

<p>James Cerbone Noise Program Manager Phone: (857) 368-8792 E-mail: James.Cerbone@state.ma.us</p> <p>Nathaniel Curtis, Howard/Stein-Hudson, Public Involvement Specialist Tel: (617)482-7080 x236 Email: ncabral-curtis@hshassoc.com</p> <p>Patricia Leavenworth, PE, MassDOT, Chief Engineer 10 Park Plaza, Boston, MA, 02116 Attn: Bridge Project Management – Project File No. 606475</p> <p>Robert J. La Trémouille Post Office Box 391412 Cambridge, MA 02139-0015 617-283-7649</p>	<p>Alex Stryssky</p> <hr/> <p>Mr. Steve Woelfel South Station Expansion Project Manager Deputy Director, MassDOT Office of Transportation Planning Email: steve.woelfel@state.ma.us</p> <p>Catherine Zusy Cambridgeport Neighborhood cathzusy@gmail.com</p>
---	---

**Submission on Draft Environmental Impact Report (DEIR)
MassDOT I-90 Allston Interchange Improvements Project:**

Lodged 9 February 2018
Dr Robin Pope 575 Memorial Drive, Cambridge MA 02139

RP-1 through RP-6

The project fails environmentally as it denies climate change and accentuates the failing health of the US by continuing excess passenger usage that through ozone, particulate matter, traffic accidents and deaths, inhibition of walking and bicycling, lack of nature, ugliness, noise pollution, and isolationism compared to use of public transport for distance travel.

“Life expectancy in the US has fallen for the second year in a row. Many factors contribute to the health disadvantage; for example, Americans are more likely to engage in unhealthy behaviors (such as heavy caloric intake, drug abuse, and firearm ownership), live in cities designed for cars rather than pedestrians or cyclists, have weaker social welfare supports”*

The project should add up the costs of the turnpike as it has operated on the above matters that are owed to the public, that properly accounted for, will amount to more than a \$billion and use these funds for transit over the Charles river to Kendall Square and Harvard Square, plus a tram instead of cars over the BU bridge and up Brookline street to Cambridge. There should be additional funds furnished by Boston University that has desecrated health by its high rise buildings where there should be nature on that segment by the Project, and by Harvard and MIT for their commercial developments.

Any continuation of the turnpike in this area must be underground and of only two lanes in each direction through the methods delineated in my may submission that is attached to this. Note that the current project’s unconscionable noise continuation damaging health and productivity also has a justice element as per James Williamson’s contribution to the 3 January Morse School discussion, at which Brad Bellows pointed to the need for the pike underground in this section and Robert La Trémouille has identified a green tram line extension needed from commonwealth Avenue to Harvard Square.

Attached as part of this submission her May 2017 submission.

* Woolf, Stephen and Lauden Aron, ‘Failing health of the United States’, British Medical Journal, 7 February 2018, p360, abbreviated. <http://www.bmj.com/content/360/bmj.k496>

Submission on I-90 Allston Interchange Project and South Station Expansion

*within an Environmentally Responsible Plan for inside route 128**
to help conform to

THE MASSACHUSETTS HEALTHY TRANSPORTATION COMPACT

by

Dr Robin Pope

575 Memorial Drive, Cambridge MA 02139

May 26, 2017

MassDot

Nathaniel Curtis,

Howard/Stein-Hudson, Public Involvement Specialist

Tel: (617)482-7080 x236

Email: ncabral-curtis@hshassoc.com

Patricia Leavenworth,

PE, MassDOT, Chief Engineer

10 Park Plaza, Boston, MA, 02116

Attn: Bridge Project Management – Project File No. 606475

Stephanie Pollack

Secretary & Chief Executive Officer of the Department of Transportation

stephanie.pollack@state.ma.us

Mr. Steve Woelfel

South Station Expansion Project Manager

Deputy Director, MassDOT Office of Transportation Planning

Email: steve.woelfel@state.ma.us

Dear Nathaniel, Patricia, Stephanie, and Steve, and through you four, MassDot

I appreciate your concern and openness in holding public meetings, and attending those held by others, and feel your concern and your courtesy, including to myself. This state, this country, and the planet are at a cross road. You are in a pivotal position in whether the right path goes forward. The below is to assist in its being taken, in placing before you the wider matters in your stewardship of how people travel and live.

It points you also to some funding issues for non-profits such as universities house for profit professors earning consulting fees, and benefitting from what you provide to them. These have obligations to aid you in your Massachusetts Healthy Transportation Compact, not play the devil, adding to bad health and non-sustainability.

I ask that you pass my submission on to the governor and the legislature, as well as acting on it yourselves.

Background: Through excess use of vehicles, especially 1-person cars, Massachusetts residents: die sooner, suffer unnecessary mental and physical illness through traffic accidents, traffic pollution and immobility transiting driving alone unable to be conscious of nature or enjoying company. Insufficiently physically and socially challenged, they are less happy, produce less efficiently produce; create an anti-social, polarized society; and contribute to climate damage.

To be in conformity with the Massachusetts Healthy Transportation Compact, MassDot's plans for the I-90 Allston Interchange Project need to assist in having in all societal strata, far fewer travelers to work and

* its seaward side with a south boundary added

events in cars. US society's troubles and those of planet earth need a revolution with immediate benefits, from MassDot taking the initiative have many walking running or cycling, and nearly all the remainder moving by public transport.

People cannot make the changes to this by themselves, much as many want it ardently. It needs coo-ordination, with you Mass Dot, a natural lead coordinator

Methods I advise including the following. Many but not all are directly in your jurisdiction, hence my request that you pass my submission on to the governor and the Legislature as the three of you combined can make the package more effective. If, however, you are limited to those only in your direction jurisdiction, that too can help much in your fulfilling the Massachusetts Healthy Transportation Compact.

- a) Impose heavy penalties on institutions –including non-profits like universities, who fail to decentralize having enough space in their current buildings for a proportion of workers to live on site. Require the conversion of much current parking space to bike storage, showers for those running or cycling to the office, residential accommodation, and where open to the air, into green space.

This means turning roughly half of each office block into residential, and exporting outside the 128 route, half their office space. This will be relatively simple since many commute in from outside that band who have unused rooms in their houses they would gladly convert to office use, with some from nearby joining them, and only going downtown one or two days a week.

- b) Use a number-plate allocation and other rules reduce vehicular traffic to about a quarter to cut congestion, time waste despite the big reduction in road space from

Allow cars only inside the 128 route 1-day a week, eg car plates A-E Monday, F-G Tuesday etc; with rules for other forms of private vehicles also. Less than a month would be needed with the internet for cities to set up sites for commuters to find others living close enough for work or special events inside the 128. Comparable limits on access days can be imposed by number plate on cars from other states.

- c) Get vehicles with more passengers Impose penalties that rise steeply with the value of the car for infringements so that police make a profit for the state in a simple way, car values being simple to ascertain. Put a big surcharge on use of taxis, Ubers etc that goes to subsidize public transport. Put a penalty on cars carrying less than four people inside 128, of if containing a handicapped person where one car seat goes for a wheel chair, less than three persons. Require all buses, shuttles for the handicapped, hotels, universities to be willing to pick up passengers when they have spare seats at specified points to avoid the current environmental waste of these being often half empty.

- d) End vehicular traffic entirely alongside the Charles Basin/River ie on what in the basin is Storow and Memorial Drive and their extensions in each direction.

RP-7

All properties are accessible by other roads so this is not necessary: even the row boat houses have roads at right angles to the river very close for carrying in by hand boats. Measure b) ensures that despite these closed roads, are travelers will get to and from venues faster than at present. On each side should be a tram line on the current vehicle track farthest from the river, then two bicycle tracks and the lane closest to the river on each side converted to nature to enable a more adequate nature area on each side and with more variety in its content than at present.

The river and basin should be cleaned for swimming, above all as global climate change accelerates, more urban wild areas created, and the white geese given the access now removed both east and west of their nesting area.

The changes should not be made under the Department of Recreation and Conservation since it authorized wanton destruction of 150 mature trees, east of the Boston University boathouse, and have

permitted contractors to generate atrocious erosion and put in paths so shoddily surveyed that they are more under water then the prior ones, and done plantings unsuitable for wildlife and people.

It is a disgrace of wider Boston that the sacred river stretch is desecrated with vehicles pouring pollution on those using the stingily narrow stretch on each side. Boston and Cambridge have far more wealth to create here something comparable to New York City's Central Park than had that city at the time it invested in its park.

e) The MassTurnpike I-90 should be cut from 4 to 2 lanes in each direction inside the 128 route. With measure b) this will have faster flow than the current 4 lanes. The halved width should be with a full above ground tunnel encasement in the area where it is above the rail west from the BU bridge. In the recommendations f) to j) it can go rapidly back onto ground level after the planned new west station.

RP-8

g) Vehicular traffic should cease on the BU bridge and Brookline: the former tram of the 1920s should be reinstated up to Massachusetts avenue.

h) A green/red connector as in general suggestion of Robert La Trémouille, should go from the river side of west station through Harvard property to the red line, built entirely at Harvard's expense, it being a mini-city within greater Boston and with obligations to be far more environmentally responsible than hitherto, having set up institutions that worsen pollution and climate change by having so many vehicular commuters. There should be a plan that it hospital complex is limited to reduce travel, and that over 90% of those as patients and employees come on foot, bike or by public transport. The plan should be a smaller hospital complex than its current one, allowing not only for pollution but the evidence of the US being so over medicalized that medical errors are the third leading cause of death in the US.

i) West station should be at where Harry Agganis Way takes a left bend toward Parking Lot C-1 (that should be pre-empted from Boston University for the station. Universities need to be environmentally responsible and greatly reduce their parking lots like all other for and not-for-profit organizations. West Station itself should be paid for by a mix of Boston University and Harvard University, being two major beneficiaries of it.

j) A green line extension should run to West Station from Commonwealth Avenue along Harry Agganis Way. It is very bad planning to have West Station without access to the green line. Placement of that station as in i) does this and gives ready public transport to the Boston University playing fields obviating the need for parking lots by it. This short green line extension should be paid for by Boston University. It may be feasible to have it a driverless tram that goes back and forth every few minutes on this short stretch.

k) A small station (for which there is room) at the junction of the commuter rail and Commonwealth Avenue at the Boston University bridge to connect with the tram spur extension of g) above, as also to give an alternative connection to the green line for rail commuters without needing to go along Harry Agganis Way

l) The reduction of I-90 to 2 lanes each way furnishes a width of 4 lanes of extra green space on the Boston side of the Charles that should be used entirely for nature with care to expand – not damage – the distinct nature present in this area now. Part of it should be to introduce more urban wild. The river bank on both sides is boringly sanitized and with inadequate wildlife.

RP-9

m) Grand junction could take a single commuter car from west station across the river, by hooking an extra engine on each of its ends and offload and upload these at a small platform by either Fort Washington

or Pacific Street, for which there is ample room in both spots, and that will primarily serve MIT rental property and MIT students and employees located nearby that are in a tram public transport vacuum, and one that would not be filled fully by n). The one-car train can reverse before Massachusetts Avenue, by its having an engine on both ends. It therefore would not generate the problems of more trains, and trains in peak hour crossing Massachusetts Avenue. The number of such one-car trains should be limited to at most two mornings and two evening to keep adequate quiet for the white geese, and for Cambridgeans and Bostonians who much appreciate having that wee nook between the Boston University Boathouse and the Boston University bridge to experience being in an urban wild.

