From: <u>Kim Motylewski</u>

To: <u>Strysky, Alexander (EEA)</u>

Cc: Cerbone, James (DOT); Decker, Marjorie - Rep.; jay.livingstone@mahouse.gov; joseph.boncore@masenate.gov;

citycouncil@cambridgema.gov

Subject: I-90 DEIR Allston CAMBRIDGE interchange project

Date: Friday, February 09, 2018 11:27:02 AM

Dear Mr Strysky and Mr. Beaton,

I'm writing to register my strong preference for retention of a right turn exit from Soldier's Field Road to the River Street bridge and points in the Cambridgeport/Central Square area.

From what I can see of the proposed design, it is entirely possible to retain this exit option AND expand the pedestrian/cyclist passage through this area. Please include both of these elements in the project

The current proposal, to send Cambridge bound traffic through the Allston neighborhood, will be a nuisance for Allston residents and for those trying to reach Cambridge.

Please record these wishes in the official public comments pertaining to this matter.

Thank you,

Kim Motylewski & Frank Gillett 39 Magazine Street Cambridge MA 02139 From: <u>Kyra Montagu</u>

To: Strysky, Alexander (EEA)

Cc: Ferrara Jan; Lamond Annette; Fairbank sandra; Lingel Pamela; Von Tscharner Renata

Subject: I 90 reconstruction

Date: Friday, February 09, 2018 11:07:06 AM

Matthew Beaton Secretary of Energy & Environmental Affairs, 100 Cambridge St Suite 900, Executive Office of Energy & Environmental Affairs Boston MA 02114

Attn: MEPA Office Alex Strysky EEA # 15278

Dear Secretary Beaton, I am a Cambridge resident who moved during the reconstruction of the BU bridge to reduce my commuting time to work in Harvard Sq. from Brookline where I lived for 39 years, . As a relatively new resident, I appreciate every oasis of green Cambridge possesses and there are not all that many until you get to the reservoir and the cemeteries!

I endorse the responses and recommendations of the Cambridge Plant and Garden Club and those of the City of Cambridge expressed by former Mayor Henrietta Davies and the Charles River Conservancy. Looking to the future, we must drive less and walk and bicycle more.

The plan for the transportation hub in Allston makes huge sense and I fervently hope you can slow down your own DOT process long enough to refine the plans for this. Boston has been graced by the 19thC foresight to reserve water in western Mass. That vision has allowed our local expansion and prosperity. We really must do the same for transport. Thus a rail connector east, south and west and north makes critical sense.

Expanding the greenway spread along the river, and enhancing amenities for recreation, and improving air quality however much is possible, and reducing noise, are equally worthy goals.

There are many detailed proposals on your desk for doing all this. I will not repeat them, but hope you will find them compelling and persuasive.

Yours truly

Kyra Montagu 104 LakeView Ave. Cambridge, MA 02138 kyramontagu@gmail.com (617) 731-6727 From: Lauren Watters
To: Strysky, Alexander (EEA)
Subject: West Station NOW

Date: Friday, February 09, 2018 10:40:03 AM

Dear Secretary Beaton,

I am writing in support for <u>building West Station in Allston **now**</u> (not in 2040).

LW-1

As a resident of the neighborhood for over 15 years, Allston is experiencing an unprecedented building boom with such projects as Boston Landing, the Harvard Science complex, and numerous new condo and apartment building. Developers have recognized the value of Allston's proximity to the surrounding areas of Boston. But with this development comes increased traffic and congestion which our roads and public transportation system are not adequately equipped.

Please help Allston reach it's full potential by including West Station in the first phase of the MassDOT plan for the reconstruction of the Mass Pike.

Best regards, Lauren Watters

--

Lauren S. Watters 617.480.6824 laurenswatters@gmail.com From: Laurie Rothstein < laurierothstein@gmail.com>

Sent: Friday, February 9, 2018 1:43 PM

To: Strysky, Alexander (EEA) **Subject:** Allston I-90 DEIR

Dear MassDoT,

I have lived in greater Boston for 40 of my 61 years, including mamy years in Allston and for the last 30, in Cambridge. I was among the first adopters of an E-Z Pass, being a frequent Turnpike driver. A primary reason that I continue living in this area -- and raised a family and grew a business -- is because of the growing promise of an increasingly people- and nature-friendly city. I am thrilled that the DOT is finally able to address the multiple problems of the Allston-Brighton exchange. At the same time, I feel compelled to express my concerns about the way the project seems to be moving forward.

1) Do not delay West Station. It is vital to easing congestion during the construction project -- and of LROTH-1 course, beyond.

LROTH-2

LROTH-3

- 2) <u>Do not build the viaduct</u>. Use the surface options proposed by other experts. Use the money saved to improve mass transit and bike/pedestrian connections. If we need temporary ramps to connect the eastbound Pike to Longwood etc. during construction, do it!
- 3) Follow the Unchoke the Throat suggestions to improve bike/pedestrian paths. Create the People's Pike and ensure that the Franklin Street bridge is an early priority. These are the residents who will be most impacted by your work.

Our economy is booming around here only because of people who have focused their brilliance and creativity on long-term gains. They've attracted a new generation of workers who don't even want to own cars, they prefer to live in a healthy, beautiful environment where they can bike or walk or take mass transit. You have the choices in front of you to make necessary improvements to our roadways and still keep those companies and people here -- and attract more like them.

Thank you for listening. -Laurie Rothstein, 90 Oxford Ave., Cambridge MA 02138

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2nd Annual Give America Heart Again: an ultra-tender fundraiser

Laurie Rothstein cell: 857 998-0207



 From:
 LILY CANAN REYNOLDS

 To:
 Strysky, Alexander (EEA)

 Cc:
 projects@livablestreets.info

Subject: Allston project

Date: Friday, February 09, 2018 8:35:59 PM

To whom it may concern:

Please accept my comments regarding the Allston interstate project.

Transportation planners in Vancouver, Canada and other cities worldwide are deconstructing viaducts - remnants of car oriented decisions that failed to create a livable, multimodal cities. Please don't build a viaduct. In the entire project please prioritize transit, walking and biking in this project.

The Charles River is a unique asset that could become Boston's active front door - a spine of active transportation. Emphasizing connections to this river route for walking and biking will help relieve current and future pressure on our roadways.

Thank you for your work, Lily Canan Reynolds Lily.c.reynolds@gmail.com

LivableStreets Alliance

70 Pacific St. / @Sidney Cambridge MA 02139

T: 617.621.1746 F: 617.716.2085 info@livablestreets.info livablestreets.info

February 9, 2018

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

Delivered as a pdf to: <u>alexander.strysky@state.ma.us</u>

Re: Allston I-90 Interchange DEIR

Dear Secretary Beaton:

LivableStreets Alliance's Advocacy Committee welcomes the opportunity to provide comments on the Allston I-90 Interchange Draft Environmental Impact Review (DEIR), and would like to thank you for reviewing these suggestions. The impact this project will have upon the Commonwealth's people and environment cannot be over-stated, and we know that this will be a defining planning initiative for generations to come. At this time, we have several main concerns for the project as it currently stands in the DEIR.

We have been actively participating in this planning initiative for several years and have worked with neighbors, fellow organizations, and decision-makers to advocate for infrastructure that will greatly improve our region's mobility, traffic safety, and overall well-being. Ari Ofsevit has represented LivableStreets in MassDOT's official Task Force, and he has personally contributed valuable designs and insights to this process, principally the "3K-AMP option" for the Throat, which, thanks to MassDOT's decision, has been reviewed for official consideration in the DEIR.

Despite the considerable design merits of this Throat option, we would like to at this time voice our <u>support for the "3K-ABC at-grade option."</u> We believe that 3K-ABC will satisfy most of the project goals with minimal impacts to the environment, while providing for multimodal connectivity and minimizing costs during and after construction. In these regards, we find that the "3K-HV highway viaduct option" falls short. Additionally, we ask that the "No Build Option," which was never presented officially to the Task Force, be removed for further consideration, as it fails to meet MassDOT's stated project goals.

At this time, we believe that the DEIR requires further analysis and request that your office ask MassDOT to submit a supplemental DEIR to investigate these issues.

First, we have grave concerns regarding the traffic modeling employed, specifically as it relates to transit ridership projections. A reliable traffic model must be investigated to ensure that seven million square feet of new construction is not served chiefly by highway traffic and takes into account new transit and active transportation connections in the

Allston area to minimize any increase to congestion on I-90. Planning for car-centric Boston neighborhoods flies in the face of state-level emission-reduction goals, as well as Governor Baker's commitment to the US Climate Alliance in support of the Paris Climate Agreement.

Second, we need to better understand impacts to the Worcester Line during construction and ensure West Station's construction in the first phase to mitigate congestion and maintain access during construction. The Worcester Line is one of the busiest commuter rail corridors in the Commonwealth, yet the decision matrix between the three potential options for replacing the viaduct does not take into account the full impact to the Worcester Line.

MassDOT's assumption is that the highway will be reduced to three lanes each direction and that the Worcester Line will be reduced to one track. This is unacceptable to communities which have been fighting for decades for better train service. When the second track was finally put in to service in Allston last year, it led to significantly faster and more reliable travel. Yet the DEIR assumes that a single track will be acceptable during construction, and does not analyze the differences between the proposals in this regard. This must be addressed, especially considering that the highway will have reduced capacity because of construction during this time.

Communities along the Worcester Line have fought for decades for improvements to commuter rail service, and now is not the time to renege on these improvements. We believe that the 3K-ABC at-grade throat alternative could be built with minimal disruption to the Worcester Line, while the 3K-HV highway viaduct option would require several years of strangled, single-track operation. Disruption to the Worcester Line must be fully addressed as a major construction impact—on par with, if not ahead of the Grand Junction—in the final alternative decision, and a supplemental DEIR may be necessary to fully account for these impacts.

Third, we are troubled by the proposed construction timeline for West Station. We believe that West Station should be built in the first phase of the project, ideally in 2020 – not in 2040, as proposed in the DEIR. This transit hub would be a vital mitigation measure during the six years of construction in the project area, which will disrupt traffic on I-90, Soldiers Field Road, and Cambridge Street. West Station is just as important for crosstown connections as it is for downtown connections. A north-south bus corridor through West Station is crucial for creating transit access to jobs in Cambridge, at Boston University and the Longwood Area. Boston and the region are growing at an unprecedented rate. Delaying West Station by 22 years will increase congestion, depress economic growth, and limit mobility for all. West Station is also vital to encourage transit-oriented development in the proposed neighborhood in the years to come.

Fourth, we ask that there be a full "apples to apples" comparison of the three Throat options, especially with regards to costs, which were not fully explored for each alternative within the DEIR. This project is state-funded, and much of this money will come from the tolls I-90 users pay every day. We believe it is imperative that the state make a fiscally prudent choice in selecting a final alignment for the project. The 3K-HV highway viaduct alternative is

nearly \$100 million dollars more expensive than the 3K-ABC at-grade alternative (simplifying construction staging for this alternative may bring costs down further). Furthermore, the DEIR does not take into account any life cycle costs for the viaduct. The current viaduct requires \$800,000 annually to keep it in a safe, usable state. An at-grade alternative would have

lower maintenance costs and a longer lifespan than a new viaduct.

Fifth, we need to broaden our mitigation measures along the Charles River parkland by			
improving open space and trail amenities in the Throat area. It is important to provide safe			
and attractive paths for people walking, running, and biking in this heavily used active			
transportation corridor. The DEIR does not fully explore alternatives for improving the Dr. Paul	LSA-8		
Dudley White path near the BU Bridge. There are opportunities to shift the existing narrow,			
unsafe path away from Soldiers Field Road, onto the river's edge or along an adjacent boardwalk.	_		
We would like to support design concepts explored by WalkBoston and the Charles River	•		
Conservancy (a.k.a. #UnchokeTheThroat).			

Finally, we need to further explore how the proposed network of streets in the new Beacon		
Yards neighborhood is safe, human-scaled, and encourages active transportation. Current	LSA-9	
street proposals are too wide, and the DEIR does not sufficiently analyze what the impact of this		
street configuration could be to people walking and biking. Neighborhood connectivity must be		
improved for walking, biking, and transit between North and South Allston. Also, we would ask	LSA-10	
that there be an analysis of the proposed People's Pike pedestrian and bicycle path between		
Franklin Street and the Charles River by "flipping" the rail lay-up yard, as Harvard has proposed.	LSA-11	
Additionally, the Franklin Street footbridge—an essential connection over I-90 for Allston		
residents who are walking and biking—should be rebuilt <i>prior</i> to I-90 reconstruction.		

In conclusion, we believe that the <u>3K-ABC</u> at-grade option—already the least expensive to	LSA-12
construct, according to MassDOT—is the best path forward. We call on the state to provide a full	
life-cycle cost estimate for each alternative and to provide greater detail and explanation for the	LSA-13
issues we raise here, to make sure that the citizens of the Commonwealth do not overpay for an	
unnecessarily complex highway. Finally, we ask that MassDOT continue to engage with the	LSA-14
community and existing Task Force with future design decisions and considerations.	

Thank you for the opportunity to comment again on the evolving plans for this important project. We look forward to supporting MassEPA and MassDOT in undertaking the further planning work that is needed to make this project a true and full success for our Commonwealth.

