From: Janette Emlen <janemlen@gmail.com>
Sent: Saturday, February 10, 2018 3:01 PM
To: Strysky, Alexander (EEA)
Cc: comments@walkboston.org
Subject:

Dear Planners,

Whenever I am in a place of natural beauty in this city, I am inspired and feel blessed by the people who came before me. Because their vision for Boston preserved ways for us to enjoy and benefit from the natural world. They intuitively knew that even city folks must remain connected to the beauty of nature in order to become good citizens and excellent caretakers. I speak especially on behalf of future generations who will need, as we do, to enjoy pockets of unspoiled beauty in this amazing city. As you make decisions about preservation and development, I urge you to be guided by what's best for humanity.

Thank you.

Jan Emlen

--
JAN EMLEN CONSULTING
Cambridge MA
617.794.9627

From: kelly mcgrath <kelly9175@gmail.com>
Sent: Saturday, February 10, 2018 12:26 PM
To: Strysky, Alexander (EEA)
Subject: I90 Allston Interstate Improvement Project

KMCG-1

I am sending this email to support and ask that the Commonwealth of Massachusetts/MassDOT includes the West Station in Phase 1 of the $1B reconstruction of the Mass Pike.

Our community needs this to happen and it will only enhance the overall infrastructure of our city as a whole.

Thank you for your consideration.

Best Regards,

Kelly McGrath
Allston-Brighton Resident

From: Nikhil S Nadkarni <ns.nadkarni@gmail.com>
Sent: Saturday, February 10, 2018 1:06 AM
To: Strysky, Alexander (EEA)
Subject: Comments on I-90 Allston project

Dear Mr. Strysky,

As a Massachusetts resdent, driver, cyclist, pedestrian, and transit user, I have been following the community process around the I-90 Allston project. I applaud MassDOT for conducting an in-depth community process. However, I am disappointed in the disjointed and short-sighted plan for transportation in this urban area, in three key aspects:

1) Build neighborhood-scaled streets, not a second Seaport District. The streets proposed in the alternative are far too wide (in terms of lane count) for an urban neighborhood area. Cambridge Street is proposed to be five lanes across and six lanes in some locations. East Drive Connector and Cambridge Street South are six lanes wide for much of their length. This is far wider than any other urban street in Boston or Cambridge - wider than Mass Ave, Commonwealth Ave, nearby Harvard Ave, etc. Instead, these road width are similar to the Seaport's Congress Street or Summer Street, which many regard as unwalkable and not appropriate to neighborhood scale. It's great that the proposed streets will comply with Complete Streets standards, but the scale of the roadways proposed, the pedestrian crossing distances, and the speed of resulting traffic will prevent a walkable, urban neighborhood from taking root here. Build streets appropriate to human scale instead. NN-1

2) Build transit first for transit-oriented development. Regardless of the specifics of Harvard's development in Allston, it's clear that there are going to be a lot of residents and employers coming to this area. Building transit, in the form of West Station, should be a priority and part of the project on the day it opens. If it takes a few years after station opening for the full ridership potential to be realized, that's fine. On the other hand, if we build out a neighborhood and wait fifteen years to provide any meaningful transit to the area, that's fifteen years of congestion, air pollution, and chaos, as well as driving habits being locked in. NN-2

3) Don't build the viaduct alternative. The height and visual aspects of the elevated option should result in it being ruled out. NN-3

Other forward-thinking cities would have planned a new neighborhood development of this size around transit, walking, and biking from the start. For example, we could be implementing the infrastructure for Bus Rapid Transit in this neighborhood to connect with the Longwood and BU areas, or thinking about how to build West Station into an inviting, architecturally significant anchor for the neighborhood. Instead, MassDOT isn't even building a simple open-air commuter rail platform.

It's time to think about how growth in Boston can grow around transit, and what that means for the projects we build.

Sincerely,
Nikhil Nadkarni
11 Ellery St., Cambridge

Somerville Bicycle Advisory Committee

February 9, 2018

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

Via: alexander.strysky@state.ma.us alexander.strysky@state.ma.us

Subject: Allston I-90 Interchange DEIR, support for "People's Pike" and West Station

Dear Secretary Beaton:

The Somerville Bicycle Advisory Committee seeks to improve the conditions for bicycling (and walking) in Somerville and surrounding communities, including regional multi-use paths and greenways which connect to Somerville's Community Path.

Hence, we are writing to express our concerns regarding your review of the Draft Environmental Impact Report (DEIR) for Massachusetts Department of Transportation's (MassDOT) Allston Interstate 90 Interchange project.

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

This project, which will reconfigure the I-90 Allston Interchange and Worcester commuter rail tracks, affords MassDOT the opportunity to restore two-track capacity to the Grand Junction rail line by rebuilding the Grand Junction bridge as it crosses over Soldiers Field Road, as well as connecting the Grand Junction Path to Commonwealth Avenue and the BU Bridge so that it connects to the Grand Junction Path being built in Cambridge. These off-street connections, called the "People's Pike", should be required as mitigation of highway impacts along the riverbank, as they will immediately provide safe and attractive paths for walkers/runners/bikers in this heavily used active transportation corridor (and also set up the transportation network for future Grand Junction rail service). When the Grand Junction path is built, bikers and walkers will be able to travel from the Somerville Community Path and East Cambridge to MIT and Allston. However, as presented in DOT's DEIR, the preferred alternatives put forth by MassDOT offer neither of these crucial elements. Nor does it include the needed West Station on the Worcester commuter rail line. SBAC-1 SBAC-2

