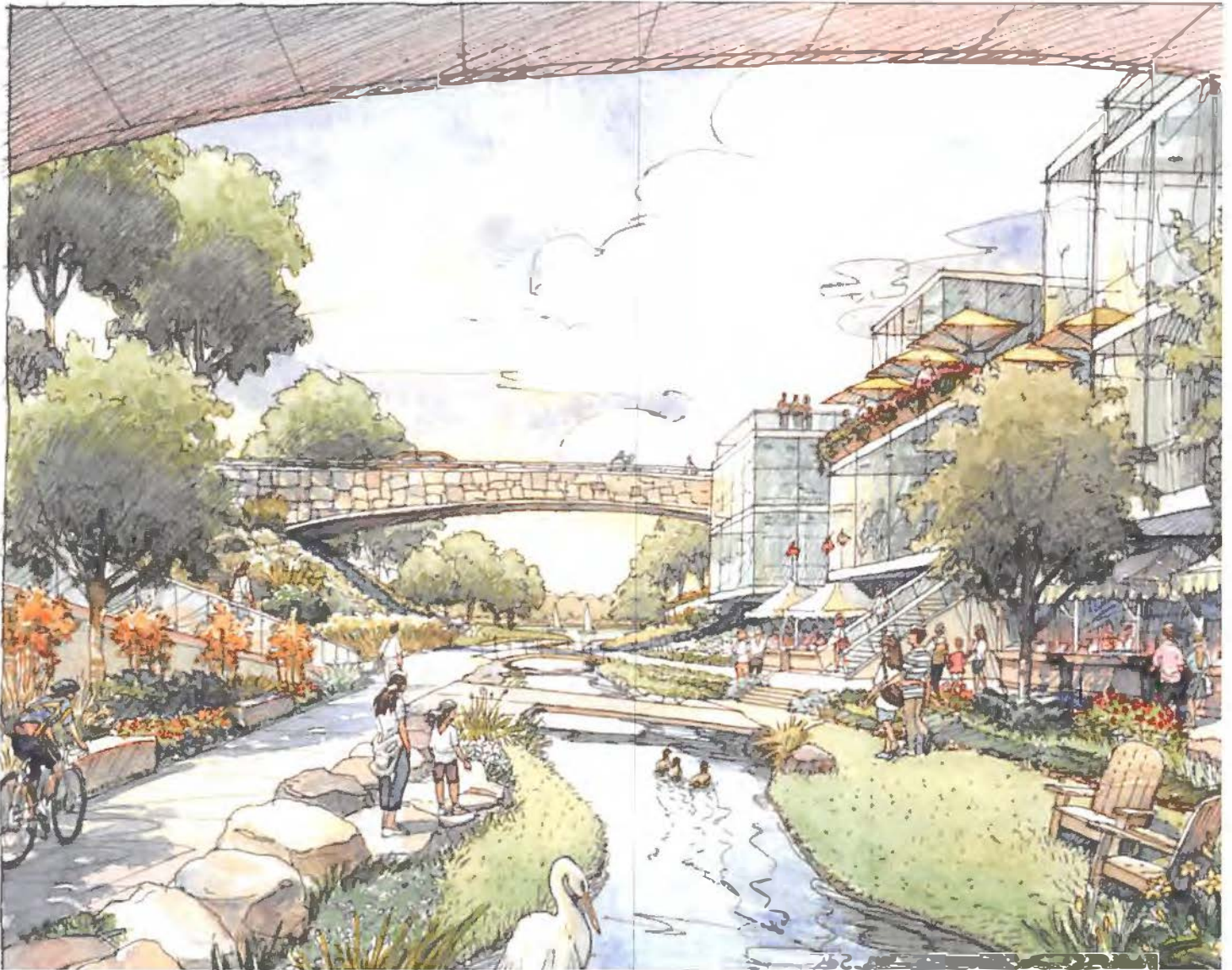
Paul Lukez, FAIA

John R Shields FAIA

A VISION For ALLSTON LANDING

...From the RIVER'S POINT of VIEW...

EXECUTIVE SUMMARY
THE ALLSTON LANDING DESIGN TEAM
February 5, 2018



There are moments in the history of a city when decisive, integrated actions, regarding urban form, infrastructure and the natural environment, if taken, can lead to immediate and long term benefits to the city and its inhabitants.

Now is such a time for Boston's Allston Landing.

To not act boldly and critically with regard to what is possible in this district will be remembered by future generations as at best a lost opportunity and more damningly as a failure of civic imagination.



Let's enhance the river experience for all

Preface

Over the past 3 years, many organizations and individuals have shared their thoughts, ideas and dreams about how to best redevelop the former Beacon Yards, an area that occupies nearly 3/4 mile of riverfront along the Charles.

The I-90 Allston Interchange Improvement Project began as a straight-forward, but complicated, transportation reconstruction initiative. It has been much improved through strong input from Harvard University, continuous citizen involvement, a Boston Society of Architects charrette, academic studio investigations, proposals from advocates for affordable housing development and bike/pedestrian access, and a place-making study by the Boston Planning and Development Agency.

This Allston Landing visioning effort, however, is the first attempt to integrate the recommendations and desires of all involved into a workable, holistic vision for this site, uniquely placed in the center of our urban area and along the very special urban Charles River.

This vision describes how a set of agreed upon design principles and four core open space elements combine to create an interconnected open space framework that can organize the entire site, while fulfilling fundamental design principles. It concludes with five specific requests to Harvard and MassDOT to take the lead in fulfilling the Vision.

This Vision looks at the whole of this development from the perspective of the River, its flora and fauna... its parklands and the open space connections to the surrounding community. It's a good start, but it needs to be followed up with an officially sponsored Master Plan for the area, ideally in an open public/private partnership.

The Charles River Basin is our most integrating and orienting urban open space resource. The state, in concert with the owner, Harvard University, will be making decisions over the next few months that will set the boundaries of this river's potential to serve this urban area for the next one hundred years.

Through circumstance, the Phase One I-90 renewal project has not fully investigated the opportunities that this site offers for both environmental improvement and open space enhancement.

This central part of our Boston region deserves an intelligent, inclusive and comprehensive plan now!
CAN THIS VISION BEGIN THAT PROCESS?

Building on the work of many others, a set of core design principles form the foundation stones of this Vision:

1. To balance environmental, transportation and community objectives with open space goals through integrated planning and design.
2. To increase economic benefit for all concerned: the landowner, investors, neighbors, abutting universities and the general public.
3. To organize this new waterside community around a safe, pleasant and inviting open space infrastructure of enhanced regional pathways and strong local connections leading to large, destination, open space features
4. To build safe transit, pedestrian and biking connections to the adjacent neighborhoods.
5. To be guided and shaped by progressive urban design objectives:
 - Enhanced social, recreational, pedestrian, bike transit, fitness and river use
 - Eco-habitats for a variety of native wildlife
 - Transit-oriented development
 - Mixed-income neighborhoods with walk-to-work and walk-to-school opportunities
 - Climate change protection and resiliency against water-level rise and storm surges
 - Enrichment of the natural environment and existing neighborhoods
 - "Best Practices", day-lighted stormwater treatment for improved water quality of the river

MAKING THE MOST OF ALLSTON LANDING



From the 19th-century Watertown dam to Boston Harbor, the Charles River winds its way in front of some of the best education and health sciences institutions in the world, along densely packed neighborhoods with sailboats and rowing shells skimming the water's surface, past its bridges, lagoons, and such beloved venues as the Hatch Shell, the Community Boat House and the Boston Museum of Science. The Charles is an attractive, connective ten-mile corridor running through the heart of our urban area.