Sincerely,

Andrew McFarland

Community Engagement Manager, LivableStreets Alliance

On behalf of the Advocacy Committee

Andrew Me Faclant

From: Loryn Sheffner < <u>lorynsheffner@gmail.com</u>>

Sent: Friday, February 9, 2018 5:01:20 PM

To: Strysky, Alexander (EEA) **Subject:** I-90 Interchange DEIR

Secretary Matthew Beaton

Executive Office of Energy and Environmental Affairs

Attn: MEPA Office, Alexander Strysky, EEA #15278

100 Cambridge St., #900, Boston MA 02114

Sent via: alexander.strysky@state.ma.us

Re: I-90 Boston Interchange DEIR

Dear Secretary Beaton:

I appreciate the opportunity to comment on the DEIR. I write as a Cambridge resident who encounters the proposed project area and environs as a neighbor, rower, driver, cyclist and runner.

A few brief comments:

• River Users. In considering solutions to improve the quality of the 'throat' for cyclists and pedestrians, please be attentive to the needs of the river users including rowers. While the river is wide in this area, there are only so many places along the river where groups of coached rowing boats can pull over to the side and allow other groups to pass. The throat is one of these areas. So while I greatly support innovative ideas for widening the bike/ped pathway in this area, please be extremely judicious in how much river width is taken.

LS-1

LS-2

- Charles River Access. Please prioritize outstanding bike/ped access to the riverfront both on a temporary basis during construction and in making long-term design decisions. The Charles River is a recreational jewel as well as being an important commuter connection for many cyclists.
- Phasing. Please accelerate implementation of public transit and bike/ ped improvements to the earliest phases possible. This includes acceleration of the delivery of West Station.
- Urban Design. Please review the scaling and street design of new blocks for 'human LS-4 scale' and bike/ped friendliness.

• Viaduct. Please review the trade-offs involved in the viaduct and prioritize bike/ped, mass transit, and rail needs over the needs of single occupancy vehicles or developable land in this important sub-area of the project.

LS-5

Thank you for your attention.

Loryn Sheffner

73 Howard Street #3

Cambridge, MA 02139

From: Carolyn

To: Strysky, Alexander (EEA)

Cc: Cerbone, James (DOT); joseph.boncore@masenate.gov; jay.livingstone@mahouse.gov; Cambridge City Council

Subject: Response to Mass Pike/I-90 DEIR from a Cambridgeport resident

Date: Friday, February 09, 2018 11:03:35 AM

Dear Secretary Beaton:

<u>Major Deficiencies in the MassDOT Mass. Pike/I-90 DEIR Report</u>: With regard to the MassDOT DEIR for the proposed Mass I-90/Turnpike reconstruction project, I believe that there are major deficiencies in the DEIR and that it is imperative that MassDOT undertake further action and/or further study.

First of all: I support the overall thrust and detailed requests for action and further study in Mayor Henrietta Davis's January 24, 2018 letter and Response to the DEIR, particularly:

Access To/From Soldiers Field Road: I strongly support the compromise solution of retaining a one-lane, westbound, vehicular exit from Soldiers Field Road onto the River St. Bridge and directly into Cambridge.

The current plan in the DEIR would increase pollution. The current plan will push traffic onto alternative routes. MassDOI has not even studied the effects of this ill-conceived plan. This is only one faulty aspect of the current I-90 plan that implicitly demands expert studies and analyses in its entirety.

There is no doubt westbound traffic will use the Mass Ave. Bridge, Memorial Drive (already heavily traveled), and neighborhood residential streets thus creating unsafe conditions for our children as well as all residents.

Other sensible reasons for the one-lane option are: 1. enough room for one lane of traffic and an expanded pedestrian and bicycle pathway; 2. it could be used, when necessary, by Emergency vehicles. 3. The one-lane solution is the only option that provides a workable compromise for pedestrians, bikers, as well as private vehicle drivers.

<u>Construction-Period Noise Mitigation</u>: This needs to be planned now, with commitments to use best efforts to reduce noise impacts and limit nighttime and weekend noise.

MCS-3

de

<u>Post-Construction Noise from Roadway and Rail Use</u>: Of special interest to Cambridgeport and Riverside residents and those trying to enjoy Magazine Beach is MassDOT's deafening silence on reducing noise in its design.

MCS-4

No expert studies have been pursued that would determine the noise levels and their compliance with current laws and ordinances, especially with regard to noise impacts at Magazine Beach and in Cambridgeport and Riverside residential neighborhoods.

The Throat: The plans for this acknowledged difficult stretch of roadway require an alternative that reduces noise below current unacceptably loud and intrusive levels and is visually attractive from Cambridge, and as well has positive impact on the Paul Dudley White Path.

MCS-5

MCS-6

Also, for safety and noise-reduction, lower speed limits should be imposed at the Throat and beyond into Boston. (Cambridge has just lowered the speed limit in all city squares to 20 mph.)

<u>West Station</u>: This is a pivotal moment in transit planning, in which not just current problems, but also <u>future</u> problems in transit should be anticipated and documented through data driven traffic projections by professional experts.

MCS-7

- >Without West Station, traffic congestion and gridlock will be exponentially many times greater than the rush hour(s) gird lock already the reality on both sides of the Charles River mornings and evenings (grid lock on the Cambridge side of the river begins at 3:30 p.m.).
- >This is THE opportunity for planning in order to avoid a disaster across the river and in Cambridge.

N.B.: Mayor Davis's letter calls for transit planning for the entire area of Allston and Cambridge that will be affected.

>It is assumed that any expert traffic impact studies would consider the thousands of jobs that businesses plan to add to the Boston area. One need only consult local newspapers, on-air news reports, and business publications to

learn of the anticipated increase in workers traveling to the Boston area for jobs that will be moved from the 128 area or that are newly created in Boston in the next decade.

>Therefore, it would be antithetical to sound planning and extremely short-sighted to postpone the rail station until after development and consequent traffic overwhelms the area.

>May one assume that MassDOT is aware of the transit disaster in the Seaport District? This is a direct result of not planning public transit prior to the arrival of business. >How can MassDOT even consider duplicating this same serious lack of insight and omission of professional traffic projections and perceived need for public transit?

<u>Width of Turnpike</u>: Reconstruct the Pike to be as narrow as possible. In this already seriously constricted area, it makes no sense to build wider travel lanes and wide shoulders that do not exist in any other parts of the Turnpike between Route 128 and the Prudential Tunnel.

t MCS-8

MCS-9

Construction Mitigation and Project Compensation: There needs to be a detailed action plan to mitigate impacts from years of aggravation and disruption, reduce construction noise, and effectively manage expected heavier traffic on Memorial Drive, Western Avenue, Massachusetts Avenue, the many bridges over the Charles River, and Cambridgeport and Riverside neighborhood streets.

Your consideration of these issues and concerns will be appreciated. Thank you.

Sincerely,

M. Carolyn Shipley (Cambridgeport resident since 1981) 15 Laurel Street Cambridge, MA 02139

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Commonwealth of Massachusetts Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker Governor

Karyn E. Polito Lieutenant Governor Matthew A. Beaton Secretary

> Martin Suuberg Commissioner

Memorandum

To: Matthew A. Beaton, Secretary, EEA

Att'n.: Alexander Stysky, MEPA Analyst

From: Ben Lynch, Program Chief Waterways Regulation Program, MassDEP/Boston

Cc: Gary Moran, Deputy Commissioner, Mass DEP Waterways

Re: EEA #15278, I-90 Allston Interchange Project Draft Environmental Impact

Report (DEIR), Boston.

Date: February 9, 2018

The Waterways Regulation Program (WRP) has reviewed the above referenced Massachusetts Department of Transportation (MassDOT) I-90 Allston Interchange Project Draft Environmental Impact Report (DEIR), (EEA #15278), published in the *Environmental Monitor* on December 6, 2017 and provides the following comments.

Project Description:

MassDOT proposes to construct a multi-modal transportation improvement project at the existing I-90 exchange in former Beacon Park Yard ("BPY") in the Allston neighborhood of the City of Boston. The Project Proponent proposes to: realign and reconstruct the existing interchange; create new public open space; accommodate commuter rail layover space for the MBTA; create a new urban street grid; facilitate the development of a new commuter rail station; realign and reconstruct Soldiers Field Road (SFR); and, provide new bike and pedestrian connections. The SFR area southeast of the proposed exchange, adjacent to the Charles River (the "Throat Area"), will be reconstructed and the Project Proponent has included three different Variations of the location and relationship of the project elements of the Throat Area, which

include the rail corridor, the realigned I-90 and SFR roadways, and project open space and bicycle and pedestrian facilities.

Chapter 91 Waterways Jurisdiction:

The DEIR filing describes the area of Filled Tidelands on Figure 4.12-3. The area of jurisdictional filled tidelands on this image appears to have properly employed the Tidelands overlay from the Mass GIS website. In the FEIR, the Department requests that the Proponent DEP BOS-1 include all Filled Tidelands and Landlocked Tidelands (those areas of fill located more than 250'-0" from the water and entirely separated by a public way).

Project Comments:

Within Chapter 91 jurisdiction, the Project Proponent describes three different cross-sectional layouts in the Throat area for the new locations of I-90, SFR, the Commuter Rail and Grand Junction rail corridors, and the open space along the Charles River, which includes a shared pedestrian and bicycle pathway. The main Chapter 91 interests affected by each of the layouts will be the creation of new public open space in this historically narrow portion of the Charles River Reservation.

Variation 3K-HV will create approximately 2.26 acres of new parkland in an area that is presently part of SFR and will have no impacts on the existing flowed tidelands. Variation 3K-AMP will create approximately 2.34 acres of new parkland in the current footprint of SFR, and will have no impacts on the existing flowed tidelands. Variation 3K-ABC will create approximately 1.59 acres of new parkland in what is currently the footprint of SFR. Unlike the previous two Variations, this iteration would have temporary impacts of 3,300 square feet, and 1,100 square feet of permanent impacts on the flowed tidelands of the Charles River. Each of the Variations will result in beneficial Chapter 91 outcomes of new parkland, and better connectivity to landward public ways. However, pursuant to 310 CMR 9.32(1)(a)3, structures to accommodate public pedestrian access on flowed tidelands are allowed only when it is not reasonable to locate such structures above the current high water mark or within the footprint of existing pile-supported structures or pile-fields. In this case, it would appear that two of the Variations, 3K-HV and 3K-AMP, present reasonable alternatives. Accordingly, if MassDOT decides to consider Variation 3K-ABC in the FEIR, it should revise its design so as to have no DEP BOS-2 impacts on the flowed tidelands of the Charles River.

If you have any questions regarding the Department's comments, please feel free to contact my office at (617) 292-5615 or at ben.lynch@state.ma.us. Thank you.



Commonwealth of Massachusetts Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

Charles D. Baker Governor

Karyn E. Polito Lieutenant Governor Matthew A. Beaton Secretary

> Martin Suuberg Commissioner

February 9, 2018

Matthew A. Beaton, Secretary
Executive Office of
Energy & Environmental Affairs
100 Cambridge Street
Boston MA, 02114

Attn: MEPA Unit

RE: Boston I-90 Allston Interchange Project Former Beacon Park Yard, rail yard EEA #15278

Dear Secretary Beaton:

The Department of Environmental Protection Northeast Regional Office has reviewed the Draft Environmental Impact Report (DEIR) submitted by the Massachusetts Department of Transportation (MassDOT), for the proposed replacement of the existing highway interchange with a new multi-modal urban interchange that meets the needs of motorists, pedestrians, bicyclists and mass transit (light and heavy commuter rail, bus and shuttle) users while accommodating potential future mixed development with an addition of 70 parking spaces for rail layover facility staff parking. The Project is located in the Allston neighborhood of Boston near the Charles River in the area of the former Beacon Park Yard (BPY), historically a rail yard, a portion of which was partially utilized to construct the Massachusetts Turnpike and the original Allston interchange and toll plaza. The Department provides the following comments.

Wetlands

This purpose of this project is to construct a multi-modal urban interchange that meets the needs of motorists, pedestrians, bicyclists and masstransit (light and heavy commuter rail, bus and shuttle) users while accommodating potential future mixed-use transit.

The preferred alternative for the "throat" segment of the roadway re-alignment is option Alt. 3K, which includes three variations: 3K-HV, 3K-AMP and 3K-ABC. All three of these options will involve temporary impacts to approximately 200 square feet of Land Under Water and 80

linear feet of Bank, and permanent impacts to approximately 40 s.f. of LUW and 10 linear feet of Bank as a result of installing stormwater culverts. It appears that these impacts may be unavoidable, DEP NERO-1 but restoration through grading, plantings and other mitigation should be proposed as part of permitting.

Alternatives HV and AMP do not involve any additional wetlands impacts. Alternative ABC would entail temporary impacts to 3300 s.f. of Land Under Water and 20 linear feet of Bank; and permanent filling of 420 s.f. of LUW, dredging of LUW, permanent impacts to 330 linear feet of Bank and filling of 2300 cubic feet of Bordering Land Subject to Filling. Approximately 1100 s.f. of federal Land Under Water would be permanently altered. Mitigation for these impacts is not described in the DEIR. In particular, MassDEP notes that compensatory flood storage must be provided on an incremental basis for filling of BLSF. A design with supporting information to show that the required volume of compensatory flood storage is being provided will be required if Alternative ABC is selected along with appropriate mitigation for the alteration of the other wetland resource areas.

DEP NERO-2

Of the three alternatives listed above, Alternative ABC has the most significant permanent and temporary impacts to wetland resource areas. Through an alternatives analysis under the Wetlands Regulations, this alternative would be unlikely to be permitted due to the availability of alternatives with fewer impacts.

DEP NERO-3

Stormwater

Stormwater management on this project site is complex due to the existence of multiple owners who have responsibility or authority for stormwater designs on different portions of the site. The DEIR seems to reflect an effort by MassDOT, MBTA, DCR, the City of Boston and Harvard University to collaborate on a stormwater management plan to achieve the treatment to the maximum extent practicable in previous developed areas of the site. MassDEP supports this approach and encourages continued cooperation.