We therefore ask that MEPA require MassDOT to select an at-grade option for the "Throat" which will allow for the possibility of pedestrian and bicycle overpasses over the commuter rail tracks, I-90, and Soldiers Field Road, thereby connecting Commonwealth Avenue and the BU Bridge to the Paul Dudley White Pathway and a future Grand Junction multi-use path, including its connection to the proposed West Station. SBAC-3 If MassDOT rebuilds the highway as a viaduct, as it is currently designed and proposed in the DEIR, we will have missed a once-in-a-100-year opportunity to connect the neighborhoods of Boston and Brookline to the Charles River and this crucial connection along the Grand Junction line. This bridge should be replaced in the scope of this project, at a time when construction and costs are least impacting. I-90 itself, should be designed in such a way that the Charles River parkland could be expanded as part of the project as well so that pedestrians and bicyclists will have more room on the river paths, and so that a bigger green buffer between the path and the adjacent roadways can be provided.

SBAC-4

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

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

Sincerely,

Alan Moore,
member of the Somerville Bicycle Advisory Committee, on behalf of the whole committee

From: Michael Gidding <mgidding@gmail.com>
Sent: Sunday, February 11, 2018 12:12 AM
To: Strysky, Alexander (EEA)
Cc: Cerbone, James (DOT); joseph.boncore@masenate.gov; jay.livingstone@mahouse.gov
Subject: I-90 Interchange Improvement Project comments

Dear Secretary Beaton:
I am writing in support of the January 24, 2018 submittal made by Henrietta Davis, community representative to the I-90 Task Force, in response to the DEIR for I-90. I support the following 12 key Requests for Action or Further Study that she notes:

- Transit and Multi-Modal Planning – implement now, not in 2040. MGID-1
- West Station – implement as part of first phase of I-90. MGID-2
- Grand Junction Rail Bridge over Soldiers Field Road – reconstruct as part of I-90 Project. MGID-3
- Right-Turn-Only Exit to River Street from Soldiers Field Road – retain a narrow one-lane exit ramp, designed with improved pedestrian/bicycle path. MGID-4
- Underpass under River Street Bridge for Pedestrians, Joggers, and Cyclists – support as part of future River Street Bridge reconstruction project. MGID-5
- Cambridge Access to/from the Turnpike – study expected travel times and develop acceptable traffic management plans. MGID-6
- Noise – develop effective noise barriers and other features to reduce existing harmful noise impacts from Turnpike on Cambridgeport, Riverside and Magazine Beach Park. MGID-7
- "Throat," – develop new, comprehensive alternative that reduces current noise levels, is visually attractive from Cambridge, and has positive impact on Paul Dudley White Path. MGID-8
- Width of Turnpike – reconstruct to be as narrow as possible; do not build wider travel lanes and wide shoulders that do not exist in any other parts of the Turnpike between Route 128 and the Prudential Tunnel. MGID-9
- Parkland and Paul Dudley White Path – design the riverfront to enhance this world-class environmental resource, increasingly used for both commuting and recreation.
- Construction Mitigation and Project Compensation – develop detailed action plan to mitigate impacts from years of aggravation and disruption, reduce construction noise, and effectively manage expected heavier traffic on Memorial Drive, Western Avenue, Massachusetts Avenue, the many bridges over the Charles River, and Cambridgeport and Riverside neighborhood streets. MGID-10
- Pathways on Cambridge side of Charles River – improve to accommodate increased use while Paul Dudley White Path is closed during construction. MGID-11

Sincerely,
Michael Gidding
39 Clinton St. #2
Cambridge, MA 02139

Decia Goodwin & Brian Conway
175 Chestnut St. Cambridge, MA. 02139

RECEIVED
FEB 12 2018
MEPA

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

Re: I-90

Dear Sec. Beaton:

We support the development of a fourth alternative plan to the current designs. Direct a new designer to think more creatively, please work on the "Throat" section with more care. The Charles River is too precious a resource to waste by squeezing a highway along the banks.

Parklands must be enhanced, not impacted negatively. The slim Boston green sliver that is planned is insufficient and looks to be a noisy, miserable space, hard by a multi-lane highway.

Across the Charles River, Magazine Beach Park is mightily impacted by the noise of the elevated turnpike. Please go to an alternative at ground level, do not replace the viaduct with another megaphone of crushing highway sound. Budget for improvements to this existing resource as well as enhance adjacent DCR pathways and green spaces in addition to the creation of spacious new open spaces on the Boston side. DG/BC-1

Multi-modal transportation will save our region, already paralyzed at either end of each day by car and truck traffic. HOV, bus ways, bike paths, peak-pricing, rail and transit will help promote economic goals and enhance the compatibility of commercial and residential development.

Consider the impact of the I-90 project upon residents of Cambridge, Brookline and Allston while looking at the beneficiaries of commercial and institutional expansion. Harvard and Boston University must contribute more, they have much to gain. BU's contributions seem underwhelming considering their landholdings and potential benefit.

We look to EOEA to plan and promote an I-90 transit plan that not only enhances travel, but contributes to urban work and living experiences for residents of Massachusetts.

Thank you for this opportunity to comment, we look forward to future conversations.

