

From: [Annette LaMond](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: Comment Letter (EEA No. 15278)
Date: Friday, February 09, 2018 10:09:57 AM

February 9, 2018

Secretary Matthew A. Beaton
Secretary of Energy and Environmental Affairs
Commonwealth of Massachusetts
100 Cambridge Street, Suite 900
Boston, MA 02114

Attention: MEPA Office
Alex Strysky, EEA # 15278

Dear Secretary Beaton:

I am writing to comment on MassDOT's Draft Environmental Impact Report (DEIR) for the Allston I-90 Interchange Improvement Project (issued on November 30, 2017). I have been following the discussion of the Allston I-90 project closely. I have attended four of MassDOT's public meetings, read the documents posted on the MassDOT website, and visited the Cambridge Public Library to review the DEIR. My comments are also informed by my 40-plus years as a Cambridge resident.

I support former Cambridge Mayor Henrietta Davis's requests for action or further study contained in her letter of January 24, 2018. While the replacement of the Allston I-90 viaduct may be a Boston project, it will also have a major impact on Cambridge.

I would like to give special emphasis to the following points:

- The new Allston I-90 should not be elevated. Please revisit the option of a tunnel financed by air rights in the so-called Throat to provide added parkland and cut noise. But if a tunnel is not possible, the highway should be at grade with the river's edge redesigned to provide more parkland with a protected bike/pedestrian pathway, either by a solution employing fill or a cantilevered bridge. ALA-1
- Noise mitigation should be incorporated into the plans, even if it is not technically required by code. The constant roar of I-90 and Soldiers Field Road bounces off of BU's towers, to the nearby neighborhoods and across the river to Cambridge. If the project includes noise mitigation, it will improve the quality of life in neighborhoods on both sides of the river. Further, with noise mitigation, the 17-acre Magazine Beach Park - the second largest park in Cambridge - would become a greater recreational asset. ALA-2
- Maintain the right turn from Soldiers Field Road on to the River Street Bridge. Eliminating the turn would feed unnecessary Cambridge-bound traffic (congestion, fumes, noise, accidents) into the new Allston community - not a ALA-3

good thing if the potential of the new place is to be realized. It would also encourage drivers to take unnecessarily long alternative routes through the neighborhood streets of Cambridge, Boston, and Brookline.

- Planning for West Station and transit connections to Kendall Square, North Station, and the Longwood Medical Area must not wait. Good rail and transit options need to be part of the development of this new section of Allston.

ALA-4

Thank you for your consideration.

Sincerely,

Annette LaMond
7 Riedesel Avenue
Cambridge, MA 02138

February 9, 2018

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

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

Re: Allston I-90 Interchange DEIR

Secretary Beaton:

Thank you for the opportunity to provide comments for the Massachusetts Department of Transportation's (MassDOT) Draft Environmental Impact Review (DEIR) for the Allston Interstate 90 Interchange project. As a lifelong resident of Allston and President of the Allston Civic Association, I wanted to provide some additional personal comments on behalf of my community beyond the group submission that was made.

Residents of Allston are no different than residents in other communities. They want a community they can be proud of that is safe and healthy and affords them a quality of life they deserve.

The Allston I knew growing up was made up of hard working people, who had little, but a great deal of pride, providing for their families where you had one household per living unit. If that household could afford one car they were lucky. They walked and took public transportation everywhere.

In the early 1960s, our neighborhood was split in half by the extension of the Massachusetts Turnpike. Despite all the political and legal battles that ensued, companies and homes were taken, we lost all our commuter rail and our quality of life was compromised because of who we were and where we were located.

Today, with a booming economy and the strong appeal our community has for young professionals, empty nesters, people who are downsizing and graduate students, as well as institutional expansion, we are seeing unprecedented development that will change our community forever.

Due to the high cost of housing, you now have multiple households in one living unit with many households owning a car. Public parking is at a premium. In addition to an increase in local traffic, we have become a pass through community for those impatient with the gridlock experienced on the Massachusetts Turnpike.

The concept of transit oriented development with more density and less parking is appealing when the appropriate transit infrastructure is in place.

ADI-1

The bottom line is to build great neighborhoods you need to build great transit.

When I spoke of growing up where most people walked or took public transportation, we simply have not kept up.

Everyone, regardless of age, ability, income, race, or ethnicity, ought to have safe, comfortable, and convenient access to community destinations and public places—whether walking, driving, bicycling, or taking public transportation.

We also need public transportation that is safe, clean, comfortable, reliable, affordable, efficient, timely, accessible and competitive, where people are not squeezed in like a can of sardines.

Our group submission details the social, economic, political and environmental justice long overdue for my community.

This once in a lifetime opportunity that potentially will benefit generations to come speaks more of who we are as a people. Whether respect and human decency can triumph over narrow self-interest and political gain is at stake here.

I look forward to future collaboration in this effort in restoring a sense of community and family to a place I have called home my entire life.

Sincerely,

Anthony P. D'Isidoro, Allston resident, MassDOT I-90 Allston Task Force Member, President, Allston Civic Association

Anthony Pangaro
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Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
Att: MEPA Office
Alexander Strysky
100 Cambridge Street, Suite 900
Boston, MA 02114

Via e mail:
Matthew Beaton matthew.beaton@state.ma.us
Alex Strysky alexander.strysky@state.ma.us

Re: I-90 Beacon Yards DEIR
EEA # 15278

Dear Secretary Beaton,

Many would agree that Allston Landing represents what may be the single biggest development opportunity with the greatest potential for fulfillment that Boston will see in the 21st Century. This is clearly a “once in a lifetime” opportunity. Big opportunities require far reaching plans that carefully integrate transportation elements with development goals.

It is quite alarming, therefore, to see that MassDOT in its DEIR proposes to postpone the full implementation of West Station to a time beyond the year 2040, and further appears to favor the reconstruction of an elevated interstate highway on a viaduct that will forever distort the development of the site.

APAN-1

I respectfully submit that these are grave errors and not consistent with the planning tradition of the Commonwealth. An at grade I-90, a widened Esplanade and a fully available at-an-early-date West Station are the elements required for a fast and full implementation of the most comprehensive vision for Allston Landing .

Some background:

Visible public investment in transit usually leads to changes in perception, perceptions not lost on institutions and investors who will take advantage of the new transit infrastructure. As the director of the MBTA’s Southwest Corridor Project I found that we could garner little pre-construction interest by Northeastern University in support of Ruggles Station (to include both Orange Line rapid and Commuter rail stops). Despite this, the Commonwealth made that transit

and roadway investment anyway because of the forward looking, strategic importance of providing access to nearby development sites, to the Longwood Medical Area and for the best possible local bus service. Only after Ruggles Street station was built as part of the comprehensive plan that included the new Southwest Corridor Park did Northeastern understand the potential. The University radically changed its campus expansion plan as it decided to take full advantage of the then clear opportunity. The stunning and still continuing growth of its campus at Ruggles is obvious testimony to the Commonwealth's planning abilities and construction commitment at that time. Had the completion of Ruggles Station been postponed until Northeastern said it was ready to build, we might still be waiting for that to happen.

At Allston Landing we can see that the same will be true for the future at Boston University, which controls most of the adjacent land to the south. BU appears to express a willingness to allow the encroachment of MassDOT's construction onto its land in order to achieve a superior infrastructure oriented to future development. If the *right* infrastructure also included a full West Station, more timely than in 2040, we would logically expect the development of key parcels at the intersection where the BU bridge approach meets Commonwealth Avenue to be followed with a full development of land adjacent to West Station. Without an advanced investment by the Commonwealth in West Station, this beneficial outcome is unlikely to occur properly.

We also have the good fortune that the owner of most of the land, Harvard University, is willing to form an appropriate partnership with MassDOT. Harvard would help develop the best infrastructure in support of regional economic growth and improved transit access *at the outset*.

It was encouraging to see that the Place Making study performed by BPDA (and which was supported by MassDOT) came to similar conclusions. The study supports West Station, an integrated roadway system including a Cambridge Street bypass connecting to West Station, and provisions for decking over the transportation corridor. This complete infrastructure is all necessary to enable the Allston site's full development potential.

Further good thinking is found in the proposal by *A Better City* to replace the existing structurally deficient and awkward Masspike viaduct with an at-grade roadway to be integrated with high quality development on the prime sites near the Charles River. APAN-2

Similarly, the Walk Boston/Charles River Conservancy/Sasaki proposal seeks to rescue the environmental quality of the river's edge with an ample Dr. Paul Dudley White Bike path. Their report establishes the basis for a stunning addition to the city's landscape, at a level of quality that would make Olmstead and Shurcliff proud. These elements are crucial to the implementation of a successful plan for Allston Landing and it is appropriate that you require the improvement of the river's edge as part of the I-90 Interchange Project as MEPA required mitigation for the project's dramatic impacts. APAN-3

I urge MassDOT to take full advantage of the Harvard and BU offers to help build West Station in full *now*, embrace the *ABC* plan and the *Walk Boston/Charles River Conservancy/Sasaki* proposal, and modify the preferred alternative to provide for these improvements and the decking needed to facilitate development. All of these actions are required to take full advantage of this

unique site. To do any less would be a tragic shortcoming on the part of the Commonwealth and the wasting of the full potential of a great asset.

In order that these essential design elements be properly integrated into the Allston Landing plan, it would be prudent for MEPA to require that they be incorporated in a Supplemental DEIR for further public review and comment. In view of what is at stake, the time that this will take is a small price to pay for the correct outcome.

Thank you for giving this your careful consideration.

Sincerely yours,

A handwritten signature in blue ink, reading "Anthony P. Fazio". The signature is written in a cursive, flowing style with a large initial 'A' and 'P'.

February 9, 2018

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

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

Re: Allston I-90 Interchange DEIR

Secretary Beaton:

I am writing to express concerns with the current status of the Allston/I-90 Interchange project, and to highlight some of the deficiencies of the analysis available in the DEIR.

I have been a member of the Allston/I-90 Task Force since 2015, representing the LivableStreets Alliance, and am a resident of Cambridgeport; I use the impacted area on a nearly daily basis by car, foot, bike, bus and/or train. I am also the originator of one of the “throat” alternatives, the 3K-AMP option, which has been analyzed in the DEIR. I believe this is a once-in-a-lifetime opportunity to get transportation right: to provide needed mobility for the greatest number of users while improving the local environment, reducing congestion and providing a better quality of life for the residents who live nearby and are affected by the decisions made regarding this complex project. There are several areas where the DEIR is deficient in its analysis regarding major aspects of this project.

A supplemental DEIR should be required to raise these issues, as well as other issues raised by other groups to allow a project which has the least impact to the transportation network, the environment, and the taxpayer and toll payer.

The 3K-ABC should be pursued as the preferred alternative, but with staging plans similar to those of the 3K-AMP as described in the DEIR.

AO-1

While I originally proposed the 3K-AMP proposal, I have worked closely with the proponents of the ABC proposal as well as with the state and feel that many of the original deficiencies with the ABC proposal have been addressed. As currently proposed, the 3K-ABC proposal is significantly less expensive than the other proposals, without accounting for the reduced life cycle costs of building an at-grade roadway, the future benefit of replacing the functionally obsolete Grand Junction railroad bridge (which is not replaced in the 3K-HV plans but would be

required for passenger rail service to Cambridge and, at 90 years in age, is older than many comparable bridges which have been replaced) and simplifying the ABC plan's staging using some of AMP staging plans. These will bring its cost down further.

The ABC plan, as proposed, requires extensive temporary ramp structures, which will add to the cost and complexity of the project. The AMP plan, however, mostly uses the existing interchange elements for the first phases of the project, nearly eliminating any temporary ramps. This reduces the complexity, duration and cost of the project. The ABC plan should be reanalyzed using these staging plans as the cost will be considerably lower.

This may require the relocation of the Paul Dudley White path, either on a temporary boardwalk in the river or via a detour to the Cambridge side of the river. By changing the staging of the Longfellow Bridge project to utilize a shared bike/ped path during later stages, the overall complexity of that project was minimized; a similar solution could be used crossing the BU Bridge and using the existing path along Memorial Drive. Since this path follows the inside of the river's curve, this adds only 500 feet to the distance traveled between the BU Bridge and Cambridge Street, even with a spiral ramp under the BU Bridge and adjacent to the Grand Junction Bridge over Soldiers Field Road, crossing the river, and then recrossing the river further upstream, a difference of just two minutes at an average walking pace and 30 seconds for a cyclist.

The other staging issues with the ABC plan regard the movement of the Worcester Line. The current staging plan would reduce the Worcester Line to a single track for a significant portion of the project, although still a shorter portion than the AMP or HV plans. By changing some staging plans, it should be possible to minimize or eliminate these impacts:

- Changing the slope of the line and regrading the right-of-way south of the existing viaduct on the sliver of land offered by Boston University and building a retaining wall can be done early on in the project without impacting service.
- Once the full width of the Turnpike is on a temporary at-grade alignment, the highway viaduct can be dismantled in place over the railroad at off-peak and weekend times, allowing full service during the busiest times of day and providing a bus shuttle—potentially from West Station, if it is built in a temporary configuration at this late phase—during off-peak hours when there is less congestion on the Turnpike and downtown. Given the speed at which other viaducts have been dismantled—for example, the Casey overpass in Jamaica Plain was actually 100 feet longer than the Turnpike viaduct, and crossed a complex series of roadways—this would result in only a few days of midday, overnight and/or weekend rail shutdowns.
- The final phase is to move the line several feet south, but since it is the only alternative which does not require a vertical realignment of the railroad, it can be carried out quite quickly.

The ABC plan requires four stages—several years—to replace the Grand Junction bridge over Soldiers Field Road, adding to the cost of the project, its complexity, and potentially to the overall length of the Grand Junction Railroad shut down, which may be able to be temporarily aligned through the project site for much of the project period. Several bridges in the Commonwealth have recently been replaced by MassDOT and the MBTA in much shorter periods of time, with traffic above and below often only impacted for a few days, such as the Fitchburg Line-Route 62 bridge in Concord, the Franklin Line-Guild Street bridge in Norwood, the Fairmount Line-Shore Line bridge in Hyde Park, and the 93Fast14 project on Interstate 93 north of Boston. Using these innovative, accelerated bridge techniques should be incorporated into this project to minimize the impact to the cost and impact to the traveling public.