TMDL (Total Maximum Daily Load) limits for nutrients (phosphorus) and pathogens apply to the segment of the Charles River where the project's stormwater discharges will be located. The DEIR describes a general stormwater management approach that emphasizes the use of infiltration BMPS wherever possible, including the use of subsurface infiltration chambers or excavated depressions, sediment forebays and surface swales, deep sump catch basins to reduce the phosphorus concentration in stormwater being released to the River. However, limited space within the highway right-of-way, high groundwater elevations near the river and the possible presence of oil and hazardous materials may affect the feasibility of installing infiltration structures. The design elements for phosphorus reduction are expected to also reduce nutrient loading, but few specific actions are proposed for nutrient control.

DEP NERO-4

As the project design progresses, the proponent should provide more detail on all of the stormwater controls that can be implemented on the site and their locations. This should include DEP NERO-5 specific structural and non-structural elements, as well as maintenance practices that will be implemented and the assignment of responsibility for maintenance.

Solid Waste and Recycling

The Project includes demolition and construction, which will generate a significant amount of construction and demolition (C&D) waste. The management of C&D waste is subject to the regulatory requirements of 310 CMR 16.00 – the Massachusetts Site Assignment Regulations, and 310 CMR 19.000 – the Massachusetts Solid Waste Regulations. These regulations include, but are not limited to, the following sections applicable to the management and reuse of C&D waste:

- 310 CMR 16.03(2)(b)5. Asphalt Pavement, Brick and Concrete Recycling (ABC) Operations Includes notification requirements for on-site crushing of ABC.
- 310 CMR 19.017. Waste Bans Includes prohibitions on the disposal of certain materials including, but not limited to, such construction wastes as clean gypsum wallboard, wood, and metal.
- 310 CMR 19.060. Beneficial Use of Solid Waste Includes provisions for the beneficial reuse of solid waste including processed rubble as construction materials (aggregate, structural fill, etc.).

DEP NERO-6

The proponent shall ensure that all asbestos containing waste material (ACWM) from any asbestos abatement activity is properly stored and disposed of at a landfill approved to accept such material in accordance with 310 CMR 7.15(17). The regulations at 310 CMR 19.061(3) list the requirements for any solid waste facility handling or disposing of asbestos waste. Pursuant to 310 CMR 19.061(3)(b)1, no asbestos containing material, including VAT, asphaltic-asbestos felts or shingles, may be disposed at a solid waste combustion facility.

The DEIR indicates that if the Project activity requires a Site Assignment, they would seek a Site Assignment as required. MassDEP recommends that the FEIR should reflect whether any part of the Project will trigger such a requirement and, if so, provide further details.

DEP NERO-7

In addition, the proponent may wish to develop a construction and demolition materials management plan for inclusion in the bid document(s) for contractors at the site. Providing sufficient space for the segregation and temporary storage of waste and recyclable materials generated by the proposed project will aid recycling/reuse of materials.

DEP NERO-8

Facilitating future waste reduction and recycling and integrating recycled materials into the project are necessary to minimize or mitigate the long-term solid waste impacts of this type of development. The Commonwealth's waste diversion strategy is part of an integrated solid waste management plan, contained in The Solid Waste Master Plan that places a priority on source reduction and recycling. Efforts to reduce waste generation and promote recycling have yielded significant environmental and economic benefits to Massachusetts' residents, businesses and municipal governments over the last ten years. Waste diversion will become even more important in the future as the key means to conserve the state's declining supply of disposal capacity and stabilize waste disposal costs.

MassDEP encourages the Project proponent and its contractors to schedule one or more pre-application meetings with MassDEP Northeast Region staff to discuss the Air Quality, Asbestos and Solid Waste aspects of the Project.

Air Quality - Emissions, Noise, Asbestos, Construction and Demolition

Pursuant to the requirements of 310 CMR 7.02 of the Air Pollution Control regulations, if the ABC crushing activities are projected to result in the emission of one ton or more of particulate matter to the ambient air per year, and/or if the crushing equipment employs a diesel oil fired engine with an energy input capacity of three million or more British thermal units per hour for either mechanical or electrical power which will remain on-site for twelve or more months, then a plan application must be submitted to MassDEP for written approval prior to installation and operation of the crushing equipment. Sufficient wetting and shrouding of crushing equipment can greatly reduce the potential for creating nuisance conditions.

The DEIR provides significant sound and noise data and proposed mitigation. The studies were conducted according to FWHSA standards.

Construction Period Air Quality Mitigation Measures

MassDEP recommends that the proponent work with its staff to implement construction-period diesel emission mitigation, which could include the installation of after-engine emission controls such as oxidation catalysts or diesel particulate filters. Additional information is available on the MassDEP website: http://www.mass.gov/dep/air/diesel/conretro.pdf. In addition, project contractor(s) are required to use ultra low sulfur diesel (ULSD) fuel in their off-road construction equipment in conjunction with after-engine emission controls.

Compliance with the Massachusetts Idling Regulation

MassDEP urges a project commitment to ensure compliance with the Massachusetts Idling regulation (310 CMR 7.11) which prohibits motor vehicle idling more than five minutes unless the idling is necessary to service the vehicle or to operate engine-assisted power equipment or other associated power. Questions regarding this regulation should be directed to Julie Ross of MassDEP at 617-292-5958.

Prior to demolition of any structures an asbestos survey shall be conducted by a Massachusetts Department of Labor Standards certified asbestos inspector in compliance with 310 CMR 7.15(4). In addition, the Project proponent is advised that asbestos and asbestos-containing waste material (ACWM) are a "special waste" as defined in the Solid Waste Management regulations (310 CMR 19.061). Asbestos removal notification on permit form ANF 001 and building demolition notification on permit form AQ06 must be submitted to MassDEP at least 10 working days prior to initiating work. If asbestos abatement cannot be done pursuant to traditional work practices as set forth in 310 CMR 7.15, then the Project must apply for approval of a Non-Traditional Asbestos Work Plan (NT Plan) to conduct non-traditional asbestos abatement. Except

for vinyl asbestos tile (VAT) and asphaltic-asbestos felt and shingles, the disposal of asbestos containing materials within the Commonwealth must be at a facility specifically approved by MassDEP (310 CMR 19.061). No asbestos containing material including VAT, and/or asphaltic-asbestos felts or shingles may be disposed at a facility operating as a recycling facility (310 CMR 16.05). The disposal of the asbestos containing materials outside the jurisdictional boundaries of the Commonwealth must comply with all the applicable laws and regulations of the state receiving the material.

The demolition activity also must conform to current Massachusetts Air Pollution Control regulations governing nuisance conditions at 310 CMR 7.01, 7.09 and 7.10. As such, the proponent should propose measures to alleviate dust, noise, and odor nuisance conditions, which may occur during the demolition. Again, MassDEP must be notified in writing, at least 10 working days in advance of removing any asbestos and at least 10 working days prior to any demolition work. The removal of asbestos from the buildings must adhere to the special safeguards defined in the Air Pollution Control regulations. See 310 CMR 7.15(7), 310 CMR 7.15(8), 310 CMR 7.15(9) and 310 CMR 7.15(10). As stated above, if the foregoing requirements cannot be complied with by the proponent for aspects of the Project, then an application can be made to the Department to utilize Non-Traditional Asbestos Abatement Work Practices by submitting application form AQ36 and a written proposal for review and approval in compliance with 310 CMR 7.15(14).

<u>Pre-Application Meetings with MassDEP – Northeast Region are Encouraged</u>

DEP NERO-9

MassDEP encourages the Project proponent and its contractors to schedule one or more pre-application meetings with MassDEP Northeast Region staff to discuss the Air Quality, Asbestos and Solid Waste aspects of the Project.

Massachusetts Contingency Plan/M.G.L. c.21E

Contaminated Soil and Groundwater:

The project proponent is advised that excavating, removing and/or disposing of contaminated soil, pumping of contaminated groundwater, or working in contaminated media must be done under the provisions of MGL c.21E (and, potentially, c.21C) and all other applicable federal, state, and local laws, regulations, and bylaws. If permits and approvals under these provisions are not obtained beforehand, considerable delays in the project can occur. The project proponent cannot manage contaminated media without prior submittal of appropriate plans to MassDEP, which describe the proposed contaminated soil and groundwater handling and disposal approach, and health and safety precautions. If contamination at the site is known or suspected, the appropriate tests should be conducted well in advance of the start of construction and professional environmental consulting services should be readily available to provide technical guidance to facilitate any necessary permits. If dewatering activities are to occur at a site with contaminated groundwater, or in proximity to contaminated groundwater where dewatering can draw in the contamination, a plan must be in place to properly manage the groundwater and ensure site conditions are not exacerbated by these activities. Dust and/or vapor monitoring and controls are often necessary for large-scale projects in contaminated areas. The need to conduct real-time air

monitoring for contaminated dust and to implement dust suppression must be determined prior to excavation of soils, especially those contaminated with compounds such as metals, coal tars, asbestos and PCBs. An evaluation of contaminant concentrations in soil should be completed to determine the concentration of contaminated dust that could pose a risk to health of on-site workers and nearby human receptors. If this dust concentration, or action level, is reached during excavation, dust suppression should be implemented as needed, or earthwork should be halted. A Licensed Site Professional (LSP) must be employed or engaged to manage, supervise or actually perform the necessary response actions at the site.

The I-90 Allston Interchange Project DEIR identified 77 disposal sites within the project area, where a release or threat of release of oil and/or hazardous material has been reported to MassDEP. An additional 62 disposal sites are located on abutting or nearby properties. For most of the disposal sites, a Permanent Solution Statement authored by a Licensed Site Professional has been filed with MassDEP. MassDEP has not audited the vast majority of these Permanent Solution Statements, and suggests that an appropriate level of review and due diligence be used when determining potential or known areas of contamination and response actions needed to manage contaminated media prior to implementing the proposed activities of the I-90 Allston Interchange Project.

Capping of Contaminated Soil:

If capping of contaminated soil is needed to achieve a level of No Significant Risk, MassDEP recommends the following capping design criteria. In unpaved areas, a minimum of three feet of clean soil should be placed over the contaminated soil. This protective layer of clean soil should be separated from the underlying contaminated soil by a geotextile or combination of materials, which will provide both a brightly colored visual marker and a permeable fabric to separate the clean soil from the contaminated soil. In paved areas, a minimum one-foot cap consisting of clean soil, road base and the pavement layer should be placed over the contaminated soil. Similar to unpaved areas, the contaminated soil should be separated from the clean soil or road base using a visual marker and geotextile. In such cases, an Activity and Use Limitation (AUL), prepared in accordance with 310 CMR 40.1012 would be necessary to identify the maintenance requirements of the cap. It should also be noted that a cap constructed as a Release Abatement Measure will not be considered a Permanent Solution until a Phase III completed in accordance with 310 CMR 40.0850 demonstrates the lack of a feasible alternative, as required by 310 CMR 40.042(4).

Potential Indoor Air Impacts:

Parties constructing and/or renovating buildings in contaminated areas should consider whether chemical or petroleum vapors in subsurface soils and/or groundwater could impact the indoor air quality of the buildings. All relevant site data, such as contaminant concentrations in soil and groundwater, depth to groundwater, and soil gas concentrations should be evaluated to determine the potential for indoor air impacts to existing or proposed building structures. Particular attention should be paid to the vapor intrusion pathway for sites with elevated levels of chlorinated volatile organic compounds such as tetrachloroethylene (PCE) and trichloroethylene (TCE).

MassDEP has additional information about the vapor intrusion pathway on its website at http://www.mass.gov/eea/agencies/massdep/cleanup/regulations/vapor-intrusion-and-indoor-air-contamination-waste-sites.html.

New Structures and Utilities:

Construction activities conducted at a disposal site shall not prevent or impede the implementation of likely assessment or remedial response actions at the site. Construction of structures at a contaminated site may be conducted as a Release Abatement Measure if assessment and remedial activities prescribed at 310 CMR 40.0442(3) are completed within and adjacent to the footprint of the proposed structure prior to or concurrent with the construction activities. Excavation of contaminated soils to construct clean utility corridors should be conducted for all new utility installations.

Activity and Use Limitations:

An Activity and Use Limitation (AUL) is a legal document that is recorded or registered at the appropriate Registry of Deeds and identifies site conditions that are the basis for maintaining a condition of No Significant Risk at a property where contamination remains after a cleanup. The AUL identifies permitted and allowable site uses and activities that may occur at a property while maintaining No Significant Risk. The AUL also identifies restricted uses and activities, which could result in the exposure of people at or near the disposal site to remaining contamination if such activities were to occur. The project proponent is advised that in cases where proposed activities would not be consistent with a level of No Significant Risk and/or an existing AUL, additional cleanup and the amendment or termination of the initial AUL and implementation of a revised AUL is necessary before the proposed activities occur.

The MassDEP Northeast Regional Office appreciates the opportunity to comment on this proposed project. If you have any general questions regarding these comments, please contact me at John.D.Viola@state.ma.us or at (978) 694-3304.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

John D. Viola Deputy Regional Director

cc: Brona Simon, Massachusetts Historical Commission Eric Worrall, Rachel Freed, Susan Ruch, Steve Johnson, MassDEP-NERO



9 February 2018

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

Dear Secretary Beaton:

Magazine Beach Partners, Inc. ("MBP") is a non-profit organization formed to protect, support and promote Magazine Beach Park, a 17-acre element of the State's Charles River Reservation located directly across the river from the "throat" of the proposed I-90 project. MBP is the Department of Conservation and Recreation (DCR) and the City of Cambridge's partner in the design, construction and activation of the park, and has raised significant private funds to that end.