The Allston Landing Site Today

That is... except for a stretch right in the center...

Gratefully, however, several years ago, Harvard acquired Beacon Yards intending to develop it in the coming decades. In December, MassDOT submitted its Draft Environmental Impact Review for I-90, rail and roadway reconstruction that runs through this area and along the Charles River.

The Allston and Cambridgeport communities have been very involved in this planning effort, as have a number of agencies, not-for-profit interest groups and individuals. Together, they have significantly improved this narrowly focused transportation improvement project.

If the recommendations of these groups are integrated into this transportation upgrade, there will be much better connections between Allston, Boston University, Commonwealth Avenue, Longwood and Brookline, to the south and the river, its parklands and Cambridge to the north.

Working together, beyond the narrow scope of this MassDOT process and this Vision, we can accomplish much to lessen negative impacts and increase enjoyment...

**HOWEVER, TO DO THIS, WE NEED A
COLLABORATIVE and COMPREHENSIVE
MASTER PLAN FOR ALL OF ALLSTON
LANDING**

This Vision, seen from the Charles River's point of view, explores how this transportation project can reach higher to create, enrich and expand waterside parklands, connect them to the Allston, BU and Brookline communities, and make this riverside rejuvenation project a national model for community access, environmental sustainability, transportation convenience, and waterfront vibrancy.

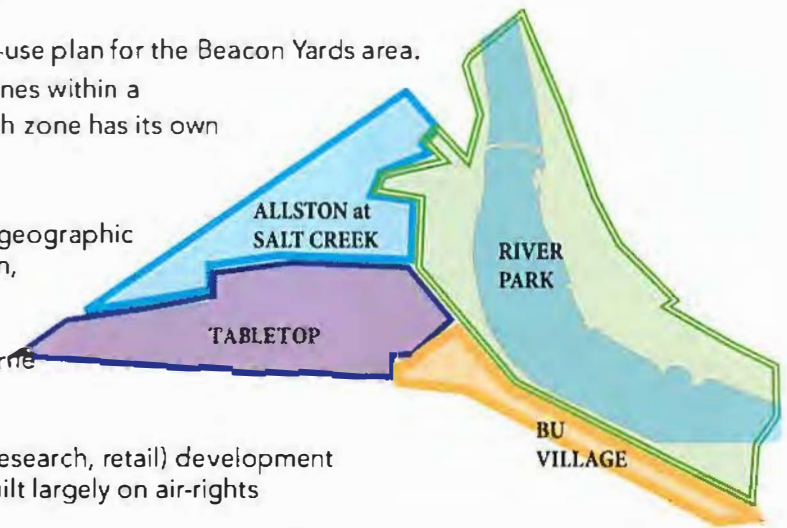


Setting the Open Space Framework...

Conceptual Site Use Program

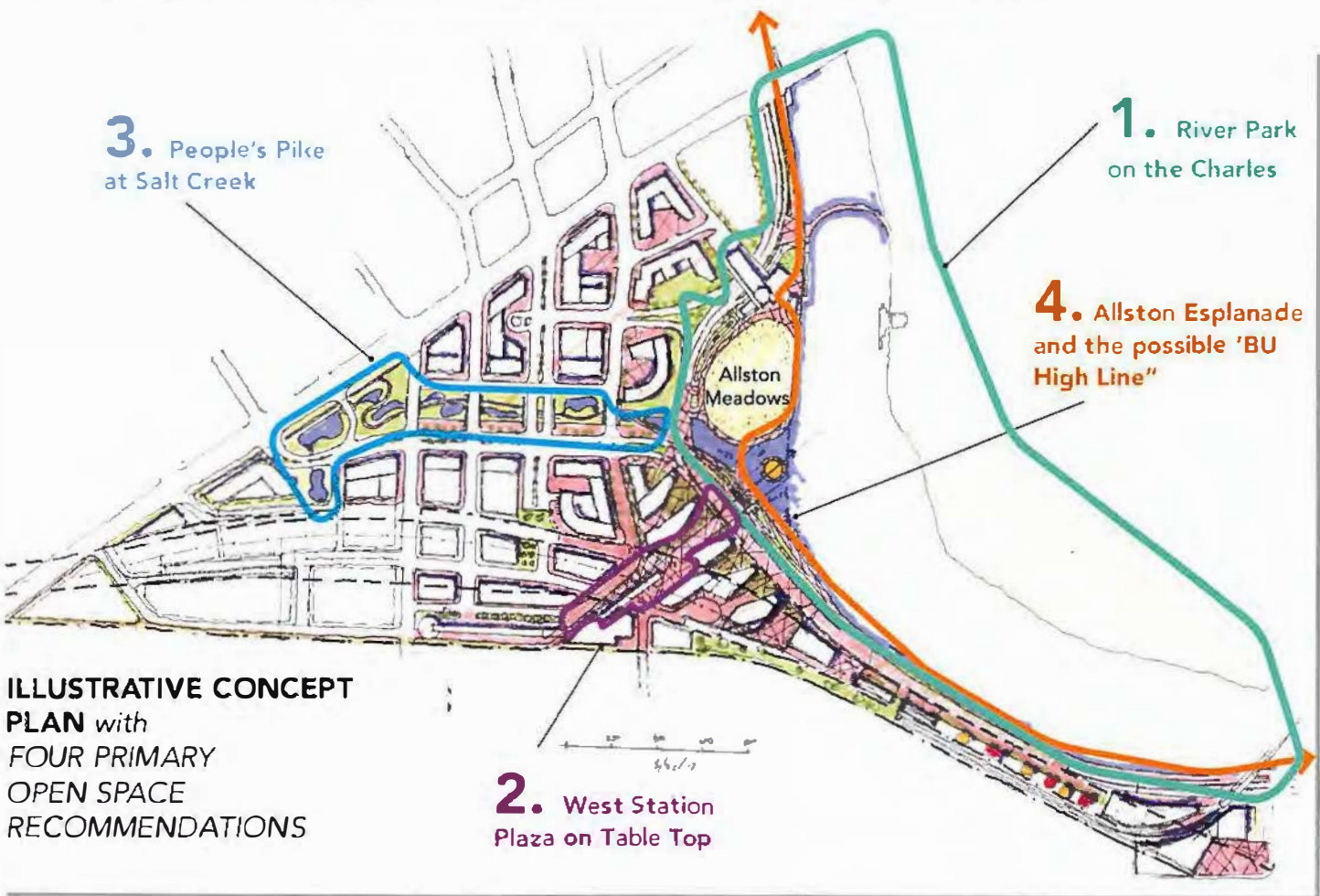
Interconnected open space is at the center of a general-use plan for the Beacon Yards area. Allston Landing is imagined as comprised of four use zones within a transportation-oriented development (TOD district). Each zone has its own characteristics, attributes, and champions.