In addition to cost, the ABC plan has many benefits for all users of the site. Its vertical alignment allows for easy connections between the river and the Commonwealth Avenue corridor. Its highway alignment removes a steep grade and reverse curve, and creates a nearly straight, flat highway through the “throat” area. It provides initial two-track right-of-way to the Grand Junction bridge to Cambridge, allowing the potential for a robust rail transit connection from the Worcester Corridor to Kendall Square and beyond, which will help to reduce the number of additional vehicles on the Turnpike, and mitigate congestion and pollution in the region.

The actual cost and benefit of Grand Junction closures must be fully examined.

AO-2

The DEIR analyzes the general amount of time the Grand Junction will be shut down for each alternative, but does not examine the order-of-magnitude costs for these shutdowns. In 2012 and 2013, when the Grand Junction bridge over the Charles was closed for emergency repairs, the MBTA and Amtrak were able to share maintenance between the North and South sides of the Commuter Rail network, and run infrequent trains via Worcester and Ayer when necessary. With more advanced planning—there was no notice for the initial 2012 shutdown of the bridge—better protocols could be established between the railroads to minimize the impacts.

Having said this, any shutdown of the Grand Junction longer than a few days will require the MBTA to transport equipment on the 100-mile route via Worcester and Ayer. This will require MBTA crews and result in some additional wear and tear to MBTA vehicles. However, it represents a small amount compared with both the Commuter Rail operating budget and the Allston/I-90 project cost. The MBTA Commuter Rail system runs approximately 24 million vehicle miles annually at a cost of about \$400 million: a rate of \$16 per mile. Assuming three round-trips between the North and South sides are required per week, and each uses an 8-car train, this would represent a cost of approximately \$4 million per year, 1% of the MBTA’s Commuter Rail operating cost and 0.4% of the cost of the Allston/I-90 interchange. If closing the Grand Junction for a period of time allows a significantly less-expensive construction or staging plan to be put in place, these costs will be easily recouped. For instance, the current staging for the ABC plan assumes a three-year closure of the Grand Junction. By this metric, this would cost \$12 million, just 1% of the overall project cost and still significantly less than the next-highest alternative.

The impact to the Worcester Line must be fully analyzed

While the impact to the Grand Junction Railroad—which carries no passenger service—is fully analyzed in the DEIR, the impact to the Worcester Line—which carries 16,000 passengers per day—is not. The document assumes that the line can be reduced to a single track during the project without impacts to the line’s performance, but there is no analysis of whether this is the case. The second track was recently completed for the Worcester Line through the project site, allowing the MBTA to run more frequent and reliable service on the line. At peak rush hour, the four Worcester Line trains consist of 23 bilevel coaches and four single-level coaches, providing 4620 seats, and the trains are often full past seated capacity. Highway counts indicate no more than 1500 vehicles per lane during this time. With the highway reduced to three lanes, the capacity of the railroad will exceed the capacity of the highway. There is no indication in the DEIR or from the project team that MBTA railroad operations were consulted as to the issues with reducing the trackage and speed during the project. Reducing the frequency, reliability and capacity of the Worcester Line during the project will result in an increase in congestion, vehicle miles traveled and pollution, and all steps must be taken to minimize these impacts. The ABC alternative, using staging plans created to minimize the impact to the peak-hour Worcester Line ridership, will result in the lowest impact to this vital rail facility and the thousands of travelers who use the railroad and highway daily.

The traffic model relies on faulty assumptions and must be reanalyzed, and the potential for Grand Junction service must be fully allocated in the model. AO-4

We live in a growing region, with much of the recent growth focused in Downtown Boston and adjacent areas. While the Turnpike and the Worcester Line provide relatively good connections between Downtown Boston and the MetroWest corridor, they do not serve the growing employment center in Kendall Square. Since the start of the project, millions of square feet of office space have been proposed for Cambridge, and anyone wishing to live west of Boston and take advantage of these jobs has little choice but to traverse the project area daily. However, this commuter is faced with two bad options: by transit, she can take a train to South Station, 13 minutes past Allston, then transfer to the Red Line there, and ride the most crowded portion of the subway through Downtown Crossing and Park Street to arrive in Kendall Square half an hour after passing through the project area. Or she can drive, braving traffic on the Turnpike before stalling out on the ramps to the River Street Bridge, where her vehicle is squeezed into the residential roadways in Cambridge for the final trip to Kendall.

Today, most commuters—more than three-quarters from most of the Worcester Line corridor—choose to drive. They do this not because it is a pleasurable experience, but because, even with the ills of traffic, it is preferable to the long rail commute via South Station. Yet from other portions of the region, where the rail commute to Kendall does not involve this time-consuming backtrack, more than half of commuters choose transit; in some towns south of Boston, this mode share surpasses 90%. (These data are from a sample of 18,000 commuters

at major employers in Kendall Square gathered by the Charles River Transportation Management Association and shared with me.)

There are several thousand daily commuters from west of Boston to Cambridge, and West Station—coupled with a fast and reliable rail shuttle to Kendall Square via the Grand Junction—would reduce travel times for most to the point where a transit trip would be time-competitive with driving. Yet the 2040 ridership analysis for West Station found that just 250 riders would take advantage of this transit node: of the current commuters from west of Boston to Kendall, this accounts for fewer than one in ten. This number is not believable for several reasons (among them: the recently-opened station at Boston Landing, a mile to the west, already has 500 daily riders even though the current development at Boston Landing is just one tenth the size of the proposed development in the project area), but by failing to account for the potential for the Grand Junction to connect to the Kendall Square employment center, it is far from complete.

A full reanalysis of the travel patterns through Allston must be undertaken. This will require modeling a last-mile shuttle from West Station to Kendall Square, as well as full occupancy of all planned development in this part of Cambridge, and an assumption that new development will fill in yet-to-be-built parcels there. In addition, any model must assume that in 25 years the Beacon Park Yard area around West Station will have seven million square feet of mixed-use development, and that residents within half a mile of a Commuter Rail station will use it as a fast means to avoid traffic to get downtown. The numbers from Boston Landing show that the model used in the project scope is wrong. It must be fixed.

In Summary, the DEIR requires additional analysis in several respects, including (but not limited to):

- Staging and construction plans for the 3K-ABC at-grade option
- The operational cost of closing the Grand Junction
- The operational impact of reducing the Worcester Line to a single track, and the increased congestion from reduced operations.
- The traffic model for the area, particularly in regards to adding a Grand Junction rail link to Kendall and transit use of West Station.

Finally, it is generally assumed that this project will be paid for with toll money from those of us who travel the Turnpike to go to work and school, to see doctors, and to experience the cultural and recreational amenities between Boston and the Berkshires. In the interest of the traveling public, the Commonwealth should select a proposal which both minimizes the impact to the environment and one which minimizes the impact to the toll-paying public. In both cases, **the 3K-ABC plan, modified with staging elements from the 3K-AMP plan, is superior and should be carried forward as the preferred alternative.**

Sincerely,

Ari Ofsevit

Member, Allston I-90 Task Force

10 Lawrence Street
Cambridge
781 710 1558
ari.ofsevit@gmail.com

From: Astrid Dodds <astrid.dodds@earthlink.net>

Sent: Friday, February 9, 2018 2:28 PM

To: Strysky, Alexander (EEA)

Cc: comments@walkboston.org

Subject: I-90/Mass Pike Project

The I-90/Mass. Pike project must plan for and fund provisions for transit, pedestrians and cyclists at the very start. Waiting until "later" when there is more time and money is a fool's errand. Watching what happened to the Seaport District should be all the lesson any of us need.

Re-arranging the roadways in Allston without providing now for safe and comfortable pedestrian and cyclist access to the Charles River will turn present-day opportunities into costly engineering impossibilities.

I know some Charles River path runners who choose convoluted running routes that avoid the "throat" next to Soldiers Field Road which is now dangerously "choked" for runners, walkers, and cyclists.

Please take this opportunity to "unchoke the throat" by adding space to provide separate paths for pedestrians and cyclists. See Walk Boston's suggestions. AD-1

Please also:

- build West Station; it should be a priority AD-2
- provide regional rail and crosstown bus connections AD-3
- provide walking and cycling access to the river, including paths that separate cyclists from pedestrians whenever possible AD-4
- provide comfortable access on foot and bicycle to regional rail, the MBTA and bus connections AD-5
- connect local streets with river paths AD-6

Astrid Dodds

73 Wendell St.

Cambridge, MA 02138

Member, Charles River Conservancy

Member, Walk Boston

34 Windom St.
Allston, MA 02134

February 9, 2018

Matthew Beaton, Secretary of Energy & Environmental Affairs
Executive Office of Energy & Environmental Affairs
Attn: MEPA Office
Alex Strysky, EEA No. 15278
100 Cambridge Street, Suite 900
Boston MA 02114
alexander.strysky@state.ma.us

Dear Secretary Beaton,

I live at 34 Windom Street in Allston which is located at the Mass Pike entrance ramp on Cambridge Street. My home is currently affected by traffic from the Mass Pike, and with the planned upgrades, will be right in the path of major traffic changes for years to come. I have attended several meetings about some of the proposed changes to the I-90 interchange and would like to add my thoughts for consideration.

One of the most crucial parts of making this project a success for decades to come is to build West Station at the beginning. This would go a long way toward reuniting Upper and Lower Allston. It would also play a critical role in encouraging transit-based transportation instead of ever-increasing car traffic. ABER-1

All modes of transportation need to be encouraged. Commitment to an all-access transportation system should include plans for separated bike and pedestrian paths. Having an at-grade highway will allow foot and bike access via bridges that connect Commonwealth Avenue with the river and Lower Allston. ABER-2

Another important consideration in this project is to create realistic traffic patterns for cars. The proposed maps that I have seen do not seem to address the traffic concerns of the existing community. In particular, the plan seems to have exiting traffic “filter” through the neighborhood streets. This is an intolerable solution. The existing streets are narrow, have parking on both sides, and are designed to be residential streets, not high-traffic streets. ABER-3

This would put tremendous stress on the neighborhood. My street already suffers from huge traffic spikes during rush hour from people using the residential street as a “cut through.” I cannot imagine how much worse this would be under the proposed plans to have connectors to the existing neighborhood streets.

Finally, an at-grade highway and commitment to multiple modes of transportation would allow for expanded parkland and wetlands. This would provide forward-thinking ways to deal with climate change as well as enhance the livability of the community. Creating varied green spaces, improves water and air quality and provides ways to control flood waters.

I hope that you will find ways to thoughtfully include these ideas into the plans for redesigning the I-90 interchange. There is a great deal of potential for this project to become a crowning achievement and model for community building in the city of Boston.

Sincerely,

Audrey Berry
audreyinboston@gmail.com

From: [Avery Faller](#)
To: [Stryisky, Alexander \(EEA\)](#)
Cc: comments@walkboston.org
Subject: Re: I-90 Allston, EEA # 15278
Date: Friday, February 09, 2018 11:36:53 AM

I didn't realize I needed to specify my address. It is Avery Faller, 11 Dartmouth Place, #1, Boston, MA 02116.

Thanks!

On Fri, Feb 9, 2018 at 11:34 AM, Avery Faller <avyk37@gmail.com> wrote:

Hi Alex,

I am a resident of Boston who has been using the Bike & Walking path alongside the Charles river for over 6 years now. At first I lived in Cambridge and commuted to work in Boston along this path from the JFK Street Bridge to the Longfellow Bridge. Then I lived in Boston and went to school in Cambridge and biked in the other direction from the Dartmouth St. footbridge to the the JFK Street Bridge as a Master's student at Harvard. Now I live in Boston and work at a small company in Harvard Square.

I would like to say that the section of the trail informally known as the "Throat" is inadequate to the amount of pedestrian and cyclist traffic that that trail sees on a daily basis. I encourage you to send some staff to the path on a summer morning between 7-10am to count the number of people who travel along that path in both directions. Also, especially in one area where a road sign juts into the path near the Cambridge Street bridge it is incredibly dangerous for two bicycles to pass each other, as on one side is fast moving traffic, and the other is drop into the river.

Anyways, that is all besides the point that there shouldn't be a pedestrian/bike path so close to a major roadway, with little more than a short guardrail as separation. Especially considering how wonderfully nice the rest of the sections of the riverside trail are like the Esplanade and the improvements that have been made to the Cambridge side in recent years.

I recently saw the alternative proposals submitted by Walk Boston, such as their video here <https://twitter.com/WalkBoston/status/958686527231610882> and got very excited that that could potentially be built.

AFAL-1

Sorry for the length of this email, but I feel very passionately about this issue, as it is a trail I use on a near daily basis, and there is so much potential for improvements, both in terms of safety, and enjoyment, as well as health benefits from not being so close to the highway, as well as encouraging people to exercise more with such an inviting trail.

Thanks so much for taking my comments into consideration,
Avery Faller



February 9, 2018

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

Re: Allston I-90 Interchange DEIR

Secretary Beaton:

Thank you for the opportunity to provide comments on MassDOT's Draft Environmental Impact Review (DEIR) for the Allston Interstate 90 Interchange project. We are writing to express our concerns with the DEIR and encourage the Commonwealth to leverage this project as an opportunity to support the administration's priorities and goals.

We ask that your office require MassDOT to submit a Supplemental DEIR to address several elements not included in the DEIR. In particular, we encourage you to study the long-term implications of building a highway viaduct in the context of maintenance and other costs over time, access to the river, and impact on nearby land use and the neighborhood. BARR-1
BARR-2
BARR-3

The I-90 Interchange is a project of regional significance with the potential to not only transform a neighborhood, but substantially improve regional connectivity and travel options. Given MassDOT's mode share goals and the Administration's commitment to reducing greenhouse gases from transportation, we urge you to evaluate this project in the context of its full potential, including its impact on the Commonwealth's ability to reach its goals. Prioritizing transit (rail and bus) connections and multi-modal access, plus many of the opportunities suggested by local advocates and the Task Force, appear to strategically align with the Administration's vision. BARR-4
BARR-5

The project is an opportunity to benefit today's and tomorrow's users of the roadway and transit systems by planning and designing beyond traditional highway reconstruction. The Commonwealth, working with municipalities and other partners, has the opportunity to better connect to areas north and south, add to our existing rail network with an infill station, and enhance the public realm and river access by taking a more holistic approach.