We write in support of Henrietta Davis's January 24, 2018 comment letter on the DEIR for I-90 calling for development of a fourth alternative, and the Cambridge City Council's Policy Order POR 2018 #20, January 29, 2018. With them, we believe the final version of the project should meet the following goals relating to aspects of the project that will have a direct impact on Magazine Beach Park and its immediate environs.

Noise

Minimize harmful noise levels from the Turnpike. At present, the highway produces unacceptable noise impacts on the Charles River, Magazine Beach and Cambridgeport. The final design for the throat solution should be based on noise analyses that establish a configuration that has the least impacts on the river surface and at Magazine Beach Park and should integrate noise mitigation solutions into that design.

MBP-1

Magazine Beach Partners, Inc. 202 Hamilton Street, Cambridge, MA 02139 (617) 868-0489

Directors: Cathie Zusy, President, Ken Carson, Clerk, Marge Amster, Treasurer, Brian Conway, Olivia Fiske, Richard Garver, Decia Goodwin, Peter Klinefelter & Heather Safforian

Visual Elements

Minimize the project's adverse visual impacts. The final design should be based on studies using three-dimensional rendering techniques to identify an alternative that most significantly improves the visual character of the throat section from the Paul Dudley White path, the river, Magazine Beach Park, and Cambridge pedestrian and bicycle paths along the Charles.

MBP-2

River's Edge in the "Throat" Area

Create an ample, landscaped pedestrian/bicycle pathway between the Boston University and Western Avenue Bridges, allowing enough space between roadway and river to provide pedestrians and cyclists with a continuous attractive experience of the river environment with minimum roadway intrusion. To that end, explore the augmentation of the river edge.

MBP-3

Expanded Parkland

Create a larger useable riverfront parkland area by increasing the distance between Soldiers' Field Road and the river's edge. Anticipating that Harvard development in the Beacon Yards area will include a much greater buffer for the river and a larger area for park use by new inhabitants of that development, it would be greatly beneficial to realign Soldiers Field Road as part of this project. Together with the renovated Magazine Beach Park this would lead to a true renaissance for the river environment in this neglected area.

MBP-4

The Need for a Fourth Alternative

None of the present alternatives sufficiently achieves these goals. We therefore strongly endorse Henrietta Davis's conclusion that MassDot must create and conduct an environmental analysis of a fourth alternative aimed at maximizing these goals.

MBP-5

Mitigate Construction Impacts on Riverfront Pedestrian/Bicycle Circulation Construction of the project will curtail pedestrian and bicycle commuter and recreational use of the Paul Dudley White path. The project should therefore enhance the alternative route along Memorial Drive by constructing the paths that DCR has designed as part of its restoration of Magazine Beach to accommodate the anticipated increased pedestrian and bicycle traffic and be accompanied by a commitment to state funding of DCR's phase II renovation design.

MBP-6

To conclude, just as cities all over the world are embracing and revitalizing their river parkland, the agency should propose a final option that celebrates the Charles River Reservation. It was Charles Eliot's grand vision of the Charles River that transformed the Cambridge shore from "squalid hovels, dump heaps and other nuisances" in the 1890s. We urge you to grasp the opportunity to match his vision directly across the river.

Thank you for your attention and commitment to refining the existing I-90 plans.

Sincerely,

Cathie Zusy, President For the board of Magazine Beach Partners, Inc.

CC:

James Cerbone, MassDOT Highway Division Massachusetts Senator Joseph Boncore Massachusetts Representative Jay Livingstone



SMART GROWTH AND REGIONAL COLLABORATION

February 9, 2018

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

RE: I-90 Allston Interchange Project, MEPA #15278

Dear Secretary Beaton:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews proposed Projects for consistency with MetroFuture, the regional policy plan for the Boston metropolitan area, the Commonwealth's Sustainable Development Principles, consistency with Complete Streets policies and design approaches, consistency with the requirement of the Global Warming Solutions Act, as well as impacts on the environment.

The Massachusetts Department of Transportation (the Proponent) proposes to replace the existing I-90 Allston Interchange, reconstruct the roads connecting to the interchange, move I-90 closer to the existing Worcester-Framingham Commuter Rail Line, add rail layover storage, build a West Station on the Worcester-Framingham Line, and address the deteriorated I-90 viaduct (the Project). The location of the Project is the area of the former Beacon Park Yard (BPY), historically a rail yard, a portion of which was partially utilized to construct the Massachusetts Turnpike, the original Allston interchange, and toll plazas.

MAPC has reviewed the Draft Environmental Impact Report (DEIR) and has concerns that primarily address challenges of the various design options in an area known as "the throat," future transit service to support proposed transit oriented development (TOD) in the Project area, and the scale and street widths of the new connecting streets. These issues, proposed recommendations, and questions are detailed as an attachment to this letter. MAPC respectfully requests that you consider our comments closely as you issue a Certificate for the Draft Environmental Impact Report (DEIR).

Thank you for the opportunity to comment on this Project.

Sincerely,

Marc D. Draisen
Executive Director

cc: David Mohler, MassDOT Chris Osgood, City of Boston

Metropolitan Area Planning Council (MAPC) comments on I-90 Allston Interchange Project, Draft Environmental Impact Report, MEPA #15278

MAPC recognizes that the key objective of the Project is to replace the deteriorating and structurally deficient I-90 viaduct, and to address vehicular congestion at the intersections of the I-90 ramps, Cambridge Street, and Solders Field Road during the morning and afternoon peak periods. We also recognize that the Project will create perhaps the largest undeveloped parcel in the City of Boston with a network of fully constructed streets subdividing this undeveloped land, and with the potential to shape development in Allston for the next 50 years or more. It is possible, as a result of this opportunity, to improve the public realm dramatically, including connections between the Allston neighborhood and the Charles River park system, while also improving transit, bicycling, walking, and recreational resources for visitors from far and wide.

MAPC believes it is critical that these once-in-a-lifetime opportunities should not be sacrificed by developing a roadway system that is too wide, with too many lanes, or so highly elevated that it effectively walls off the neighborhood created by opening up this undeveloped land. MassDOT should take a longer term view and create a Project that helps to meet the Commonwealth's goals for increasing the share of people using transit, cycling, and walking.

Unfortunately, we believe that the current Project design focuses primarily on accommodating vehicles and increasing the capacity of this highway to allow for free flow conditions. As a result, the current Project proposals all leave a significant barrier between neighborhoods and the Charles River, with designs that create 12 to 14 vehicular lanes and 4 to 8 railroad tracks along the realigned I-90 turnpike. These configurations were designed based primarily to accommodate current and expanded vehicular traffic, and will make it more difficult to build a sustainable, vibrant, urban neighborhood with a narrowed urban highway and clear connections to the river, parks, and paths. Whatever short-term improvements in congestion the Project may achieve will evaporate as more drivers choose to use the roadway instead of other modes.

Rather, the goal should be to develop the roadway and the spaces around it in such a way as to maximize use of alternatives modes of transportation, specifically transit, biking, and walking, while optimizing the connections between Allston and the Charles River.

MAPC-2

MAPC-1

I-90 Throat Alternatives

One of MAPC's chief concerns is that the existing I-90 highway and viaduct are a barrier separating the residents and workers in Allston from the Paul Dudley White Path and the Charles River. A goal of this project should be to increase the amount of park space, including bicycle and pedestrian paths, along the river, even if that means pushing into the shallows of the river, and to create better connections to the river from neighborhoods in Boston and Brookline.

The area where these issues come into play, between the current highway and the Charles River, has become known colloquially as "the throat." MAPC supports additional evaluation of all three alternatives as the Project moves into design, and believes all the proposed alternatives should include an evaluation of impacts on (and possible improvements to) the Charles River park space, the possibility of adding park space into the river, and the important goal of establishing separate bicycle and pedestrian paths, with greater separation from each other and from adjacent roads.

MAPC-3

The alternative proposed by A Better City (ABC) recommends placing both I-90 and the railroad primarily at-grade. The benefits of this alternative include eliminating the elevated structures, the potential for increased access to the river via pedestrian bridges, and creating the potential for air rights development over the long term that would reduce noise and visual impacts of the railroad and the highway. While this alternative would reduce the vertical visual barrier between Allston and the river, it would also create a railroad and highway footprint that is wider than the current configuration. This alternative, if constructed

Matthew A. Beaton, Secretary, Executive Office of Energy and Environmental Affairs RE: I-90 Allston Interchange Project, DEIR, MEPA #15278

February 9, 2018 P. 2 of 5 without adding park space into the shallows of the river, would only provide a 9-foot path in the most constrained area along the Charles River, and eliminate the possibility of a landscaped buffer between the path and Soldiers Field Road. Additional analysis should include an updated cost estimate to account for life-cycle costs of elevated structures versus at-grade infrastructure, which could be an advantage of the ABC proposal. We also recommend analysis to determine if construction impacts could be lessened by building the at-grade roads while I-90 continues to operate on a viaduct.

MAPC-4

MAPC also supports further evaluation of the highway viaduct alternative (HV) and the so-called "amateur planner alternative" (AMP). HV would carry I-90 over the railroad tracks on a reconstructed viaduct, while AMP would place the railroad tracks above I-90, providing for a lower profile of elevated structure.

The HV alternative allows for a widened, 12-foot Paul Dudley White Path and a landscaped buffer between the path and Soldiers Field Road. This alternative also allows for the greatest flexibility in commuter rail operations, including keeping the Grand Junction railroad open during most of the Project construction. However, MAPC has concerns that the new viaduct in MassDOT's preferred HV3 alternative will be approximately 20 feet wider than the current viaduct, creating a larger footprint and placing the viaduct closer to buildings on the Boston University campus.

MAPC-5

MAPC recognizes that the current AMP alternative (railroad over I-90) would not allow the creation of a landscaped buffer between the Paul Dudley White Path and Soldiers Field Road without additional fill in the Charles River. The alternative would also limit some rail operations. For example, the DEIR states this alternative would restrict speeds for commuter rail and Amtrak trains passing through the area, and would require shutting down the Grand Junction railroad for an extended period during construction. However, MAPC recommends that additional design be conducted on this alternative to see if these impacts to rail operations could be mitigated. Finally, MAPC suggests that variation on this alternative be considered, such as stacking I-90 (eastbound and westbound on separate levels), or elevating portions or all of Soldiers Field Road over I-90. These design options could reduce the overall project footprint while increasing space for the Paul Dudley White Path and the park along the Charles River.

MAPC-6

Regardless of which alternative (or modified alternative) is eventually chosen, MAPC recommends that a reduced highway footprint be considered, such as 11-foot travel lanes and 4-foot shoulders, which are common within urban settings including in adjacent sections of I-90 and should not substantially impact vehicular capacity.

MAPC-7

West Station Design

The conceptual cost estimates of constructing West Station are approximately \$90 to \$96 million, depending on the Project design alternatives. The rail station concept currently includes a large bus port to be added above the tracks and rail platforms. We suggest additional analysis to determine if the station construction cost could be decreased by reducing the size of the bus port and evaluating a design that changes the east-west bus circulation area above the platforms to a north-south busway extending from Seattle Street Connector to Malvern Street. This option could have a smaller footprint above the tracks and rail platforms and therefore lower the capital cost, while also facilitating north-south buses and shuttles to connect Kendall Square and Harvard Square from the north to Longwood Medical to the south, with a stop at West Station.

MAPC-8

More broadly, we realize that the question of whether and when to build a commuter rail stop at West Station is a serious issue, with strongly held views by MassDOT and the MBTA, the City of Boston, and community advocates. While MAPC generally supports additional transit stops, we recognize that this stop would be very close to other stops on the Worcester-Framingham Line, and could impact overall travel time on the line. We believe the question of whether and when to build the station should be determined based on additional transportation analysis and a consideration of potential land use scenarios in the area, which would help to determine the timing and level of transit demand, and help to decide on the design and configuration of the station. In the meantime, careful attention should be paid to ensure that the

MAPC-9

Multimodal Street Network and Transit Oriented Development

DEIR Section 5.8 summarizes a detailed vehicular level of service (LOS) for the AM and PM peak hour, with performance measure goals for vehicular LOS E at intersections. MAPC is concerned that the concepts shown in the DEIR are primarily five lane streets and intersections with 11- or 12-foot wide lanes in an area that is proposed to be transit-oriented development (TOD). The street design should follow nationally recognized Complete Street guidelines, as well as the City of Boston's Complete Street guide. This mean truly "urban streets" with fewer lanes, mid-block pedestrian crossings, and overall reduced lane widths.

MAPC is also very concerned that this peak-hour vehicular analysis has helped to create a project that is 14 lanes wide at the interchange, including 4-lane highway access ramps. As currently designed, the interchange will create a wide barrier and severe difficulty for pedestrians connecting between West Station, future TOD north of the interchange, and the existing Boston University campus and Allston neighborhoods to the south.

MAPC-10

There is no indication that an LOS or Quality of Service (QOS) analysis was performed for pedestrians, bicyclists, or transit riders in an area that is proposed to have 42 to 50 percent of trips using transit, walking, or cycling. As the Project moves into more detailed design, MAPC requests that MassDOT conduct a multimodal LOS/QOS analysis that will help to ensure that streets are not over-designed to accommodate primarily vehicular traffic for the morning and afternoon peak hours of the weekday. A multimodal LOS/QOS study should also consider good urban design, place-making, and level of service for transit and non-vehicular users, including ways to reduce the overall footprint of the streets and highway interchange in this area. There are multiple resources that can be referenced for a more holistic multimodal LOS/QOS, including the 2008 Multimodal Level of Service Analysis for Urban Streets (National Cooperative Highway Research Program Report 616), and the performance measures shown in 2013 Urban Street Design Guide (National Association of City Transportation Officials).