- **River Park:** A new 'central park' spanning the most geographic and most populous stretch of the the Charles River Basin, including a new park node, Allston Meadows.
- **Allston at Salt Creek:** A new mixed-use, mixed-income residential-retail neighborhood
- **Table Top:** The core mixed-use (commercial, office, research, retail) development centered around West Station Transportation Center, built largely on air-rights
- **BU River Village (air rights):** Potential air-rights development in the narrow Throat area, accessible from BU and Commonwealth Avenue



Four core Open Space Elements

In addition to pedestrian/bike paths, neighborhood parks and playgrounds, this Vision identifies four critical, interconnected open-space elements that maximize river access to boating and activity nodes along the river.



River Park on the Charles

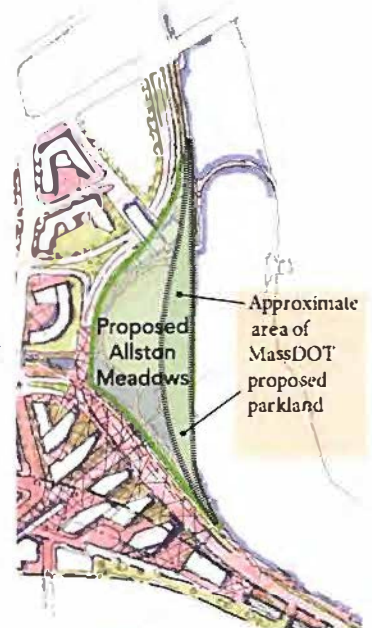
In this Vision, a new 6-acre park node in Allston, (Allston Meadows), coupled with Magazine Beach across the Charles, engages the river with its neighborhoods in new ways, both on the water and along its banks, creating a new central, destination river park sited in both Cambridge and Allston.

As shown, Allston Meadows could include a large grassy field for picnics, events and recreation; a quiet cove at the mouth of the reopened and restored Salt Creek providing additional turning space for rowing events; a performance ring with a grand staircase/seating to West Station Plaza, a year-round restaurant/activity space at the water's edge, a ferry landing with docks, a segment of a replanted and expanded Allston Esplanade, and convenient pedestrian connections from all of the above to Boston University and Commonwealth Avenue.



Looking west, (above) and
a birdseye over Cambridgeport (below)

*Allston Meadows can
be wide enough and
large enough to support
a wide variety of land
and water activities for
people throughout the
Region!*



*Allston Meadows nearly triples
the width and size of parkland proposed in this area*



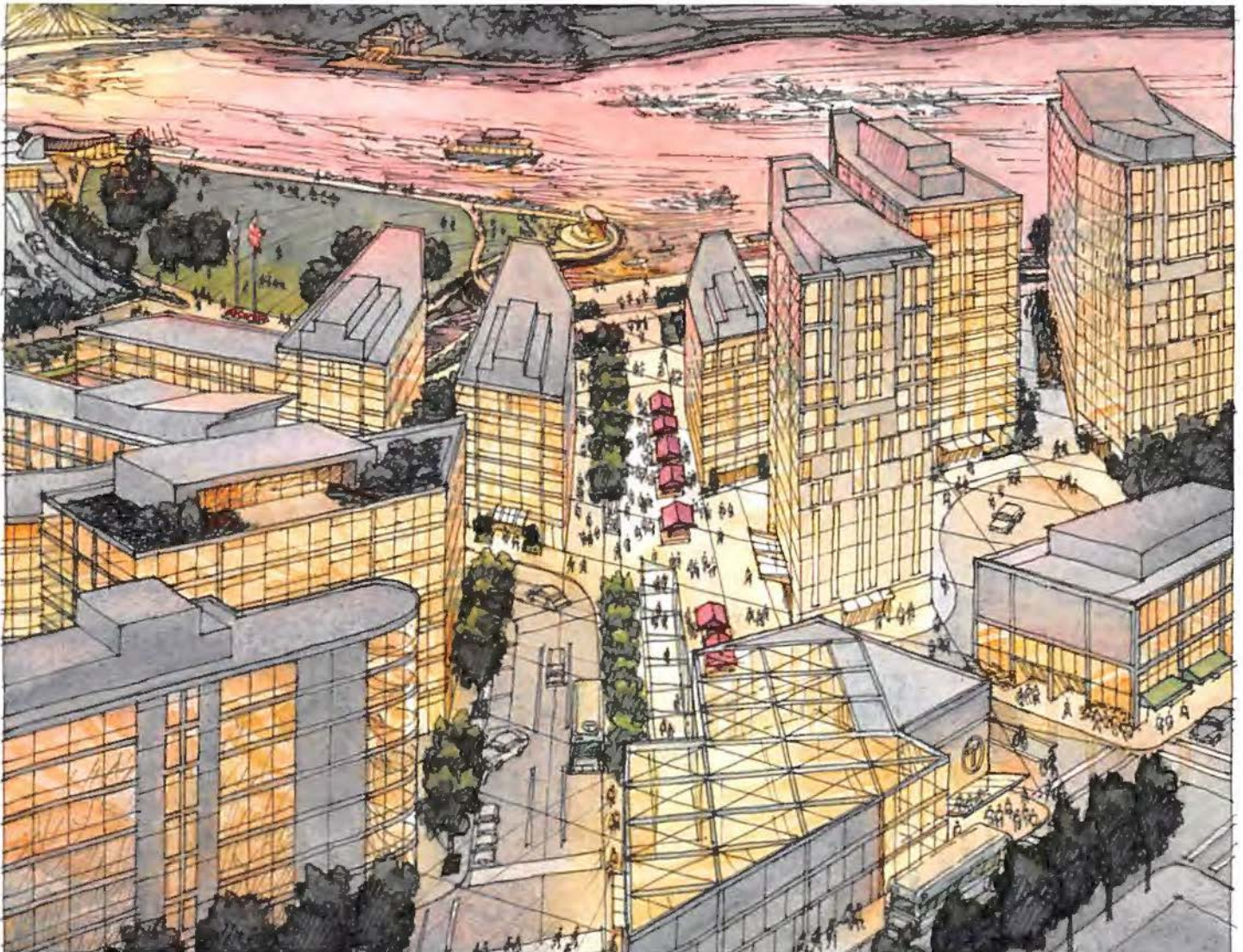
next, create exciting New Ways to the River...

Via West Station Plaza ...