We urge the administration to advance its ambitious climate-friendly goals and priorities by investing in a project that truly benefits the Commonwealth and future generations.

Thank you for your consideration.

Sincerely,

Mary Skelton Roberts
Co-Director, Climate

Lisa Jacobson
Program Officer, Mobility

From: Ben Reed <benreed@mit.edu>
Sent: Friday, February 9, 2018 12:15 PM
To: Strysky, Alexander (EEA)
Cc: comments@walkboston.org
Subject: I-90 Allston, EEA # 15278

Hello,

I'm writing in strong support of improving the walking/biking infrastructure along the river through Allston BR-1 as part of the reconstruction. I was amazed recently when I rode through there at just how narrow it is – and that it wasn't even plowed!

Let's move away from the era of the car and into the era of mixed-use transportation.

Thank you,

Ben Reed
Program Administrator, Advanced Study Program
MIT Professional Education
Massachusetts Institute of Technology
700 Technology Square, Bldg. NE48-416
Cambridge, MA 02139
617.253.6128
professional.mit.edu



From: [Ben Patience](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: I 90 Allston/Cambridge Masspike project
Date: Friday, February 09, 2018 4:17:20 AM

Greetings Mr Strysky,

I am writing to let you know that moving forward with West Boston Redevelopment project along the Masspike without prioritizing alternative modes of transportation is a serious mistake.

While the Masspike Extension project, which opened in 1965 may have contributed billions of dollars to the economy of greater Boston, it has come at the expense of the overall quality of life for people residing along the Masspike corridor.

The highway in its present form remains very much a project of 1960s era American Urban Planning, whereby private automobiles are prioritized over every other mode of transportation. Public attitudes regarding the importance of alternative modes of transportation have changed dramatically since the 1960s, and current Masspike corridor redevelopment plans do not reflect this.

Allston & Cambridge are dense Transit & pedestrian oriented neighborhoods, & current redevelopment plans for the Allston/Cambridge interchange do seemingly nothing to incorporate existing neighborhood design into the plan. The interchange is at a major cross point, just outside central Boston and has the potential to serve as a major transit hub. North/South crosstown bus routes could serve a West Boston Commuter Rail Station on the Worcester Line of the Commuter Rail. The commuter rail that operates thru that area in its present form is a vastly underutilized public resource. Redevelopment plans for the Masspike Corridor should include upgrading the Commuter Rail from South Station to Auburndale/Riverside in Newton into a frequent RER/Sbahn type of Commuter service. With that type of service in place, West Boston could then serve as a major transit hub, with several crosstown bus routes feeding into an upgraded commuter rail there.

Another feature missing from existing redevelopment plans are upgraded pedestrian & cycling paths in the vicinity. The existing path along nearby Storrow Drive is woefully inadequate & dangerous for the volume of current users. Considering the distance the area is from Downtown Boston, as well as the pedestrian oriented nature of neighborhoods in Cambridge & Allston, there is tremendous potential to vastly increase the volume of environmentally sustainable pedestrian & cycling traffic in the area through the development of improved trails. Currently such plans are being delayed much too far off in the future.

I seriously hope the state will reconsider its plan to delay alternative mode friendly design into Allston/Cambridge I90 redevelopment plan until 2040, & make environmentally sustainable; bike, transit, & pedestrian friendly design the cornerstone of any redevelopment plan.

BEP-1

Sincerely,

Benjamin E. Patience
Wellesley, MA

Sent from my iPhone

From: Bill Boehm [mailto:bill@boehmarchitecture.com]
Sent: Friday, February 09, 2018 8:51 AM
To: Strysky, Alexander (EEA) <Alexander.Strysky@MassMail.State.MA.US>
Cc: Cerbone, James (DOT) <James.Cerbone@dot.state.ma.us>; joseph.boncore@masenate.gov;
jay.livingstone@mahouse.gov
Subject: I-90 DEIR - Cambridge Impacts

Dear Mr. Strysky

We agree with and support the concerns raised by Former Mayor Davis in her Requests for Action and Further Study letter.

However, in regards to the Soldiers Field Road right turn to River Street, **we believe that improving the pedestrian/biking network should take priority over the convenience of Cambridgeport residents.** There are many ways to achieve this, including **expanding the shoreline to accommodate a pathway, as illustrated in the "Unchoke the Throat" video that has been circulated.** **We urge you to prioritize the environmental and health benefits of an excellent pedestrian/bike network in your design.** BBOE-1 BBOE-2

thanks

Bill Boehm
Danielle Sauve
18 Laurel Street
Cambridge



Boston Cyclists Union

P.O. Box 191710
Roxbury, MA 02119
617-516-8877

February 9, 2018

Secretary Matthew Beaton

Executive Office of Energy and Environmental Affairs, Attn: MEPA Office Attn: Alexander Strysky, EEA
#15278

100 Cambridge Street, #900, Boston MA 02114

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

Re: Allston I-90 Interchange DEIR

Dear Secretary Beaton,

On behalf of the Boston Cyclists Union and the thousands of members and constituents we represent, I am submitting this comment letter with regards to the Draft Environmental Impact Report (DEIR) submitted by MassDOT for the I-90 Allston Interchange Project DEIR. We already signed on to a letter with advocacy partners and Task Force members across the metro region and state, but have some additional and urgent points to bring to your attention as you consider the future of this project and again, respectfully request that you require MassDOT to submit a Supplemental DEIR and to minimize the environmental impact of this project and to better reflect the vision and goals of the Commonwealth and its communities.

The Boston Cyclists Union is a member-based nonprofit with a mission to make bicycling a safe and comfortable means of transportation for people of all ages and abilities throughout the Boston metro region. We know that people choose bicycling to get around because it is one of the most efficient ways to get where you want quickly, it is an active, healthier way to get around, and for many, it is also the most affordable means of transportation. Additionally, and important to you, it is one way to tackle some of the most pressing environmental issues facing the Commonwealth of Massachusetts.

As you know very well, transportation is **the largest** contributor of greenhouse gas emissions in Massachusetts and accounts for more than 40% of the state's greenhouse gas emissions.¹ You yourself stated that to achieve the dramatic reductions in emissions that we need to see, we need to tackle this problem with major, transformative efforts and on a regional scale. Building for modeled and maximized

1

<https://www.bostonglobe.com/metro/2017/11/13/states-mull-how-cut-transportation-emissions/glCHNp3mAMFiYnSiyw83JM/story.html>

motor vehicle capacity without putting active modes of transportation and transit at the forefront of such a large capital project is a huge mistake.

Instead, with this I-90 Allston Interchange project the Commonwealth's leadership has the opportunity to more accurately reflect the mode shares we -- you and Governor Baker -- want to see attained.

At more than 6%, the Cities of Cambridge and Somerville already have two of the highest bicycle commuting mode shares of any cities in the country. Boston's bicycle mode share is slightly more than 2% and they have an ambitious goal of achieving 10% by 2020 according to their environmental goals set in their Greenovate Boston 2014 Climate Action Plan² and 10% by 2030 according to the mobility goals set out in the Go Boston 2030 Vision and Action Plan.³ Cambridge is aggressively working towards achieving a connected network of protected bike lanes and bike paths and reducing reliance on automobile travel. Without comprehensively building a network, and without addressing and closing critical gaps in the network, we'll never convert the 60-70% of people who are interested in biking but concerned for their own safety.

In recent developments, Cambridge and MIT have committed funding and the right of way to design and construct a majority of the rest of the Grand Junction Path. If the at-grade option is not constructed, there will be serious connectivity issues to allow the Grand Junction Railroad bridge to carry bicyclists over the Charles River. Additionally, the opportunity the bridge poses to be one of the first safe crossings of the Charles for people on bikes is not something to take lightly. BCU-1

With regards to the throat, we strongly support the concept put forth by WalkBoston and the Charles River Conservancy,⁴ to consider moving the bicycle and pedestrian paths further into the Charles River, either as a boardwalk or ""resilient soft edge"" on fill. These alternatives will allow the path to be expanded to a more substantial width to encourage and allow more people to choose a bike for their commute. Additionally, while there are many health benefits of biking and walking, the environmental exposure pedestrians and bicyclists can face is one not to be overlooked. In an ongoing study out of Columbia University in NYC, researchers are studying the particulate exposure of people biking on paths and on street, and they have found that ""even relatively short-term exposures can increase body-wide inflammation and boost the likelihood of strokes and heart attacks.""⁵ Their research suggests that moving or choosing a bike route that is even 8-10' removed from motor vehicles can significantly reduce exposure (ie, parking protected bike lane as opposed to a bike lane next to moving traffic). Placing bicyclists and pedestrians directly adjacent to the highway places an undue exposure burden on these vulnerable road uses, is a public health risk, and alternatives, especially the ones mentioned above, should be explored and implemented. BCU-2

While it is our hope that our streets and street culture change in a way that everyone of any age or ability will choose to ride a bike as transportation, we know it is not a choice that every person can or

² https://www.boston.gov/sites/default/files/greenovate_boston_2014_cap_update.pdf

³ <https://www.boston.gov/news/go-boston-2030-vision-and-action-plan-released>

⁴ <https://www.youtube.com/watch?v=S06XDNsetKc&feature=youtu.be>

⁵ <https://www.nytimes.com/2017/07/06/well/move/on-your-bike-watch-out-for-the-air.html>

will make, and believe in a multi-modal Massachusetts. We also urge the state to reconsider plans to build West Station now as opposed to waiting until 2040.

BCU-3

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Becca Wolfson', with a stylized flourish at the end.

Becca Wolfson
Executive Director, Boston Cyclists Union
bwolfson@bostoncyclistsunion.org

Boston University Operations

Office of the Senior Vice President
One Silber Way
Boston, Massachusetts 02215
T 617-353-6500 F 617-353-6556



February 9, 2018

Matthew A. Beaton
Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs
Attn. MEPA Office
Alex Strysky, EEA No. 15278
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: I-90 Allston Interchange Project — Draft Environmental Impact Report

Dear Secretary Beaton,

Thank you for the opportunity to comment on the I-90 Allston Interchange Project Draft Environmental Impact Report (DEIR). Boston University (BU) strongly supports the efforts of the Massachusetts Department of Transportation (MassDOT) to address aging transportation infrastructure with a comprehensive set of infrastructure improvements benefitting area stakeholders, the neighborhoods, and the region.

Boston University is the fourth largest private research university in the nation and the third largest employer within the City of Boston (and 15th largest employer in the Commonwealth). With more than 33,000 students and 10,000 faculty and staff, the University generates more than \$4 billion annually in economic activity. The University's faculty are committed to excellence in teaching and in path-breaking interdisciplinary research and scholarship. BU places a strong emphasis on collaborative research efforts of both faculty and students, with major initiatives in emerging areas such as neuroscience, systems biology, photonics, engineering biology, data science, urban health, global health and development, and emerging infectious diseases, as well as research in communications and the humanities.

Founded in 1839, BU has been located on the Charles River since 1920 and has witnessed the transformation of the campus environs into a thriving vital section of the City of Boston. The University appreciates the important nexus between transportation infrastructure and the vibrancy of the campus, the neighborhood, and the City. The campus is well served by public transportation with seven stops on the Green Line and the Yawkey Station Commuter Rail Station. Boston University operates its own transit system, the BU Shuttle, carrying over a million passengers a year. BU has been on the forefront of encouraging bicycle use through the construction of the first dedicated bike lanes in the City of Boston along Commonwealth Avenue. BU has strived to reduce single-occupancy vehicle trips to the campus by providing increased on-campus student housing, subsidizing T passes for students and employees, and reducing on-campus parking spaces. Sidewalks have been widened along the entire campus to support heavy pedestrian use, with as many as 100,000 pedestrian trips per day in some locations. Our transit-oriented investments have resulted in an absolute reduction in vehicular traffic along Commonwealth Avenue even while the campus and the City continue to grow in size and scope.

The University values its relationships with its government partners and has joined forces with the City of Boston and state transportation agencies on infrastructure improvements such as the rebuilding of Kenmore Square, the construction of the Kenmore T Station entrance within the Hotel Commonwealth, and the rebuilding of Commonwealth Avenue Phases I and II to reduce vehicle travel speeds and increase bike and pedestrian safety. Most recently BU has coordinated closely with agencies on the reconstruction of the Boston University Bridge and the Commonwealth Avenue Bridge over the Massachusetts Turnpike. In these projects, BU has contributed community support, design and construction dollars, and real estate, while experiencing construction phase disruptions and logistical issues, in the interest of a better outcome for all.

In reviewing the proposed I-90 Allston Interchange Project, our comments are informed by the need to replace the existing infrastructure that has outlived its useful life, as well as the potential significant benefits of the project for regional transportation mobility and the potential to grow the Allston Yards area of the City into a new center of economic development. In that light, BU supports the construction of a new West Station sooner rather than later, supports the expansion of parkland and improved connectivity to the Charles River, and supports a North-South transit-only link from Commonwealth Avenue to West Station and Cambridge Street. BU1-3

At the same time, there is a potential for both construction and operational impacts to adversely affect the University. BU believes the impacts are manageable and can be addressed through further study and/or mitigation. As an abutter with 4,000 feet of frontage on the project area and home to thousands of students residing next to the project area, the University has carefully reviewed the DEIR and has identified the following major concerns which require further consideration;

- The findings in the DEIR validate the findings of BU's traffic consultants that a general traffic connection between West Station and Commonwealth Avenue would be detrimental to the level of service for the existing users of Commonwealth Avenue and the surrounding street network. It is important that level of service along Commonwealth Avenue be at a minimum preserved, if not improved. The University requests that no further consideration be given to this option. BU-4
- The University firmly believes that there should be a North-South transit connection for busses and shuttles to West Station. After extensive study by the University, we believe that this connection is best located at Malvern Street. This connection can be accomplished with reasonable impacts if modifications are made to the Packard's Corner intersection, and routing is achieved using Malvern and Alcorn Streets. BU-5
- The surface alignment options are very appealing but have not been sufficiently engineered to understand what the impacts will be on Boston University real estate through property takings. BU has over 2,500 feet of frontage with dozens of buildings in this stretch and we are not able to discern the actual impact on these properties. A surveyed and engineered plan is needed for the throat area, showing the exact dimensions of the roadway sections sufficient to understand the potential impact on University property. BU-6

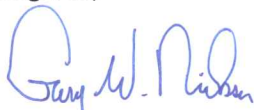
February 9, 2018

- The layover and repair facility for commuter rail trains has enormous potential to adversely affect the quality of campus life and abutting residential neighborhoods through noise, vibration, and fumes. The facility should be as small as possible and appropriately mitigated to minimize impacts. BU 7-8
- We have technical concerns regarding the assumptions and methods used to evaluate the noise and vibration impacts of the project along the length of the campus and believe additional analysis is required to determine appropriate mitigation. BU-9
- While much planning thought has been given to integrating the new infrastructure corridor with the City street grid in Allston, the design does not sufficiently integrate pedestrian access through the corridor to the Charles River from the south. There is some 3,000 feet of riverfront west of the BU Bridge that is isolated by this project from the surrounding neighborhood. A midpoint pedestrian/bicycle access route would more fully integrate the project into the neighborhood while improving safety and access to one of the most difficult sections of the Charles River pathway. BU-10
- Finally, construction period impacts are insufficiently described, particularly with regard to the throat area and Babcock Street, a private way. BU-11

For the record, Boston University continues to support West Station and believes that planning should continue to be a high priority of MassDOT and the Commonwealth.