MAPC-11

MAPC is particularly concerned that the primary pedestrian and bicycle connection between West Station and the redeveloped Beacon Park Yard site requires pedestrians and cyclists to travel through two major intersections that are part of the I-90 eastbound interchange (Seattle Street Connector and Cattle Drive Connector). This is different from the westbound interchange, which is completely separated from any West Station pedestrian, bicycle, and transit traffic. MAPC requests that MassDOT consider other interchange and street network options that would separate the heavy vehicular eastbound interchange traffic from West Station. If an alternative interchange design is not feasible, then the design of these intersections will be very important to ensure they meet the necessary quality of service for all users, and support the TOD proposed for the area. This would include reducing the number of lanes, lane widths, and curb radii, while improving crosswalks and traffic signal phasing.

MAPC-12

Regional Land Use and Transportation Study

MAPC-13

At the present time, none of the major landowners in this area have adopted or proposed clearly defined and detailed plans for the size, density, and mix of land uses that could occur on the parcels they own. Furthermore, the automobile and transit trips that pass through the study area are both local and regional in nature, including trips to and from downtown Boston, Kendall Square and Harvard Square in Cambridge, and the Longwood Medical area bordering Boston and Brookline. The uncertainty about development, as well as the substantial amount of current and projected traffic in the study area, has led to a vigorous discussion on the type and timing of transportation infrastructure that should be considered. In order shed light on the proper level and timing of investments in roadway, transit, bicycle, and pedestrian infrastructure, public entities should conduct a separate land use and transportation study to determine the level of service that would be needed to accommodate transportation demand across various land use scenarios. The scenarios should span all reasonably likely combinations of development in the area, and

should take into account efforts to make jobs in Allston accessible to people who live in other parts of the region, while also enabling residents of Allston to access jobs elsewhere (also known as an "accessibility analysis"). The study should begin to identify a range of possible infrastructure improvements that might help to meet the demand identified across the various development scenarios, while also considering how denser scenarios involving higher levels of development might increase the overall value of the underlying land, yielding additional taxes for public entities and additional value for local property owners.

MAPC, as the regional land use, transportation, and environmental planning agency for Greater Boston, pursuant to Chapter 40B Section 24 of the Massachusetts General Laws, respectfully offers to facilitate this coordinated land use and transit study with the Cities of Boston and Cambridge and the Town of Brookline, and respectfully requests the involvement of MassDOT and the MBTA in this effort. We will make all reasonable efforts to include local property owners in the study, which will include a public engagement element. MAPC believes that this coordinated land use and transportation study will provide the proper forum for addressing broader regional development and transit issues, in a manner similar to the study currently underway by the Lower Mystic Regional Working Group that was established as part of the Wynn Everett Project (EEA Number 15060).

From: Marcy Pell

To: Strysky, Alexander (EEA); nwishinsky@brooklinema.gov; bfranco@brooklinema.gov; bgreene@brooklinema.gov;

<u>hhamilton@brooklinema.gov</u>; <u>nheller@brooklinema.gov</u>; <u>Diana Spiegel</u>

Subject: New I-90 Mass. Pike Interchange Project

Date: Friday, February 09, 2018 12:12:32 AM

Dear Mr. Strysky,

I am writing to express, in the strongest possible terms, my opposition to an I-90 project proposal that would allow an additional 15,000 to 20,000 cars per day across a new Malvern Street Bridge into North Brookline via Babcock, Pleasant and St. Paul Streets.

MMP-1

These streets are already traffic-choked at rush hours. Additional cars would only add to the congestion, contribute more pollutants into the air, and represent an increased safety hazard for our one thousand young children who walk to and from school and the many older resident pedestrians of our community.

Please reconsider this part of the I-90 project that would do serious harm to North Brookline.

Respectfully,

Marcy M. Pell 116 Pleasant Street, Unit 1 Brookline, MA 02446 From: marie elena saccoccio [mailto:saccocciom@yahoo.com]

Sent: Friday, February 09, 2018 4:51 PM

To: Strysky, Alexander (EEA) <Alexander.Strysky@MassMail.State.MA.US>

Cc: Cerbone, James (DOT) < James. Cerbone@dot.state.ma.us >; Sal.DiDomenico@masenate.gov; Connolly

Mike - Rep. (HOU) <mike.connolly@mahouse.gov>

Subject: I-90 Allston MEPA 15278

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

Dear Mr. Strysky:

Could you kindly enter this comment into the file of the above-referenced MEPA Case No. 15278. I just learned of the pending time frame and support the request of Henrietta Davis seeking further study and analysis. Specifically, I request that any anticipation of expansion of use of the Grand Junction in East Cambridge consider the close proximity of Millers River Apartments, consisting of 425 units exclusively for elderly and disabled, which actually shares the lot line of the building and rails. I also respectfully remind this agency of the close proximity of the St. Anthony Parish Church and Buildings, a breath away from the rails as well. This is one of the oldest Catholic parishes in Cambridge and a Portuguese Parish now serving the robust Brazilian community as well, with services throughout day and night. To be sure, any expansion of use of the Grand Junction within East Cambridge would be an immediate threat and obstacle to our elderly and disabled and families attending religious services.

MES-1

Logistically, expansion of Grand Junction in East Cambridge would have to cross Cambridge Street and Gore as well. The only pharmacy and supermarket walking distance within East Cambridge is situated across Gore Street, where the rails cross. We often see our seniors with supermarket carts crossing Cambridge and Gore Streets. I realize the pressure to link North Point with Kendall but this should never be off the backs of our disabled and elderly, our lifelong residents or those who seek to worship.

I am a lifelong resident and my family has owned and lived in East Cambridge for four generations. I was a child when Grand Junction was more active. Note, Millers River Apartments did not exist back then. St. Anthony's Church was in a small house far from its present location and the supermarket was not built until my adult years. Instead, there were small grocery stores throughout the neighborhood with five pharmacies within 5-blocks of Cambridge Street. In other words, the impact of a more active rail was not dramatic as it would be today.

Respectfully submitted,

Marie Elena Saccoccio, Esq.

55 Otis Street Cambridge, MA 02141 Tel. No. 617-864-8403

651 Green Street Cambridge, MA 02139 9 February, 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

re: DEIR I-90 Allston Interchange Project (EEA No. 15278)

Dear Secretary Beaton:

While disagreeing with specific points in former Cambridge Mayor Davis's letter to you dated 23 January, 2018, I join her in asking for further study and analysis before any final EIR. In transportation, everything is connected to everything else and a project's boundaries are not easy to define. Even so, it would be negligent to accept the DEIR's boundary at the Boston bank of the Charles River and omit analysis of the project's effects in Cambridge.

Here are a few:

- 1. Omitting the SFR westbound right-turn lane over the River Street bridge to Cambridge transfers that traffic to the proposed Allston street grid and so increases air pollution and travel times. It would also move westbound traffic from SFR to Memorial Drive via the Longfellow, Mass Ave, and BU Bridges. From my time on the Storrow Tunnel CAC, I know this has long been a goal of Boston Back Bay residents and business associations. DCR's work on Mem Drive is consistent with this goal. The DEIR seems to indicate that Harvard's and MA DOT's goals are also to move more cars to Cambridge.
- 2. Similarly, cars and trucks westbound from Cambridge are likely to stay on the north side of the river rather than navigate the Allston street grid to access the Pike. The DEIR does not consider this effect.
- 3. Noise from the project during construction and after, whatever option is chosen for the "throat," will be significant in Cambridge but is unaddressed. Federal noise standards for Interstate highways are minimal. They provide inadequate protection against the known damage to public health from noise pollution. A proper EIR will address the problem here and elsewhere. Increased noise from Memorial Drive from the proposed change to SFR at River Street is only one example.
- 4. If there is further study and analysis, any consideration of West Station before 2040 must include noise from West Station's possible connections, by whatever mode, through Cambridge. Noise is only one of the major environmental consequences of any such

connection through Cambridgeport, East Cambridge, and other neighborhoods to North Station. As an alternative to West Station before 2040, I suggest MA DOT take a close look at what the North-South Rail Link would do to connect a future West Station to North Station. (And I understand Barry Steinberg, board member of the Association for Public Transportation, has suggested a Green Line A, from Packards Corner to West Station, possibly beyond, for greater connectivity.)

MW-5

Thank you for considering these factors. I urge you to withhold final approval of the DEIR and, with Mayor Davis, ask for more study and analysis.

Yours sincerely,

Marilyn Wellons

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, <u>Joseph.Boncore@masenate.gov</u> Sen. Sal DiDomenico, Sal.DiDomenico@maSenate.gov Rep. Jay Livingstone, <u>Jay.Livingstone@mahouse.gov</u>





MEDICAL ACADEMIC AND SCIENTIFIC COMMUNITY ORGANIZATION, INC.

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Massachusetts Eye and Ear Infirmary

Merck Research Laboratories February 9, 2018

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

Re: Comments on the Draft Environmental Impact Report for the I-90 Allston Interchange Project (MEPA #15278)

Dear Secretary Beaton:

I am writing on behalf of the Longwood Medical and Academic Area (LMA) neighborhood of Boston in response to the I-90 Allston Interchange Project Draft Environmental Impact Report. The LMA, with its 57,000 jobs and consistent creation of over 700 new jobs annually for more than a decade, is a major economic force for not only the communities surrounding the interchange but also for the Commonwealth. The Medical Academic and Scientific Community Organization (MASCO) is a non-profit which serves 23 member organizations in the LMA. The LMA is the destination of over 112,000 patients, visitors, students, and employees each day.

We strongly support the construction of a new urban interchange instead of just repairing the existing I-90 viaduct at the Allston Interchange. As an appointed member of the Task Force we acknowledge and appreciate the time and effort that MassDOT staff has dedicated to inform the group about the pressing needs to rebuild the I-90 viaduct and address our questions about the scenarios being studied. Given its prominent location between Cambridge, Boston and Brookline, constructing a new I-90 Allston Interchange has the potential to transform the local urban landscape and strengthen the multi-modal transportation system for the region. Making the

choice simply to repair the highway viaduct and ramp system in its existing condition will rob this 135-acre area of its potential to be a catalyst for the regional economy.

Our comments are offered from the specific perspective of how the plans affect access to and from the LMA, and also from a broader civic perspective. Overall, we recommend, before selection of the final preferred 'throat variation' in the FEIR, that consistent information be provided on all variations to provide better comparability:

1. Life cycle costs should be included to improve consistency in cost-benefit analyses and improve comparability of options for selection of the final build alternatives.

MASCO-1

2. Additional context is needed for estimating construction phasing costs and impacts to allow for a full understanding of comparability between build options.

MASCO-2

3. Phasing of 3K-AMP should be adjusted to enable commuter rail system improvements in Phase 1 instead of Phase 2.

MASCO-3

4. A stronger commitment to transit is needed in Phase 1 of the project. We recommend early implementation of some rail and bus service at West Station based on an evaluation that:

MASCO-4

- A. Includes a plan for MBTA bus routes using a new Commonwealth Avenue bike/pedestrian and transit-only connection implemented in Phase 1.
- B. Evaluates alternatives for use of the Grand Junction Railroad (GJR) that include Bus Rapid Transit for improved crosstown transit service; current alternatives for GJR studied preclude the option of a convenient one-seat ride to the LMA.

C.

5. Include more information on the duration and potential travel impacts of the actual construction phasing for each variant studied and consider mitigation that potentially includes transit options studied in 4A-C.

MASCO-5

We expand on these issues below after describing benefits in the DEIR from the perspective of LMA access:

- The DEIR designs incorporate 2-way separated bike lanes along Cambridge St. South with an at-grade connection to the Paul Dudley White path which will provide a more direct, safer, lower-stress connection for employees, students, and visitors who wish to bicycle to the LMA from the neighborhoods of Allston located between the Massachusetts Turnpike and Charles River.
- Construction of the rail yard for storage and service of MBTA commuter rail trains within the interchange (during Phase 1 for 3K-HV and 3K-ABC or in Phase 2 for 3K-AMP) of the project will provide benefits to the entire commuter rail system by reducing congestion and overcrowding at South Station.

 While there are small speed differences through some segments in each of the "throat area" variations, all three designs allow for similar levels of commuter rail service on the Framingham/Worcester commuter line to Yawkey Station. This is because the station serves approximately 2,000 passenger trips per day, a doubling since the station was built, the majority of whom are traveling to the LMA from the west.

While we value these benefits we offer a number of suggestions and questions below that we believe should be addressed in the FEIR prior to selection of the final preferred build scenario from among the three throat area variations 3K-HV, 3K-AMP, and 3K-ABC.

1. Consistency in Cost Benefit Analyses Needed

The cost analyses provided in the DEIR do not provide an objective comparison among the three throat area variations because they do not account for the full life cycle costs of each. It is reasonable to expect that the costs to maintain the roadways, structures, and other physical elements of each variation would differ significantly throughout the facilities' 50+ year operational life. For example, the annual costs to maintain the highway viaduct structure in 3K-HV will likely be higher than those needed to maintain the highway when it is at-grade as in 3K-AMP and 3K-ABC. The FEIR should conduct additional study on the life cycle costs of each throat variation under review to make sure that consistent comparisons of the full financial burden have been made among the options being considered. It is also important to understand if the assets of the Grand Junction Railroad rebuilt or upgraded in variations 3K-AMP and 3K-ABC would also need to be constructed within the operational lifetime of the project, and therefore should be considered as a cost to the Commonwealth regardless of the throat area variation. With this information, the comparison between the final alternatives will be more objective.