Decia Goodwin + Brian Conway

Decia Goodwin & Brian Conway

CC: Mass DOT Highway Division
Environmental Services section
Att: James Cerbone
10 park Plaza, Room 4260
Boston, MA. 02116

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

RECEIVED
FEB 12 2018
MEPA

By email

cc: MassDOT Highway Division
Environmental Services Section
Attn: James Cerbone
10 Park Plaza, Room 4260
Boston, MA 02115
James Cerbone@state.ma.us

Cambridge City Council
Council@cambridgema.gov

Jay Livingstone
jaylivingstone@mahouse.gov

Joseph Boncore
josephboncore@masenate.gov

Henrietta Davis
henridavis@gmail.com

Cathie Zusy
cathzusy@gmail.com

RE: Comment to the DEIR I-90 Turnpike project; focusing on the how the planning and construction of the Allston Turnpike will affect residents of Cambridgeport

Introduction:

When this project began I attended quite a few meetings in Allston about this project. However only Allston residents and/or Harvard, BU and local business people were allowed to

speak at the meetings; Cambridge residents were not. The Allston meetings took place over at least three years, if not more, with no input from Cambridge except for one City of Cambridge employee who rarely spoke. Approximately thirty or more Allston residents attended these meetings. The plans for the project were drawn up before any Cambridge resident could express any input. The meetings took place at the Jackson Mann school or at a local community center whose name I do not recall, located near the Star Market.

In the last year or so there have been meetings with the Cambridge Community at the Morse School, which I attended. However, plans had already been drafted for the project area. We were there only to have input on what had already been drafted, not to create new plans. As a result of this unfair process, the Cambridge community should have more time to examine these proposals. In that regard I agree with Henrietta's proposal to order a Supplemental DEIR to allow more study and input from Cambridge residents.

My response to the present DEIR is incomplete as I had insufficient time to review the materials and to write up a response. As a result, I have listed areas of concern below, but with insufficient descriptions of my concern. One reason the list is incomplete is because I went to the library as directed, pored through the 600 plus pages of the DEIR, noted which parts I wanted to copy, and then discovered that the DEIR could not be copied. The binder could not be taken apart to be placed on the copier.

As a handicapped senior citizen, my old home computer could not handle downloading 600 plus pages. As a result, I cannot comment on the specific alternatives that were presented at the meetings, much as I would like to. Listed below are most of my areas of concern, but with limited or no description of the concerns:

1. History of exclusion of input by Cambridgeport and Cambridge residents (see above for limited description). LKR-1
2. Effect of Cambridge's exclusion on planning for the construction plans for the I-90 turnpike repair and related projects. LKR-2
3. Issues:
   a. Noise from both highway and new train traffic, during both the construction phase and the ongoing phase; LKR-3
   b. Pollution – there have been numerous studies done regarding the harm to children who live near highways. This project certainly qualifies as a highway, the turnpike, Storrow Drive, and Memorial Drive all combine to create a giant automobile exhaust field. LKR-4
   c. Traffic – the BU Bridge Rotary is already in gridlock for many hours of the day,
   d. Architectural design.
   e. What are the changes to the Grand Junction Railroad going to be? Is this going to be the new Innerbelt? LKR-5
   f. New exit from turnpike – where is this exit going to be? Will it be a new Innerbelt that was defeated by the neighborhood almost fifty years ago? LKR-6

g. What has been the input from Harvard, BU, MIT? LKR-8

h. Keep the right turn exit from Storrow Drive to River Street. Adding to the traffic by creating a longer route for Cantabridgeans, forcing us to go all around Allston instead of being able to reduce pollution by taking the present direct route, the right turn off of Storrow Drive onto River Street. LKR-9

i. Effect on parkland on both sides of the river LKR-10

j. What will be the construction time frame and mitigation of effects on River and Western Avenue, as well as on Commonwealth Ave. and the roads adjoining the BU Bridge, where gridlock for most of the day makes it impossible for nearby neighbors to leave their houses by car and experience many cars going the wrong way on Granite St to avoid traffic and driving the wrong way on Brookline St to go over the bridge so that neighbors cannot get out of Granite Street. LKR-11

k. Handicapped access for people who must drive or use UBER, taxis, or The Ride instead of limiting the number of driving lanes by adding bike lanes. LK-12

l. Discrimination against Cambridge residents and favoring input from Allston residents.

m. Lack of accessibility to hard copies as the library copy can only be read at the library, but could not be copied because of how it was compiled. Therefore, only people with computers could access the report. LK-13

n. Effect on Magazine Beach – pollution, noise, etc. LKR-14

Conclusion

Please order a supplemental DEIR for the I-90 project so that there can be a careful study of the area on both sides of the river. Our view of the river has already been compromised by the addition of the new BU dorms. Please do not add any more high rises along the river so we can enjoy the beautiful view from our windows. That is another example of how Cambridge was not included in the planning for the building of those dorms. I speak as an alumni of BUSL. Thank you for your kind consideration.

Sincerely,

Laura S. Kershner

Laura S. Kershner, Former Ward 5 Democratic Chair for many years
97 Henry Street
Cambridge, MA 02139
lskershner@aol.com

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF
ENERGY AND ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENERGY RESOURCES
100 CAMBRIDGE ST., SUITE 1020
BOSTON, MA 02114
Telephone: 617-626-7300
Facsimile: 617-727-0030

Charles D. Baker
Governor

Karyn E. Polito
Lt. Governor

Matthew A. Beaton
Secretary

Judith F. Judson
Commissioner

12 February 2018

Matthew Beaton, Secretary
Executive Office of Energy & Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02114
Attn: MEPA Unit

RE: I-90 West Station, Boston, Massachusetts, EEA #15278

Cc: Ian Finlayson, Acting Director of Energy Efficiency Programs, Department of Energy Resources
Judith Judson, Commissioner, Department of Energy Resources

Dear Secretary Beaton:

We've reviewed the Draft Environmental Impact Report (DEIR) for the above project. The purpose of this letter is to identify emission reduction measures consistent with the objective of MEPA policy to avoid, mitigate, and reduce greenhouse gas emissions.