We appreciate the responsiveness of MassDOT and its team in addressing several previously raised concerns. The information provided the DEIR on various issues and alternatives has helped to clarify for BU the potential benefits and impacts of the project. Attached to this letter is a more detailed set of issue by issue comments. We look forward to continuing to work with the MassDOT, the City, the neighborhood, and other stakeholders to further refine the design to make sure this project is truly transformative for the future of this area.

Regards,



Gary W. Nicksa

Senior Vice President for Operations.

cc: MassDOT Highway Division
Environmental Services Section
Attn: James Cerbone
10 Park Plaza, Room 4260
Boston, MA 02116

February 9, 2019

I-90 Allston Interchange Project

Draft Environmental Impact Report

Detailed Comments

Provided below are further details supporting issues of concern to BU. The comments are organized around the impact categories of the DEIR.

Land Use

Chapter 1, Section 1.5.2 states that the 3K-AMP and 3K-ABC Variations of the Project requires BU right-of-way (ROW) acquisitions at Buick Street and Nickerson Field for installation of noise barriers, and partial acquisition of Parking Lot D and parking structure and relocation of the fire escape at the College of Fine Arts.

Chapter 3, Section 3.3 states that the Worcester Main Line track alignments shift southerly, thus requiring a 7-foot-wide property acquisition from BU, which will impact parking facilities (surface lot and structured), a building and utilities. *Chapter 5, Section 5.2.2.2, Page 8* also states that "BU property in this area includes existing parking, a parking structure, steam piping, and a building fire escape". Figures 5.4-5 and 5.4-8 in *Chapter 5 Figures* show the cross-sections of the proposed Throat Area Variations for 3K-AMP and 3K-ABC, respectively. These figures show the limit of the existing MassDOT easement and the 7-foot taking of BU ROW for relocated commuter rail tracks.

For all three Throat Area Variations, ROW is required from BU at the end of Babcock Street for a pedestrian/bicycle structure planned for 2040. As a result of the pedestrian/bicycle connection along Babcock Street, on-street parking spaces will be eliminated to create a wide sidewalk, landscaping, wayfinding, and other features.

Comments/Questions:

BU 12 - 16

- What are the length, height, and width extents of the proposed noise barriers?
- There is no mention of the extents of takings (land area) in the DEIR and the appendices. What are the geographic extents of the proposed 7-foot wide taking on BU property and buildings shown in the figures?
- What is the location and total land area (square feet) of each taking of BU property for the ROW in each Throat Area Variation, at each stage of construction?
- Which of the ROW takings are temporary construction phases only and what is the expected duration of those?
- What impact would there be on BU's existing use and ownership of, and future development rights in, Babcock Street and adjacent properties?

Visual

A solid noise barrier will be provided atop the existing retaining wall at Nickerson Field.

Chapter 5, Section 5.3.3.3, Page 15 describes the visual impacts for the three Throat Area Variations. In the 3K-HV Variation, the I-90 viaduct is higher and closer to the Paul Dudley White (PDW) Path than the 3K-AMP rail viaduct and 3K-ABC retained fill section. It will be a prominent feature in views to both the west and east along the path, but it will be visually buffered in growing seasons by tree plantings in a continuous landscaped buffer between the path and Soldiers Field Road (SFR). There is no mention of visual impacts from a BU perspective.

In the 3K-AMP Variation, the rail viaduct will have less visual impact on PDW Path users than the 3K-HV Variation, as it will be lower in elevation and farther away from the river than the I-90 viaduct in 3K-HV. Westbound SFR will be at the same elevation as I-90, but the eastbound SFR lanes will be elevated on a retained fill section. The retaining wall will be 7 feet above westbound SFR elevation to the east and west of that point. At its highest point, the retaining wall will partially screen eastbound SFR, I-90, and rail viaduct, and it will be a prominent visual element for those using the PDW Path. There is no mention of visual impacts from BU perspective.

In the 3K-ABC Variation, the elevated portion of the GJR will have even less visual impact on PDW Path users, as it will also be lower in elevation and farther away from the river than 3K-HV and 3K-AMP Variations. This variation also places eastbound SFR above the westbound lanes and above I-90, with 7 feet high retaining wall above westbound SFR elevation. The retaining wall will partially screen eastbound SFR, I-90, and rail viaduct, and it will be a prominent visual element for those using the PDW Path. There is no mention of visual impacts from BU perspective.

Comments/Questions:

- 3K-HV Variation: This Variation will not change the existing visual and aesthetic character of the Project area. Views toward river and northward from street level and from BU buildings need to be provided to understand what the new viaduct and its sound walls would look like. BU 17- 21
- 3K-AMP: Putting the railroad on viaduct has the advantage of only occasional trains on it compared to more or less continuous auto traffic on the HV variant. As shown in the Graphics 5.3-6 and 5.3-7, the retaining wall will create some visual obstruction of the Charles River area for ground level viewers on the BU side. The visual impacts of the retaining wall, rail viaduct, and noise barriers on BU need to be more fully described and illustrated.
- 3K-ABC: Removal of the viaduct will open up views of the Charles River from the BU area. However, the retaining wall will create some visual obstruction of the Charles River area for the ground level viewers on the BU side. The visual impacts of the retaining wall and noise barriers on BU should be more clearly presented.

- The descriptions of visual impacts and the renderings describe the impact for the PDW Path users. BU is the largest abutter of the Project Area. Please provide renderings of the Throat Area Variations and the overall Project from key viewpoints along the BU West Campus, i.e. west of the BU Bridge.
- The creation of a solid noise barrier atop the existing retaining wall at Nickerson Field may have the effect of creating an enclosed acoustical field that may reverberate public address sound from Nickerson Field events into student residences and into the surrounding neighborhoods of the Town of Brookline and City of Boston. Please provide acoustical studies to determine the impact of the noise barrier on the BU Campus and surrounding community.

Open Space and Recreation

BU West Campus existing access to the PDW Path and south bank of the Charles River appears to be somewhat improved in all the Throat Area Variations compared to existing conditions, but additional options to make these connections more direct should be developed. On the far west, access is shown via the pedestrian/bicycle ramp at the north end of Malvern Street through Cattle Drive Connector and Cambridge Street South.

Comments/Questions:

- There is little discussion of pedestrian and bicycle connectivity between the BU West Campus and the open space and recreational opportunities along the PDW Path and south bank of the Charles River. Currently, the only connections between the BU Charles River Campus and the south bank of the Charles River are at the existing pedestrian overpasses of Storrow Drive at Bay State Road (non-accessible) and Silber Way, which are distant from West Campus. The Malvern Street pedestrian/bicycle connection is at the far western edge of campus and the proposed Babcock Street pedestrian/bicycle connection is not shown until the full West Station is built. BI 22- 23
- The FEIR should explore the feasibility of more direct access to the open space and recreational areas along the Charles River and PDW Path from the BU West Campus area for the year of opening.

Bicycle and Pedestrian Connections

The DEIR proposes new pedestrian/bicycle connection (bridge structure over rail yard) between Malvern Street and the reconfigured I-90 Interchange for Phase 1, which will be completed by 2025.

Chapter 5, Section 5.7.3 states that in 2040 Design Year, the Malvern Street ped/bike bridge will maintain the original alignment, but will be modified to connect to the bus loop level of the proposed station.

For all three Throat variations, ROW is required from BU at the end of Babcock Street for the pedestrian/bicycle structure planned for 2040. As a result of the pedestrian/bicycle connection along Babcock Street, on-street parking spaces will be eliminated to create a wide sidewalk, landscaping, wayfinding, and other features.

Comments/Questions:

BU 24- 26

- The bus routing options using Malvern Street would require a new bridge structure at the north end of Malvern Street starting at the intersection with Ashford Street. If the bus bridge is not built as part of the opening year Project it would need to be added after the pedestrian/bicycle bridge is in place, which would likely be more costly and disruptive than creating a single multimodal bridge connection.
- The proposed bicycle and pedestrian shared-use path of the 3K-AMP Variation provides a long isolated path almost entirely on viaduct, which raises safety and emergency response concerns.
- We believe a more direct ped/bike connection between West Campus and the PDW Path is possible with the 3K-ABC Variation over the Throat Area, and the engineering feasibility and cost of such a connection should be developed.

Highway and Street Safety and Operation

North/South Transit Only Connection: The DEIR (*Chapter 5, Page 47*) evaluates one northbound bus route to West Station and three southbound bus routes exiting West Station for the 2040 Design Year. Of the three southbound bus routes, the DEIR identifies the least disruptive route as Southbound Bus Route Variant #1 (Malvern Street southbound, to Gardner Street eastbound to Babcock Street southbound to Commonwealth Avenue eastbound), and indicates that the future bus connection would be by others – it is not part of the Project.

Comments/Questions:

BU 27-34

- The DEIR Variant #1 Bus Route would have a significant impact on traffic, parking, pedestrian and bicycle operations on Babcock Street. Babcock Street is the center for BU athletics, as well as the other regional users of BU's athletic complex and experiences significant pedestrian activity and bus traffic. Buses from West Station, Cambridge Street, and other points on the north would conflict with this activity that would raise safety issues and exacerbate existing long delays for vehicles on southbound Babcock Street approaching Commonwealth Avenue. Of the Transit-Only options analyzed, the Base Case with buses using Malvern Street in both directions or in conjunction with Alcorn Street would have the least impact on the BU West Campus. BU requests that these options be explored in more detail in the FEIR.
- The intersection capacity analysis of Packard's Corner in the DEIR did not include a new crosswalk on the east side of Packard's Corner as proposed by the City of Boston as part of their Commonwealth Avenue Improvement Project to improve pedestrian and bicycle safety in the area. Has analysis been conducted with the City's new crosswalk and modifications to signal timing and phasing? Has analysis been conducted that includes mitigation measures to improve

operations at the Packard's Corner intersection to LOS D or better? Please provide this information in the FEIR.

- The DEIR bus route analysis assumes use of Commonwealth Avenue east of Packard's corner. The Project should consider a bus route option to/from West Station where buses are routed to/from Commonwealth Avenue west of Packard's Corner. Inbound buses to West Station and other points on the north would make a left turn from Commonwealth Avenue eastbound to Malvern Street northbound. Outbound buses would use Malvern Street southbound, Gardner Street, and Alcorn Street where they would make a right turn onto Commonwealth Avenue and a left turn at Packard's Corner to continue westbound to Harvard Street. This route would minimize the impact of buses along Commonwealth Avenue through the BU Charles River Campus. Alternative routing options such as this, and mitigation measures to improve operations at the Packard's Corner intersection to LOS D or better should be identified in the FEIR, and will require close coordination with neighborhood, municipal, and institutional stakeholders.
- Although evaluated in the DEIR, the N/S bus connection ramp and improvements are not included in the MassDOT Project. The DEIR includes an illustration of the N/S bus connection routes; however, it is not clear how these ramps will be connected to the West Station bus loop. Please provide this information in the FEIR.
- The bus routing options using Malvern Street proposes a bus bridge at the north end of Malvern Street north of Ashford Street. How will the bus bridge be incorporated with the proposed pedestrian/bicycle connection on Malvern Street?

North/South General Traffic Connection: If a new connection to Commonwealth Ave were provided, the DEIR demonstrated that traffic volumes and traffic impacts would increase significantly at Packard's Corner, Malvern, Ashford and Babcock Streets, with significant adverse impacts on Commonwealth Ave.

Comments/Questions:

- Malvern Street traffic volumes (Table 5.8-3) would be over capacity if a general traffic N/S connection were provided. It was evaluated in the DEIR and is not included in the MassDOT Project. BU agrees that a N/S general traffic connection at Malvern Street would cause significant adverse traffic impacts to West Campus and should not be included in the Project.

The BU West Campus is a high-volume pedestrian area. The BU Student Village of existing and potential future student residences is located immediately adjacent to the Project. The mainline rail tracks, yard operations, I-90 mainline, and SFR are all located between the Student Village and the open space and recreation attractions of the PDW Path and Charles River.

Comments/Questions:

- What access security will be provided to prevent unauthorized access into the operating rights-of-way of the rail line, yard, I-90, and SFR?
- What type of fences and security devices are being planned? Please provide this information in the FEIR.

Rail Operations

The DEIR proposes relocating the rail layover yard to the north side, closer to the I-90 new interchange and West Station and platforms along the existing Main Line tracks near Malvern Street, with the mainline tracks immediately adjacent to the BU property line similar to the existing condition.