2. Additional Context Needed for the Construction Phasing, Costs and Impacts

Similarly, for each throat area variation the DEIR draws a series of firm conclusions related to the closures of the Grand Junction Railroad and Paul Dudley White pathway based on only one set of construction plans for each throat variation and without providing analysis on the basis for the conclusions. This is important because the construction phasing for each alternative could be structured a number of different ways that allow for a different balance between trade-offs such as construction cost, impacts on travel, etc. It is difficult to feel confident in the DEIR's conclusions related to the construction phasing without some discussion of options considered, especially when it is likely that the design-build contractor will have the flexibility to propose alternative phasing and closure schedules based on their own desired risk management profile. A more comprehensive discussion and allowance for this flexibility in the construction phasing and alternatives would allow for a more realistic understanding of the timelines presented in the DEIR and how serious the potential impacts will be.

3. Phasing of 3K-AMP Should Be Adjusted

As presented in the DEIR, phase 1 of throat area variation 3K-AMP does not meet the demonstrated need for midday storage of MBTA commuter rail trains. In the FEIR we

request that MassDOT shift construction of the four new layover tracks and associated switches and yard ladders currently included in phase 2 of this variation to the initial phase, so that the benefits to the commuter rail system are more consistent across the first phase of all of the throat area options.

4. Stronger Commitment to Transit Needed in Phase 1

We applaud Harvard University's recent commitment to fund \$58 million of West Station's construction costs. While we understand MassDOT's current funding limitations as well as some of the uncertainties about the planning and timelines for land and station development in the vicinity, by others, we believe that the potential benefits and presence of a cooperative partner should enable the Commonwealth to make more ambitious assumptions about the transit services that could be supported by this project.

This project is located at one of the key transportation gateways from the west into the region's urban core and it is important that the FEIR fully consider how the transportation infrastructure built as part of this project will help lay the foundation for future travel patterns and preferences. We appreciate that MassDOT evaluated several transit-related elements as part of the DEIR, including options for the layout of West Station and potential transit-only roadway connections to Commonwealth Avenue. However, with its focus only on commuter rail service and shuttle services the evaluation included in the DEIR provides only a limited picture of the role that public transit services could play in the street and rail network surrounding West Station. It does not take the opportunity to consider new or altered MBTA bus routes that could use the new roadway network to provide better crosstown connections and more reliable transit travel. Defining a more robust transit system for the project area could potentially lead to stronger benefits in constructing and operating West Station in the first phase of the project and the inclusion of other transit-supportive elements into the project scope.

We offer three suggestions that we believe should be incorporated in the I-90 Allston Interchange FEIR to better define the potential transit-related elements of this multi-modal facility.

A. <u>Create a Plan for MBTA Bus Routes Using a new Commonwealth Avenue</u> Bike/Pedestrian/Transit-Only Connection

A bike/pedestrian connection was studied and recommended in the DEIR. In the FEIR a transit connection between the proposed interchange roadways and Commonwealth Avenue should be evaluated as a way to provide greater flexibility for MBTA and City planners to add crosstown bus service through the project area to better meet the surrounding neighborhood's mobility needs and support the more direct transit service that will be needed to support the area's future development. The value of this type of transit service is shown in the DEIR's daily transit ridership projections which show that demand for just a small scale shuttle between West Station and the Longwood Area attracts over 3,000 daily boardings.

In considering a direct transit connection across Cambridge Street, through the interchange and West Station to Commonwealth Avenue, MASCO completed a screening study of gateways and services to the LMA that might benefit from it. Using the current transit connections as the baseline, the study compared travel times between the LMA and Central Square, Harvard Square, and Watertown Square. The study found:

- A new Watertown Square bus route following portions of MBTA Route 70
 along Arsenal Street and Western Avenue through West Station to the LMA
 would provide substantially faster end-to-end travel times to the LMA
 compared with existing service on MBTA Bus Route 57.
- A Harvard Square bus to the LMA, following segments of MBTA Route 66
 routed through West Station would offer similar travel times to existing
 services between Harvard Square and the LMA. Travel time savings would
 be limited by current and expected future traffic congestion between Harvard
 Square and Western Avenue.
- A Central Square bus to the LMA via West Station would be slower and less direct than current routings that use the BU Bridge to cross the Charles River.

This suggests that, in the existing conditions a transit connection to Commonwealth Avenue would be useful, even before considering future development being planned for the interchange area. We agree that the Southbound Bus Route Variant #1 (Malvern Street southbound, to Gardner Street eastbound to Babcock Street southbound to Commonwealth Avenue eastbound) is the least disruptive in the existing conditions. Given the potential mobility benefits, a Malvern St. transit connection to Commonwealth Avenue would ideally be constructed as part of Phase 1 for the project, even if West Station is not yet fully operational. We do however note that other variants identified in the DEIR which bypass congestion on Commonwealth Ave. would provide stronger incentives for the use of transit between Allston and the LMA and hope that future discussions can continue, outside of this process, to keep open additional options as land use and transportation patterns change in that area.

B. Evaluate Alternatives for use of the Grand Junction Railroad (GJR) for improved crosstown transit service

Currently the GJR is used for railroad freight trains and non-revenue moves for Amtrak and MBTA trains to and from maintenance yards. The DEIR takes the position that its nominal plans for West Station do not preclude the implementation of any option for use of the GJR. However, that is not actually the case.

All detailed West Station plans presented in the DEIR and to the Task Force have focused solely on the GJR's use as a possible new rail connection between West

Station and Kendall Square primarily as a way to save time for passengers on the Framingham/Worcester commuter rail line destined for Kendall. On the other hand, in the DEIR documents for Urban Ring crosstown services the GJR right-of-way was shown to be a cost effective route for Bus Rapid Transit as a dedicated busway shared with rail operations to ease existing extremely constrained conditions that result from the limited number of crossings over the Charles River. The current ramp and street designs presented in the I-90 Allston Interchange DEIR make no physical provisions for convenient access for through buses between the GJR platforms at West Station and the circulating roadway network above, effectively making BRT a less feasible and convenient option for future consideration. From the perspective of improving access to the LMA, a BRT through route is the only option for a one-seat ride on the GJR from Kendall and other points north of the Charles River to the LMA. Any rail option from Kendall will require transfers, which will impact travel time and ridership.

To maintain flexibility of options in an area where so much development and infrastructure is not yet in place, we suggest that an analysis of use of the GJR for bus rapid transit be included for comparison with potential rail options (e.g. commuter rail, and DMU rapid rail) in all scenarios so as not to preclude critical connections that may be needed now or in the future. MassDOT's plans should be detailed enough to yield plans that will inform requirements, design, and implementation timing for the new intermodal hub. The cost implications as well as benefits and impacts should also be addressed so that alternatives evaluated provide comparable factual information from which decisions can be made.

We have not yet seen any analysis of the feasibility, benefits and costs or the potential service implications of new Kendall commuter rail or DMU rapid rail services to West Station. Due to the LMA's reliance on transit services from the west exclusively via the Worcester Main Line Commuter rail at Yawkey Station and the Green Line D Branch, we would be keenly interested in service planning and implications of all of these alternatives.

C. Explore possible Intercity and regional bus connections at West Station

As a transit hub located astride an interstate highway ramp, regional and intercity bus services could substantially expand the multi-modal options at West Station. With the proposed density of development, planned pedestrian and bicycle infrastructure, potential new bus services and nearby public transit, longer distance bus carriers and travelers may find West Station as an attractive "easy-on/easy-off" transfer to major universities, and other institutional and neighborhood destinations near West Station (e.g. Harvard University, Harvard Square, Boston University, Kenmore Square, and the LMA). Any transit study in the FEIR should examine options to encourage intercity coach bus services to add a stop at West Station given its proximity to the I-90 exit.

5. Provide additional information on construction phase travel impacts of each variant and consider applying transit as a mitigation measure.

The FEIR should also include more information on the duration and potential travel impacts of the actual construction phase for each throat area variation evaluated. As an area that attracts 112,000 patients, students, visitors and employees daily, the implications for the LMA's access by commuter rail, public transit and the Massachusetts Turnpike (I-90) need to be identified. In fact some of the transit options recommended for additional study might be useful mitigation measures for any travel impacts.

In closing thank you for the significant effort that MassDOT has put into the preparation of the DEIR. We appreciate your consideration of our comments as you go into the development of the FEIR. We look forward to a continued role in this project. If you have any questions, please contact me at (617) 632-2775.

Sincerely,

Marilyn Swartz-Lloyd, President and CEO

cc: MASCO Board of Directors

Stephanie Pollack, Secretary, MassDOT

Michael O'Dowd, Project Manager, MassDOT

James Cerbone, Environmental Services, MassDOT

Manlyn Swart- Lloyd

Chris Osgood, Chief of Streets, City of Boston

Gina Fiandaca, Boston Transportation Department

Brian P. Golden, Director, Boston Planning and Development Agency

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

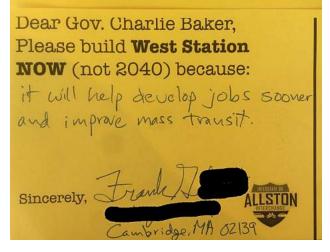
Secretary Beaton,

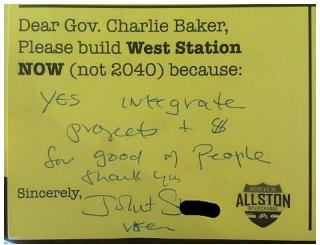
Over the past month, several members of the MassDOT I-90 Allston Task Force and other concerned citizens went door-to-door in our communities and held a series of events to educate and inform people about this project. One result of this outreach was several dozen people writing their support on the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

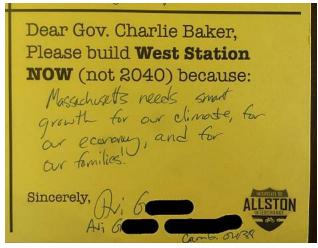
We hope this outpouring of support for the construction of West Station at the start of the project, improving bus TF-1 service, and making a safer neighborhood for walking and biking will be noted as you prepare your reply to the MassDOT DEIR.

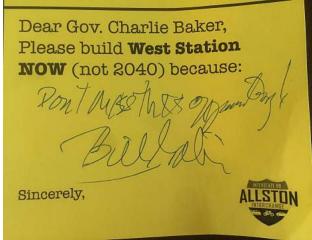
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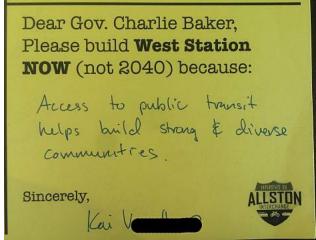
I-90 Allston Task Force members & Allston residents Harry Mattison, Galen Mook, and Emma Walters

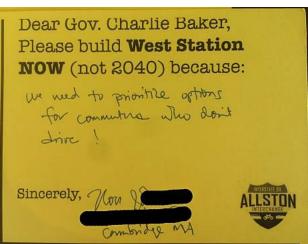








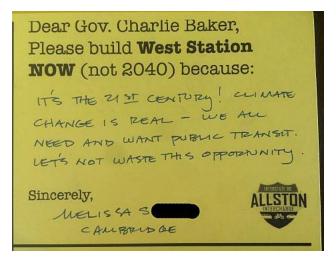


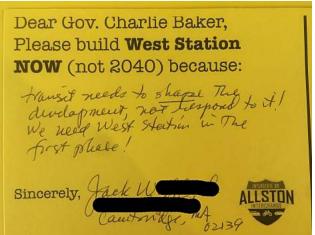


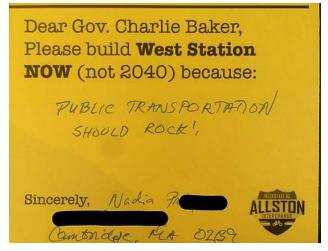
Dear Gov. Charlie Baker,
Please build West Station
NOW (not 2040) because:

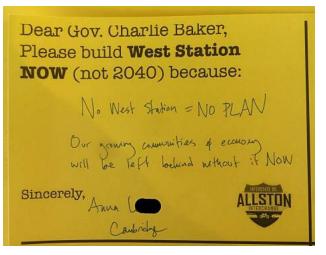
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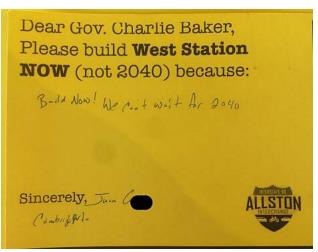
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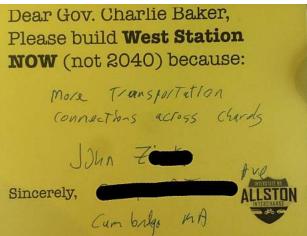


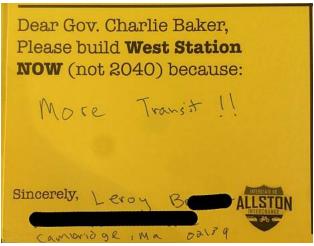


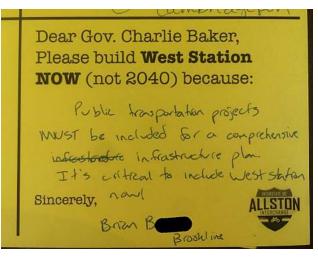












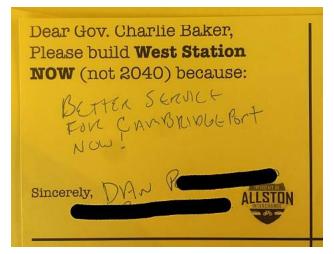
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NOW (not 2040) because:

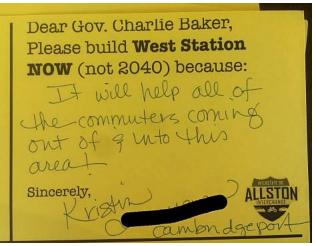
It's so obvious that this
Needs to be part of the first
Phase, not deferred.