This Vision proposes that West Station be built as a major transportation hub with intercity Commuter Rail and local light rail serving North, South and Back Bay stations, bus and taxi service to points in Cambridge, Allston, Longwood and Brookline, and a seasonal, no-wake river ferry along the Charles.

The lively West Station Plaza provides a direct connection to Cambridge, Boston, Harvard, BU and MIT via an attractive bridge plaza over the rail and roadways (like Harvard's Plaza over the Broadway underpass linking the Science Center with Harvard Yard) and leading down to the river as a large, well-used riverside park node for events, festivals, art displays, food trucks, or simple pedestrian accessways.

As the core of a Transit-Oriented District (TOD), the West Station transit hub, West Station Plaza, and the critical foundations supporting air rights should be built as a Phase One priority. Ultimately, development buildout and the required air rights structure would be the responsibility of private initiatives, similar to the process by which Copley Place was built above the Turnpike and its interchange ramps.



Heading home at the end of a busy day

Along Salt Creek Park...

Based on conversations with the Charles River Watershed Association, as a major environmental enhancement of the Charles River's water quality, this park uncovers and reroutes Salt Creek, currently buried in a century-old underground viaduct. It proposes a day-lighted stormwater mitigation and treatment facility, similar to one recently completed at Alewife Brook. Overlaying this is the Allston neighborhood's long-sought "People's Pike," a network of safe, generous bike and pedestrian pathways connecting Allston to the river, potentially grade-separated from vehicular traffic.

Along this open space spine in this low-lying part of the site, the owner, Harvard University, can create one of the nation's most diverse and environmentally sustainable mixed-use communities by incorporating 'best use' practices across all of its social, physical and environmental aspects.



Salt Creek Park weaves resiliency, storm water treatment, bike and walking paths and lounging areas together.

and especially ... enliven the River's edge

The Allston Esplanade

The Allston Esplanade can provide a lush greensward for the Paul Dudley White Bikeway. However, today, three areas pose significant challenges.

The Throat

This Vision urges reconstruction of roadways and railways at-grade, for reasons of cost, social and environmental impact, and development flexibility. Of the three options to be submitted in the DEIR, the **abc alternative** is judged preferable.

However, even when all other width dimensions are held to a minimum, less than 9 feet of width remains for parkland, even though 40 feet is the minimum width required for dedicated and separated bike and strolling lanes, landscaped buffer/rain gardens at the highway's edge, along with wildlife habitats and intermittent docks at the water's edge.

Given the narrowness of this part of the site, only two solutions would yield a generous, pleasant, safe park movement corridor for bikers and strollers through this area:

Alternative A- Expanding parkland into the river. This configuration, while ultimately the least costly to build and maintain, could delay the project. It would also impact the river environment, but ultimately could enrich the riverbanks for both wildlife and boaters.

Alternative B- A "High Line" styled belvedere above the highway. It would cost more than Alt 'A', but much less than an elevated 8 lane turnpike; however, it would minimize river impacts, provide better noise mitigation, and promote connectivity and air-rights development across this narrow neck.

NOTE: Both schemes would incorporate well-built, well-landscaped, full-height sound walls to reduce highway and railway noise, as does the sound wall along the Thomas J. Butler Freight Corridor and Memorial Park in South Boston.



Alt A

By expanding into the river in this wide segment, one gains a better engineered wildlife interface, a public promenade at the river's edge, seating and native landscaping, a dedicated bike-way and a day-lighted stormwater treatment corridor at lower cost than with other schemes. Fill might come from selective dredging of the Basin to improve boat movement



Alt B

Staying out of the river completely requires an elevated promenade above Soldiers Field Road. This allows for future BU air-rights development. In the future, an over-the-water walkway (similar to that found at Herter Park) would provide waterside access and, if built in Phase one, could provide an area for construction staging and an edge for continuous, day-lighted storm water treatment.

Grand Junction Bridge

This project includes reconstruction of Grand Junction Bridge, for the following reasons:

1. It will upgrade rail service into Cambridge, as a potential rail link from Cambridge to North Station.
2. The existing bridge is old, poorly maintained and in need of significant repair.
3. Both its horizontal and vertical alignments will likely need to shift in order to become a significant new public transitway into Cambridge and North Station.
4. The bridge's present abutments prohibit development of pathways under the BU Bridge that could efficiently extend the Boston Esplanade pathway system upriver along the extensive Paul Dudley White Bikeway that runs the length of the Basin.
5. The reconstruction can eliminate a dangerous 'kink' in the path system by removing the existing narrow 'over-water' pedestrian/bicycle wooden bridge, with its poor sightlines and channel restrictions.

6. Removal of the wooden bridge would make it easier for boats to navigate the BU pier abutments. This should be a major priority for both the DCR and boaters.



Grand Junction Bridge today (above) and, in the future (below) incorporating park paths. In this view, the BU Belvedere sits atop the realigned Turn Pike (West bound)