Comments/Questions:

- How is crew and vehicle access provided to the layover yard during the interim stages of the Project prior to completion of permanent access from the north? Will access be required through the BU campus, and if so what type of access? Who would use such access and what would be the volume of such vehicles over what duration? How is unauthorized entry prevented across dangerous mainline tracks?
- What are the specific operations that will occur in the proposed rail layover yard? Is it limited to only mid-day and overnight layover of commuter trains? Will any train interior or exterior cleaning, maintenance, or repair work occur there? And if so, what types and during what hours?
- Appendix A, page 80 describes two “Flip Options” moving the rail layover yard to the southern portion of the rail yard and the proposed West Station and mainline tracks to the north. Would either of these options facilitate a N/S bus connection serving West Station?
- The “Flip Options” appear to shift the rail tracks northward away from the BU property line to provide greater separation from the BU West Campus. What would this area of separation be used for and did the DEIR consider how this would change the noise and vibration impacts of the Project? Could this separation area be used for emergency vehicle access into the railyard in lieu of Babcock Street? Please provide this information in the FEIR.

BU 35- 38

Noise

According to the DEIR, compared to existing conditions, all three Throat Area Variations provide improvement to noise impacts when mitigated with noise barriers. However, review of the N/V analysis and the technical report provided in DEIR Appendix H raise important questions relative to the assumptions and methods used.

Appendix D of the FTA guidelines provides a calculation method to estimate Ldn values from measured Leq values, in which case Ldn is approximated by $Leq - 2$ for measurements between 7 am and 7 pm. Since the values listed in Table 4.11-10 are listed as peak hour values, it can be assumed that these

values correspond to those occurring between 7 am and 7 pm, but the Ldn values in Table 4.11-10 translate to Leq + 2.

Comments/Questions:

- How were the Ldn values calculated from loudest-hour Leq values, as this does not seem to match standard methods? BU-39

The values listed in Tables 5.11-7 through 5.11-9 on Page 69 for Moderate and Severe FTA Impact Criteria limits should be based on using the levels in the Existing columns of those tables as they relate to Figure 5.11-1 on Page 64, taken directly from the FTA guidelines. The impact limits based on the listed Existing levels don't match the impact limits that should be derived from Figure 5.11-1, so the impact limits seem to be incorrect.

Comments/Questions:

- For Tables 5.11-7 through 5.11-9 on Page 69, how were the FTA impact criteria values calculated? The values don't seem to match those in the FTA guidelines. BU-40

It is mentioned that noise reduction due to the building materials on the BU campus is assumed to be 35 decibels. As the interior impact level of 52 dBA is approached or met (depending on the Variation) assuming the 35 dB value, this value makes a significant difference with respect to impacts.

The 35 dB building reduction assumption is mentioned in several places in Appendix H and in the main document in the bottom paragraph of Page 69. The FHWA noise abatement criteria (from the FHWA noise regulation and shown in Table 5.11-1 in the DEIR) have limits for outdoor and indoor uses, with outdoor limits being 15 to 20 dBA higher than indoor limits. Activity Category E in Table 5.11-1 incorrectly lists the 72 dBA limit as being an interior limit (it should be an exterior limit). Another example is that HUD guidelines assume a building reduction of 20 dBA for standard residential buildings. In any case, a reduction of 35 dBA would require special materials, especially for windows, so a justification is needed for that assumption since it otherwise can be underestimating the number of impacts for interior noise-sensitive spaces.

Comments/Questions:

- FHWA assumes this value to be 15 to 20 decibels, so please provide justification for the assumed 35 dB value. BU-41

The College of Fine Arts concert hall is shown to have significant noise and vibration impacts associated with the Project, including ground-borne noise levels exceeding the impact limits by up to 16 dBA. Although there are no backup calculations for the noise barriers, the results listed in the DEIR seem to be reasonable. The mitigation measure mentioned in Section 7.11 for the concert hall is a

reconfiguration of the rail track turnouts, with no details about what reconfiguration would be required (at a minimum) to eliminate the noise and vibration impacts.

Comments/Questions:

- Generic mitigation measures are mentioned but given the sensitive nature of a concert facility, specific measures should be evaluated to determine what needs to be done to eliminate the impacts and how feasible each of those measures are. Calculation results are listed for noise barriers for other locations on the campus but no mitigation calculations are listed for the concert hall. **BU-42**
- We ask MassDOT to consider using transparent noise barriers at certain locations, or for upper portions of such barriers. For certain locations, depending on lines of sight and views from campus, barriers that block the view of I-90 but retain views of the Charles River and Cambridge may provide the necessary noise mitigation while also reducing visual impacts. **BU-43**

For noise impacts, the DEIR evaluated 10 noise-sensitive receptors on the BU campus. Since 3 of these receptors are on the Nickerson Field property, only eight properties were evaluated. These properties were evaluated using both highway and rail noise impact criteria. The following table summarizes the five locations that were determined to have impacts. As listed in the DEIR, the locations with noise impacts reported are shown as an X:

Location	3K-HV Variation Impacts		3K-ABC Variation Impacts		3K-AMP Variation Impacts	
	Road noise	Rail noise	Road noise	Rail noise	Road noise	Rail noise
College of Fine Arts	X	X		X		X
College of General Studies		X		X		X
10 Buick Street	X	X	X	X	X	X
33 Agganis Way				X		
Nickerson Field	X		X	X	X	

To mitigate potential noise impact at Nickerson Field, the acoustical and cost effectiveness of noise walls ranging from 8 to 24 feet was evaluated. The results of the evaluation indicate that a 12-foot-tall noise wall approximately 650-feet-long, constructed on top of the existing retaining wall, as well as an 8-foot-tall noise wall constructed as an extension of the highway viaduct parapet wall for 3K-HV, will provide substantial noise reduction throughout most of Nickerson Field for all three Throat Area Variations. The proposed noise walls will reduce noise at Nickerson Field by 6 to 8 dBA for 3K-HV, from 5 to 11 dBA for 3K-ABC and 5 to 6 dBA for 3K-AMP.

Comments/Questions:

- BU is pleased that steps to mitigate noise are carried in the DEIR, however details regarding the design and construction of the noise walls should be provided in full detail. **BU-44**

For 10 Buick Street, a noise wall was found to be not acoustically effective.

Vibration

The construction vibration assessment (Chapter 5, Section 5.11.7) assumes a damage impact peak-particle velocity (PPV) value of 0.5 in/sec for non-fragile buildings. The FTA manual lists limits down to 0.2 in/sec for non-fragile buildings. Also, the PPV assumption for pile driving that was used is based on a “typical” level of 0.644 in/sec at 25 feet according to the FTA manual; however, the “upper range” of these values is listed as 1.518 in/sec at 25 feet. This can be underestimating the potential vibration impacts from pile driving, with a difference in impact distances from the 30-foot distance listed in Table 5.11-32 to a distance of 97 feet with the assumed more conservative values mentioned in this comment.

Comments/Questions:

1. Assuming the worst cases of a 0.2 in/sec limit and a 1.518 in/sec source level will increase the impact distance limit listed in Table 5.11-32. This should be evaluated to determine the range of potential impacts from pile driving. BU-45-46
2. For vibration/ground-borne noise impacts, only the College of Fine Arts was listed as having impacts. All Variations except 3K-ABC have vibration impacts and all Variations have ground-borne noise impacts for this location.

Construction Impacts

Work to construct and operate the Project will impact BU property. Specific impacts will occur along the property line where the south rail platform for West Station is proposed. Permanent construction access and excavation work will require temporary easements.

Construction of West Station and the proposed pedestrian ramp at Babcock Street (2040) may require construction vehicle and equipment access along Babcock Street. There is a new noise barrier shown atop the retaining wall at Nickerson Field.

Variation 3K-HV

The impacts are due to the need to demolish and reconstruct the viaduct columns that are along the property line. Work may need to extend onto BU property along Buick Street and within the properties lying between the railroad and Commonwealth Avenue to the east of Buick Street. These impacts are expected to be limited to the construction phase, with no permanent construction elements built outside of MassDOT’s current property-right areas.

Variation 3K-AMP

The existing retaining wall along Nickerson Field would be impacted due to the proposed shift of the inbound Worcester Main Line track and the need to lower the track profile through the Throat Area. Some impacts would occur within the field area along the property line by the existing wall as reconstruction is completed.

Railroad and at-grade highway work in this area will require lowering of an MWRA water supply main that crosses from Buick Street into the railroad area towards the Charles River. MassDOT expects that

Buick Street will be closed while work is performed to lower the water supply main under the street and into the track and highway areas.

Variations 3K-AMP and 3K-ABC

Construction of the retaining wall along Buick Street from the existing wall at Nickerson Field and eastward is expected to require temporary width reduction along Buick Street to excavate and form the wall. Repositioning the inbound track into the BU properties to the east of Buick Street will encroach approximately 7 feet into an area occupied by two structures. BU also has at-grade parking in this area that will be impacted. The existing storm water pump station situated below I-90 at the easterly limit of the existing viaduct will require reconstruction and relocation. The DEIR indicates the best location available for the new pump station would be on the unimproved property bounded by I-90, the BU Bridge, the GJR and SFR. The unimproved property includes a parcel owned by BU.

Comments/Questions:

BU 47-50

- Reduced speeds and delays during construction along the rail line, I-90, SFR, and PDW Path would impact BU students, faculty and staff who travel to/from campus daily by commuter rail, highways, and bicycle.
- Variation 3K-AMP has an overall construction of duration of eight (8) years compared to a duration of six and a half (6.5) years for 3K-HV and 3K-ABC. The FEIR should estimate and compare total delay to all roadway users in hours and cost across the three variations.
- We request that MassDOT prepare more detailed survey and engineering plans for the 3K-ABC alternative to clearly define impacts on BU property and the Charles River and also explore alternatives that would further mitigate such impacts through a reduced roadway width design. The FEIR should also include a detailed construction management and mitigation plan.
- The FEIR needs to show further details regarding the new pump station associated with 3K-AMP and 3K-ABC and the impacts of that pump station on the BU owned parcel.

Brad Bellows Architects 87 Howard Street, Cambridge MA 02139 617-661-4500

Matthew Beaton, Secretary of Energy & Environmental Affairs
Executive Office of Energy & Environmental Affairs
Attn: MEPA Office
Alex Strysky, EEA, No. 15278
100 Cambridge Street, Suite 900
Boston MA 02114
alexander.strysky@state.ma.us

9 February 2018

re: Allston I-90 Interchange Improvement Project DEIR / EEA No. 15278

Dear Secretary Beaton,

I respectfully offer the following comments on the I-90 DEIR as a 35-year resident of the Riverside neighborhood in Cambridge, as co-president of the Association for Public Transportation, and as a member of the North South Rail Link Working Group.

The Charles River and its associated park systems are the great treasure of Boston and Cambridge, and an example of the highest standard of wise civic investment. From a collection of muddy rivers, prior generations created a global icon of visionary planning, and laid a foundation for sustainable growth for centuries to come. One would hope therefore that any major project built along this corridor would be developed at a comparable standard, so as to extend and build on this precious and farsighted legacy.

Sadly, the plans outlined in the I-90 DEIR fall far short of this standard. MassDOT proposes to double-down on 1960's era planning, devoting hundreds of acres of prime riverfront property to highways, rail tracks and rail layovers, without adequately considering the opportunity cost of these uses or alternatives to them. This plan might have made sense a half century ago, but not in 2018.

Nowhere are the consequences of this blinkered vision more apparent than in the "throat" area between the BU and River Street bridges, which constitutes the sole gap in an otherwise continuous system of riparian parks and paths, where there is a clear need and opportunity to push back the infrastructure from the river edge, restore the continuity of the park system, and thereby enhance not just the recreational opportunities, but to weave together Harvard and Boston University campuses, with all the economic benefits that would flow from that.

Unfortunately, despite many thousands of hours of effort by consultants and citizen volunteers, the DEIR shows how little the Commonwealth seems to have learned since the original construction of the I-90 viaduct. There seems to be virtually no recognition of the opportunities that exist here, beyond the most paltry remediations along the PDW path.

The fault is not with MassDOT, a cash-strapped agency with the narrow mandate to fix a decrepit viaduct at the least possible cost. The fault is with two Governors who allowed such a

major opportunity to be delegated to an agency with a woefully inadequate mandate. This is not how Massachusetts became a world leader. If we build this project in its current form, it will be a monument to the shortsightedness of the administrations that allowed it to happen.

It seems incredible, given the extensive discussion of how to accommodate the vast width of rail and highways in the narrow "throat" area, that the DEIR contains no discussion of tunnel options, which would have the obvious benefit of reducing the infrastructure footprint without the visual blight of a viaduct, while enabling air rights development and much more effective connections between new development and the river (see attached diagram). BBELL-1

The only discussion of a tunnel option I have found in the entire 8 year process is contained in the presentation for Task Force Meeting #4, on June 25, 2014, where there is a single drawing, not drawn to scale, with a list of bullet points itemizing reasons for rejecting it. No costs are provided, no benefits are identified and, not least, any revenue streams that might offset the costs over the decades this plan will be in place. It appears this "review", such as it was, was little more than a "straw man" to be dismissed at the earliest opportunity.

I see no assessment of the potential value of the land that will be dedicated to transportation uses, were it to be more effectively used. Without such an analysis, it's impossible to say how much it might be worth investing to depress the transportation uses. Given the immense stakes and long-term impacts, such shoddiness is totally unacceptable. If tunnels and/or air rights options are truly not feasible, then let's see the proof.

Beyond the issue of the throat and the river connections, there are a number of other critical omissions from the study process and DEIR. We are told that Beacon Park Yard must provide layover facilities for 8 trainsets, to support stub-end rail operations at South Station. We are not told that the North South Rail Link project, currently being studied by MassDOT, would reduce the need for these layovers, and greatly expand the potential sites where they could be accommodated. BBELL-2

Likewise, a North South Rail Link would obviate the need for another critical component of the I-90 project, the Grand Junction Line. BBELL-3

Furthermore, modernization of the commuter rail fleet, including electrification and the adoption of modern Multiple Unit technology (the global standard for regional rail, currently being studied by MassDOT) could further reduced the need for layover space. BBELL-4

MassDOT's insistence on evaluating projects in isolation from one another assures that potential synergies are ignored, and opportunities squandered. Just as the NSRL's potential benefits for the I-90 project are being ignored, so that potential added value is not being credited toward the NSRL project in MassDOT's analysis of it.

Thoughtful planning in the 21st century would take a holistic look at the entire transportation system and identify opportunities to solve problems in the most efficient way. Sadly, the I-90 study has taken place without such coordination.