- n) A green/red connector from Yawkey station to Kendall Square paid for by MIT since its people will be the main beneficiaries
- o) Arrange a retraction by MIT (its 2014 report on this path), the Cambridge City Council (its 2006 project on this path) and former Mayor Davis of plans for an alleged bike path along Grand Junction. The plan is spurious, a disgrace for any to propose. It has stunt rider bike skills plus required of the bikers in the urban wild bit. The entire remainder wastefully duplicates a much superior bike path along Vasser Street. I would endorse fining personally MIT, Davis and each member of the Cambridge City Council to jointly pay the planned \$3million plus cost. The alleged bike path plan on the rail track is absurd. It is essentially only explainable as a plan to bring cars off the turnpike along this route after it is essentially wrecked for rail under a pretense it would help bikers. The cars along Grand Junction, combined with the needed fence, would devastate the white geese, and severely deplete the valuable forms of nature growing by the rail track and in the urban wild between the Boston University boathouse and bridge. I ask MassDot to get the retraction, and take special measures that MIT in its opportunity in Kendall Square redevelopment, be required to ensure that it occurs in conjunction with a halving of cars coming there, with explicit repudiation of cars ever on the Grand Junction rail track (much of whose borders it owns.) I refer you on grand Junction also to the letter that Robert La Trémouille has drafted to one of you, Stephanie Pollack. La Trémouille has been earnest and energetic in his public duty to alert on where projects damage wildlife and human communities.
- p) Require businesses and institutions to furnish all employees earning below the median wage free public transport from their homes to the employment place to ensure that the needed reductions in vehicular use do not fall on the less well-to-do. But seaward of route I28 and on a southern bound, make all public transport free. The State of Massachusetts will have considerable savings from the halved turnpike width in the area, in maintenance, in police required, and in health costs. Its fines and taxi surcharges under c) will also yield revenue to assist in furnishing free public transport in this area.
- q) Raise revenues from higher charges for car licenses and car parking to cover a massive increase in public transport, explaining to people how they are damaging their own mental and physical health, social and natural environment as well as generating more global warming by over-driving.

I wish you well in the splendid opportunity you have through implementing proposals such as the above to take steps toward the Massachusetts Healthy Transportation Compact that can make this state a beacon of health and happiness taken up by other states, and whole nations.

I have many more suggestions, and details on each of the above, and on how to impart the healthy vision. Feel free to phone or email me.

May greetings

Dr Robin Pope, Email robin.el.pope@gmail.com, Mobile: +1-929-365-3345

From: Sam Wertheimer <samwerth@gmail.com>
Sent: Friday, February 9, 2018 12:15 PM
To: Strysky, Alexander (EEA)
Cc: projects@livablestreets.info; comments@walkboston.org
Subject: I-90 Alston DEIR Comments, EEA # 15278

Dear Mr. Strysky:

I am a homeowner with a condo near Kenmore Square and I work for a healthcare technology startup headquartered near the Prudential Center. My wife - who also works in Back Bay - and I are expecting our first child in April and we love walking our dog through the city's public spaces and parks.

I am writing in response to the I-90 Alston DEIR and strongly support prioritization of family-friendly pedestrian walkways and non-car commuting options. My specific requests related to this project include:

- Emphasis on improved parkland and trail amenities in the "Throat." As a regular user of the Esplanade and the terrific walking and bike paths and green spaces that line the Charles River, I strongly support new and improved pedestrian space. Through my work with the Charlesgate Alliance, I am committed to improving Boston's public spaces near my home and would love to see adjoining neighborhoods linked by similarly improved, pedestrian-friendly avenues. SW-1
- Acceleration of the timeline for an operational West Station. Although glad the project plans include a new commuter rail station, I am disappointed that my unborn child will likely be out of college and in the workforce before the station begins operating. This is too long - I want to be able to use West Station before my kid! An operational West Station should be included earlier in the phasing. SW-2

Thank you for your consideration and for the opportunity to submit comments.

Sincerely,
Sam Wertheimer
19 Bay State Road, #3
Boston, MA 02215

RECEIVED

FEB 12 2018

MEPA

9 February 2018

Secretary Matthew A. Beaton, Secretary of Energy and Environmental Affairs
Commonwealth of Massachusetts
100 Cambridge St., Suite 900 Boston, MA 02114
Attention: MEPA Office Alex Strysky, EEA # 15278

Dear Secretary Beaton,

As a resident of Cambridge I am writing to add my support the letter and ideas of Henrietta Davis. The I-90 project, like the Central Artery project, has the potential of bringing positive change to the built and natural environment, to the residents of the cities adjacent to the project as well as to those who drive through.


The project as proposed, at this point still needs refinements and improvements. We are building a project which will well outlive us, and time must be taken now to create a design that will truly work. An expedited process should take place to work quickly and consider seriously the aspects of the project which are as yet unresolved.

The aspects stated below still need serious review and potential redesign:

- Planning for West Station and transit connections to Kendall Square and Longwood must not wait. (It needs to be part of the current planning equation as the area's development is visualized.) SFA-1
- The new Allston I-90 structure should not be elevated. We need a visionary solution involving a tunnel financed by air rights in the so-called Throat to provide added parkland and cut out noise. SFA-2
- Noise mitigation must be incorporated into the plans, even if it is not technically required by code. (These highways run through densely populated areas; the noise bounces off of BU's towers, and carries across the river.) SFA-3
- The planners should seek an innovative solution to maximize parkland and bike/pedestrian pathways along the river (i.e., by building a cantilevered boardwalk or by adding fill to the river's edge). SFA-4
- Maintain the right-hand turn from Soldiers Field Road on to the River Street Bridge. (To eliminate the turn would feed unnecessary traffic (congestion, fumes, noise, accidents) into the new Allston community – not a good thing if the potential of the new place is to be realized. It would also encourage drivers to take unnecessarily long alternative routes through the neighborhood streets of SFA-5

Cambridgeport and other parts of Cambridge.)

Thank you for your consideration. I look forward to seeing the next stages of project planning and execution.

A handwritten signature in black ink, appearing to read "Sandra Fairbank", with a long, sweeping horizontal line extending to the right.

Sandra Fairbank
221 Mt. Auburn Street
Cambridge MA 02138
sandratfairbank@aol.com

cc: Congresswoman Katherine Clark
Congressman Michael Capuano
Senator Elizabeth Warren
Senator Edward Markey
Stephanie Pollock, Secretary and CEO of Mass. DOT

From: SARAH FREEMAN <FREEMANSHERWOOD@hotmail.com>

Sent: Friday, February 9, 2018 3:19 PM

To: Strysky, Alexander (EEA)

Subject: Fw: I-90 Allston Interchange Improvement Project

Dear Mr. Strysky and MassDOT,

I am writing about the I-90 Interchange Improvements Project. I was not at the public meeting on Dec. 5, 2017 because I was at LivableStreets "StreetTalk 10-in-1", listening to Secretary Pollack say all the right things about progressive transportation planning, prioritizing ped/bike/transit projects etc. Grants were given by the Barr Foundation & Boston BRT to Arlington, Cambridge/Watertown & Everett to pilot bus rapid transit projects. All very promising trends.

So imagine my surprise and disappointment to hear from a neighbor who attended the I-90 project meeting that MassDOT appears to be placing transit, pedestrians & cyclists in a very distant back-row seat in that project. The target date for the West Station was reported as Phase 3 (which could be as late as 2040), well after the completion of the highway project.

I realize the I-90 project was started years ago, but in 2017 & beyond, let's not go back to the policies of the 1950's & 1960's.

Forty-seven years ago, in 1970, Gov. Sargent - a Republican - took a strong position resulting in "changing the federal laws governing aid to states for highway construction so that more funds were available for mass transit projects such as subways and [light-rail vehicles](#).^[13]".

His policies allowed the creation of Southwest Corridor Park & the Orange Line instead of I-95.

Two excerpts & the link to additional information about him are below.

"He achieved renown among [conservationists](#) and advocates of a [multi-modal](#) urban transportation system by canceling most highway construction inside [Route 128](#), with the exception of the [Northern Expressway](#) in 1970. Sargent became a strong advocate for changing the federal laws governing aid to states for highway construction so that more funds were available for mass transit projects such as subways and [light-rail vehicles](#).^[13]"

"Governor Sargent went on television and said, basically, he had been the public works commissioner who had fought for the inner belt earlier in his career and, as governor he said it was a mistake and "I'm going to admit that mistake and stop the program and we're going to shift towards public transportation."

https://en.wikipedia.org/wiki/Francis_Sargent



Francis Sargent - Wikipedia

en.wikipedia.org

Francis Williams Sargent (July 29, 1915 – October 22, 1998) was an American politician who served as the 64th Governor of Massachusetts from 1969 to 1975.

Our current administration can find a way to see that this billion-dollar transportation project does more than move cars. Please prioritize pedestrians & bicyclists and bring the transit improvements to fruition well before 2040!

I strongly support the position of WalkBoston and others who believe that:

SF-1

- Regional rail & crosstown bus connections must be priorities, not back-burner afterthoughts. SF-2
- Active transportation is important for environmental health, and physical activity is important for public health. This project will benefit immeasurably from prioritizing ped/bike access, including access to the river, across the project area, and along the Charles River paths. Separate paths for separate users were a key principle of Frederick Law Olmsted, and that principle is as relevant today as it was in his day. SF-3

Thank you for considering these comments and for anything you can do to encourage greener transportation in Massachusetts,

Sarah Freeman
22 Arborway
Jamaica Plain, MA 02130

freemansherwood@hotmail.com

617-276-5093

From: Sarah Smith <bedandmuffin@comcast.net>
Sent: Friday, February 9, 2018 4:36 PM
To: Strysky, Alexander (EEA)
Subject: West Station and Storrow Drive exit to River Street

Dear Alex Strysky,

The building of West Station should not have to wait until 2040 to be built. SSM-1

The exit from Storrow Drive to River Street should be retained without sacrificing bicycle or pedestrian access. SSM-2

You can do all of it!

Sincerely yours,

Sarah Smith
267 Putnam Ave.
Cambridge, MA 02139
bedandmuffin@comcast.net
(617) 576-3166

From: Sayem Khan [mailto:skhan1124@gmail.com]

Sent: Friday, February 09, 2018 1:51 PM

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

Cc: Cerbone, James (DOT) <James.Cerbone@dot.state.ma.us>; joseph.boncore@masenate.gov;
jay.livingstone@mahouse.gov

Subject: I-90 DIER Project Policy

Hello Mr. Beaton,

I am a resident of Central sq, in Cambridge. I am an Architect, a graduate of Northeastern University. I am a graduate of Morse School and currently my daughter is attending this school. After looking at the plans that have been proposed. I believe that more studies will need to be conducted for the impact that this proposal will have on the traffic coming in and out of Western ave and River st. Also looking at the options for the highway, we need to look at each option and look at how it will effect the other side of the river, where we have the park and school. SKH-1

Thank you.