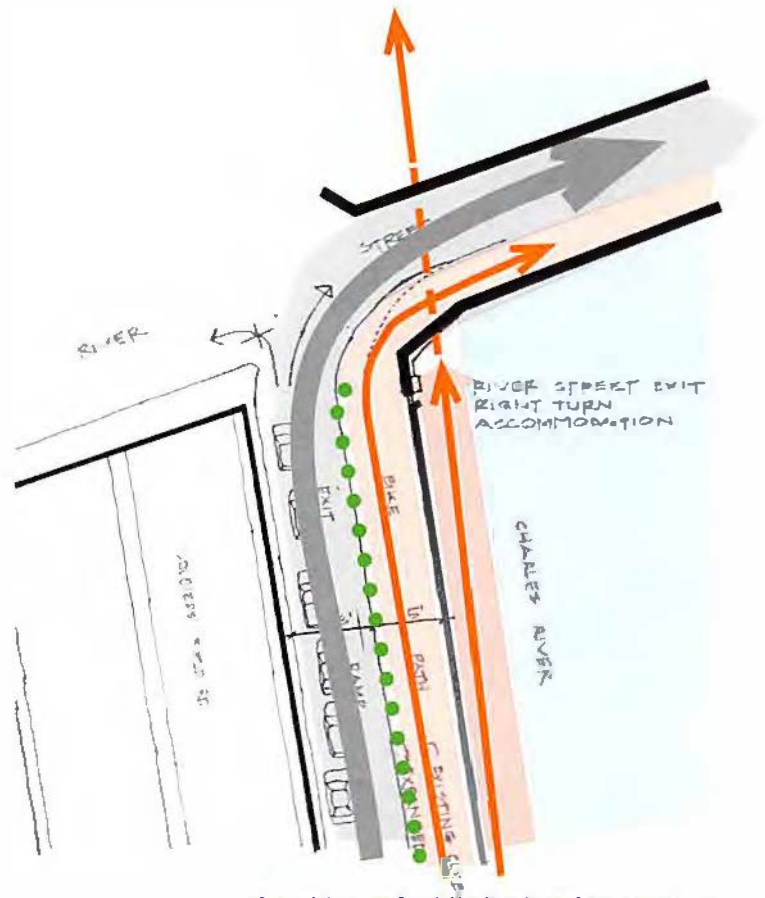


River Street Intersection

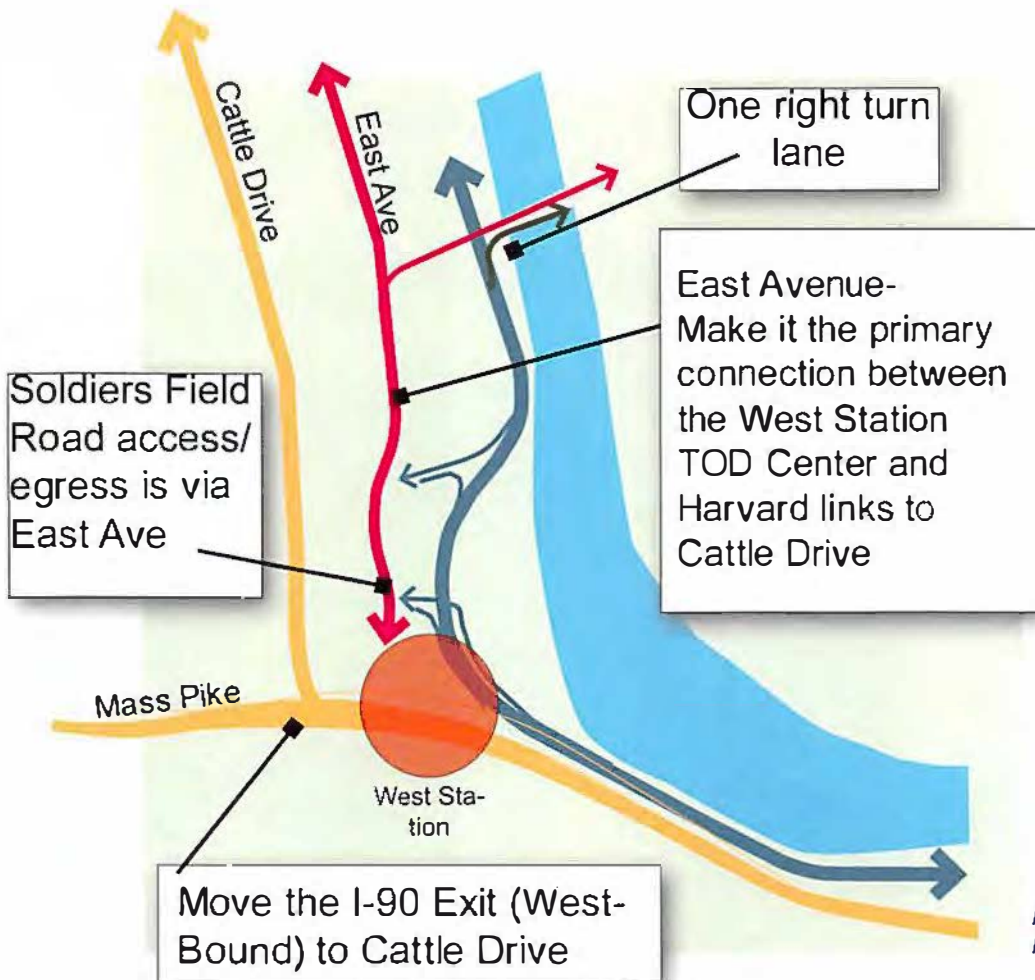
This is one of the Allston Esplanade's most unpleasant and unsafe stretches.

While MassDOT's current recommendation to remove the west-bound off-ramp altogether appeals to bikers and park lovers, this is also a major access point for drivers into Cambridge. Two improvements could ease this situation and allow a single right-turn-only off-ramp to remain:

1. The Charles River Conservancy proposes a bike/pedestrian passage under River Street. Most bikers and pedestrians would then be safely separated from right turning vehicular traffic, thus facilitating these right turn movements for motorists. Since this bridge is in poor repair and in need of reconstruction, this project should dovetail closely with MassDOT's planned Allston I-90 improvements.



Provide a safer bike/pedestrian way, one right-turn-only lane and a new bike ped connection under the River Street Bridge



2. Also, this Vision proposes **not** to make East Avenue an exit route for I-90 westbound, but to reroute that movement to Cattle Drive. This would facilitate traffic circulation off Soldiers Field Road by allowing a safer and easier right-turn, resulting in a shorter drive time, making it more desirable for motorists.

Key Turning Movements

Concluding Thoughts

1. MassDOT Phase One scope should be limited to its core mission, i.e ...

- I-90 reconstructed, (at-grade through the 'Throat'), with only the key interchange roadways built now across the development area
- Two track, through-rail serving South and North Stations
- A new West Station, with full transportation services on air-rights plaza above
- Bus, bike and pedestrian connections to Commonwealth Avenue and into Cambridge
- Bike/footpath improvements at Lincoln Street and River Street Bridge
- Landscaped sound walls adjacent residential areas and parkland.
- First phase stormwater treatment infrastructure

This would allow time for comprehensive and integrated planning and permitting of the entire Allston Landing site and river improvements. Specifically, realignment of Soldiers Field Road west of the 'Throat' and storm water treatment configurations should not be implemented until this process is comprehensively planned

2. We need an officially sponsored comprehensive Infrastructure Master Plan

This plan would finalize the scope, design intent and alignment of all public infrastructure: streets, roadways, transit facilities, parks and open space, bikeways and foot paths, docks and other river-

side impacts. This would greatly facilitate future build-out.

As with the Storrow Drive tunnels at the Hatch Shell, inexpensive, interim repairs to the viaduct can be made to allow time for this more comprehensive approach. It will also provide time for any required permitting regarding the river.

In the meantime, we must find funding for early improvements—e.g., relocation of existing sewer and stormwater lines—to keep options open for a better final result.

3. There's lot's of money to be saved

- The potential savings, both in capital (\$70-100 Million) and lifecycle costs, of an at-grade solution as opposed to an elevated turnpike, can offset many other project's costs.
- The Vision's initial capital costs will be more than offset by its long-term benefits, in terms of the increased attractiveness and economic value of the resulting development parcels, given their disposition along the river, which will contribute to the health and enjoyment of future generations.
- Moreover, shortfalls appears to be modest enough for a strong public/private initiative to close much of the expense gap. There are examples all over the country.

What could still make a difference in Phase One?

With a few key moves, the Phase One, I-90 Improvement Project can set the stage, assuming Harvard and MassDOT 's collaboration, to insure eventual realization of the key components of this Open Space Vision.