Recognizing that the basic flaws in the current plan are unlikely to be corrected, I make the following more incremental recommendations:

• West Station is absolutely essential to the new development and must be constructed in conjunction with it, not years later. BBELL-5

• Widening and beautification of the “Throat” area is critical to the expansion of bicycle and pedestrian infrastructure, not to mention the fulfillment of the Charles River Reservation’s vision of an uninterrupted riparian park system. Given MassDOT’s nearly total neglect of this mandate thus far, the best remaining option is the proposal by Walk Boston, Charles River Conservancy, and Sasaki to “Un-choke the Throat” by expanding the PDW footpath into the Charles River. Of the two options proposed, I strongly support the option of filling the river rather than building a boardwalk. While this may be more challenging from a permitting standpoint, I don’t believe the boardwalk option will adequately meet the actual need. The river is wide enough at this point to tolerate a modest incursion. This should not have been necessary, and we should be accomplishing so much more, but given the flaws in the process thus far, this ingenious proposal is our best chance to salvage a flicker of common sense from an otherwise benighted plan. BBELL-6

I trust in years to come, as future generations ponder how it was that responsible people not only built a rusting viaduct on precious riverfront property, but recommended repeating the mistake in 2018, that our planning process will have been reformed such that more enlightened policies prevail.

Sincerely,



Brad Bellows

Architect

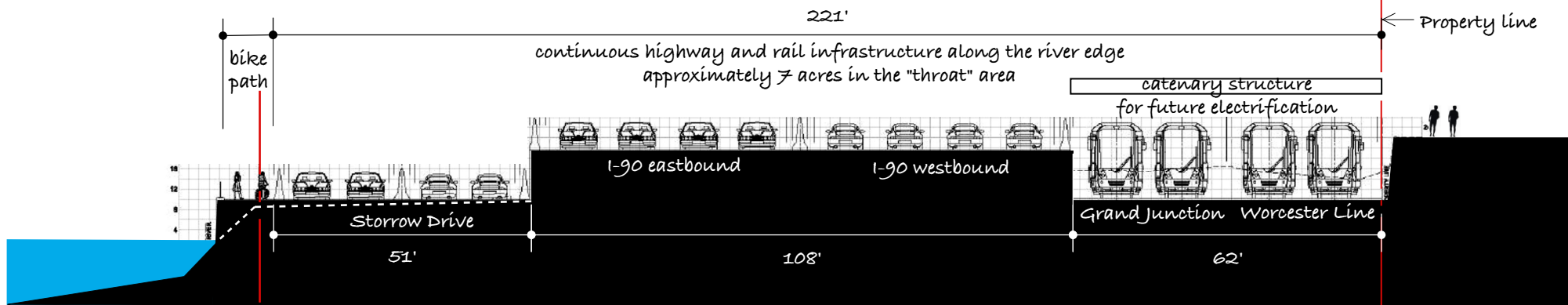
Co-President, Association for Public Transportation

Member, North South Rail Link Working Group

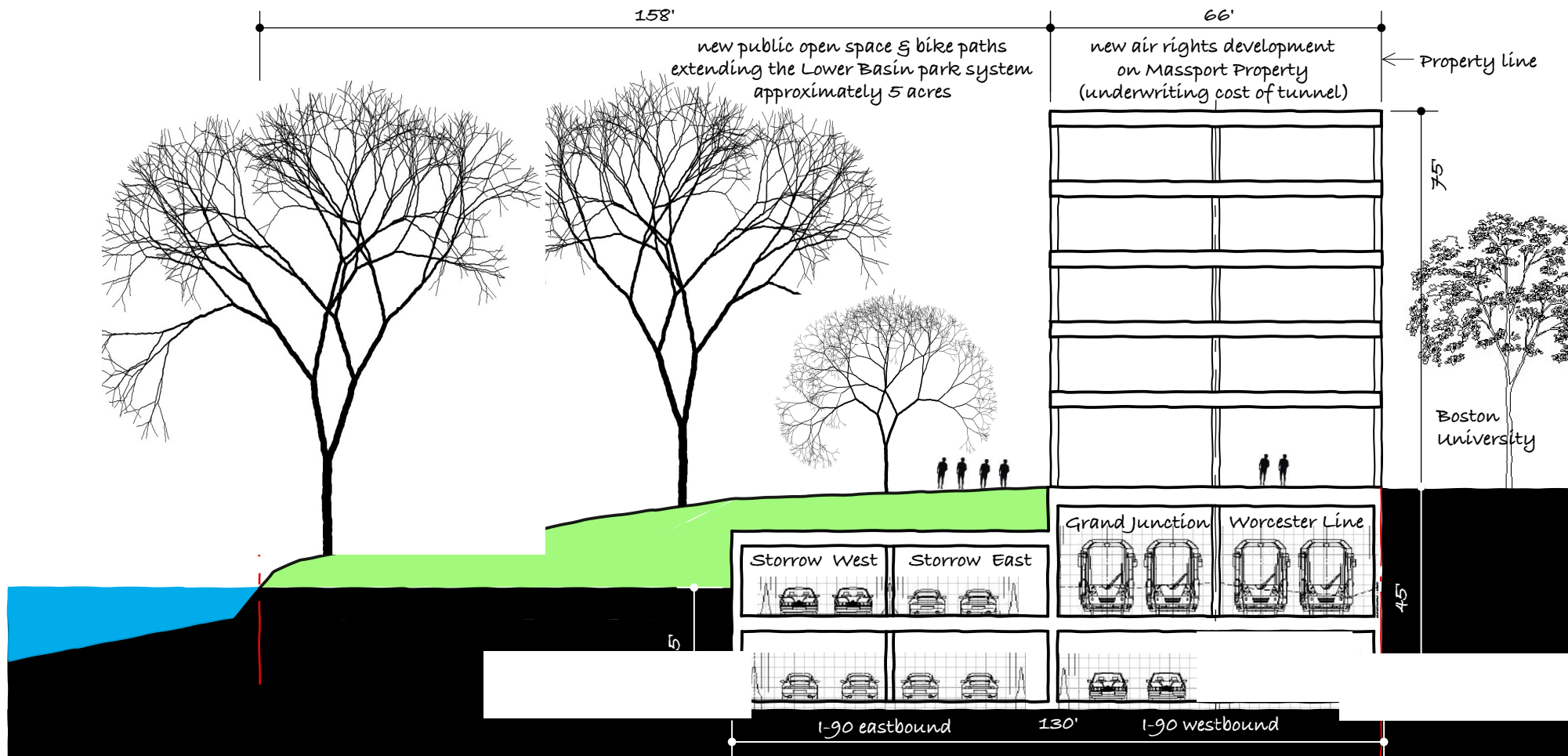
cc: MassDOT Highway Division
Environmental Services Section
Attn: James Cerbone
10 Park Plaza, Room 4260
Boston, MA 02116
James.Cerbone@state.ma.us

Sen. Joseph Boncore
Joseph.Boncore@masenate.gov

Rep. Jay Livingstone
Jay.Livingstone@mahouse.gov

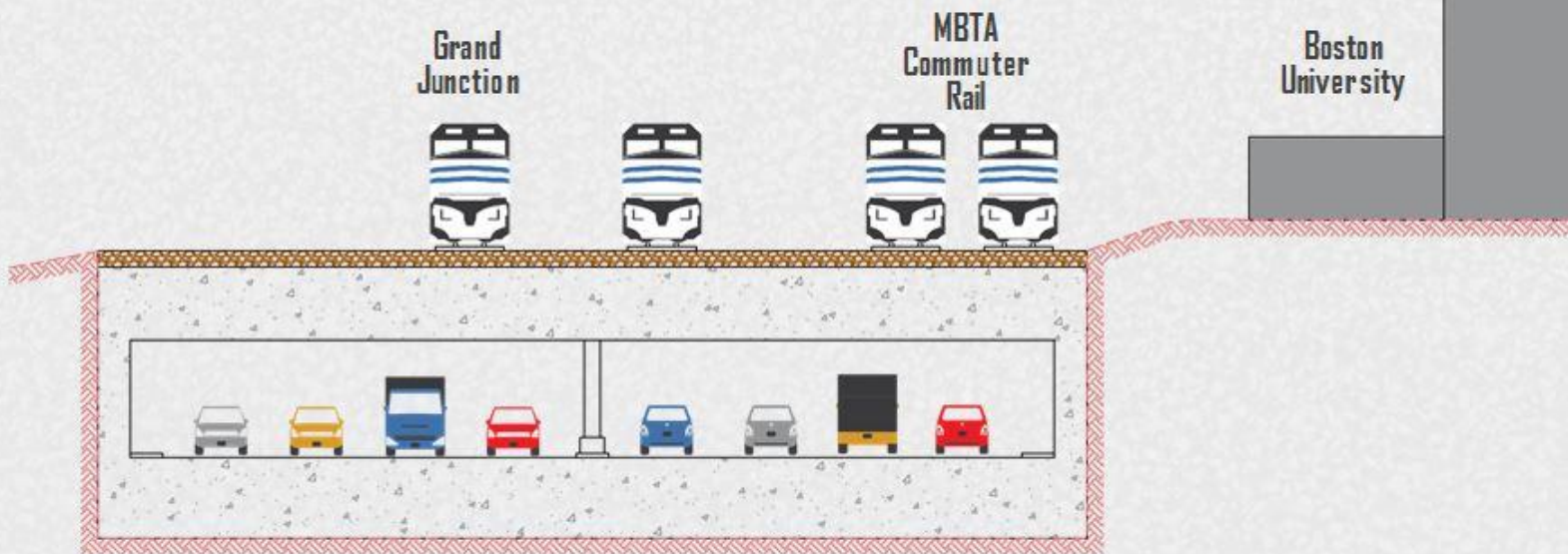


At-grade Concept for the south shore of the Charles River adjacent to Boston University ca. 10/29/15



Tunnel Concept with air-rights development over 25% of the site, and the balance devoted to 5 acre public open space

Depress I-90 with Trains At-Grade Typical Section



Cross Section at BU near Buick Street (Looking East)



Depress I-90 with Trains At-Grade Reasons Why Not Pursued

- Cost Prohibitive
- Exceeds Project Scope
- Exceeds Project Schedule
- I-90 Traffic Severely Impacted During Construction
- Rail Operations Severely Impacted During Construction
 - MBTA Commuter Rail
 - Grand Junction Rail
 - Houghton Chemical Rail
- Triggers more Complicated Permitting (noise, ROW, environmental, etc.)

From: [Brendan Kearney](#)
To: [Strysky, Alexander \(EEA\); comments@walkboston.org](#)
Subject: I-90 Allston, EEA # 15278
Date: Friday, February 09, 2018 11:21:27 AM

Dear Mr. Strysky:

Please take a closer look at the I-90 Allston interchange Project, EEA #15278, in order to ensure Massachusetts does not miss a massive opportunity. This project has been branded since 2014 as a multi-modal project, not just a highway project. That vision isn't realized with the current plans or timetable.

Please prioritize:

1. An at-grade plan.

BKR-1

MassDOT has removed the viaduct for the Casey in Jamaica Plain and there is a vision to do the same for the McGrath in Somerville. An at-grade solution here will also make air rights development possible. Additionally, building at grade will avoid the high continuing maintenance costs of a viaduct (currently ~\$800,000/yr).

2. Crosstown access through West Station and connections for transit, walking, and biking.

BKR-2
BKR-3

Build West Station early on in the phasing to set the travel habits of those that will live & work in this newly expanded neighborhood. There is an opportunity to create less circuitous trips between Cambridge & the Longwood Medical Area by redirecting routes that currently use the BU Bridge through the project area via West Station, and create better access to the river for people running, walking, and biking.

3. Expanded pathways in the "throat" area of the Charles River paths, currently pinned next to the highway.

BKR-4

The WalkBoston / Charles River Conservancy / Sasaki proposal to "Unchoke The Throat" highlights the opportunity to rethink & fix the worst section of the Charles River Basin for people running, walking, and biking. (See walkboston.org/masspike for more info). Wider and separate paths, with separation from the roadway - like DCR has created along Memorial Drive on the Cambridge side of the Charles River - should be provided as part of the mitigation for this massive construction project.

Thank you for the opportunity to comment on this proposal.

Brendan Kearney
Somerville, MA

From: Brian Aull <brian.aull@comcast.net>
Sent: Friday, February 9, 2018 9:01:12 PM
To: Strysky, Alexander (EEA)
Cc: joseph.boncore@masenate.gov; jay.livingstone@mahouse.gov
Subject: EEA No. 15278 - MassDOT I-90 Allston Reconstruction

Dear Secretary Beaton,

As a member of the Board of the Cambridgeport Neighborhood Association, I endorse the comments already made to you by that Board.

But I want to add a note of emphasis on one point.

Any specific infrastructure upgrade should always be an opportunity to take a long-term view of the future of transportation. One long-term goal should be to minimize our dependence on personal cars and encourage the other modes: walking, running, bicycling, and public transportation. These things need to be thought about at the inception of any project rather than added later as an afterthought. Boston now desperately needs a modernization of its public transit system. One aspect related to the I-90 project has been mentioned by the CNA Board: rebuilding the Grand Junction Railway as a light rail and bike/pedestrian path.

BAUL-1

Sincerely,

Brian Aull
577 Putnam Avenue #3
Cambridge MA 02139

From: Caitlin Goos <cgoos@finepointcap.com>

Sent: Friday, February 9, 2018 3:55 PM

To: Strysky, Alexander (EEA)

Cc: comments@walkboston.org

Subject: Unchoke the Throat

Hi Alexander,

I work at the Wagner Foundation, a funder of Boston Cyclists Union, Charles River Conservancy and other organizations around Boston striving to make our city a more walkable and bikable place.

I wanted to send comments pertaining to the “Unchoke the Throat” project. We believe it is extremely important to include a complete revamp of the walking and biking path in this project. Creating a better biking infrastructure will help reduce the amount of cars on the road and ultimately reduce the amount of traffic and it will add integral green space to our city. We ask that these recreational paths not be an afterthought but rather be incorporated into the complete project plans!