The proposed project consists of an open air train station. Energy use would be limited to lights and escalators. The proponent is committing to all-LED lighting and high efficiency elevators, resulting in a 36% reduction in energy use.

The proponent has also evaluated solar PV. Solar PV on about 50% of the roof (about 200 kW) would offset all GHG emissions associated with the station. As the project moves forward, the project may wish to investigate a solar PV brise soleil (example on right) which would provide both solar PV, eliminating emissions, and shading to station users.

MA DOER-1

Sincerely,

Paul F. Ormond, P.E.
Energy Efficiency Engineer
Massachusetts Department of Energy Resources

CITY OF BOSTON • MASSACHUSETTS

OFFICE OF THE MAYOR
MARTIN J. WALSH

February 13, 2018

Secretary Matthew A. Beaton
Secretary of Energy & Environmental Affairs
ATTN: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

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

Dear Secretary Beaton:

We would like to start by expressing our appreciation to Secretary Pollack and the Massachusetts Department of Transportation (MassDOT) team for their extraordinarily hard work on the Allston I-90 Interchange Project. Through dozens of Task Force and community meetings, MassDOT has taken public engagement seriously and responded meaningfully to community feedback. The voice of our residents and the hard work of MassDOT are reflected in the dramatic evolution of this Project's design since its inception.

In this letter, on behalf of the City of Boston and the Boston Planning & Development Agency (BPDA), we offer comments on the current design as shown in Allston I-90 Interchange Project Draft Environmental Impact Report (DEIR). Identified in both Imagine Boston 2030 and Go Boston 2030, the Project is of great importance as it helps us to advance three key goals:

1. Create a New, Vibrant District

Moving I-90 opens up the opportunity to create a new part of the Allston neighborhood. As the many stakeholders in this process have advocated, this district should be anchored by a walkable, bikeable street grid that is capable of supporting a sustainable, mixed-use development with ample open space, connections to the Charles River, and seamless links to surrounding neighborhoods.

2. Enhance Transit Service

We believe that expanded transit service in this area is critical for two reasons. First, we will not have a vibrant, transit-oriented neighborhood without it. Second, we believe that this area sits at the crossroads of some important desire lines, including a connection to Kendall Square from the west; to Harvard Square from the south; and to the Longwood Medical Area from the north. Getting transit right in this area will help make the opportunities in this critical node and throughout the region more accessible to all.

3. Improve Interstate Reliability

It is critical for the region that we replace the obsolete I-90 viaduct. By also improving its alignment, we can enhance the ability of I-90 to connect people and freight to the rest of the interstate network and to key destinations such as Logan International Airport.

Our comments on the DEIR are structured to reflect those three goals.

1. Create a New, Vibrant District

We appreciate that MassDOT funded a Placemaking Study for this area and that, in response to the study, MassDOT incorporated many significant changes to the Project including:

- Realignment of Soldiers Field Road to allow for the creation of additional open space along the edge of the Charles River;
- Direct access to Soldiers Field Road from the proposed interchange so as to reduce congestion on Cambridge Street;
- Modification to the new interchange to align with three new streets planned by Harvard University (Harvard) north of Cambridge Street; and
- The inclusion of a continuous multi-modal path from Allston to the Charles River.

We have additional comments below which will further the development of the district.

Reduce the Roadway Widths COBOS-1

Over the many months of meetings held by the Allston I-90 Interchange Task Force, the City has always emphasized that the streets built as part of the project "should be no wider than they need to be." That speaks to the City's goal and policy of Complete Streets, which serve all the users in a balanced way without being over built in capacity. The more lanes that pedestrians and bicyclists have to cross, the less effective we will all be in achieving our Complete Streets goal.

We are concerned that the current street network as contained in the DEIR, has numerous closely spaced signalized intersections. That, combined with most of the roads being two-way, creates COBOS-2

challenge to efficiently managing the traffic, which may result in excess lanes in the cross-section.

Therefore, we urge MassDOT to continue to review, analyze and appropriately adjust the roadway network as the environmental and design processes continue. Specifically, we urge MassDOT to consider street segment changes that may lengthen some of the short blocks. This may also create an opportunity to convert some additional roadway segments to one-way. These and other circulation changes, such as restricting some turns, may allow excess or redundant lanes to be eliminated from some of the streets, thereby reducing pedestrian and bicycle crossing distances. COBOS-3

Reserve Space for Future Bus and Bike Facilities COBOS-4

As MassDOT advances the project design, and as subsequent, land use plans evolve, it would be useful for the roadway designs to include some flexibility. While the street network plan should include agreed upon bus lanes and bicycle facilities, it may also be useful to reserve adjacent land area for later introduction of additional bus lanes and bicycle facilities. We may also be able to have certain of the initially built roads have fewer lanes if land were reserved for a later expansion as development occurs. Further consideration for setting aside space as reserve for bus rapid transit (BRT) should also be examined, as described below under "Enhance Transit Service."