- 1- Realign Soldiers Field Road, much further away from the River than currently proposed, to make room for a broad, new 6+acre, multi-purpose river-side parkland with mitigation as necessary to insulate the park and river from highway impacts, engaging the river and improving the water's edge for boaters**
- 2- Reconsider Stormwater Treatment options- At Salt Creek Park and in the Throat, weave day-lighted, storm water treatment with dedicated bike and foot pathways into a pleasant linear park tapestry, from Allston to and along the river**
- 3- Support early construction of a multi-modal West Station Transportation Center in PHASE ONE and encourage significant TOD development on air-rights around the station and along BU in the 'Throat'**
- 4- Make Allston Esplanade a safe, pleasant and engaging activity corridor the length of the water's edge: in the Throat Area, at Grand Junction Bridge and at River Street**
- 5- Rethink street alignments, connections, scale, hierarchy and well-landscaped pathways to maximize the Transit-Oriented Development (TOD) potential around West Station and connections to the river Parklands**

MAKING IT HAPPEN ...

1. Think and Plan comprehensively-

The physical form and details of this vision for Allston Landing represents the current understood desires of the community and the various interest groups and stakeholders. It is also based on today's physical and financial realities. While these will evolve over the coming years, the core planning and design principles need not. It is important that development decisions be made in an open and inclusive manner. A well organized master planning process, led by a team free to examine all issues, opportunities and the desires of all interest groups can do this.

This is the largest and most significant development site in the heart of the Boston urban core. It deserves a comprehensive and holistic examination of the issues and opportunities involved in any work proposed impacting the river. This is particularly true regarding the 'Throat', Soldiers Field Road's realignment, storm water treatment strategies. The need for better rail and bus service to serve both the existing community and new development is obvious.

This plan would finalize the scope, design intent and alignment of all public infrastructure: streets, roadways, transit facilities, parks and open space, bikeways and foot paths, docks and other river-side impacts.

As with the Storrow Drive tunnels at the Hatch Shell, inexpensive, interim repairs to the viaduct can be made to allow time for this more comprehensive approach. It will also provide time for any required permitting regarding the river.

The need for a more comprehensive study is well evidenced by a recent analysis by Sasaki Associates of the Throat area, organized by the Charles River Conservancy and WalkBoston and sponsored by the Solomon Fund. It clearly shows that, even in this small part of the site, how there are multiple solutions than better meet everyone's goals than those currently proposed in the DEIR.

2. Establish Phase One priorities-

MassDOT and Harvard have priorities that differ from those of the Allston, Cambridgeport and river-user communities, making a comprehensive and inclusive master plan even more critical. Per the weight of community desires, and given the Phase One funding limitations, this Vision recommends the following items be included in Phase One:

- **Reconstruction of I-90 and mainline railways-** per the less costly 'Throat' configuration, i.e. the **abc all-at-grade solution**, with adequate space provided for future air-rights development the length of the 'Throat'
- **Development of West Station and plaza complex-** This facility would include the open air-rights platform for bus operations and the central plaza leading to the river. Requests for proposals for development of the air rights immediately around the plaza could be issued upon completion of the master plan, thus coordinating initial development.
- **Bus, bike and pedestrian connections to Commonwealth Avenue-** At a minimum this includes a new connecting ramp to Malvern Street and potentially to either Alcorn or Babcock Streets.
- **Sound wall(s)-** Fully landscaped along any abutting residential properties and the riverside parklands
- **Mass Pike Off Ramps-** Make Cattle Drive and **not** East Drive the main exit from I-90 WB and Stadium Way the main exit from Mass Pike EB.
- **Storm water system-** Develop an interim storm water treatment strategy that allows a more innovative, day-lighted storm water solution in the future.

Due to funding constraints, we propose that final construction of three items of the present scope be delayed to a later phase and implemented per the results of the proposed master plan:

1. *Realignment and reconstruction of Soldiers Fields Road west of the 'Throat'*
2. *Streets within the development zone that are not critical for MassPike access and egress*
3. *Essential storm water treatment only*

3. Finding the Funds-

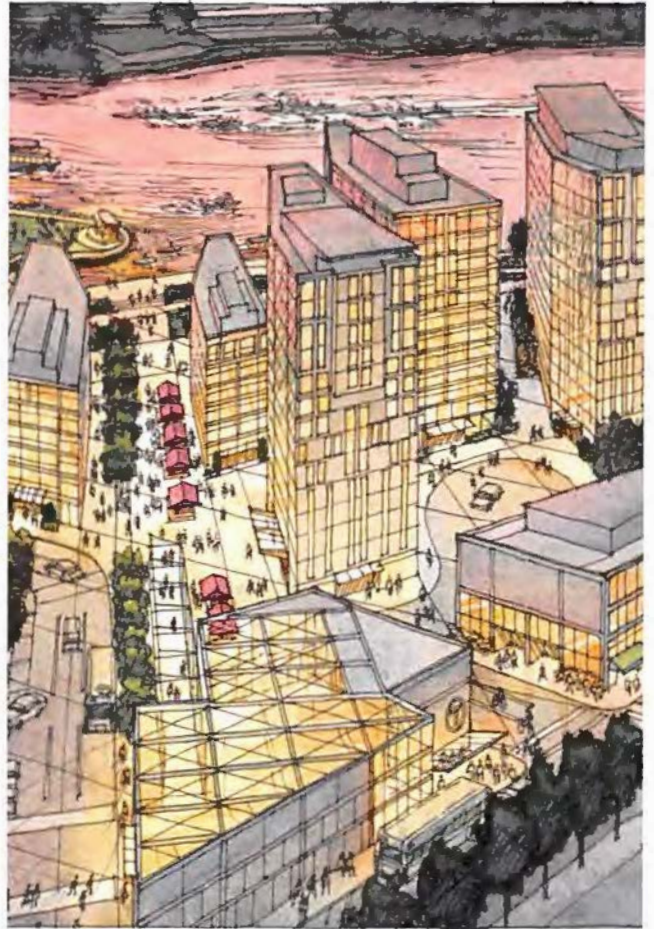
Phase One is narrowly defined as rebuilding I-90 and its interchange as quickly and cheaply as possible. At a minimum, sponsors must be quickly found to fund:

- A comprehensive master planning effort
- Early improvements, e.g. relocation of existing sewer and stormwater lines, in order to keep options open for a better final result

MassDOT prefers the viaduct alternative through the 'Throat', in spite of the fact that its construction is estimated to be \$70 to \$100 million more than the at-grade alternative. The savings by building at-grade (both construction and maintenance) could help fund West Station and bus/bike/pedestrian connections to Commonwealth Avenue.

Moreover, if reconstruction of Soldiers Field Road west of the 'Throat' were delayed until the master plan were complete, additional savings can be realized. By building the minimal internal street grid at this time even more funds can be available. It's a matter of priorities.

We believe that with proper support from the state, a public/private partnership could garner substantial amounts of funds for public park and open space development. Several, similar initiatives are happening all over the country.



West Station and its core air rights development should be a first priority. Connecting it through parkland down to the river would enhance its economic viability and create year-round vitality.

This report presents sturdy, informed and broad-based evidence for a better solution.

Will the City, or Harvard, or the State, provide the means to help realize the best results – for all of us and the River?