CGOOS-1

Thank you,
Caitlin

Caitlin Goos
Program Director

WAGNER FOUNDATION

Building Just & Robust Communities

Tel. 617-336-2204

wfound.org



City of Cambridge

Executive Department

LOUIS A. DePASQUALE
City Manager

LISA C. PETERSON
Deputy City Manager

February 9, 2018

Matthew Beaton, Secretary of Energy & Environmental Affairs
Executive Office of Energy & Environmental Affairs
Attn: MEPA Office
Alex Strycky, EEA No. 15278
100 Cambridge Street, Suite 900
Boston MA 02114

RECEIVED

FEB 12 2018

MEPA

Dear Secretary Beaton,

I appreciate the opportunity to comment on MassDOT's Draft Environmental Impact Report (DEIR) for the I-90 Allston Interchange project. This is an important project with regional and long-term impacts for the area, including Cambridge which is a nearby neighbor directly across the Charles River. Replacing the aging and unsightly Massachusetts Turnpike (Turnpike) viaduct and ramps with a state of the art highway interchange that has broad benefits is vital to community members and the City of Cambridge. That work, along with the array of work needed to accompany it, should lay the groundwork for a truly sustainable neighborhood. Including a comprehensive transportation network not only makes that possible, but encourages people to access the neighborhood via transit, biking and walking rather than single occupant vehicles (SOV). Cambridge has participated in the project Task Force for the past three years and is pleased to provide several comments on the DEIR and make some requests for analysis and information to be included in your project certificate.

Vision and Development

The street network, paths and other infrastructure that is proposed in the DEIR does not adequately create a sustainable transportation vision that meets the needs of current and future residents of this neighborhood and the region. Transportation is now the largest contributor to carbon dioxide in the Commonwealth. Additionally, roadways – both within the project area and in Cambridge - cannot accommodate large numbers of new trips. Therefore, short and long-term transit planning is a key component to service the project area. It is important to identify transit opportunities now so the framework for them can be determined during this design process. Transportation modeling projections for the area are based on an overly modest proposed buildout of the underlying property, when it is probable that future development densities will result in increased transportation impacts.



The on-street facilities supporting cyclists and pedestrians included in the current plans are relatively minimal in terms of design and level of comfort. This is especially evident when paired with relatively large roadways that are designed to accommodate projected vehicle traffic, which many would prefer did not materialize. Emphasizing vehicle capacity will make it harder to make sustainable modes the preferred mode of travel.

Requests:

- Create a sustainable transportation vision based on the City of Boston's, Go Boston plan which calls for an overall SOV rate of 19% in Boston by 2030. This would require substantial transit service combined with aggressive parking ratios and enhanced transportation demand management measures. CACM-1
- Include a more conservative buildout analysis that might be closer to 10-15 million square feet for the project area south of Cambridge Street, or buildout based on current/contemplated zoning changes for the area will allow CACM-2
- Update traffic modeling to show where trips will use Cambridge streets and identify areas where capacity to handle trips is exceeded (e.g. Western Avenue), and propose mitigation through improvements to sustainable modes. CACM-3

Transit

During the planning for the project, MassDOT garnered agreement from key stakeholders to include and help fund West Station. The phasing included in the DEIR anticipates that the station will not be built until 2040 and risks that nearby development could begin without good transit service and too much available parking. This could begin a cycle of auto-oriented development. Transit should be an integral piece of the vision for this area with West Station as a transit hub, rather than just a commuter rail stop.

Requests:

CACM 4-7

- Complete a study of short and long-term transit improvements, including bus, shuttle, rail and future passenger service on both the Worcester line and on the Grand Junction line to Cambridge and beyond creating convenient connections to all nearby job centers including Kendall Square, Harvard Square and the Longwood Medical area. This should include a phasing plan for transit that details a reasonable timetable, thresholds for the state and its private partners to implement transit improvements, and be included in the FEIR certificate.
- Include a bus bridge to Malvern Street so bus connections in this north/south route can be made as soon as project construction is complete, either before West Station is built or as part of an interim West Station
- An option moving forward must include two rail tracks connecting to the Grand Junction line, as well as a reconstructed rail bridge over Soldiers Field Road (SFR). If not factored in at this stage, construction of these elements will be extremely difficult and unnecessarily expensive to undertake once the project is complete.
- Consider moving West Station north, to the inside curve of the Turnpike providing space for a buffer to the neighborhood and a potential bicycle/pedestrian path connection alongside the tracks.

Noise

The current Turnpike traffic generates a great deal of consistent traffic noise that is a detriment to quality of life for the Cambridgeport neighborhood and users of the Department of Conservation and Recreation's (DCR) Magazine Beach, the city's second largest open space. Cambridge asks that all available means are used to decrease future noise over current levels and that project changes do not lead to new noise being deflected to Cambridge. MassDOT should look beyond noise reduction standards of MassDOT and FHWA to reduce noise from the project in any way possible. Requests:

CACM 8-11

- Further evaluate alternatives and include mitigation of noise to Magazine Beach and Cambridgeport with strategies including attractive noise walls along the Turnpike throat area, such as transparent ones being widely used now on other highway projects.
- Move SFR away from the river as far as practical.
- Raise SFR, if needed, in combination with a parapet wall (with a combined height of at least 8') and densely planted vegetation to block and reduce noise from users of the Paul Dudley White Path (PDW) and Magazine Beach. The DEIR shows that height and solid nature of such barrier at will reduce noise and create a much more pleasant experience for path users who are now discouraged from using this section of PDW path.
- Place absorptive material on any noise walls on the Allston neighborhood side of the project so that noise is not reflected back to Cambridge.

Access to and from Cambridge

Access to and from the Turnpike and Soldiers Field Road could change substantially under the proposed preferred alternative for those in Cambridge. Residents and workers in Cambridge who access the Turnpike and Soldiers Field Road need to know that in the future, streets will not be overwhelmed with traffic and that reasonable access is provided. Traveling through a minimum of four additional intersections will be required to access River Street from SFR with the proposed removal of the right turn. The same number of intersections will also be added to access the Turnpike to and from Cambridge. Given the proposed development that has been modeled, and the potential for much more, it is not clear how many more vehicles will be traveling those roads and whether travel times will be reasonable. The timing of construction and availability of East Drive, Cattle Drive and Stadium Way will affect these trips. If access on all these streets is not reasonably provided, an unacceptable shift of many trips to Memorial Drive would likely occur, negatively impacting not just drivers but, of greater concern, the high numbers of pedestrians and cyclists traveling along Memorial Drive.

Requests:

CACM 12-15

- Calculate proposed travel times going to River Street from SFR, and to and from Cambridge to the Turnpike in both directions, with additional possible development included. Analysis should look at both peak and non-peak travel times and compare with travel times on Memorial Drive from the start of Land Boulevard and Massachusetts Avenue as both detour routes are likely.
- Traffic modeling shows that there are more trips than can be accommodated on Cambridge streets. Propose changes for optimizing intersection performance at Memorial Drive and Soldiers Field Road intersections that gives the best performance for all modes of travel, including path users.
- Conduct further traffic modeling including a review of existing evening peak Simtraffic analysis where field observations indicate that queues from Western Ave at Storrow Dr. will spill back across Memorial

Drive and will require mitigation. Also, level of service E in the existing conditions model for this intersection is overly optimistic based on field observations due to queue interactions.

- Review and consider retaining the right turn from SFR to River Street, particularly if analysis reveals that reasonable access does not exist to River Street and trips will be diverted to Memorial Drive.

Throat Alternative

In this narrowest section of the project area, the three alternatives shown in the DEIR (3K-HV, ABC, and AMP) try to fit the same uses and functions into the area using different configurations. None of the throat alternatives by themselves adequately meet the uses, function, noise, open space, and aesthetics needed in this narrow area adjacent to Boston University and directly across from Cambridge and Magazine Beach. A combination of elements from various alternatives should be integrated to create a better and more aesthetically pleasing design for this area. The design should create less noise in Cambridge than the current design and more rather than less parkland with better connections to and from the river. It should also include all rail improvements possible during construction of the I-90 Interchange, rather than waiting to construct them later when construction would be considerably more difficult or expensive. f a viaduct is ultimately built, it should be as small or smaller than it is today, be visually attractive and not intrude onto DCR parkland. CACM 16-19

3K-HV Alternative

Pros

- The noise analysis projects the least amount of noise reaching Cambridge in this alternative because SFR is further from the river and the 40' height of the viaduct. But, given the receptors used in Cambridge, it's not clear if all noise from this option is accounted for in the analysis. CACM-20
- The DEIR states that this alternative has the most flexibility for future transit and the least interruption of the Grand Junction during construction which is important. However, it is not clear that this analysis is accurate as it may be difficult to physically fit in two tracks between the Mainline tracks and the SFR bridge, given the required curvature. CACM-21
- A modest widening of the Paul Dudley White path is possible in this scenario, but not separated paths as envisioned in the DCR's Basin Master Plan.
- Parkland space is saved by stacking uses.

Cons

CACM 22-27

- This alternative does not include two tracks connecting to the Grand Junction and reconstruction of the rail bridge over SFR. This should have been included to make each alternative comparable.
- A simple concrete and steel raised viaduct would be unattractive to people looking at it from the Paul Dudley White path and Magazine Beach and additional effort should be made to make this alternative more attractive and sustainable.
- A raised viaduct will block future connections to Commonwealth Avenue between BU, Brookline and nearby residents to the river.
- Life-cycle costs of this alternative could presumably be higher but this was not studied in the document.
- The persistent drone of highway noise from a raised viaduct reaching into Cambridgeport is difficult to quantify in the noise model and is a constant detriment to quality of life of residents in lower Cambridgeport and at Magazine Beach.
- This does not make the most efficient use of space in that space under the viaduct is under-utilized.
- The highway foot print is widest with the 3K-HV alternative.

ABC Alternative

Pros

- This alternative does not include a raised, unattractive structure
- Future bicycle/pedestrian connections to Commonwealth Avenue are not precluded
- A path connection from the Paul Dudley White path to a future Grand Junction path may be more feasible, and could be included with a reconstruction rail bridge over SFR
- This is less expensive to construct and presumably to maintain into the future given life cycle costs.

Cons

- This alternative uses all available space between BU and the river, including parkland, and creates a hard edge at the river bank
- The Paul Dudley White Path is left at its current width and not separated as envisioned in the DCR Basin Master Plan
- Without additional noise mitigation, this alternative could generate the most noise for Cambridge.

AMP Alternative

Pros

- This alternative includes an additional bicycle/pedestrian connection from the neighborhood and Commonwealth Avenue to the river
- The rail bridge over SFR is rebuilt and two tracks are shown connecting to the Grand Junction
- Parkland space is saved by stacking uses.

Cons

- Roadway noise could reflect off the bottom of the raised rail structure
- Trains raised on the viaduct could create new noise as seen in other areas of the country where this has been done
- A raised viaduct blocks some future possible bicycle/pedestrian connections to Commonwealth Avenue.

Requests:

CAMC 28-32

- MassDOT should reassess the need for breakdown lanes and wide travel lanes, and research design alternatives and design exceptions that have been used on other highway projects nationally where space is very constrained. The Turnpike should be located as far away from the river as possible.
- If pursued, a new viaduct/bridge should be architect-designed to be a visual addition to the area and one that is also sustainable and keeps noise contained at the source through attractive, preferably transparent noise walls.
- Re-assess and prioritize making use of the under-utilized barrel shown in the HV-3 alternative for a portion of SFR to create more parkland and move roadways away from the river.
- Newly created parkland such as outlined in the Sasaki study of adding a soft edge to the river should be studied and seriously considered. This will allow more for more planting and introduction of storm water features, in addition to allowing more path space and some noise attenuation.
- Further study is needed for all alternatives to minimize construction impacts on the Grand Junction line including strategies for rebuilding the SFR bridge using design and construction techniques aimed at shortening the construction period as much as possible.

Park Lands and Paths

The addition of three acres of parkland in the project by moving Soldiers Field Road will be a valuable open space, recreation and ecological asset to the area. It also provides opportunities for an improved path system to access new development by walking and biking, and better connections to Cambridge. The basin parks and paths are heavily used and will be increasingly used as new residents and workers move to the area. Better connections for cyclists and pedestrians across the River and Western bridges would be improved once these bridges are reconstructed, using the designs finalized as part of the Accelerated Bridge Program designs.

Requests:

CAMC 33-36

- Connections from the Paul Dudley White path system to the future Grand Junction Path that Cambridge is currently designing should be included
- Opportunities to provide additional and preferably separate, off-road biking and walking connections to and through the site should be explored further and implemented to increase the likelihood of making trips by walking and biking
- Study the possibility of adding a soft edge to the river to increase parkland and planted area including new, separate paths for cyclists and pedestrians
- Proposed new noise should be fully mitigated at Magazine Beach by containing the noise at its source immediately adjacent to the Turnpike

Construction Impacts

The construction of the project will be a long, noisy and difficult process for residents on both sides of the river. At this point, without a final project determined, it is difficult to assess all construction impacts at this time.

Requests:

CAMC 37-39

- Construction impacts in Cambridge including additional traffic to Memorial Drive and the Paul Dudley White Paths (and all detour routes), noise at Magazine Beach and in the neighborhood, and alternatives to avoid closure of Riverbend Park on Sundays should be evaluated, detailed and mitigation proposed in the FEIR
- If the Paul Dudley White path is closed during construction on the Allston side of the river, a significant upgrade to the paths on the Cambridge side and at Magazine Beach should be completed in advance of the PDW closure. This priority order is important given the path's very poor condition from the BU Bridge to River St, as the paths in Cambridge will likely see significant use while parts of the path in Boston are closed.
- While it appears that peak capacity along I-90 and SFR is maintained throughout the project, construction impacts may still have unforeseen impacts to commuter routes. To monitor possible changes and address as needed, MassDOT should modify the traffic signals for Memorial Drive at Western Avenue, and Memorial Drive at River Street to install video detection equipment to monitor all three approaches to each intersection and provide cloud based traffic volume monitoring accessible by MassDOT and City of Cambridge staff.

Climate Change Resilience

The proposed project faces a range of climate change vulnerabilities related to increasing temperatures, increasing precipitation, and rising sea levels. The analysis provided in the DEIR needs clarification on some points and is deficient in some areas.