Include the the Cambridge Street Bypass Road in the Phase I Design COBOS-5

We believe the Cambridge Street Bypass Road, which has been proposed in the past by Harvard but is not currently in the plan, would provide multiple benefits. In particular, this connection could divert I-90-bound vehicles away from Cambridge Street, create a more seamless and direct pedestrian & bike connection from Allston to the Charles River consistent with the People's Pike concept, and help set the stage for air rights development. We urge that MassDOT to include this road as part of the project and evaluate the traffic impacts in the Final Environmental Impact Report (FEIR).

Require Adaptive Signal Technology COBOS-6

We expect that the project design, as it advances, will provide for the use of Adaptive Signal Technology, so long as those signals work well for pedestrians and cyclists as well as buses, cars and trucks. This will allow the signal operations to be optimized and will result in more efficient operations for all roadway users. The City and the State are working on introducing this advanced technology along the South Boston Waterfront.

Analyze North Harvard Street COBOS-7

One issue of concern to the City and to some residents of the North Allston neighborhood is the connection of the proposed new Cambridge Street South to North Harvard Street. The concern expressed by the neighborhood is that this connection, which would allow traffic to flow directly from I-90 to Cambridge Street North, and vice-versa, could cause increased congestion on the portion of North Harvard Street north of Cambridge Street. The Synchro model does not show a significant increase in traffic volumes north or south on North Harvard Street; however, logically it would make sense for the traffic volumes to increase. Therefore, we ask that this element be further analyzed.

Protection of Nearby Neighborhood Streets COBOS-8

On the northside of Cambridge Street across from the project area lies a longstanding neighborhood vulnerable to cut-through traffic that will be generated by the Project. We ask that all reasonable measures be taken by MassDOT, working in concert with the City of Boston, to protect the residents of Windom Street, Hopedale Street, Seattle Street and adjacent streets from such traffic.

Noise Reduction and Air Quality COBOS-9

To protect environmental quality for existing and future residential neighbors, we recommend the use of sound barrier walls and, where appropriate, vegetation barriers behind the sound walls. According to the Boston Public Health Commission, sound barrier walls typically reduce the presence of carbon monoxide and particulate matter between 15% and 50 % behind the barrier.

Use Medians to Create Pedestrian Refuges on Wide Streets COBOS-10

There are a number of crosswalk locations, particularly on Cambridge Street, where curb-to-curb distances are considerable and where crossing the entire width of the street in a single pedestrian signal phase may not be possible, especially for elderly or disabled persons. We therefore request that, wherever possible, medians be integrated into crosswalks to create refuges for pedestrians in longer crosswalks.

Add Landscaped Aprons on Bridges over I-90 and Railyards COBOS-11

The streets spanning over the railyards and I-90 to West Station will remain in place for many years, or decades, before any air rights are built. To make these crossings more hospitable and comfortable for pedestrians and bicyclists, we request that they be designed to include landscaped "aprons" consistent with the recommendation of the Placemaking Report.

Build A Dedicated Multimodal Path to Commonwealth Ave. in Phase I COBOS-12

Safe, dedicated routing for pedestrians and bicycles to get from Cambridge Street over I-90 to Commonwealth Avenue should be built as part of Phase I of construction. This will facilitate achievement of City goals for walk and bicycle mode share.

Use the City-Standard for Climate Change Evaluation COBOS-13

The project area appears to be subject to stormwater flooding risk and is located within a heat island. Accordingly, we strongly support any and all efforts to increase the tree canopy or utilize porous pavement or cool pavement materials.

Franklin Street Footbridge COBOS-14

The City of Boston strongly supports completing the redesigned Franklin Street Footbridge prior to the start of construction of this project. This footbridge will help to significantly enhance neighborhood connectivity and facilitate sustainable mode shares, which will be especially helpful during certain phases of I-90 Interchange project construction.

No Build Option Should Be Removed From Consideration COBOS-15

The No Build Alternative would preclude all of the sustainable neighborhood building, placemaking, new connections between neighborhoods and the Charles River, and transit opportunities that make this such a promising project for the future of Boston. Moreover, it is clear from the socioeconomic analysis presented in the DEIR that by producing over one billion dollars of new gross regional product (value added) and 9,940 news jobs in 2040, and by generating a benefit-cost ratio of 3.22, the economic benefits of the proposed project would far exceed the economic benefits of simply rebuilding the highway viaduct as is. For these reasons, the City of Boston would be categorically opposed to the No Build Alternative and believes that it should be removed from the FEIR.

2. Enhance Transit Service

Plan for More Sustainable, Transit-Oriented Mode Splits COBOS-16

Chapter 5, Section 5.8.2.2 (Chapter 5, page 41) describes mode split forecasts in the 2040 Build (Design Year), reflecting 50% auto mode share, 26% transit mode share, and 24% Non-Motorized more share in the AM Peak, and 58% auto mode share, 20% transit mode share, and 22% Non-Motorized mode share in the PM Peak. These mode shares are significantly at odds with the City's mode share goals as outlined in *Go Boston 2030*.

	Go Boston 2030 Mode Share Goals
Public Transit	**45%**
Walk/Bike	**28%**
Drive Alone/ Carpool/ HOV	**25%**
Other/Work from Home	**5%**

**NOTE: Percentages add up to more than 100%.*

Moving deliberately toward the mode share goals of Go Boston 2030 is critical to the City's achievement of its long term mobility, resiliency, and sustainability goals. It is paramount that any major new neighborhood planned in Boston be designed to achieve these mode share goals. The recommendations below are ways to achieve these aims.