Sayem Khan

Registered Architect

Scott Englander
26 Elm St.
Brookline MA 02445

February 9, 2018

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

VIA EMAIL: alexander.stryisky@state.ma.us

Re: EEA No. 15278

Dear Mr. Stryisky,

I am a Brookline resident, Town Meeting Member, and member of the Brookline Transportation Board, writing to offer comments on the Draft Environmental Impact Report (DEIR) for the I-90 Interchange project in Allston. I support the comments submitted by the Transportation Board; these comments are my own.

The DEIR is deficient in many ways. The project is “multi-modal” in name only; it emphasizes highways, minimizes mitigation efforts, downgrades and postpones transit improvements for decades and inadequately accommodates commuting and active transportation on designed pedestrian and bicycle paths. It is critical that these deficiencies be addressed by MassDOT, a multi-modal agency with a singular role in shaping the future of the transportation networks critical to our communities and our economy. The design of this project will determine the nature of surrounding land uses and millions of square feet of development, transportation choices, and environmental impacts for decades to come, and it is critical that the significant shortcomings be addressed.

The specific deficiencies I wish to highlight in these comments can be summarized as follows:

- Public transit, which is vital to the region, is receiving woefully inadequate attention and investment in Phase 1—by deferring West Station development (potentially indefinitely) and not providing for through service for north-south crosstown buses. SE-1
SE-2
- It fails to address the fact that I-90 and the rail lines stand as a major barrier between Brookline, much of Allston, Cambridge, and the Charles River. SE-3
- There is insufficient attention to the need for a network of safe and effective bicycle and pedestrian pathways and access. SE-4
- The design fails to create a network of safe, multimodal, and human-scaled streets in the proposed neighborhood made possible by the highway realignment. SE-5

NOTE: Specific comments relative to these topics
are discussed on the following pages.

Include Meaningful Public Transit

The project as presented in the DEIR is an anachronism—it embodies the suburban design vocabulary of the 1960s, rather than integrate with walkable urban fabric appropriate to the surrounding context using contemporary urban planning and design standards.

For this project to be truly multi-modal, it must include a significant transit component. Failure to take advantage of this opportunity will mean that all of the real-estate development resulting from the project will be automobile-centric, locking in the associated negative impacts on environment and livability in the surrounding communities for decades.

Instead, the project should provide for a transit hub in Phase 1, to foster transit-focused rather than car-dependent development. As a truly multi-modal hub, West Station, would help transform existing commuter rail into a regional rail system, connecting to South Station, via Grand Junction to Kendall Square and North Station, to one-seat-ride north-south crosstown bus service, and to the network of local and regional bikeways and walking paths.

To do otherwise would be to ignore MassDOT's responsibility to encompass all modes, accommodate clear trends in urban mobility preferences and land use density, and fulfill its role in enabling the Commonwealth to meet its statutory CO2 reduction obligations under the Global Warming Solutions Act.

West Station must be built as soon as possible to improve mobility, mitigate commuter traffic during construction, and ensure that development in the surrounding area is transit-oriented.

A long-discussed projected north-south crosstown bus route between Harvard Square and the Longwood Medical Area, connected to West Station as a major stop, is omitted from the DEIR. Better MBTA crosstown bus service north-south is needed through the area proposed for West Station. This new service should be included in Phase I of this project to link Brookline via new transit and pedestrian/bicycle routes to the Longwood Medical Area and Roxbury to the south and Harvard/Porter Square and Somerville to the north. Without including in Phase 1 a dedicated busway providing direct crosstown bus service through West Station, we would expect motor vehicle traffic to increase in north Brookline and beyond (relative to a scenario with such service), with negative impacts on our community.

The No. 66 bus route is one of the most heavily used MBTA bus lines, and currently acts as something of an urban ring, connecting six radial T lines: Silver, Green E, D, C, and B, and Red. Nevertheless—because of the barrier posed by the I-90 viaduct, its path is circuitous; the 66 is regularly over capacity, and the route it travels is congested with motor vehicle traffic. If busway access could be built through the project site from Commonwealth Ave to Cambridge St in Allston (and points beyond), new bus service could potentially address the considerable unmet demand for mobility between Brookline and Cambridge. It is estimated that such a route could potentially reduce lengthy transit times between Brookline (and the Longwood Medical Area) and Harvard Square by roughly 50 percent.

Address the I-90 and Rail Barrier between the Surrounding Communities and the Charles River

This barrier limits travel mode choice, and imposes a traffic burden. Brookline will have new mobility opportunities if the project area can be made more accessible through permeable routes serving foot, bicycle and bus transit access across this barrier. Though this problem was created decades ago by the highway viaduct, the current project has a responsibility to mitigate rather than perpetuate it.

The Charles River Esplanade and paths provide a tremendous recreational, open space, and active transportation resource nearly on Brookline's boundary. Yet, because of the barrier, the section of the Charles River in the vicinity of the project is inaccessible to Brookline residents. The project offers the potential to solve this problem, in particular if the viaduct is removed and replaced with at-grade facilities.

With better access across the barrier, Brookline residents would have direct access to the proposed new development in the project area as well as economic and recreational destinations to the north of the site and not be required to travel around this extensive barrier to reach it.

Not building the viaduct will save time and tens of millions of dollars in construction costs, which can be better spent to provide new transit, bike, and walking connections.

Improve Parkland and Trail Amenities in the Throat

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

The existing bicycle and pedestrian path along the river is narrow and unsafe for users and has no modern replacement in the DEIR. It is too narrow to handle current peak bike and pedestrian traffic, and users of the path contend with high-speed traffic passing by a few feet away. To create options, the highway viaduct should be demolished and the resulting roadway planned to include two wide riverside paths to improve safety and capacity. If sufficient width to widen and separate the paths cannot be found by reducing the roadway width, it may be worth considering using space that is now in the shallows of the river for this purpose, because the resulting environmental benefit may well outweigh any possible detriment.

Create a Network of Safe, Multimodal, and Human-scaled Streets in the Proposed Neighborhood

A significant responsibility of MassDOT as a multi-modal agency is to improve neighborhood connectivity for walking, biking, and transit. Current plans for the proposed street grid in Allston are too wide and pose safety challenges for people walking and biking, and will encourage sprawled automobile-centric real estate development.

The design should provide for the creation of the proposed People's Pike pedestrian and bicycle path between Franklin Street and the Charles River by flipping the rail lay-up yard, as Harvard

has proposed. The Franklin Street footbridge is an essential connection over I-90 for residents of Allston who are walking and biking, and should be built in Phase 1.

I appreciate the opportunity to comment on the DEIR for the I-90 Interchange Project.

Sincerely,

Scott Englander

From: Shai Inbar <sinbar42@gmail.com>
Sent: Friday, February 9, 2018 6:26:46 PM
To: Strysky, Alexander (EEA); Cerbone, James (DOT)
Subject: Mass Pike project

Sirs

I attended a meeting in Brookline on 1/25 about the proposed Turnpike project and Allston changes. I was very concerned to learn that the Mass DOT is planning to create a full access connection to connect the Harvard development north of Cambridge Street to Babcock Street.

SI-1

It's clear that the result of this could mean thousands of cars exiting I-90 and heading south through the narrow, residential streets of North Brookline, particularly to the Longwood medical area. There should be environmental impact studies and safety studies concentrating on the outcomes of this option before any final decisions are made.

Thank you in advance for considering these issues, and the needs of local residents.

Shai Inbar
23 Manchester Rd
Brookline

From: [Stacey Beuttell](#)
To: [Strycky, Alexander \(EEA\)](#)
Cc: comments@walkboston.org
Subject: I-90 Allston interchange project
Date: Friday, February 09, 2018 10:18:02 AM

Dear Mr. Strycky:

I am writing to express my concern about MassDOT's planning and design process for the I-90 Allston Interchange Project. This is not just a highway project. It is an opportunity to promote transit-oriented design in a new neighborhood that will contribute to the Commonwealth's prosperity and benefit those living in Allston.

I hope that you will prioritize transit connections - including West Station and cross-town bus service. SBE-1
And please do not overlook the opportunity to improve the Charles River waterfront along the Throat.
Continuous dedicated walking and biking paths, more green space and access to the river are sorely SBE-2
needed.

Thank you for the opportunity to comment on this proposal.

Stacey Beuttell

From: Stanley Spiegel [<mailto:sdspiegel@att.net>]
Sent: Friday, February 09, 2018 4:25 PM
To: Strysky, Alexander (EEA); Cerbone, James (DOT)
Subject: I90 Project - impact on North Brookline

I am opposed to a Malvern St vehicle bridge over the Turnpike because there could be great pressure to allow private vehicles to use it to travel north-south from Cambridge through Brookline streets to points south such as the LMA. This use, as outlined in the DEIR, would be very harmful to North Brookline residential neighborhoods. SSP-1

Stanley L. Spiegel
39 Stetson St
Brookline, MA
Elected Town Meeting Member in Precinct 2 since 1982
!

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

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

From : Stephen H. Kaiser

Comment #4 : Draft EIR for I-90 (EEA # 15278) : CONCLUSIONS on Highways, Transit and Traffic

In summary of my past comments, on January 19 I noted the need for updated information from Harvard on their development proposals for Allston, as they were somewhere in the range of ten to twenty million square feet, significantly more than the 8 million square feet of building proposed for the Suffolk Downs site. MassDOT also needs to file an ENF for a transit master plan focused on Allston.

My February 1 comment urged that MassDOT adopt this need for a master transit plan and should seek via outreach for all transit ideas that could function as components of a larger plan elements serving Allston and the Boston region generally.

On February 7 I submitted an analysis of traffic flow and low speeds on the Mass Turnpike in Allston. Traffic data indicate that existing peak hour volumes can be carried on a six-lane Turnpike, and that two lanes of the existing eight-lane roadway are not necessary. Also, widening of the viaduct to provide breakdown lanes is not justified by an appeal to "AASHTO standards" or any claims for safety benefits.

Since the submission of this third comment, Fred Salvucci has indicated that he is in agreement with the concept of six-lanes being sufficient, with two lanes removed from the Turnpike in any of the three alternatives. He has also urged consideration of ramp changes at St. Mary's Street and Beacon Street, noting that these changes could possibly affect the number of lanes in the throat area. I support his recommendation that this ramp option be reviewed by the design team as part of the Final EIR. He has also indicated that he agrees that the "AASHTO standards" defense of added breakdown lanes cannot be supported.

The Final EIR should also consider more closely pedestrian priorities for quality SK4-1
WALK time at signalized intersections, especially for exclusive crossing time for River
Street at the PDW path, rather than a special right turn lane.

While I have mentioned my concerns over the accuracy of provisions of the Highway Capacity Manual and the Synchro computer program, I am increasingly worried about the appropriateness of various assumptions in the regional traffic modeling by CTPS. I do not believe that the DEIR adequately assessed the new traffic growth from numerous developments, including Harvard's Allston properties. SK4-2

The CTPS analysis covers an area whose boundaries extend well beyond the narrowly-defined project area studied in the EIR. Such a comprehensive approach has the advantage of taking a big-picture view of traffic impacts and its effect on regional planning. However, there are some traditional features in the CTPS modeling that are worrisome in their implications and consequences. In reviewing the traffic growth from 2015 to 2025 and 2040, I found instances when 2025 and 2040 No-Build traffic volumes actually decreased from today (2015). How could that be? Are we seeing a true traffic effect or simply errors in the computer model, including failures in calibration?