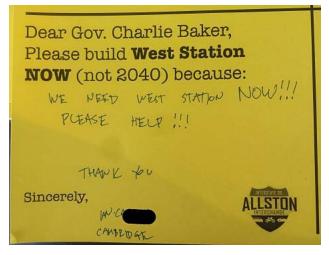
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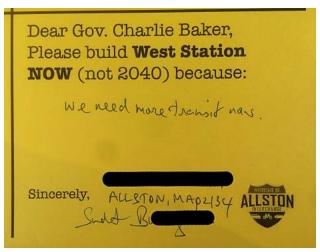
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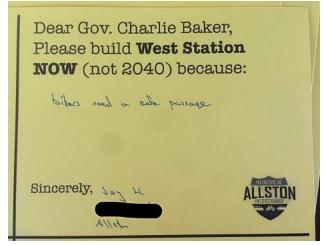
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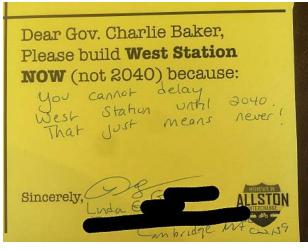


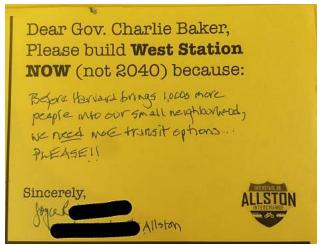


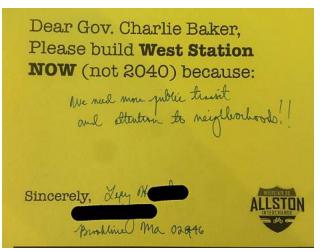


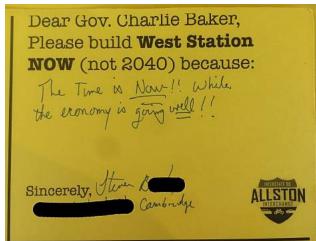


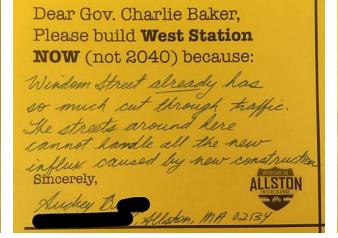


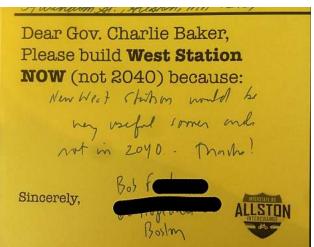


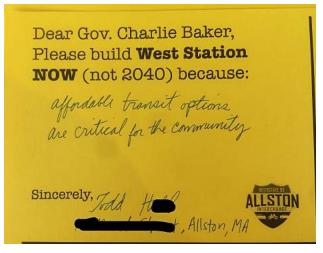


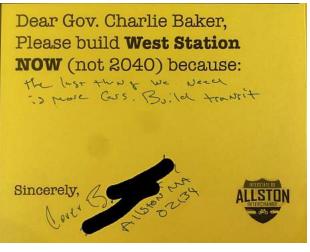


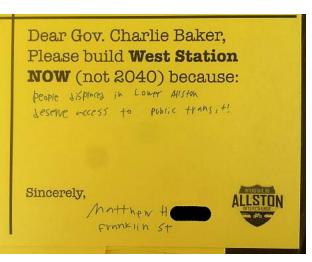


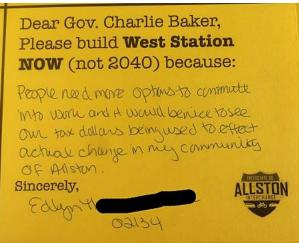


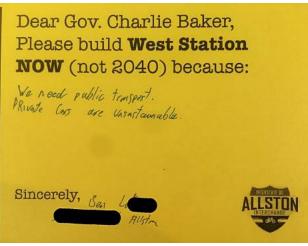


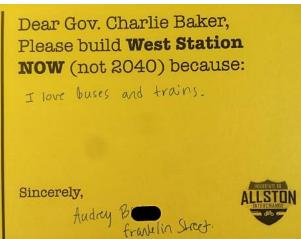


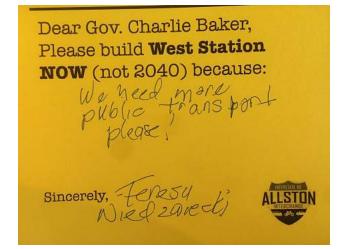


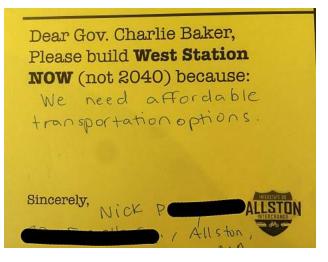


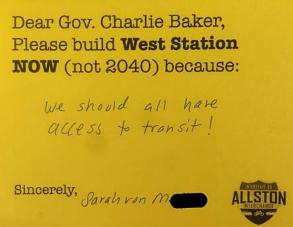


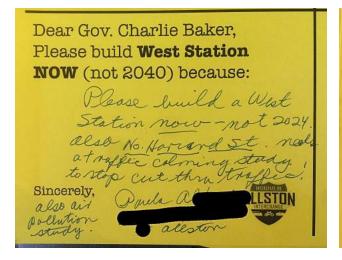


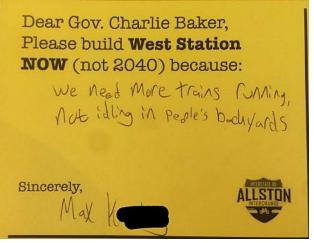


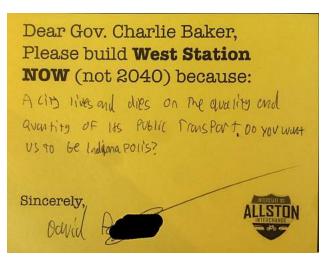


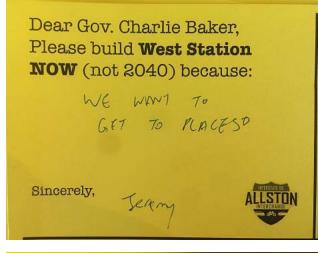


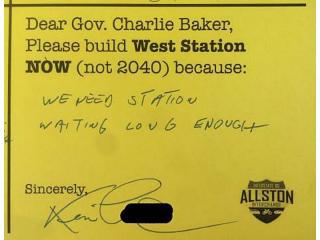


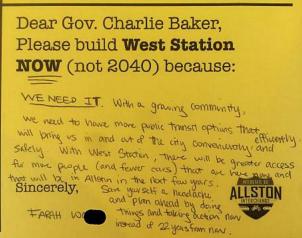


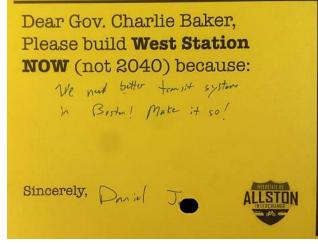


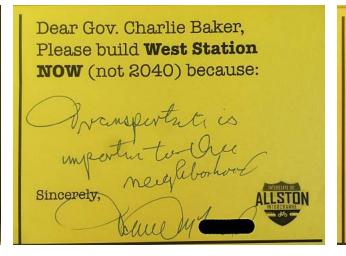


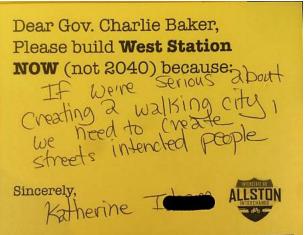


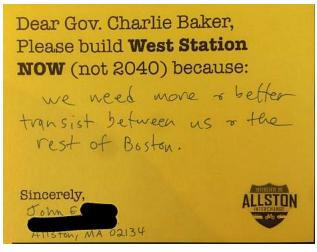


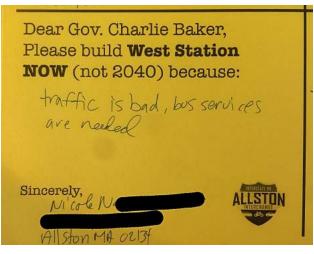


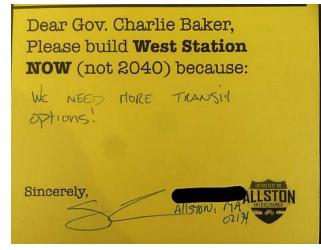


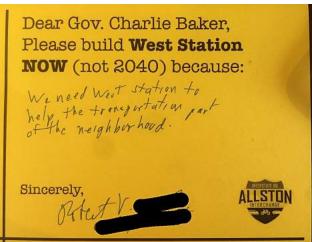


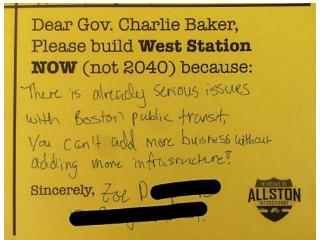


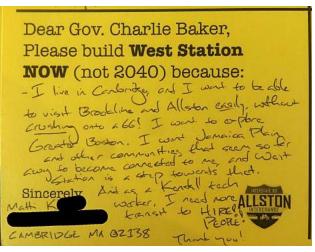


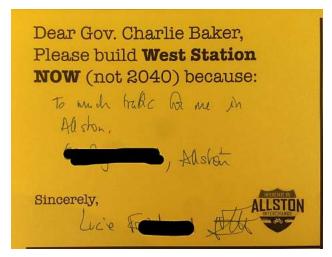


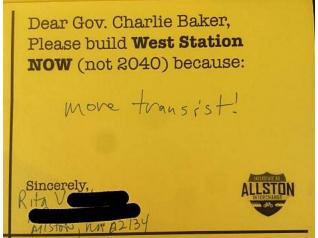


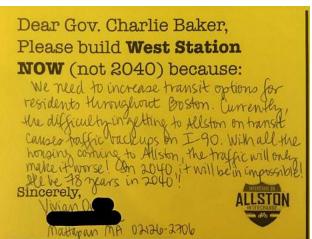


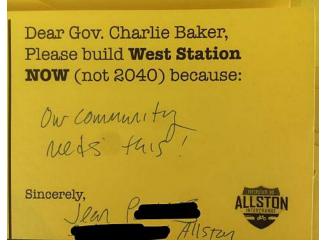


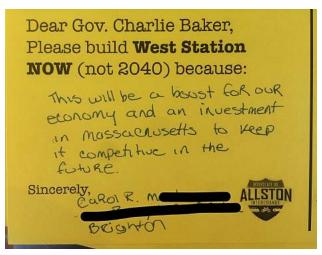


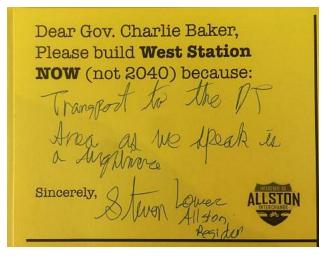


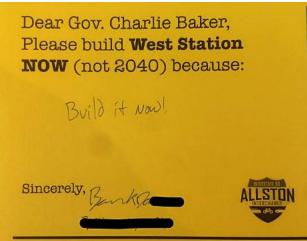


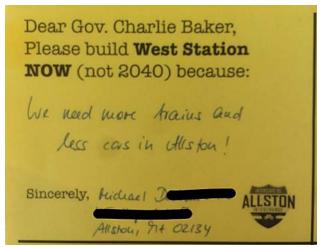


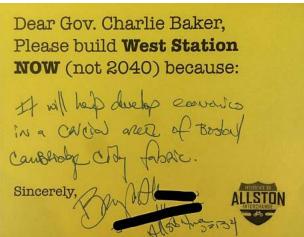






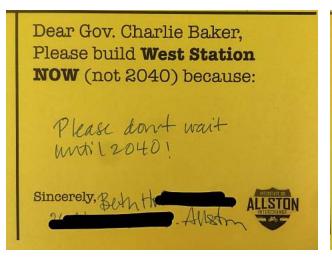


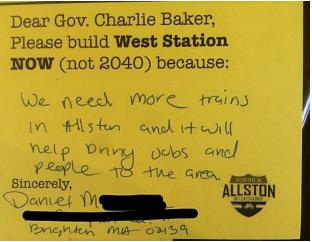


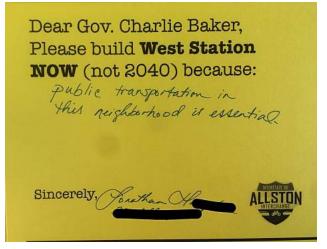


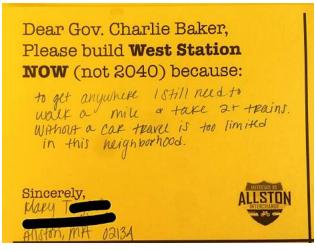
Dear Gov. Charlie Baker,
Please build West Station
NOW (not 2040) because:
Allston is seeing a lot of New development and we need public transportation to keep up with it. PLEASE SEE THE BENEFIT IN MAKING BOSTON A WORLD-CLASS CITY! We all know public transportation improves equality + Safety + Health.
Sincerely,
Hazel R