Collaborate on a Short Term Transit Action Plan CBOS-17

This is an area that is underserved by transit today, and the mobility challenges will likely be exacerbated once construction starts. To address this, the City and the BPDA will work with MassDOT, as well as Harvard, Boston University (BU) and other stakeholders on a Short Term Transit Access Plan. This plan will focus on services that can be added or enhanced prior to the completion of Phase 1 of the project. It will identify and analyze opportunities both the Massachusetts Bay Transportation Authority (MBTA) and the City can advance together, as well as those made possible through partners, including Harvard's offer to support an interim West Station.

CBOS-18

Conduct a Long Term Transit Study

Appropriately, there has been tremendous focus on improved future transit service in this area. We believe high quality transit service is essential given the opportunities that the viaduct project opens up. We want to get that transit service right and get that service built.

The City's vision for that transit service is described in both our long term citywide transportation plan, Go Boston 2030, and our citywide plan, Imagine Boston 2030. Both plans call for a neighborhood anchored by West Station - a regional transit hub, facilitating connections between major population and employment centers and providing direct connections to local buses as well as new BRT and rail service.

The City believes that West Station will play a critical role in helping to achieve the City's long term planning, neighborhood building, and sustainability goals. The importance and value of

West Station has been consistently underscored by a range of stakeholders, including Harvard University who has committed $50 million dollars towards the construction of the station.

In the City's plans, West Station is built by 2030 at the latest. Consequently, we believe a completion date of 2040 for West Station is too late. We also believe that West Station is the essential armature for a network of transit service from and to this area - from BRT to passenger rail service on the Grand Junction.

We appreciate, however, that the specifics for when West Station is fully built and operational depends on the timing of new development in Beacon Yards, the pace and extent of regional growth, the provision of new local and regional transit service, and other factors.

For these reasons, we call for a Long Term Transit Study for this region. We will collaborate with the State, other institutional and municipal partners, and the public on this study to answer three key questions:

(1) What is the demand for transit service both to and through this area?
(2) What service -- both bus and rail -- could meet that demand?
(3) When should that service be provided to support and spur the expected growth?

The result of this study will assist in answering questions about the timing of West Station, expanded bus and rail service, Grand Junction passenger rail service, and BRT.

The City is requesting that the Secretary of Energy and Environmental Affairs require this transit study. The City also anticipates that MAPC, the regional transportation agency for Greater Boston will coordinate this study in cooperation with the involved parties. Additionally, the City requests that the MEPA Certificate specify that the conclusions of this transit study guide future transit investment including expanded transit service and the timing of construction of West Station.

Build North-South BRT Connection
While the Transit Study will help confirm the specifics, we believe this project will be enhanced by a North-South BRT connection.

CBOS-19

The current design as evaluated in the DEIR does not include any dedicated right of way for BRT. Given that: a) Harvard is planning a dedicated bus route along Stadium Way immediately north of the project area; b) an entirely new roadway system is being planned and designed as part of the project; and, c) incorporating dedicated BRT lanes is one of the least capital intensive and most cost-effective ways of creating new dedicated right-of-way for transit, the City is

requesting that the current design be modified to identify and preserve a continuous right-of-way for dedicated BRT from the Harvard Enterprise Research Campus to and through West Station to Commonwealth Avenue. For the stretch from West Station to Commonwealth Ave., we believe that Malvern Street should be studied as a potential corridor, with that analysis examining - in particular - its impact on Packards Corner. CBOS-20

Where this right-of-way extends over bridges and elevated roadways, it should be built and preserved for future service as part of the Phase I construction of the project. Where the right-of-way is not located on elevated fill or bridges, it may not be necessary that the dedicated lanes be built as part of phase one; however, it is necessary that the needed right-of-way be identified and that all parties commit to preserving the right-of-way going forward.

For the dedicated bus route from West Station to Commonwealth Avenue, the City requests that the viaduct(s) and streets necessary for this right-of-way be constructed as part of the Phase I of the project. The City also requests that MassDOT study whether it would be appropriate and feasible to establish a complementary bus route from West Station to Mountfort Street along Soldiers Field Road and University Road. CBOS-21

Explain the Layover Plan/Layover Plan Should Not Interfere with Timing of West Station
In Chapter 5, Section 5.9 of the DEIR, Rail Operations, the rail yard is described as follows: "In the 2025 Opening Year, the rail yard will consist of a total of four layover tracks storing up to eight train sets. The four existing layover tracks will be reconstructed and realigned to widen the space between layover tracks to improve access for light maintenance. Sometime thereafter, but before 2040, MassDOT will construct an additional four permanent layover tracks to the north of the MBTA easement area. The existing yard ladder to the east will be rebuilt to provide access and to connect to the realignment of Main Line tracks and GJR." Later, the DEIR states, "In the 2040 Design Year, the four original storage tracks will be removed to allow for the construction of West Station. The rail yard will retain the four permanent storage tracks, allowing total midday rail yard storage for up to eight train sets."

There is no explanation in Chapter 5 of how and why the capacity of the yard needs to be increased, and yet can then be reduced by 50% by the year 2040. CBOS-22

The City has a number of concerns about the expansion (i.e., second phase) of the proposed rail layover facility. First, it is not clear why the expanded layover is now deemed necessary when in prior iterations of the Project design it was not. Second, it is not clear what circumstances will lead to the second phase of the layover facility becoming obsolete by the year 2040. Third, once such a facility is built, the City is concerned that it could be much difficult to remove or relocate layover facilities to make way for West Station. Therefore, the City is concerned that building CBOS 23-26

the expanded layover facility will delay and/or preclude the eventual construction of West Station. If the expanded layover facility is determined to compromise the timely construction of West Station in any way, the City will be opposed to it. Fourth, the layover facility design has not been clearly articulated in the DEIR and the City has concerns about negative environmental impacts for nearby neighborhoods and institutions.