The cause of my concerns can be traced to an important traffic-related assumption in the model that is neither calibrated nor verified. A traditional formula called the BPR function specifies the relationship between traffic volume and speed on roadways. Many regional traffic models use this formula, and I believe CTPS has been using it almost exclusively since CTPS was formed in 1973.

A word about the origins of the formula. The Bureau of Public Roads was moved from the Commerce Department to the new Federal Highway Administration within the Department of Transportation, effective April 1, 1967, by Act of Congress in October 1966. BPR formally became a transitional agency in 1970 and by 1972 it was completely absorbed into FHWA. I doubt that the origins of the formula and its BPR association would have occurred after 1967, although I have found no hard information on when the BPR formula was invented. I suspect it was in the period 1962 to 1967. In other words, the origins of the BPR formula go back many years.

A few words on how these computer models work. Socioeconomic data would have been used to create a trip table of desired future movements from one point to another, as applied throughout the Boston region. The computer considers different routes for vehicular travel and different modes for transit travel. The shortest travel time for each trip (with consideration of costs) is selected and would be the route associated with each trip. The likelihood of traffic delay from congestion and overloading of roads or intersections must be taken into account. The combination of all trips means that the traffic volume (number of trips) will cause a reduction in speed and an increase in trip time.

The difficult challenge occurs when there are too many trips in the trip table and the highway system congests at many locations. This was the finding for Boston first presented in the Coverdale and Colpitts report to Mass DPW of 1957 and substantially repeated in the 1962 Inner Belt and Expressway Master Plan report of DPW (the "Green Book"). A free assignment of all the trips in the trip table was made and it was found that the Central Artery already in place (6-lanes, elevated) would be overloaded by a factor of four. In other words, twenty four lanes would have been needed to handle all of the trips. It is fair to say that many highway engineers were stunned by this result. The report provided evidence that the highway master plan would not work and would be massively congested.

The solution to this quandary was the creation of a formula which would distribute the trips in a different way. Instead of highways having a certain fixed maximum capacity that cannot be exceeded, the new formula allowed traffic volumes to exceed capacity and be assigned at increasing slower and slower speeds. When the computer program was run again, fewer trips would be assigned to the congested roads and instead are assigned "elsewhere" -- presumably to local streets. The magic of the BPR formula is that it allowed the computer to make the assignments based on trip speed, and the results could be expressed entirely in terms of a future traffic volume, with no reference to existing traffic volumes or to roadway capacities.

Exactly how future volumes are shifted around within the region is unclear and usually not recorded in publications. Such is the case with almost all regional traffic models since the 1960s and appears to be the case in the I-90 DEIR.

The application of the BPR formula is described in Appendix C, page 1131+ :
“Developed by its now defunct namesake, the BPR function is a widely used and validated volume-delay function that is parabolic in shape and takes the form” for expressways of :

$$\text{Congested Speed} = (\text{Free-Flow Speed}) / (1 + 0.83 * [\text{Volume/Capacity}]^{5.5})$$

The formula is undoubtedly widely used, but its true validation is in doubt. It is most directly a description of speed in terms of volume of vehicle trips. The next page shows the shape of the speed-vs-volume BPR curve, compared to the empirical relation expressed in Figure 3.44, p. 66 of the 1965 Highway Capacity Manual.

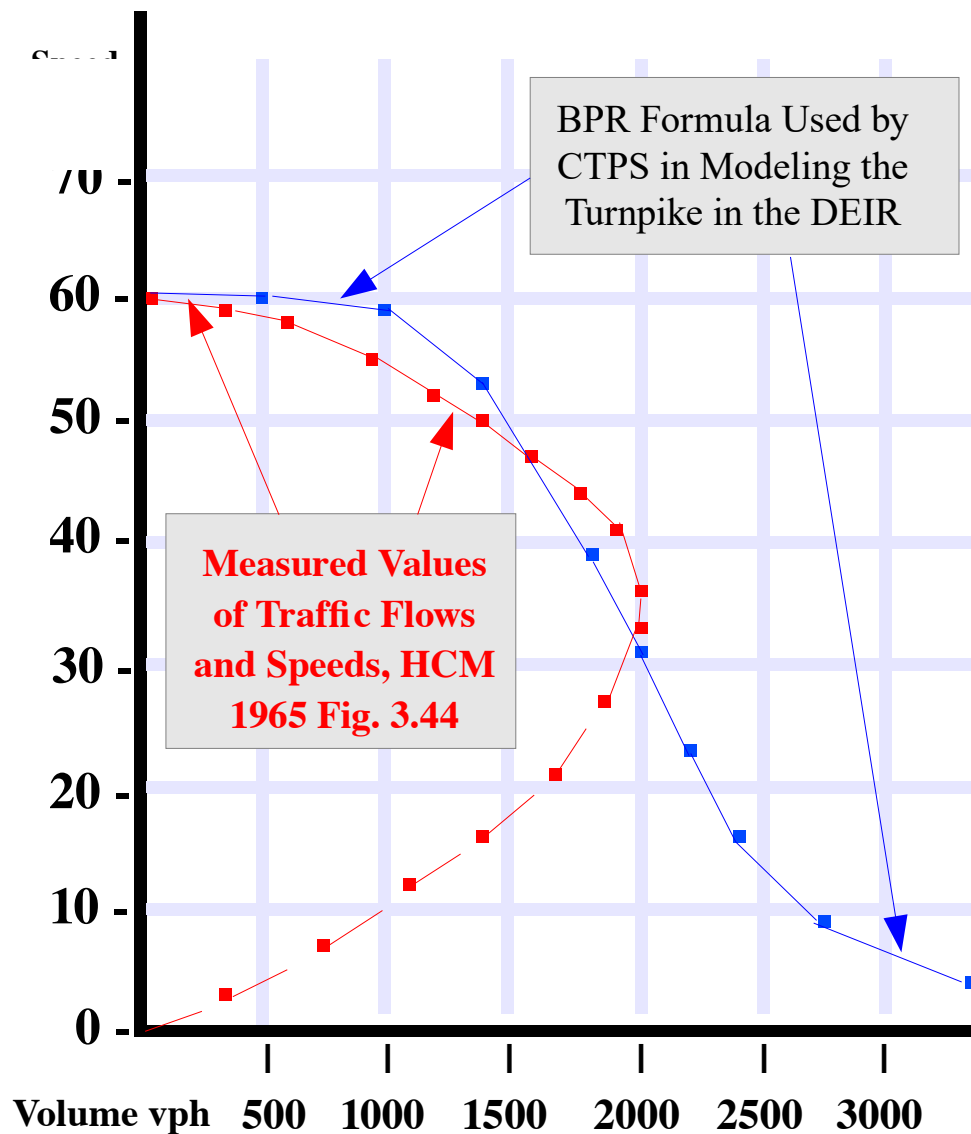
It should be evident that the shape of the BPR curve is not parabolic, but is instead a lazy backwards S-curve. Instead, it is the 1965 HCM curve which is approximately parabolic in shape and represents actual measured traffic behavior. The BPR curve is an entire fiction, design to distribute trips, not to reflect actual capacity-flow conditions. In its extreme form, the formula tells us that when traffic speeds are zero, the traffic volume is infinite. We all know that in the real world when traffic speeds go to zero, flow goes to zero, and there is gridlock.

SK4-3

For the Final EIR, CTPS should investigate the history and accuracy of the BPR formula in terms of its allowance of volumes to exceed capacity, and for volumes to increase as speeds drop below 30 mph. They should candidly conclude whether after fifty years the BPR formula should be abandoned, and instead a true trapezoidal speeds/volume formula adopted.

The first place for CTPS to apply the modeling result is to compare the model results with the traffic measurements on the Turnpike as recorded as count station AET12, with appropriate sampling of the Turnpike measurements to reflect the notable volatility in speeds and volumes during peak hours.

The next step would be to design a speed/volume formula which is indeed roughly parabolic in shape, and include it in the computer model instead of the disgraced BPR formula. The result should be expressed in a way to flag all links and



The **RED** represents measured values for speed and flow, with a parabolic shape to the curve. The BPR Formula shown in **BLUE** is a theoretical construct that shows no evidence of low-speed correlation to the empirical traffic data and no evidence of either validation or calibration.

intersections that are LOS F. Incremental changes in the modal split relationship in the model should be made to reduce the number of vehicle trips until the number of LOS F locations is less than today. This exercise would tell us how many vehicle trips would need to be converted into transit trips, and thereby would define what would be the dimensions of a transit improvement program leading up to 2040.

In effect, these results -- if calibrated -- should be able to tell us what type and size of transit improvement program we need to plan for. We do not have such numbers today, and instead must have recourse to support West Station alone, when most of us should know that one station alone is insufficient to meet transit demand.

The DEIR shows that in the future Build case there will be Level of Service D conditions everywhere except at Memorial Drive and Western Avenue. Do I believe those results are credible? No. Do I believe that the CTPS model can be modified to become a dynamic intermodal planning device to advise us on needed transit improvements? Yes.

Similarly, I have drawn a contrast between the ability of the Highway Administration at MassDOT to produce designs for the new interchange, and prepare for the reconstruction -- all in dramatic contrast to the absence of timely and complete transit proposals. MassDOT has run a public participatory process in Allston, sometimes with uneven results, but far better than the Green Line Extension process in Somerville, which ended with the design/contractors being fired. The DEIR is billed on its cover as a multimodal report. Yet the highway engineers are not authorized to do transit design and construction.

What would happen if through reorganization, MassDOT became a truly intermodal agency? Could the design of the road, West Station and the throat area be done entirely by one agency and one set of engineers and consultants, in true multimodal manner? If highway engineers engaged in roadway reconstruction saw the need for transit solutions, they would be able to take action immediately, already being authorized -- and without waiting for any other agency to be willing to get involved and start transit planning, without authorization to look into highway needs.

In this way the MassDOT planning office could become truly intermodal without the constant transit/highway split that has plagued state planning for at least 50 years. Authorization to shift modes would be decentralized.

The challenge could be stated another way : could the 602-page EIR have been developed by the MBTA? Most probably not. With transit such a vital priority, could we take advantage of highway design and construction skills to advance transit priorities? Given the strong support of transit initiatives this week by the Boston and Barr Foundations, with the assistance of A Better City (ABC), there appears to be a coming together of business sentiment on finding ways to achieve the vital improved transit infrastructure in the coming decades. We need engineers who know how to design things.

ANTICIPATING THE FINAL EIR

An important caution can be offered in comparing the size of the DEIR with modern computer models. The DEIR package consisted of 2 gigabytes of files, with the 602-page double-size DEIR representing only 1/15 of the 2 gigabyte total. Surely such submissions have crossed over the boundary into sensory overload. There is reason to believe we have reached a level of too much complexity in the way we do our business, and with all the complications it becomes impossible for humans to debug the computer programs ... do proofreading ... check spreadsheet calculations ... understand the flaws in the Highway Capacity Manual and the Synchro calculation models, or look into flaws in the BPR formula. Simulations are especially hard to check unless we have good on-site evidence of today's road and transit operations. d

Another limitation of the February 9 deadline is that the City of Cambridge will be submitting its consultant report on noise. Citizens will have insufficient time to read the report, digest its contents and comment by the end of the day. It could be that MEPA could allow for the submission of late comments for another two weeks, for the record and limited only to comments on the Cambridge noise report. That might work.