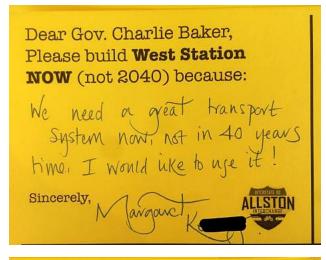
Allston MA 02134

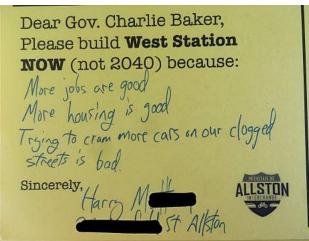


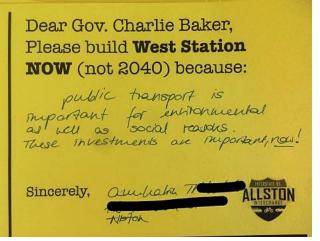


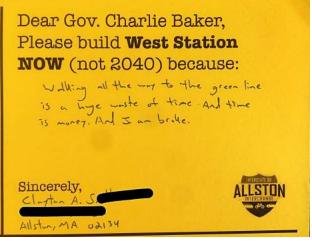


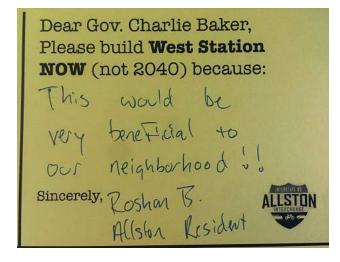


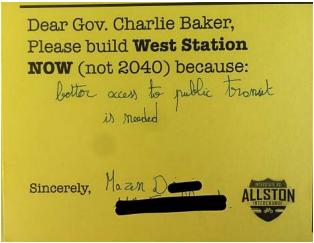


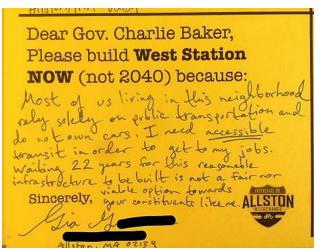


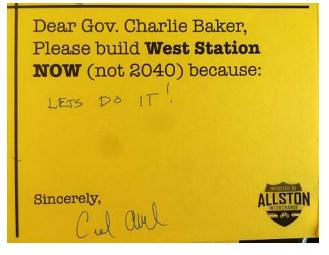


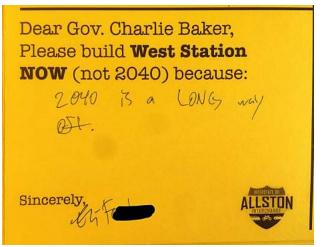


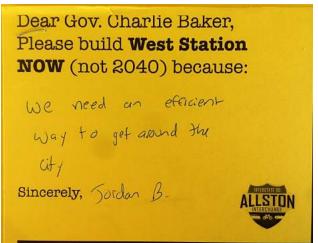


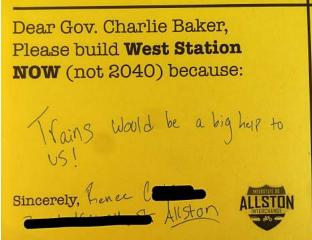


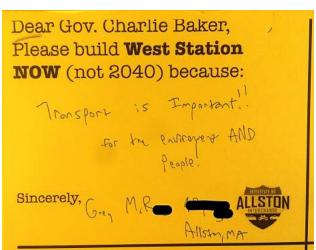


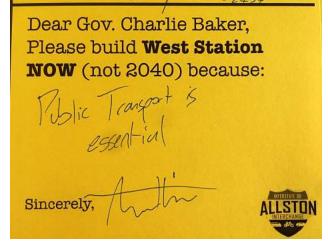


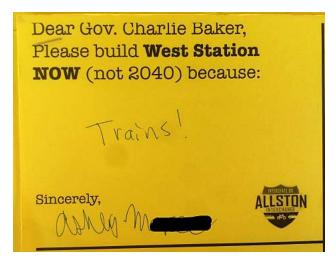


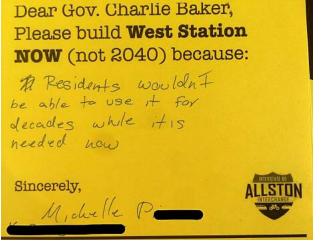


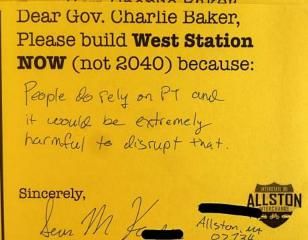


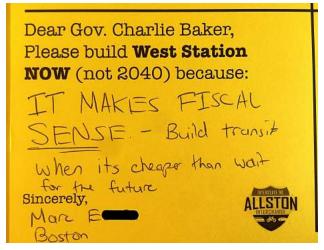


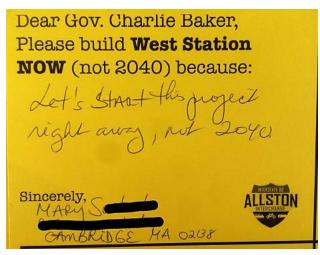


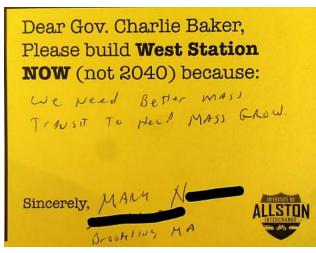


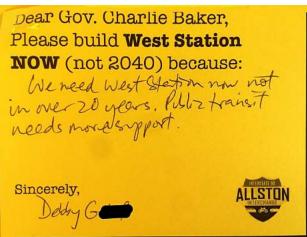


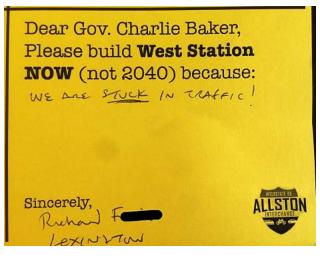


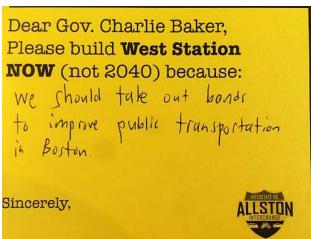


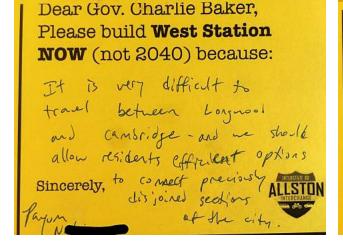


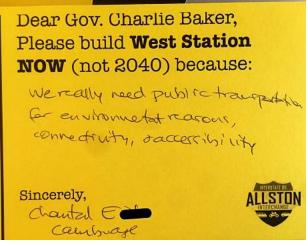


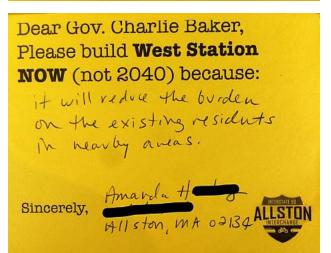


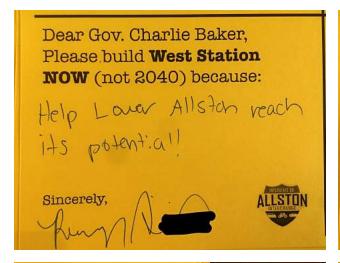


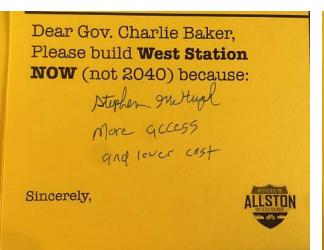


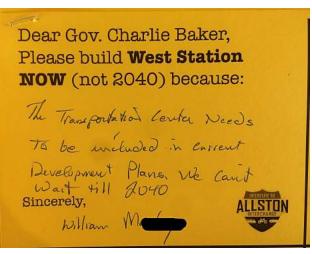


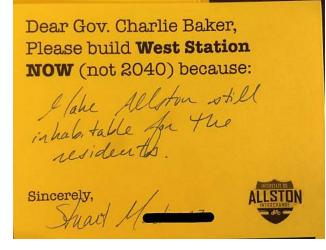


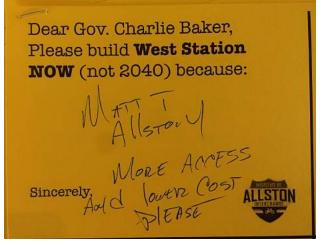


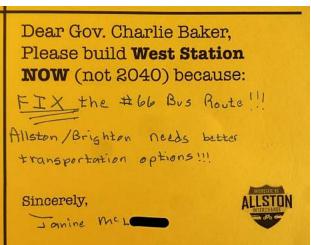


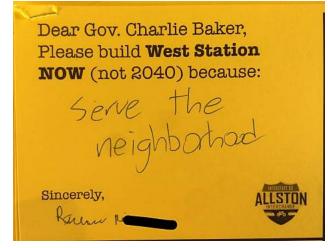


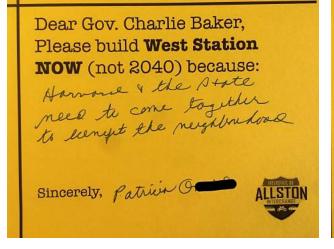


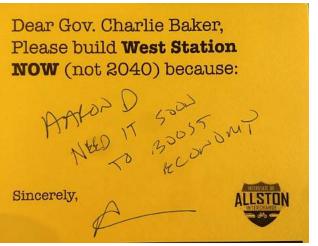


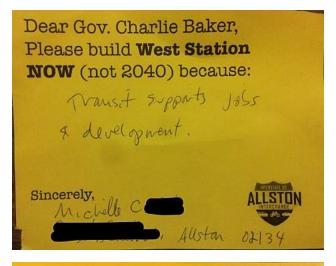


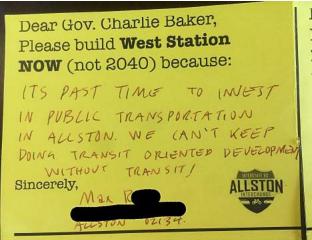


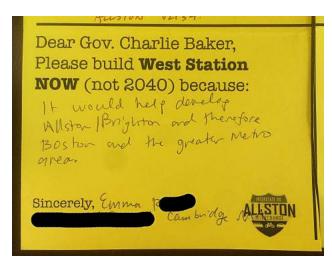


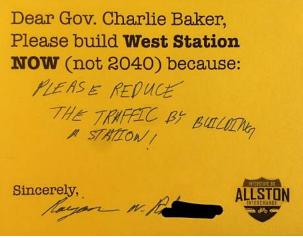


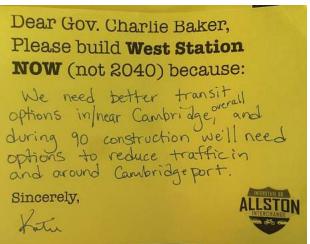


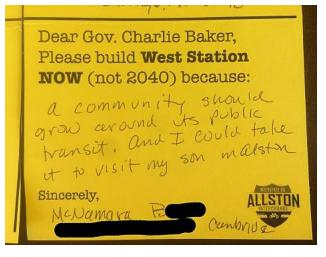


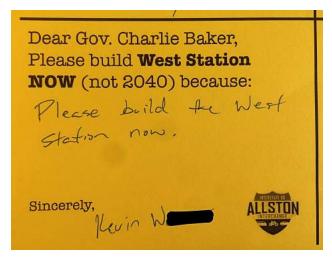


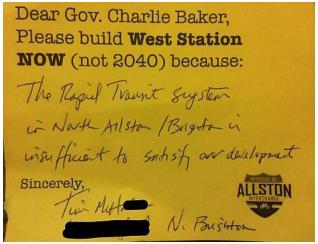


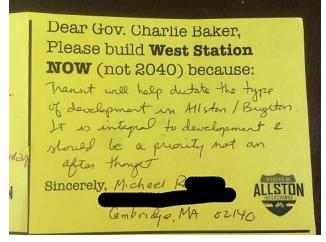


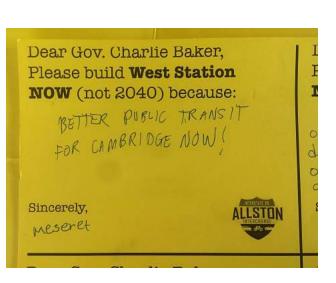












143 Pleasant Street, 2C Cambridge, MA 02139 February 9, 2018

Matthew Beaton, Secretary of Energy and Environmental Affairs

Executive Office of Energy and Environmental Affairs

RECEIVED

Attn: MEPA Office

FEB 1 2 2018

Alex Strysky, EEA, No. 15278

MEPA

100 Cambridge Street, Suite 900

Boston, MA 02114

Dear Secretary Beaton:

I live in Cambridgeport and have a number of concerns about the plans for the I-90 redevelopment project across the Charles. Briefly, I am dismayed to see that the creation of the much-needed West Station has been pushed off to the distant future when it would so clearly be useful more immediately. I am a supporter of the Magazine Beach revitalization and would love to see comparable parkland created along the river to the south. The best possible noise mitigation should also be installed there during the years-long construction project and after its completion. Finally, as an avid cyclist and walker, I am all in favor of the proposed underpass at the River Street Bridge.

MSM-1

MSM-2

MSM-3

Sincerely yours,

Merissa Smith

Melissa Smith

cc: James Cerbone, MassDOT Highway Division, Environmental Services Section

Representative Jay Livingstone

Senator Joseph Boncore