Inspiration from other places

River Park



Paris-Parc Citroen



Zurich, Water's Edge Playground

Salt Creek Park:



Hamburg- Pflanzen un Blumen



Boston- Muddy River Daylighted

West Station



Bethesda- DC Metro Center



Seattle- Air Rights in Freeway Park

Allston Esplanade



Indianapolis- Canal State Park



Columbus, OH- Scioto Mile Riverway



San Francisco- Yerba Buena Park



Stuttgart- Stadt Park, Beer Festival Tents



Seattle- Olympia Art Park



Paris- Albert Kahn Gardens



Boston- Olmsted's Fenway



Amsterdam, Water Reclamation



San Francisco- Union Square



Boston- State Street



Prague- Vitava Belvedere



Drammen, Norway- River Promenade



Hamburg- Hafen City Resiliency



Portland, OR- Floating Multi-purpose Path

- Some of us sense the soul of the river -

Call me Charles

My ageless body in this western hemisphere was discovered long ago by human beings... whose bodies are substantially of my same substance, and who had the power of naming. For four centuries I have been known as the Charles River, honoring an English king from human's short past. This name for my waters has identified and endeared me to generations of people, who know where I am, what power, beauty and grace I provide, and who begin to understand the mysteries of my waters.

Generations have used my resources, wisely or carelessly, for their livelihoods and their pleasures. The varying pulse of my body runs swift and true, ever-dependable for the recurrent life cycles that bring my fellow beings deep enchantment through the seasons.

I am the eternal source, providing life for all plants and creatures. On my shoulders and in my body, humans engage with me in many delightful ways. As with humans, I too need to breathe, to keep my health - from which humans, wildlife, fish and plants can sustain their health. I am able to transmute and transform abuses, to heal and regenerate my substance, to offer myself at my most vigorous for human benefit.

Machines and hard surfaces are anathema to the flow I shall always follow. Having been constricted and reshaped over the centuries, I need to stretch my shoulders further from my banks, to soften the pinched edges that at present are the narrow corridors of connection to humans.

Sweet Charles, run softly, till I end my song.
Sweet Charles, run softly, for I speak not loud or long.
But at my back from time to time I hear
The sound of horns and motors, which shall bring
The highway too close to the river in the spring.

Cf. The Wasteland - Section III The Fire Sermon, T.S. Eliot

I, the river, must rely on the reshaping powers of my fellow humans to allow for a broadening of my shoulders. Then I can slowly, softly, transform these soft edges, with which to embrace in thankfulness the uses of man. In expanding the body of my waters, I shall realize more silent strength, more enchanting beauty, more transformative power that brings life and healing to all who embrace me back.
I quietly sing my song, in the here and now, for all who listen, but also eternally,
beyond time, to a music of the spheres.

Frank Costantino

Alister McIntosh



ACKNOWLEDGEMENTS

This work is the result of an extended conversation among Aliston and Cambridgeport community members, over a two year period, concerning the need for a larger vision of what this area can become for the sake of the community, the river, and its parklands. Over the past half decade, a volunteer group of Boston professionals, aka the informal River Remarkable Work Group, has conducted numerous studies of issues and opportunities within the Charles River Basin. In this spirit, it formed the volunteer Allston Landing Design Team, ALDT. An inclusive ad-hoc advisory group kept the effort focused. While this document is the result of invaluable input from many vested parties, special thanks go out to its major authors: Skip Burck, Landscape Architect; Frank Costantino, Illustrator / Imagineer; Todd Larson, Copy Editor; Paul Lukez, Architect / Urban Designer; Alister McIntosh, Landscape Architect; John Shields, Architect / Urban Designer

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February 9, 2018

Secretary Matthew Beaton
Attn: Alexander Strysky

MEPA Office
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, 9th Floor
Boston, MA 02114

RE: EEA No. 15278 The I-90 Interchange Project

Dear Secretary Beaton,

Thank you for the opportunity to comment on the Massachusetts Department of Transportation's (MassDOT) Draft Environmental Impact Review for the Allston Interstate 90 Interchange project. I am writing on behalf of Allston Village Main Streets' (AVMS) Board of Directors to express our concerns in regards to the project as it currently stands.

Allston Village is a vibrant commercial district nestled along a highway that sees hundreds of thousands of travellers per day. Both our commercial and residential streets are choked by traffic daily causing unsafe conditions, public health issues, and environmental damage. This is a transformative project with the opportunity to dramatically transform the health of our community and the connectivity of the region. Unfortunately, we believe that the DEIR has inadequately addressed multiple environmental concerns and that more planning and review is required. **As such, we are asking that you require MassDOT to submit a Supplemental DEIR to address the issues described below.**

Below are our comments on multiple aspects of the project that directly affect Allston Village and our constituency.

1) West Station must be built during Phase One of the construction and include north-south through bus connections to mitigate construction impacts and to reduce traffic load on neighborhood streets. As it currently stands, Allston Village sees most vehicular traffic generated from the pike heading to Brighton, Brookline, Allston, Longwood, Kenmore Square, Fenway, and Boston University. The businesses, residents, employees, cyclists, and pedestrians of Allston Village deserve relief from this burden far sooner than in 2040. Transit options must be prioritized. AVMS-1

2) The project must increase access to the river. On average, anyone travelling to the river from Allston Village must travel 1.5 miles. By building the highway in the throat at-grade using the ABC option, we would be able create new bike/pedestrian access points to the river. This provides increased access to green space for Allston residents and safer travel for cyclists. AVMS-2



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Allston, Massachusetts 02134
Telephone: 617.254.7564
Fax: 617.254.2442
mainstreets@allstonvillage.com
www.allstonvillage.com

3) Franklin Street Footbridge must be completed at the onset of the project. The Franklin Street Pedestrian bridge has been the single point of access that knits together the two Allston neighborhoods. Built in the 1960s when the turnpike divided Allston in half, the bridge has seen no improvements and does not meet accessibility standards. This bridge must be built prior to the reconstruction of the turnpike. AVMS-3

4) There needs to be further analysis of the Cambridge Street/Harvard Avenue intersection. Currently standing at a grade F, this primary intersection sees all traffic heading to points south, east, or west. With the DEIR assumption that traffic volumes will continue to rise throughout the years, MassDOT needs to analyze and seek improvements to this directly abutting intersection. AVMS-4

There are many concerns to be addressed and issues needing further analysis. Along with the submission of a Supplemental DEIR, we request a comprehensive public process and continued engagement with the Task Force to address all presented issues. We appreciate the opportunity to comment on the DEIR and to have helped improve the project over the past several years. We look forward to continued collaboration to make the most of this transformative, multimodal project.

Best,

Emma Walters
Executive Director
Allston Village Main Streets

From: [Andrea Williams](#)
To: [Strysky, Alexander \(EEA\)](#); [Cerbone, James \(DOT\)](#); joseph.boncore@masenate.gov;
jay.livingstone@mahouse.gov
Subject: I-90 Allston Interchange Project
Date: Friday, February 09, 2018 12:13:50 PM

Dear Secretary Beaton:

I am writing in response to the DEIR that was presented at the Morse School in Cambridge in early January and in support of Henrietta Davis' response to same.