Fortunately, MassDOT did allow for a comment period extension to help us through the end-of-year vacation period, but if people were asked, they would

probably say there was still not enough time. Citizen reviews would have been helped if people sent in their comments well before the February 9 deadline. In this way other citizens could read and absorb the thoughts and ideas of others before the inevitable rush before 5 PM on a Friday afternoon.

FINAL THOUGHTS

A good way to end my four comments is to take a final look back at the history of the Allston Interchange and the Turnpike viaduct. One step takes us back to the Big Dig project when the ugly Green Monster of the elevated Central Artery viaduct through downtown Boston, and at considerable expense (\$15 billion) build a new tunnel underground. Could we take down the elevated Turnpike in Allston, rebuild it at grade, and end up actually saving money?

In the entire 602 page Draft EIR I could find no reference to the history of the Turnpike and especially its construction in Allston. There was no mention in the EIR of the memorable William Francis Callahan, who served as Chairman of the Turnpike Authority from 1952 to 1964. Born in 1891, Callahan died of throat cancer in April 1964. The New York Times reported his funeral was attended by 1,000 people.

In the mid- 1930s he was Commissioner of Public Works under Governor James Michael Curley. His name as new DPW Commissioner was on the 1948 initial Master Plan for Boston Expressways. In 1952 he decamped to the new Turnpike Authority and saw to the construction of the Turnpike from Route 128 to the New York state line. In 1962, he had the new harbor tunnel named after William F. Callahan, Jr. -- his son killed in WWII.

Callahan turned against the Inner Belt and Southwest Expressway when he sought to extend the Turnpike into Boston. He perceived the toll-free express roads as competition to his Turnpike which needed toll revenues in order to pay off the bonds. Such thinking probably affected his decision to have a basic design of eight travel lanes with no breakdown lanes, instead of six lanes with breakdown lanes.

A key conflict point (and one of the few defeats for Callahan) occurred in Allston. His original plan was to fill out into the river and relocate Soldiers Field

onto the new fill. The old location of Soldiers Field Road would then be used for his eight-lane at-grade Turnpike. The railroad tracks would stay in their existing corridor. There would be no viaducts except for a Grand Junction freight connection over the Turnpike lanes.

Callahan was thwarted by the new MDC Commissioner, Robert Murphy, a former Attorney General. In 1962 he had been appointed Commissioner after a series of scandals at the MDC and DPW -- leading to the 1960s Crime Commission investigations. An MDC department head told me a scandal-ridden former Commissioner, John Maloney, had paid \$50,000 to get the commissioner's job and he was trying to get the money back.

Morale was at a low point, and Murphy wanted to increase the sense of integrity at the MDC. When Callahan sought an eminent domain taking of MDC parkland, Murphy fought back and opposed the Callahan move.

Those who defend the Charles River often speak appreciatively of Commissioner Murphy as a hero for saving the Charles River from the ravages of Bill Callahan. Indeed, Murphy left a message that the MDC was not ripe for the picking and that the agency would exercise its rights and protect its park lands. The case went to court and the judge determined that because both agencies had the power of eminent domain, the Turnpike Authority could take the MDC's land and then the MDC could take it back. The back-and-forth takings could continue endlessly.


This stalemate forced Callahan to change his plans and to leave Soldiers Field Road and MDC lands in place. His only option was to go up and over the railroad tracks, with an elevated viaduct, which he did. It is this same viaduct which is the subject of much attention in the DEIR and in discussions of its future. Critics are proposing removal of the road viaduct, while supporters of the Charles River and its path system have hired Sasaki and associates to develop plans to improve the riverfront parkland through the throat area, and part of their proposal is to fill in part of the river to create new parkland and a better park environment for the path system.

The location is immediately across from Magazine Beach in Cambridge, and the new landscaping plan would reduce the visual and noise blight of the elevated Turnpike viaduct. Such an approach would seem most compatible with the ABC alternative to have the Turnpike at-grade.

Here is the fascinating revelation : when we put the Sasaki plan together with the ABC plan, we get the basic concept behind Bill Callahan's first and original plan -- the one opposed by MDC's Robert Murphy. Not to fill in the river and try to revise or expand the elevated viaduct could be seen as supporting Callahan's second plan -- the one he was forced into by opposition from parks supporters. Callahan's original plan probably included filling in much more than a 30-50-foot strip, and the 21st century introduces another twist : that advocates for extending the Esplanade upriver would see a highway project as the device to achieve those goals, while the highway agency spends most of the allotted funds to replace Callahan's viaduct.

I am reminded of another particular twist in Callahan's way of operating. When he was seeing to the design of the original elevated Artery through Boston, he insisted on hiring the best structural engineer he could find. He chose Professor John "Bud" Wilbur, professor of Civil Engineering and author of the landmark textbook "Structures" in 1950. But Callahan proceeded to fill many positions at the Turnpike Authority with political hacks and deadbeats in order to advance the political fortunes of the road project. In other words, Callahan could do some things right and some things wrong. Was his original plan for Allston the right one in concept and his Viaduct plan the wrong one? History has many surprise judgments and this may be one of them.

Sincerely,



Stephen H. Kaiser, PhD

From: [Suraffel](#)
To: [Stryisky, Alexander \(EEA\)](#)
Cc: advocacy@thecharles.org
Subject: Reconstruction of the Mass Pike in Allston
Date: Friday, February 09, 2018 8:12:53 AM

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

Dear Secretary Beaton,

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

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

SAS-1

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

SAS-2

SAS-3-5

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

1. Build West Station with two-track service in the first phase of the project SAS-6
2. Rebuild the highway at-grade in the "throat" using the A Better City (ABC) concept SAS-7
3. Study how separate paths for biking and walking can be provided in the entire section of Charles River Parkland from the River Street Bridge to the BU Bridge, including the "throat," for all viaduct and at-grade options. This study should include consideration of a boardwalk (both temporarily during construction and as a permanent structure) and the use of fill, and how to mitigate impacts on the river by restoring today's degraded bank into a "living shoreline" of native vegetation. Consider how this can be done both as part of the I-90 project or in a subsequent project. SAS-8
SAS-9
SAS-10
4. Construct new footbridges near Agganis Way and Amory Street that cross over the highway and link Commonwealth Ave in Boston and Brookline to the Charles River parkland to SAS-11

further encourage commutes by bike.

5. Reduce the number of lanes in streets throughout the proposed urban grid to create a safer environment more conducive to walking and biking. SAS-12
6. Introduce new North-South bus routes that cross over the highway and connect North Allston and Commonwealth Ave, and by extension Harvard Square and Longwood. SAS-13
7. Fully evaluate the possibility of shifting the rail lines away from the abutting homes and creating an at-grade, off-road walk/bike path from the Regina Pizzeria end of Harvard Ave to West Station and over the at-grade highway to the Charles River. A simple barrier wall is insufficient mitigation for the Environmental Justice community that is so heavily burdened by the air pollution, noise pollution, and vibration impacts of the highway and rail. SAS-14
8. Study how to upgrade the Grand Junction railroad linking West Station, Kendall Sq. and North Station, and enhance the Grand Junction Bridge to become a walk/bike connection between the Charles River parkland in Cambridge and Boston. SAS-15
9. Evaluate increasing off-peak commuter rail service between Worcester and Boston-obviating the need to build a layover area to store idle trains in Allston. SAS-16

Sincerely,
Suraffel Assefa
141 Shawmut Street, Apt. 2
Chelsea, MA 02150

From: [Susan Martin](#)
To: [Stryisky, Alexander \(EEA\)](#)
Subject: EEA No. 15278 - I90 Allston
Date: Friday, February 09, 2018 9:06:33 AM

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

Dear Secretary Beaton,

The reconstruction of the Mass Pike in Allston will define our region for decades to come. There must be major transformations of Massachusetts' transportation system to make it far more climate-friendly, socially equitable, and suited to the 21st century economy. Unfortunately, the project as currently proposed in the Draft Environmental Impact Report (DEIR) fails to do so.

While the Allston DEIR is an improvement over the existing dreadful conditions, it recreates an outdated 20th-century car-centered transportation system incompatible with such a reduction in emissions. SMAR-1

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

1.

Build West Station with two-track service in the first phase of the project SMAR-2

2.

Rebuild the highway at-grade in the "throat" using the A Better City (ABC) concept SMAR-3

3.

Construct new footbridges near Agganis Way and Amory Street that cross over the highway and link Commonwealth Ave in Boston and Brookline to the Charles River parkland to further encourage commutes by bike. This is particularly important to me, as I live nearby in North Brookline and have long wished there was a way for me to reach the River by walking. Right now, that's just not possible. SMAR-4

4.

Introduce new North-South bus routes that cross over the highway and
connect North Allston and Commonwealth Ave, and by extension Harvard
Square and Longwood.

SMAR-5

Sincerely,

Susan Martin
11 Abbottsford Rd.
Brookline, MA 02446

Susan Martin
susan.f.martin@gmail.com
617.953.9661 *mobile*
617-277-1027 *home*

From: Tony Schreiner <tony.schreiner@gmail.com>

Sent: Friday, February 9, 2018 4:51 PM

To: Strysky, Alexander (EEA)

Subject: Foot/Bike path near I-90 interchange

Hello

I am a frequent bike commuter, and occasional runner on that section of the path between River Street and the BU Bridge on the Boston side.

I want to add my voice to say that it would be terrible shame to miss the chance to improve this section when the highway is reconfigured. As it is now, it is too narrow, there is not enough room for both bikes and and runners. My biggest beef is that after dark, the lights from cars on the highway are blinding to cyclists, and make other users on the path very difficult to see.

Any reconfiguration that moves a) moves bikes and foot traffic futher from the road, b) widens that path, and/or c) separates bikes and pedestrians would be very welcome. I have no strong preference between the two proposals. ^{TSCH-1, 2, 3}

Thanks for your attention

Tony Schreiner
6 Whittier Place, Apt. 5H
Boston, MA 02114

tony.schreiner@gmail.com



18R Shepard Street, Suite 100
Brighton, MA 02135
617-515-5321

Matthew Beaton, Secretary of Energy and Environmental Affairs
Attn: MEPA office
EEA No. 15278
100 Cambridge Street
Boston, MA 02114

February 9, 2018

Dear Secretary Beaton,

The Transportation Committee of the Allston Brighton Health Collaborative agrees that the reconstruction of the Mass Pike in Allston will define our region for decades to come. There must be major transformations of Massachusetts' transportation system to make it far more climate-friendly, socially equitable, and suited to the 21st century economy, and Allston must show a bold commitment to these changes. Unfortunately, the project as currently proposed in the Draft Environmental Impact Report (DEIR) fails to do so.

We ask that you require MassDOT to submit a Supplemental DEIR to address these deficiencies and study the items described below.