3. Improve Interstate Reliability

Throat

City staff have spent a great deal of time reviewing the various options for the "Throat" section and applaud the efforts of the citizens and organizations that have helped to advance the discussion of the pros and cons of each option.

Our priorities for the throat are as follows:

- While acknowledging the challenges of building into the river, the I-90 Interchange project should improve conditions on the Paul Dudley White path and, more generally, along the edge of the Charles River, and should yield enhanced parkland and improved buffering between the parkland and vehicular traffic.
- The I-90 Interchange project should yield enhanced opportunities for additional pedestrian and bicycle connections from Commonwealth Avenue to the Charles River and Paul Dudley White Path between the BU Bridge and Malvern Street, including at the BU Bridge itself.

Given our priorities, the At-Grade option is very compelling:

- For the neighborhood, it opens up sight lines from BU to the river; and, it provides a possibility for a pedestrian and cyclist connection from that section of the BU campus to that section of the river;
- For transit, it necessitates a reconstruction of the Grand Junction Rail Bridge span over Soldiers Field Road at a time that and is likely to minimize disruption. Such reconstruction, as we understand it, is necessary if we are to expand rail service on that line in the future.
- For Interstate reliability, it lowers the likely future costs of maintenance.
- From a financial perspective, it offers potential savings in cost and construction time.

However, the At-Grade option does come with some questions in comparison to the Highway Viaduct option: it results in the loss of breakdown lanes; and, given the encroachment on the Charles, it injects some permitting questions into the process.

Given these potential significant benefits, we request an analysis of the permitting requirements of both the ABC and HV options as well as an analysis of the impact on emissions and safety that loss of a breakdown lane may have. This information will serve to clarify the costs and benefits of the At-Grade option. CBOS-27 CBOS-28

Regardless of which throat option is selected, we urge MassDOT incorporate replacement of the rail bridge over Soldiers Field Road as part of the project. Connecting to the Grand Junction Rail Bridge and built in 1927, this span will undoubtedly require major repairs or replacement in the near future anyway. Replacing the bridge as part of the I-90 Interchange project would facilitate potential for enhanced transit rail service in the Grand Junction rail corridor, improve the Paul Dudley White path, and reduce construction related disruptions. CBOS-29

The City of Boston also supports plans that increase the amount and quality of parkland along the river in this area, such as the imaginative concepts that have been put forth by the Charles River Conservancy and WalkBoston to extend access into the river by means of a boardwalk or other structures; the City believes such options should be pursued regardless of which option is chosen for the I-90 Interchange. If constructed in a way that preserves and enhances the environmental quality of the Charles River, such actions will represent a dramatic improvement to the quality of the Paul Dudley White path and Boston's riverfront parklands. CBOS-30

Thank you for the opportunity to comment on this DEIR. If you have any questions, please do not hesitate Jim Gillooly, Deputy Commissioner of Transportation at Jim.Gillooly@Boston.gov, or John (Tad) Read, BPDA Senior Deputy Director for Transportation and Infrastructure Planning, at John.Read@Boston.gov.

Sincerely,

Chris Osgood	Gina N. Fiandaca	Sara Myerson,
Chief of Streets	Transportation Commissioner, BTD	Director of Planning, BPDA

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

Secretary Beaton,

Thank you for the review that you, Deirdre Buckley, Alex Strysky, and all of your staff are doing for this large and complex project. It will change how more than 200,000 people travel every day, the quality of life and health of tens of thousands of people who live nearby, and the Charles River parkland alongside the highway. It will make a strong statement about the priorities of our Commonwealth.

The MEPA regulations are clear:

> State agencies must use all feasible measures to avoid, minimize, and mitigate damage to the environment or, to the extent damage to the environment cannot be avoided, to minimize and mitigate damage to the environment to the maximum extent practicable.

MassDOT has not come close to meeting that standard. I therefore ask that you require MassDOT to submit a Supplemental DEIR that will comply with MEPA.

Similarly, MassDOT has failed to comply with the Federal Section 4(f) which requires: “all possible planning to minimize harm” and the selection of the alternative “that causes the least overall harm”.

Traffic-related air pollution is a main contributor to unhealthy urban air quality[1].

- Over the last 30 years, growing numbers of studies have shown that smaller particulates emitted by trucks and cars barreling down our nation’s highways can promote heart disease and strokes
- Traffic pollution not only worsens asthma, but may cause It
- Living close to heavy traffic is associated with a higher incidence of dementia

Please do not let MassDOT abdicate its responsibility for these and other impacts on the Environmental Justice communities surrounding the project area. While the impacts of living near a highway cannot be avoided, they can be minimized and mitigated much more than proposed in the DEIR. This theme should be emphasized throughout the requirement for the Supplemental DEIR.