Rather than reiterate the same points her letter makes, I will simply note that this project will be a very expensive failure if it does not address the need to immediately develop effective and efficient alternatives to automobile transportation. The current design is backward-looking rather than one that will effectively move people in the 2020's and beyond. Transit planning needs to be incorporated as an integral part of the project. West Station should be built at the outset, not in 2040, the Grand Junction RR Bridge should be rebuilt with pedestrian and bicycle paths, and the tiny strip of Paul Dudley White bike path should be widened into a safe and inviting commuter route and recreational path. And it would be crazy not to take this opportunity to make the riverfront here a genuine park.

I own an automobile and drive when necessary, but this project cannot be treated as primarily a highway reconstruction. If we don't want to be sitting in traffic on I-90 in 2035, we have to build the infrastructure to enable people to get in and out of Boston conveniently and comfortably by other means.

Thanks very much,

Andrea Williams

176 Appleton St.

Cambridge, MA 02138

[617-354-2066](tel:617-354-2066)

From: Andrew Breck <ahbreck@gmail.com>

Sent: Friday, February 9, 2018 4:02 PM

To: Strysky, Alexander (EEA)

Cc: projects@livablestreets.info

Subject: Draft Environmental Impact Review (DEIR) for Allston I-90 Interchange project

ABRK-1

Dear Mr. Strysky,

I am writing to state that I support the positions of livable streets and walk boston on this project.

It is critical to ensure multimodal options and connectivity in this area (surface option, accomodations for biking/walking/transit). My name is Andrew Breck and my address is 19 Virginia Avenue, Melrose, MA

Thank you,

Andrew

From: Andrew McNerney <amcnerney@rcg-llc.com>

Sent: Friday, February 9, 2018 6:35:16 PM

To: Strysky, Alexander (EEA)

Cc: [Liz McNerney@yahoo.com](mailto:Liz_McNerney@yahoo.com)

Subject: I-90 Interchange Project

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

Dear Secretary Beaton,

The reconstruction of the Mass Pike in Allston seems to be a once in a lifetime opportunity to make a bold and drastically positive change in our quality of life.

I strongly believe it would be great to create a network of transit by bus, rail, and bike that also dramatically improves active transportation in the Charles River Parklands. I ask that you require Mass DOT to submit a Supplemental DEIR to address these issues:

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

8. Study how to upgrade the Grand Junction railroad linking West Station, Kendall Sq. and North Station, and enhance the Grand Junction Bridge to become a walk/bike connection between the Charles River parkland in Cambridge and Boston. AM-10
9. Evaluate increasing off-peak commuter rail service between Worcester and Boston—obviating the need to build a layover area to store idle trains in Allston. AM-11

Sincerely,

Andrew McNerney

32 Garfield Street

Cambridge, MA 02138

From: [Andrew Yakoobian](#)
To: [Strysky, Alexander \(EEA\)](#)
Cc: [Cerbone, James \(DOT\)](#); joseph.boncore@masenate.gov; jay.livingstone@mahouse.gov
Subject: I-90 Renovation
Date: Friday, February 09, 2018 9:53:35 AM

Dear Secretary Beaton:

I am afraid we may be rivals in more ways than one. I understand you are a St. John's Shrewsbury alum and I went to St. John's Prep!

Oh well, I hope you will still hear me out about the plans for I-90.

I have been living in the Cambridgeport/Riverside neighborhood of Cambridge since 2003. My wife and I decided to stay in Cambridge to raise our family and have a 6th and 2nd grader in Cambridge public schools. It is a great community.

My biggest issue with the proposed plan is the increased traffic and congestion it will cause in the neighborhoods of Cambridge.

I seldom drive and generally bike or walk to work. My kids also generally walk to and from school.

When I do drive it is because I need to pick up one of my kids (and sometimes along with someone else's kid) for some reason - or I need bring equipment (that won't fit on my bike) to a youth sporting event. (of course there is the occasional trip to the North Shore as well).

Even now the traffic is horrible and it is a challenge to make after-school activities on time. Putnam Ave is particularly laden with traffic for many hours of the day. If there is no immediate public transportation as part of this project this will only get worse. Moreover, when walking and biking, it is dangerous, especially for kids, with all this traffic as many drivers are texting and driving or driving impaired smoking marijuana. I invite you to visit the city any weekday for rush hour to see and smell this for yourself.

Therefore I hope you will consider my support of the January 24, 2018 submittal made by Henrietta Davis, community representative to the I-90 Task Force, in response to the DEIR for I-90. ' I support the following requests for Action or Further Study that she notes (notice that I have selected only the most important of the requests):

- Construction Mitigation and Project Compensation – develop detailed action plan to mitigate impacts from years of aggravation and disruption, reduce construction noise, and effectively manage expected heavier traffic on Memorial Drive, Western Avenue, Massachusetts Avenue, the many bridges over the Charles River, and Cambridgeport and Riverside neighborhood streets. AY-1
- Transit and Multi-Modal Planning – implement now, not in 2040. AY-2
- West Station – implement as part of first phase of I-90. AY-3
- Grand Junction Rail Bridge over Soldiers Field Road – reconstruct as part of I-90 Project. AY-4
- Right-Turn-Only Exit to River Street from Soldiers Field Road – retain a narrow one-lane exit ramp, designed with improved pedestrian/bicycle path. AY-5
- Underpass under River Street Bridge for Pedestrians, Joggers, and Cyclists – support as part of future River Street Bridge reconstruction project. AY-6
- Cambridge Access to/from the Turnpike – study expected travel times and develop acceptable traffic management plans. AY-7

Sincerely,
Andrew Yakoobian
238 Putnam Ave.
Cambridge, MA 02139

From: Andy Hinterman <ahinterman@LDA-ARCHITECTS.COM>

Sent: Friday, February 9, 2018 3:15 PM

To: Strysky, Alexander (EEA)

Cc: 'comments@walkboston.org'

Subject: I-90 Allston, EEA # 15278

Mr Strysky –

I've just heard about the proposal to decongest the interchange of I-90 in Allston. As a commuter traveling from Natick to Cambridge any changes that reduce traffic and time spent traveling by car are most-welcome. As someone who is a biker and runner with a lot of familiarity with this stretch of the Charles I feel that it's important that considerations be made for runners, walkers, bikers and people who just plain love strolling along the river and I'm supportive of the two schemes that Walkboston is proposing. That edge of the river is sorely lacking in some nice vegetation and the path in that section is also in dire need of a more well-defined separation from the high-speed traffic on Soldier's Field Road. It's not a pleasant place to be and I have in the past had safety concerns both as a user of the path and as a driver. Please consider including these suggestion in your plans.

AH-1

Thanks.

Andy Hinterman @HinterSpace
34 Pine Street
Natick MA 01760

T Andrew Hinterman, AIA
Senior Associate
617 300-0009