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

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

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

1. Build West Station with two-track service in the first phase of the project ABCH-6
2. Rebuild the highway at-grade in the "throat" using the A Better City concept ABCH-7

3. Reduce the number of lanes in streets throughout the proposed urban grid to create a safer environment more conducive to walking and biking. ABCH-8
4. Study how separate paths for biking and walking can be provided in the entire section of Charles River Parkland from the River Street Bridge to the BU Bridge, including the "throat", for all viaduct and at-grade options. This study should include consideration of a boardwalk (both temporarily during construction and as a permanent structure) and the use of fill, and how to mitigate impacts on the river by restoring today's degraded bank into a "living shoreline" of native vegetation. Consider how this can be done both as part of the I-90 project or in a subsequent project. ABCH-9 ABCH-10
5. Construct new footbridges near Agganis Way and Amory Street that cross over the highway and link Commonwealth Ave in Boston and Brookline to the Charles River parkland to further encourage commutes by bike. ABCH-11
6. Introduce new North-South bus routes that cross over the highway and connect North Allston and Commonwealth Ave, and by extension Harvard Square and Longwood. ABCH-12
7. Fully evaluate the possibility of shifting the rail lines away from the abutting homes and creating an at-grade, off-road walk/bike path from the Regina Pizzeria end of Harvard Ave to West Station and over the at-grade highway to the Charles River. A simple barrier wall is insufficient mitigation for the Environmental Justice community that is heavily burdened by the air pollution, noise pollution, and vibration impacts of the highway and rail. ABHC-13 ABCH-14
8. Study how to upgrade the Grand Junction railroad linking West Station, Kendall Sq. and North Station, and enhance the Grand Junction Bridge to become a walk/bike connection between the Charles River parkland in Cambridge and Boston. ABHC-15
9. Evaluate increasing off-peak commuter rail service between Worcester and Boston—obviating the need to build a layover area to store idle trains in Allston. ABHC-16

Sincerely,

Transportation Committee members:

Anna Leslie
 Anthony D'Isidoro
 Jason Desrosier
 Kate Fahey
 Max Rome
 Andrew McFarland
 Lisa Tran
 Maxwell Geist
 Elizabeth Sullivan
 Carl Seglem
 Kate White
 Hazel Ryerson



Transportation for Massachusetts

50 Milk Street, 16th Floor

Boston, MA 02109

(413) 367-T4MA ♦ t4ma.org

info@t4ma.org ♦ @T4MASS

February 9, 2018

Matthew Beaton, Secretary of Energy and Environmental Affairs

Executive Office of Energy and Environmental Affairs

Attn: Alex Strysky, MEPA Office (EEA No. 15278)

100 Cambridge Street, 9th Floor

Boston, MA 02114

Dear Secretary Beaton:

Thank you for the opportunity to comment on this important project on behalf of the Transportation for Massachusetts coalition, which consists of more than 70 organizations and is dedicated to improving our transportation system from Pittsfield to Provincetown.

We urge the state to make public transportation a priority in the redevelopment of the Beacon Yards and the relocation of the Massachusetts Turnpike. Building West Station with connectivity for buses should be part of the initial development of this important site, not deferred to a future stage of the project. With the significant financial contribution pledged by Harvard University, an intermodal station is within reach. From a planning and policy perspective, it is essential that the station be designed from the outset.

TMA-1

This project, and this vacant land, represent a rare opportunity to invest in transportation to shape a new neighborhood, unlock economic development, and encourage environmentally friendly transportation modes like public transportation, biking, and walking.

Businesses want to locate near public transportation, because people want to live and work near transit. Better transportation is essential to attracting talent and capital investment. Public transportation and active transportation infrastructure is a key part of what makes our region economically competitive, as leading regions around the country and world have realized. So deferring the construction of West Station, while building a billion-dollar highway project, would signal the complete opposite to the talented workforce we want to recruit to and keep in Massachusetts.

In addition, as Massachusetts looks for ways to reduce transportation's carbon emissions, as laid out by Executive Order 569 and led by both EOEEA and MassDOT, a major project like this must be planned and built with climate as a key consideration.

TMA-2

Thank you for your consideration of our coalition's perspective. Please do not hesitate to be in touch if you would like additional information.

Sincerely,

Chris Dempsey, Director (cdempsey@t4ma.org)

CC: MassDOT Highway Division Environmental Services Section Attn: James Cerbone

From: [Victoria](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: West Station Rail Link, All At Grade Turnpike
Date: Friday, February 09, 2018 11:16:23 AM

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

Dear Secretary Beaton,

It is past time to reconfigure the Massachusetts Turnpike in a manner that reflects modern transportation needs in Allston Brighton, promotes reunification of the neighborhood, and brings the Charles River back to us.

As a 21 year resident of "Lower Allston" the designation we have borne since the turnpike separated the two halves of our neighborhood in the 1950's, I see three top priorities in this project:

1. West Station must be included in Phase 1 of this project. Even an austere version of this transportation link will improve our transportation options by magnitudes. As a militant pedestrian for the first 15 years of my time in Allston, I am intimately familiar with every bus line and red line/B train route possible into the city. The idea of a West Station Rail Link is a dream come true. It would allow us to become a 1 car family again. VS/SR-1
2. The Turnpike Viaduct is an out dated model, and the Cambridge Street Bridge is not a reasonable crossing. The ALL AT GRADE option seems to be the ONLY option to see our rapidly growing neighborhood into the next century and beyond. The population of Allston is set to skyrocket and apartment buildings are sprouting up everywhere. FAMILIES are moving into and STAYING in Allston for the first time in decades. Please don't saddle us with third rate infrastructure from the Robert Moses Era. We no longer wish to "pass over" Allston as quickly as possible, we wish to LIVE in it. VS-SR-2
3. Those of us who have chosen to stay in the city with our new families, as our beloved Mayor Thomas M Menino asked us to, crave access to the waterfront that is neither dangerous, or too difficult for our young children to navigate. The ALL AT GRADE option for the Turnpike project design will meet these needs. Our temporary student neighbors need legitimate access to the Charles River Bike Path, and green space. Our elderly neighbors have not been to the river bank in years, although they would go if the walk was not so treacherous.

While the all at grade option is more expensive initially, it requires far less ongoing maintenance or rebuilding than another old school viaduct. It will reduce turnpike noise. Modern elevated pedestrian crossings will provide a nice walk to the river, rather than a harrowing adventure. Furthermore, getting to the Charles river bike path from Lower Allston is nearly impossible without playing "Frogger" across soldiers field road, or carrying your bicycle up the pedestrian path (this is

the option I chose from 2008-2012).

If you do nothing else, WEST STATION must be built. A great city depends on a great transportation system. Without it, we become Atlanta.

Have you ever been to Paris or London and admired their investment in long term infrastructure? Have you ever played the day away on a magnificently maintained waterfront? Imagine living in the midst of such a place, right here in Boston. Our city is just as magical as the other two mentioned, please let's give it the respect it deserves.

Some who write to you will cite regulations, ordinances, and agreements. Others will list complaints. Perhaps here I am pleading with you to let Allston be the paradise on earth that it was meant to be. Wild horses could not drag me out of 02134, let's all make it better together!

Thank you very much for your consideration.

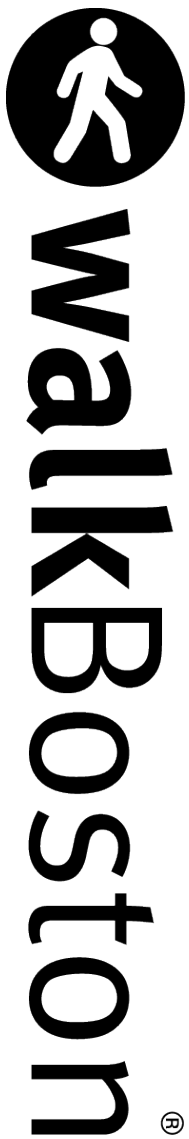
Sincerely,

Victoria Stock [45]

Scarlett Rogers [3]

Lower Allston Residents since 1996 and 2014 respectively.

47 Royal Street; Allston, MA 02134



February 9, 2018

Secretary Matthew Beaton
Attn: Alexander Strysky
MEPA Office
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, 9th Floor
Boston, MA 02114

Re: EEA No. 15278 The I-90 Allston Interchange Project

Dear Secretary Beaton,
WalkBoston has reviewed the findings of the Draft Environmental Impact Report (DEIR) for the I-90 interchange project in Allston. We offer the following comments.

The Project has substantial significance for walkability in a very large future development area in the City of Boston. The I-90 project provides the transportation underpinnings of an area that will ultimately house or employ 35,000 to 50,000 people on the site, in addition to serving the Allston, Brookline and Cambridge neighborhoods that surround it. This level of anticipated activity demands provision of facilities that meet current and future needs. The approach to planning for movement to and within this site should demonstrate up-to-date thinking about how, when and why people walk, so that the outcome of MassDOT's actions will encourage walking for transportation, health and fun, and will enhance walking access to transit.

The project will have a major impact on surrounding residents and businesses as well, offering new transportation options and affecting commuting patterns for all modes – vehicles, transit, walking and cycling. It may also dramatically impact people's ability to connect with and use Charles River shoreline walking paths.

The DEIR does not describe a multi-modal project.

The Project cannot accomplish desirable community and regional improvements if it inadequately meets multi-modal transportation needs. The DEIR for the I-90 project, purportedly a multi-modal effort, emphasizes highways, minimizes mitigation efforts, downgrades and postpones transit improvements for many years and inadequately accommodates active transportation on pedestrian and bicycle paths. MassDOT's over-focus on highway and roadway infrastructure will not provide the platform for economic and physical redevelopment of the site to support the agency's own objectives for GHG reduction, public health and safety, and transportation equity. The anticipated impacts that come from changing the highway's configuration and opening 100 acres for land development carry with them a MassDOT responsibility to view the project more globally. Certainly MassDOT must serve vehicle users, but should also refocus access to and through the area via other modes of travel, if only because the highway portion of the reconstruction will quickly become overwhelmed with users – a pattern that has been repeatedly observed since the advent of the interstate network.

As a result of our review of the I-90 Allston Interchange Project as described in the DEIR to address all of the necessary project elements or to fully assess the Project, we recommend that MEPA direct MassDOT to conduct a Supplemental Environmental Impact Report to explore and analyze the project deficiencies.

1. The Project fails to provide a comprehensive approach to meeting the needs of walkers, runners and cyclists.
2. Transit, which will be vital to the development of the site and the quality of life for all adjacent neighborhoods, has been given inadequate attention and inappropriately late phasing – and not just by deferring West Station development.
3. There is insufficient Project mitigation, both of construction impacts and long-term impacts, and the mitigation does not adequately address the prior two deficiencies.

MassDOT should be asked to correct these problems and fully address its responsibilities as a multi-modal transportation agency.

WBOS-1a-1f

1. **The Project fails to provide a comprehensive approach to meeting the needs of walkers, runners and cyclists.** A truly multi-modal project must provide good walking and bicycling access throughout the project area. The Project as described in the DEIR provides most of the walking and biking connections through sidewalks or on-street facilities – a necessary but insufficient plan.

Pedestrian access to West Station from the north.

Pedestrian access between the project area and West Station needs careful thought and planning to overcome the quality of the walking environment because the route is via connections to Cattle Drive and Seattle Street that are designed to function as I-90 Interchange ramps.