Framing Climate Risks:

- The DEIR defines climate as “typical or average weather” and climate change as “a change in typical or average weather”. This definition is not inaccurate, but it doesn’t convey the need to address both changes in averages as well as in extreme events. While climate patterns are shifting to a warmer and wetter regime in our region on average, we also know that extreme events are becoming more severe. Heat waves will become more frequent, more intense, and longer in duration. With precipitation, we are already seeing the most extreme events become more severe compared to the historical baseline. And sea level rise will introduce a new risk to the project area which we don’t have to contend with under current circumstances. These trends and projections all indicate that projects must be designed for a different set of future parameters. CAMC-40
- Establishing the expected design life of the project is important to properly assess the climate risks. On page 5-103, the DEIR appears to suggest the project’s risk tolerance in regard to storm surge flooding for this project is an annual 1 percent probability. This level of risk seems too high for a major public infrastructure project. Highway, railroad, commuter transportation, and bicycle and pedestrian infrastructure are all critical assets and disruption of these services would have major consequences to a large population and the economy. An annual 1% risk is usually considered appropriate for residential properties. MassDOT should consider the climate risks in the context of a more conservative level of risk and propose actions that are commensurate with that risk. CAMC-41
- Risks are presented in annual terms, which is not the best way for public infrastructure. Cumulative risks should be analyzed. Assuming the design life is 50 years, a 1 percent annual risk would translate into a 39 percent cumulative risk. CAMC-42

Heat vulnerability: The DEIR only addresses the urban heat island effect. This is important, but MassDOT should also assess the potential vulnerabilities of the infrastructure itself to higher temperatures in the future. The heat tolerance of materials used in the project should take into consideration the temperature ranges that are being projected within the design life of the project. The construction specifications for the project should reflect this analysis. CAMC-43

The DEIR indicates the area of paved surface will be reduced modestly compared to existing conditions for all three alternatives. This is a positive impact. The reduction of the urban heat island may be underestimated as it appears that potential tree canopy and other shading are not considered. It would be useful to estimate the reduction of urban heat island more comprehensively. The design, particularly of the commuter rail station and the Allston Landing area, should also consider the projected ambient air and heat index temperatures that will be experienced in the future. While the amplifying effect of paved surfaces may be reduced, it may not be enough to mitigate the projected increase in ambient temperatures. Opportunities to further mitigate ambient air and heat index temperatures should be further explored. For example, is it possible to establish greater tree canopy cover and physical shading? Could materials be chosen with higher albedo values to reduce heat absorption? It would be useful to understand what the future air temperature conditions will be given the final design of the project and the associated Allston Landing development in the context of a warming climate. CAMC-44
CAMC-45

The project should include goals for expanding tree canopy and increasing surface albedo. The commuter rail station, which is planned as an open platform, should be designed in a manner that makes it ready for enclosure in the future. High temperatures and heat waves in the future may make an outdoor platform inhospitable. CAMC-47
Being able to enclose the platform and add air conditioning should not be inadvertently precluded by the design.

Sea level rise/Storm surge flooding: The project site doesn't currently face significant risks from coastal storm surges given the protection afforded by the Charles River Dam. But as sea level rises, the barrier protection provided by the dam will be compromised by flanking and overtopping. The DEIR reflects the current assessment that this could happen by mid-century. While it is unclear what the design life is of the proposed infrastructure, there will be development in the Allston Landing area that will certainly have been built out by then. The project should not assume that increased barrier protection will be implemented since none is currently planned. CAMC-48

The DEIR relies on the Boston Harbor Flood Risk Model (BHFRM) for its analysis. The BHFRM is certainly the best analysis available to understand storm surge risks. However, it only depicts risks through 2070. The DEIR reports that storm surge flood risks are less than one percent annually. However, sea level rise will not stop in 2070 and planning should assume it will continue. Therefore, storm surge flood risks will increase in the project area. It is our understanding that the BHFRM is being updated to reflect the latest sea level rise projections from NOAA and that the modeling is being extended to 2100. It would be useful to use the updated modeling if possible in assessing the project risks. CAMC-49

The BHFRM uses assumptions about river flow, but does not account for flood risks from increased river flow or a higher river. A higher river due to increased flow that is not managed by the pumps at the Charles River Dam or is raised by storm surge flows may result in flooding that propagates through storm drains onto streets and developed areas. In the Cambridge Climate Change Vulnerability Assessment, this risk was modeled for 2070. Due to the flat gradient of many storm drains in the eastern Cambridge area, it is likely that a higher river will cause significant street flooding. There are many outfalls identified in the DEIR. The risk of propagated flooding in the DEIR project area should be assessed as it may affect the rail system and possibly roadways, as well as buildings that are developed in new areas. If propagated flooding is identified as a problem, measures should be proposed to reduce this risk. CAMC-50

The DEIR does suggest the possibility of deploying strategically located berms and raising certain roadways to reduce future storm surge flood risk. It would be useful to have identified specific locations for these actions and incorporate these measures into the proposed project. The design for the berms should be analyzed to understand the potential to further raise their elevation after 2070 so that sufficient space is reserved for a flexible adaptation response. A 0.1 percent probability in 2070 may become a higher probability in later years. CAMC-51

Precipitation-driven flooding: The DEIR does not assess the risk of precipitation-driven flooding. Current FEMA floodplains are considered, but those maps do not take climate change into account and only show riverine flooding. The project site is likely to face increased risks from greater precipitation that will increase river flows and overtax street drainage systems. Increased precipitation-driven flood risk will be a problem for the site before storm surge flooding. UMass Boston is studying the Charles River in terms of climate change and precipitation and may be an information source. Street drainage would need to be modeled with projected precipitation rates. MassDOT should analyze the risks from increasing precipitation for both street flooding and increased riverine flooding. The project design, including the Allston Landing area, should reflect these increased risks in the sizing of gray infrastructure and the deployment of green infrastructure. CAMC -52

It should also be noted that riverine and street flooding is probably highly dependent on the Charles River Dam. Most modeling efforts have assumed that all six pumps at the dam will operate. Scenarios for pump failure CAMC-53
should be considered when assessing flood risk.

Also, there is the possibility of the project site experiencing storm surge flooding with heavy precipitation. Most studies have modeled these events separately and it is difficult to model the joint probability. The scenario of a CAMC-54
joint storm surge/heavy precipitation event should be considered in assessing risks.

Conclusion

The complexity of this project, the need for comprehensive short and long-term transit access, and the many pros and cons of the alternatives in the throat are going to require substantial additional study by MassDOT. This is needed to develop a final concept that can achieve the many goals of this project as outlined in the project's public process. It is also of critical importance to use this unique opportunity to add additional parkland and greenery along the river's edge in the throat area considering the very tight constraints faced in this area. These additional steps could contribute significantly to the quality of life in both Boston and Cambridge and the ecological benefits that they could produce. Thank you again for the opportunity to comment on this important project for Boston and Cambridge.

Sincerely,



Louis A. DePasquale
City Manager

Cc: Alex Strysky, MEPA, alexander.strysky@state.ma.us
Jim Cerbone, MassDOT, James.Cerbone@state.ma.us
Bill Deignan, Cambridge Community Development
Susanne Rasmussen, Cambridge Community Development



February 9, 2018

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

Re: I-90 Allston Interchange Draft Environmental Impact Report

Dear Secretary Beaton:

Thank you for the opportunity to comment on the critical Allston I-90 interchange project. I writing on behalf of the Cambridge Innovation Center (CIC), home to over 1,000 start up and innovation companies in our Kendall Square and Downtown Crossing locations in Cambridge and Boston. We, like many other area employers, are deeply concerned about the deteriorating functionality and capacity of our rapid transit and rail system. In addition, we strongly believe the Commonwealth should be pursuing a range of transportation strategies, including expanded bicycle and pedestrian options. The loudest and most frequent concern voiced by our clients and employees is the need for improvements in the infrastructure to support various modes of access for commuting. With the planned and recent growth in development in Cambridge and Boston, thoughtful planning as well as immediate action by the Commonwealth is a necessity.

We believe that the Commonwealth has an important opportunity in Allston. What began as a necessary highway repair for the deteriorating I-90 viaduct could either support a bygone model of single occupancy vehicle commuting or take the initial steps in delivering the essential transportation infrastructure to allow the regional economy to grow in the next ten to twenty years.

In addition, the infrastructure and service that we recommend directly support the GHG emission, transportation mode split and “smart growth” goals that MassDOT has set for itself. A highway viaduct project with a rail layover yard does not bring the Commonwealth closer to the kind of sustainable transportation system it has committed to.

The modeling assumptions, demand and ridership analysis must be revised. A more complete and robust transit analysis is necessary to explore this opportunity. The dynamic changes in the local economy and land uses are not reflected in the analysis contained in the DEIR.

CIC-1

There are many things the proposed project does right: broad community participation, thoughtful urban design resulting in complete urban-style roadways, retaining train storage space in an important location for the region and placement of a multi-modal transit station in the center of the project. Unfortunately, the preferred alternative and, in particular, its limited near term scope and sequencing fails to deliver on its promise as a key portion of the metropolitan transportation system.

West Station

The preferred alternative calls West Station a “neighborhood-oriented” commuter rail station with a terminal bus station and circuitous connection for bicycles and pedestrians. The central strength of West Station is not to capture residential neighbors looking to escape the Green Line or even to provide a commuter rail stop for development in Beacon Park Yard, although this is certainly one of its benefits. The strength of West Station is its role in connecting across the innovation arc of the metropolitan region. It can immediately facilitate north-south bus routes, connecting Allston, Harvard and Boston University to Kendall Square and MIT to the north and to Longwood Medical Area (LMA) to the south. West Station can intercept commuter rail passengers that currently go to South Station only to ride the Red Line back out to Kendall Square, wasting time and taking up space on over-crowded subway trains, potentially deciding that driving is a better alternative.

It is essential to build the transit-only roadway connection when the Malvern Street pedestrian and bicycle viaduct is constructed from West Station to realize this short-term vision. Frequent bus service can achieve what rail and automobile-oriented solutions cannot in this location and at a fraction of the cost associated with tunnel solutions. Additional improvements on local roadways will be needed, but West Station’s bus connection is the first step in opening up the innovation arc.

CIC-2

West Station is key to a near future using the Grand Junction rail line as an urban rail connection that can take commuters off regional highways, reduce congestion on local roads and deliver employees directly to where they are trying to go. The Grand Junction can accommodate urban rail and a bicycle and pedestrian path that is being designed for construction in Cambridge. West Station is the nearest location to Kendall Square for a switch from bus or commuter rail to the urban rail and community path that can serve commuters going to Kendall Square and MIT, all the way to North Station and Mass General Hospital. Losing this critical fulcrum of regional transportation until 2040 not only sells the opportunity at Allston short, but also consigns regional roads to devolution into gridlock, slowing economic growth for the Commonwealth. Improving intersections in the project area is a good thing, but the nearby roads in Cambridge and Boston cannot absorb the growth in automobile traffic needed for employees to reach rapidly growing businesses in Boston and Cambridge.

Using the West Station area for train layover area makes sense, but doubling the proposed eight (8) train sets to sixteen (16) in place of West Station is likely to doom the future construction of the station. It seems unlikely that new locations for these additional layover tracks will be easier to find in the future than currently.

CIC-3

Throat-Area Alternatives

There are a variety of advantages and disadvantages to each of the so-called throat-area alternatives – the highway viaduct that is MassDOT preferred alternative, the at-grade solution and the Grand Junction viaduct above the highway.

Highway Safety – The primary benefit of the highway viaduct is its conformance with AASHTO highway standards. However, this is only a small stretch of highway (0.6 miles). The existing condition is a four lane, 48-foot cross section, with 11.5-foot lanes and 1-2 foot shoulders and no breakdown lane. This is the typical condition for the Turnpike roadway to the east. Recent Turnpike roadway construction projects to the east of this area have retained widths of as little as 44 feet, with 10.5 lanes. The at-grade and the Grand Junction viaduct solutions both remove the horizontal move required by the highway viaduct. The straighter roadway will be safer for all alternatives. Retaining the existing width and lane condition will be safer in the at-grade solution than the current reverse curve and elevation of the existing highway.

Grand Junction Bridge over Soldiers Field Road – The at-grade and Grand Junction viaduct alternatives require the replacement of the existing single-track Grand Junction Bridge over Soldiers Field Road, whereas the highway viaduct avoids this improvement. This 90 year-old bridge is at the end of its useful life and will need to be replaced in the next few years. This replacement is a feature and an opportunity, not a burden, as the urban rail connection that Kendall Square desires should have a two-track profile, with an adjacent community path. In addition, the new bridge over Soldiers Field Road provides the opportunity to connect to and make improvements to a difficult portion of the Paul Dudley White under and around the BU Bridge.

Bicycle and Pedestrian Connections to West Station- The Grand Junction viaduct alternative provides an opportunity to carry the Grand Junction bicycle and pedestrian path directly to West Station. The at-grade solution provides an opportunity for a similar bicycle-pedestrian connection toward Boston University and West Station. The highway viaduct alternative cannot provide this connection, without going over the highway viaduct, forcing the connection past the throat area to South Cambridge Street.

The Paul Dudley White Path and the Charles River Open Space– The DEIR emphasizes minor differences in path widths and parkland changes. The opportunity to create parkland is not to expand an 8.5-foot pathway to 12 feet, but rather to improve the soft-edge of the riverbank and create a beautiful Allston esplanade. This creative step is allowed under all throat alternatives.

Costs – The at-grade alternative first cost estimate is lower than the other alternatives and a life cycle estimate should increase its cost advantage. The higher-cost highway viaduct alternative does not even include the costs of replacing the Grand Junction Bridge. This just puts off a bridge replacement that will be required in just a few years. The costs and inconvenience associated with closing the Grand Junction is a near term cost that must be borne, although the three year estimate for taking the Grand Junction out of service seems excessive, given the swiftness of other bridge replacements in the Commonwealth.

Given the scope and cost of the project under any of the alternatives, it would be very disappointing to see the Commonwealth move forward with the narrowest scope highway project, reproducing for 50 – 100 years far too many of the poor conditions that exist today. Please do not ignore the reality of the new knowledge-economy and its dynamism. MassDOT can play a critical role in supporting economic growth in the Commonwealth. This is a core role of government, one that no other organization can play.

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

Sincerely,

Brian Dacey

A handwritten signature in blue ink, appearing to read 'BD', with a stylized flourish at the end.

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