These will be very busy streets, and will have noise and air quality issues related to the heavy congestion of slow-moving vehicles. Special efforts should be made to provide wide, well-landscaped sidewalks with buffers in the years before development (air rights or at-grade) along the streets occurs. These efforts are particularly important on the bridges over the Turnpike and rail lines, both because those may be the most heavily traveled routes and because the walking environment on an un-protected bridge over the highway and rail is especially exposed and noisy for pedestrians (many examples in Boston exist separating Chinatown from the South End – these bridges form a real impediment between the two neighborhoods for people on foot).

MassDOT should consider providing a platform for air rights developments in this portion of the project that could significantly improve walking conditions if landscaped buffers could be provided in the interim period prior to constriction of air rights projects.

Pedestrian access to West Station from the south.

Malvern Street sidewalks that provide pedestrian access to West Station are critical to the Project's pedestrian network and should be constructed in Phase 1 of the Project.

WalkBoston supports the Wadsworth Street path.

A safe, off-road route has been outlined by Harvard University for a new path along the south boundary of the project (between Cambridge Street and West Station and parallel to

Wadsworth Street). This planned path would improve pedestrian (and bicycle) access and significantly improve conditions for the homes along Wadsworth Street that back up against the project boundary. This route is based on the “Flip alternative” which describes both an interim and a permanent West Station in the DEIR.

- The path could be built as a package with the proposed high noise wall. In order to provide space between the homes and the noise wall and also allow the construction of a walking and biking path, one rail line would need to be deleted from the Project as proposed by MassDOT.
- The path could extend to West Station, then to Agganis Way and Commonwealth Avenue under any of the Turnpike options.
- The path could also connect to the Charles River waterfront paths via a pedestrian/bicycle bridge over the Turnpike, rail lines and Soldier’s Field Road if the ABC at-grade option is chosen. This has been a key community goal since the beginning of the Project planning – known as the “people’s pike.”
- The Wadsworth Street path does not appear to be feasible with the DEIR’s phased schemes for the MBTA layover yard which is directly adjacent to the proposed alignment. A discussion of this possible conflict was not included in the DEIR.

Riverbank paths

WalkBoston has provided a detailed set of recommendations about the need to provide improved riverbank paths in the “throat” through a separate comment letter submitted jointly with the Charles River Conservancy. We will not repeat those comments in this letter. However, our comments regarding planning for the length of the riverbank and the choice between the viaduct and at-grade alternative are described below because these issues were not included in that separate submission.

The length of the riverbank – beyond the throat.

WalkBoston believes that the relocation of Soldier’s Field Road (SFR) and the construction of new parkland, a SFR underpass, and at-grade walking and biking connections to the park will no doubt require touching the shoreline. We urge MEPA to require MassDOT to proactively work with DCR on the planning and design of the shoreline from the River Street Bridge to the BU Bridge. In addition to the environmental issues that require attention, this would provide MassDOT with a very positive element of mitigation for the highway project.

WalkBoston supports the at-grade (ABC) alternative.

- The at-grade alternative would allow the construction of pedestrian connections from Agganis Way and from Commonwealth Avenue to the Charles River path system – this opportunity does not exist with the other alternatives.
- The at-grade alternative requires the reconstruction of the Grand Junction “little” bridge over SFR. This allows the removal of a large bridge abutment that blocks the riverfront path and causes it to divert to a boardwalk under the BU Bridge. Removal of this abutment opens up space under the BU Bridge and provides a significantly improved and straighter alignment for the path.
- Views from the Paul Dudley White path, from Cambridgeport and Magazine Beach and from Commonwealth Avenue are heavily impacted by the Turnpike viaduct, which looms above the river and the narrow walkway. The existing viaduct can be seen from Commonwealth Avenue and has long formed a wall between Commonwealth Avenue and the Charles River. The ABC alternative removes this visual wall and opens up the

views.

- The new viaduct proposed by MassDOT is wider than the existing viaduct and comes closer to the river – thus its visual impacts are even more significant than the existing viaduct.

WBOS-2a-2e

2. Transit, which will be vital to the development of the site and the quality of life for all adjacent neighborhoods, has been given inadequate attention and inappropriately late phasing – and not just by deferring West Station development.

Walking and transit are inextricably linked. Without good transit connections there will be much less walking in and through the project area. Therefore, walking underlies our comments on transit issues.

- MassDOT's default should be to provide for mass transit access from all possible directions in order to foster transit-focused rather than car-dependent development. To do otherwise is to ignore MassDOT's responsibility to encompass all modes, accommodate clear trends in urban mobility preferences and land use density, and fulfill its role in enabling the Commonwealth to meet its statutory CO2 reduction obligations under the Global Warming Solutions Act. A failure to include West Station in Phase I of the project will cause new real estate development in the area to be automobile-oriented, perpetuating these negative impacts and the associated environmental injustice for decades to come.
- Transit must be included in this project at the beginning. The DEIR defers transit planning, construction and implementation until an undetermined future time – beyond Phase I of highway development.
- Building transit into this project should be regarded as an important mechanism for mitigating the overall emissions impacts of vehicle traffic and during construction.
- Financial and forecasting constraints should not prevent MassDOT from taking a transit-oriented approach to this project. Lack of programmed funding for building out West Station as a truly multi-modal transportation hub, including rail as well as bus, should not be a barrier to providing the "bones" of transit access in Phase I.
- Phase 1 should include, at minimum:
 - A simple West Station
 - An interim/temporary multi-route cross town bus system
 - Pedestrian and bicycle connections and bus-only roadway access between north and south Allston at Malvern Street.
- The potential importance of new transit for Allston, Brookline, Newton, and Kendall Square residents has not been adequately considered in the DEIR.

The transit analysis included in the DEIR is flawed. We note the following technical issues.

- The station would be used by current residents and workers, and not just by future riders. Rail service at West Station would offer wholly new opportunities for Brookline and Allston residents going to Downtown Boston and Kendall Square, because many live within one half mile of the station (a typical catchment area for riders of rail transit).
- The DEIR transit demand analysis for year 2040 (Appendix L) did not take into account that a similar analysis for Boston Landing Station has already proved to be incorrect and that MassDOT's projections (without the area being fully developed) significantly underestimated near and long-term demand as a result.
- The DEIR transit demand analysis assumes a West Station with various configurations of

vehicle connections, but none of them include a north-south bus-only through connection, which would offer significantly greater intermodal connectivity (and likely ridership) than any of the modeled configurations.¹

- The study area is exceedingly small, dominated by the Harvard-owned land yet to be developed in the north of the project area, excludes all areas at all to the south of West Station and the commuter rail tracks, and places West Station on the edge of the area rather than in the middle.
- The analysis appears to assume, outside the small study area, that no new development (and associated ridership) would be induced by the introduction of West Station.
- The model's assumptions about bus mode share appear to be based on current values for an area that is poorly-served by bus service.
- Projected ridership on connecting buses is significant, but includes very limited bus connections. The shuttle connections at or near West Station that were analyzed are all very limited. Continuous north-south crosstown buses are most feasible with a bus-only connection to and through West Station. The DEIR, inexplicably, did not include that option.
- West Station with a web of bus routes can significantly help mitigate negative impacts from the construction of the highways on this site during and after construction by shifting would-be drivers to bus and rail.

The proposed commuter rail car layover facility plan will likely interfere with West Station design and development.

- The site for the layover facility is immediately adjacent to the site of an interim or a permanent West Station. Four tracks are proposed as part of a commuter rail layover facility in Phase I, and MassDOT wants to add four more at a later date during Phase II, then remove four and build the final four at a different location sometime after 2040 in Phase III. This seems financially wasteful and potentially difficult to execute, reportedly makes it much more difficult to construct West Station (even an interim facility) in Phase I, and has local environmental implications.
- Predicating the build-out of West Station in Phase III upon the ability to relocate four commuter rail layover tracks may set up West Station for failure, given how difficult it has proven to be to get communities to accept new layover areas and change MBTA operations. The correct number of layover tracks for supporting Worcester commuter rail line and other nearby system needs should be built into these plans as permanent.
- The need for this many layover tracks is predicated upon perpetuation of the existing low-frequency mid-day commuter rail service. Currently, layover tracks are needed because most commuter rail trains from Worcester to Boston lay over in Boston until the evening rush hour rather than returning to Worcester for mid-day service, which currently runs at two-hour intervals. The high capital cost of building and relocating the layover tracks—and the value of the real estate they occupy—should be weighed against the operating cost of a potential layover alternative: running trains more frequently throughout the day between Worcester and Boston—even if only temporarily during construction.
- More frequent daytime service between Boston and Worcester—the second-largest city in New England—could transform the service from commuter rail to regional rail, with

¹ I-90 and the rail lines form a mile-long barrier to transit, pedestrian, and bike access between Brookline, Allston, Cambridge and the Charles River. Numerous ideas for addressing this situation have been put forward before. Unfortunately, the DEIR postpones all of these improvements and they are not included in the proposed Phase I work.

- potentially significant economic benefits for the region.
- Careful layout planning and strict operational oversight will be necessary to minimize emissions and conflict. The DEIR states that commuter locomotive idling will be limited to 30 minutes, per state law and as required by the 2010 EPA/MBTA consent decree. In practice, per-locomotive idling is likely to be of longer duration during cold weather, maintenance activities, and service disruptions. The cumulative noise and emissions impacts of operating locomotives at a variety of times of day and night is likely to pose a burden to neighbors.

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

- Access for buses to and through West Station would allow for supplementing and/or modifying existing MBTA bus service to meet current and near-future demand, as well as potential future demand generated by new residents, businesses and institutions in the project area. For example:
 - A long-discussed projected north-south crosstown bus route between Harvard Square and the Longwood Medical Area, connected to West Station as a major stop, is omitted from the DEIR. This new service should be included in Phase I of this project to link Brookline via new transit and pedestrian/bicycle routes to the Longwood Medical Area and Roxbury to the south and Harvard/Porter Square and Somerville to the north.
 - Routes are circuitous for the 66 bus route, one of the most heavily used MBTA bus lines, which currently acts as something of an urban ring, connecting six radial T lines: Silver, Green E, D, C, and B, and Red. The 66 is regularly over capacity, and the route it travels is congested with motor vehicle traffic. A new crosstown bus route could relieve some of the crowding on this bus route.
 - New circumferential MBTA bus routes such as the proposed crosstown bus route could relieve pressure on the Green Line, now used by many for commuting indirectly through Boston to Cambridge. Without such routes, CTPS estimates that riders will experience serious delays due to overcrowding in the Central Subway tunnel (and almost certainly along the aboveground branches as well).
- Motor vehicle traffic will increase if Phase 1 does not include a dedicated busway providing direct crosstown bus service through West Station.

The three throat area options presented in the DEIR are not directly comparable.

- There is a missing bridge in Option HV. On Jan. 11, 2018, the I-90 Task Force was first informed that the proposed Kendall Square-West Station connection, integral to both at-grade schemes, had not been examined in the viaduct scheme because of geometric difficulties. The Kendall Square physical connection remains, but the viaduct option includes neither this important bridge nor the two tracks necessary for a future transit service to Kendall Square (they don't fit under the HV plan for a widened viaduct).
- The DEIR neglects full costs of each option for identical services. Costs of the missing bridge in Option HV with its two tracks were not included in the viaduct option. They should be added to the \$107,000,000 HV Option costs, which are already higher than the ABC at-grade option.
- The DEIR neglects full costs of each option over time. Option HV, with a new viaduct, will have maintenance costs over time that are greater than the at-grade options. The current viaduct costs \$800,000/year in maintenance costs, and a new viaduct will have similar annual costs over the next 50 years - \$40,000,000 solely for maintenance.

- The DEIR neglects costs per year for temporary suspension of Grand Junction line rail service. As portrayed in the DEIR, temporary suspension of service to facilitate construction brings disruption to rail traffic in all options. Costs of temporarily curtailing Grand Junction service are not presented in the DEIR, yet they are cited as a disadvantage of only the at-grade options. These costs must be calculated and made available as a consideration in choosing the best option for the throat area.
- The DEIR neglects the safety issue raised by widening lanes and shoulders in the throat. The existing highway, which is not obsolete, passes under the BU Bridge with 6 lanes that are 11.5' wide with nominal shoulder widths. These dimensions have not been demonstrated to be unsafe for carrying traffic safely. Keeping the present dimensions would allow the ABC at-grade option to be built in limited space, and it could operate as effectively and as safely as the current highway does.
- The at-grade options reduce the disruption of rail travel to and from the west, in comparison to the highway viaduct plan. The highway viaduct option requires the disruption of rail service on the Worcester Branch from the very beginning of construction, reducing the available 2 tracks to 1, operating at very slow speed to meet construction safety requirements, at the same time that the turnpike is reduced to 6 lanes for construction activity, thus disrupting movement by western corridor residents either by rail or road. The two at-grade plans retain 2-track functionality in most of the early roadway reconstruction, and reduce the available tracks to 1 for twelve months near the end of construction, when the new turnpike will be completed and operating better.
- The sub-options presented for the highway viaduct are puzzling. The DEIR claims that the HV3 plan will provide somewhat wider lanes, and will permit the Grand Junction railway to maintain operations throughout the construction, but does not demonstrate that these features can fit in the available space and omits providing corroborating cross-section information requested by the task force. By contrast, it appears that the HV4 viaduct plan would fit, providing the same cross section as the at-grade plans, but without room to keep the Grand Junction operating. Neither option appears to meet planning objectives as well as at-grade options.

WBOS-3a-3d

3. There is insufficient Project mitigation, both of construction impacts and long-term impacts, and the mitigation does not adequately address the prior two deficiencies. MassDOT has elected to follow a course of minimal mitigation throughout the project area.

The project currently calls for these elements of mitigation:

- A 0.93-1.16-acre park (adjacent to a rebuilt Soldiers Field Road) along a half-mile of the river just north of the throat, 155 feet wide at the midpoint.
- A new pedestrian bridge to replace the existing Franklin Street overpass.
- A tree-lined South Cambridge Street as a major walking and biking route to the river.
- Noise walls – one on the north side of Pratt Street, one at BU's Nickerson Field, one along the south side of Lincoln Street outside the project area.

The extensive discussion of walking and transit provided above could be used as a core set of mitigation measures for the Project. In summary these are:

- Construction of significantly improved paths along the river.
- Integrated planning of the riverfront from River Street to the BU Bridge.

- Early Phase I inclusion of West Station, crosstown bus, pedestrian and bike connections.
- Pro-active bus system planning to serve construction period mitigation needs.
- Phase I inclusion of air rights platforms with landscaping adjacent to pedestrian access to West Station.
- Noise mitigation for the Charles River pathway system (which would also benefit Cambridge)

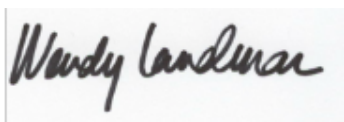
For a broader approach to mitigation for the impacts of the highway proposals, MassDOT may need to explore different ways of meeting current regulatory and statutory stipulations. Here are some upcoming possibilities:

Federal section 4(f) and 106 requirements As this project moves forward, there is considerable expectation that MassDOT will ask for federal government participation and support. When this happens, an environmental impact statement for the project may be prepared, and it will address the section 4(f) statute that requires "all possible planning" to mitigate the damage done by the highway improvements. It will be appropriate for MassDOT to examine the situation from a mitigation point-of-view, since all of the DCR owned land along the throat is legally a park, and decades of incremental road expansion (with no mitigation whatsoever) have resulted in a park that is nothing more than an 8 foot path and a bit of slope by the River. We hope that MassDOT will use this opportunity to undo the mistakes of prior construction.

Legislative assistance. MassDOT has consistently cited legislative restraints as the principal reasons that mitigation for, in particular, transit improvements cannot be funded. If that is the case, the agency should be exploring methods of alleviating or removing the restraint so that it can properly perform its mandated functions. Public support for a comprehensive project that meets many needs and not just those of vehicular owners and drivers should be relatively easy to find.

Thank you for your attention to our comments. We look forward to working with EOEA and MassDOT on this very important project.

Sincerely,



Wendy Landman
Executive Director



Bob Sloane
Senior Planner

CC:
Mayor Martin J. Walsh
Mayor Marc McGovern
Congressman Michael Capuano
Senator William Brownsberger

Senator Sal DiDomenico
Representative Michael Connelly
Representative Kevin Honan
Representative Michael Moran
Representative Jay Livingstone
Councilor Mark Ciommo
Councilor-at-Large Michelle Wu
Councilor-at-Large Ayanna Pressley
Councilor-at-Large Michael Flaherty
Councilor-at-Large Annissa Essaibi George
Secretary Stephanie Pollack, Massachusetts Department of Transportation
Commissioner Leo Roy, Department of Conservation and Recreation
Ken Miller, Federal Highway Administration
Shaun Donovan, Harvard University
Kevin Casey, Harvard University
Chris Osgood, City of Boston Chief of Streets
Brian Golden, Boston Planning and Development Agency
Louis D. Pasquale, Cambridge City Manager
Andreae Downs, Councilor-at-Large, Ward 5 Newton
Susan Albright, Councilor-at-Large Ward 2
Neil Wishingski, Chair, Brookline Select Board

From: Wayne Welke <wayne.welke@gmail.com>
Sent: Friday, February 9, 2018 5:18:29 PM
To: Strysky, Alexander (EEA)
Cc: projects@livablestreets.info; comments@walkboston.org
Subject: I-90 Allston, EEA # 15278

Please accept my comments on the Draft Environmental Impact Review (DEIR) for the Allston I-90 Interstate project:

- 1. Transit should be a priority. We need West Station now, not in 22 years, as a construction mitigation measure and to ensure transit-oriented development. WW-1
- • 2. Don't build the viaduct. A surface option will save millions of dollars, be WW-2
more practical, and maintain opportunities for multimodal connections to and from the river.
- • 3. We need better accommodations for walking and biking along the Charles River. (Please see WalkBoston's proposal to #UnchokeTheThroat!) WW-3
-
- 4. Design a network of safe, human-scaled streets in the proposed new neighborhood. WW-4

Thank you for your consideration of my recommendations.

Wayne Welke
30 Dover St - #3
Cambridge, MA 02140

617.441.2922 (landline)
603.264.3674 (cell)

From: [Yousef Alsharif](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: I-90 Allston Interchange DEIR Comments
Date: Friday, February 09, 2018 1:56:02 AM

Secretary Matthew Beaton,
Executive Office of Energy and Environmental Affairs,

Attn: MEPA Office
Alexander Strysky, EEA#15278
[100 Cambridge St., #900, Boston MA 02114](#)
alexander.strycky@state.ma.us

Dear Secretary Beaton,

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

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

YA-1

The DEIR is also inconsistent with the City of Boston's Imagine Boston 2030 and Go Boston 2030 plans and the Boston Planning and Redevelopment Agency's I-90 Allston Placemaking Study. While it is commendable that the MBTA is in the process of launching a Commuter Rail Vision Study, it is unacceptable that MassDOT's Allston DEIR perpetuates out-dated thinking (using valuable acres of urban land for rail layup) while it should instead support better mid-day service, construction of West Station in the first phase (not 2040), and steps to move forward with passenger service on the Grand Junction.

YA-2

YA-3-5

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

- 1. Build West Station with two-track service in the first phase of the**

YA-6

project. The 2040 daily boardings in table 5.9-3 are hard to believe, and if the progressions are true, consider attracting more riders via higher frequency service and transit oriented development with low or no minimum parking requirements in the area to be developed.

2. **Rebuild the highway at-grade in the "throat" using the A Better City (ABC) concept.** YA-7

3. **Reduce the number of lanes in streets throughout the proposed urban grid to create a safer environment more conducive to walking and biking.** The urban grid should not act as a barrier penetrating through the newly built neighborhood. The more lanes you have, the faster cars will go and the less other active road users will feel. Also, the 11 ft wide lanes aren't necessary and induce higher speeds according to research. 10 ft lanes do the job and if space is needed for larger vehicles to maneuver, consider 2 ft, mountable and/or flush medians. YA-8

Also, extra lanes are needed at signalized intersections, to store vehicles during a cycle's red time. Traffic analysis software will show you a better letter grade when you increase the number of lanes, but with the advent of the autonomous vehicle, ride sharing and reduction in private car ownership, a few extra seconds of delay per vehicle (a lower LOS grade) won't really matter. Levels of service for pedestrians and cyclists should be compared.

To better serve pedestrians in the proposed urban grid, **please consider the spacing of signalized intersections (not to exceed 300 ft) as not to encourage jay walking.** If signalized intersections are in fact more than 300 ft apart, unsignalized intersections with pedestrian crossing islands and traffic calming before and at the crossing location must be strongly considered to ensure slower speeds (the statutory 25 mph) and thus high driver yield rates and less chances of fatal collisions. YA-9

4. **Study how separate paths for biking and walking can be provided in the entire section of Charles River Parkland from the River Street Bridge to the BU Bridge, including the "throat", for all viaduct and at-grade options. This study should include consideration of a boardwalk (both temporarily during construction and as a permanent structure) and the use of fill, and how to mitigate impacts on the river by restoring today's degraded bank into a "living shoreline" of native vegetation. Consider how this can be done both as part of the I-90 project or in a subsequent project.** YA-10

5. **Construct new footbridges near Agganis Way and Amory Street that cross over the highway and link Commonwealth Ave in Boston and Brookline to the Charles River parkland to further encourage commutes by bike.** YA-12

6. Introduce new North-South bus routes that cross over the highway and connect North Allston and Commonwealth Ave, and by extension Harvard Square and Longwood. This will increase access to developments and West Station and would certainly change the projected numbers in the DEIR. YA-13
7. Fully evaluate the possibility of shifting the rail lines away from the abutting homes and creating an at-grade, off-road walk/bike path from the Regina Pizzeria end of Harvard Ave to West Station and over the at-grade highway to the Charles River. A simple barrier wall is insufficient mitigation for the Environmental Justice community that is so heavily burdened by the air pollution, noise pollution, and vibration impacts of the highway and rail. YA-14
YA-15
8. Study how to upgrade the Grand Junction railroad linking West Station, Kendall Sq. and North Station, and enhance the Grand Junction Bridge to become a walk/bike connection between the Charles River parkland in Cambridge and Boston. YA-16
9. Evaluate increasing off-peak commuter rail service between Worcester and Boston—obviating the need to build a layover area to store idle trains in Allston. YA-17

Sincerely,

Yousef Alsharif

28 Westland Ave

Boston, MA 02115