MassDOT should do much more in Allston to be consistent with the statewide mode shift goal of tripling the share of travel in Massachusetts by bicycling, transit and walking[2] which would go a long way towards minimizing the impacts of the highway’s continued operation and construction impacts of this project. In downtown Boston, MassDOT spends millions of dollars to support the Rose Kennedy Greenway[3]. The people of New Bedford are the fortunate beneficiaries of five million dollars from MassDOT for the CoveWalk path[4]. New recreational paths across Massachusetts are made possible by state funding[5] and the Northern Strand path just got a $1.5 million planning

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[1] http://now.tufts.edu/articles/big-road-blues-pollution-highways
https://www.bostonglobe.com/metro/2016/04/13/new-evidence-dangers-living-near-highways/hVyqTnY4iyn9YRoNSwWtGI/story.html
http://www.thelancet.com/journals/lancet/article/PIIS0140-6736(16)32399-6/fulltext
https://www.cdc.gov/mmwr/preview/mmwrhtml/su6203a8.htm

[2] http://www.massdot.state.ma.us/main/tabid/1085/ctl/detail/mid/2937/itemid/223/MassDOT-Announces-Mode-Shift-Goal-to-Triple-the-Share-of-Travel-in-Massachusetts-by-Bicycling--Transit-and-Walking-.aspx

[3] http://www.wbur.org/news/2017/06/19/greenway-funding-deal

[4] http://www.southcoasttoday.com/news/20170419/covewalk-officially-opens-on-new-bedfords-south-end

[5] https://www.mass.gov/guides/recreational-trails-program

grant from the State[6]. When MassDOT spends hundreds of millions of dollars to build a new highway that harms our health and degrades our quality of life in Allston, what is MassDOT doing to improve our health and well-being?

The Massachusetts Port Authority (MassPort) operates airports and shipping facilities that, like MassDOT's operation of I-90, are essential to the regional economy and also damaging to the environment. But MassPort does much more for the local benefit of the people who bear the impacts of its activities. When considering what is "feasible" for MassDOT to do in Allston to minimize and mitigate, consider what MassPort has already done:[7]

> "The new 18 acre Bremen Street Park in East Boston and up to $15 million for a series of four Airport Edge Buffers. Massport also improved a two-mile-long trail system located on 42.5 acres of property at L.G. Hanscom Field. We've invested $50 million to develop, maintain and secure 33 acres of green space in East Boston for walking, playing, biking and enjoying panoramic views of the Boston skyline. Massport has spent $170 million to soundproof dwellings and schools."

While I can't possibly enumerate for you every inadequacy of the DEIR and MassDOT's highway-centric approach to the Allston project, here are few items that many people have consistently suggested:

HM3A-I

A. Prioritize walking and biking by building streets that have 2 or 3 total lanes. The 4, 5, and 6 lanes streets MassDOT proposes are unacceptable.
B. Prioritize transit by building West Station at the start of Phase One construction. MassDOT's too-low ridership projections fail to align with the actual ridership at Boston Landing[8]. The DEIR's Appendix L Ridership Forecasting Technical Report uses flawed land use assumptions for Transportation Analysis Zone 245 that incorrectly estimate zero population growth by 2025 in this zone and population growth of 462 people between 2025 and 2040 even while Harvard has already submitted plans to the Boston Planning and Development Authority to rezone 14 acres[9] and start development of what many call the "next Kendall Square"[10].
C. Prioritize transit by building a transit connection capable of Bus Rapid Transit service from Cambridge Street to Commonwealth Ave[11]
D. Prioritize transit by building dedicated bus lanes or bus/bike lanes
E. Reduce the traffic load on neighborhood streets by building the Cambridge Street - West Station bypass[12]
F. Minimize project cost, construction impacts, and make possible new bike/ped connections to the Charles River Parkland by building the highway in the "throat" at-grade using the ABC option
G. Increase walking and biking with two footbridges over the at-grade highway in the throat, one from Agganis Way and one from the BU Bridge/Commonwealth Ave
H. Improvements to the Charles River's natural environment that mitigate the impacts of the project and create better places for people to walk and bike as proposed by Sasaki, WalkBoston, and the Charles River Conservancy[13]
I. A linear park along South Cambridge Street connecting to new Charles River Parkland comparable to the Commonwealth Ave Mall in Boston's Back Bay

With this in mind, below is more thought on that items I ask you to require MassDOT to address in the Supplemental DEIR:

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[6] https://www.itemlive.com/2018/02/02/car-free-path-north-shore-beaches-gets-1-5m-boost/
[7] http://www.massport.com/massport/community/initiatives/
[8] https://commonwealthmagazine.org/back-story/west-station-vs-boston-landing/
[9] http://www.bostonplans.org/getattachment/1797b053-d7df-4d71-a92d-9ab393c16673
[10] https://www.bostonglobe.com/business/2017/12/26/harvard-makes-first-step-toward-commercial-development-allston-land/YJwn9ohJCivU2YOrtqDU8H/story.html
[11] http://www.bostonplans.org/getattachment/4b43e98f-7790-4885-bbbc-39fafe478611 - page 13
[12] http://www.bostonplans.org/getattachment/4b43e98f-7790-4885-bbbc-39fafe478611 - page 12
[13] https://commonwealthmagazine.org/opinion/unchoke-the-throat/

1. MassDOT presents multiple alternative only for the small “throat” section between Agganis Way and the Charles River. For the rest of the project area there is only one alternative presented. To select the alternative that causes the least overall harm, there must be multiple options for the entire project, not just one piece of it.

2. A significant amount traffic would be removed from Allston, and damage to the environment reduced, if new I-90 ramps were created closer to the Longwood Medical Area. This would reduce vehicle miles travelled in Boston and Cambridge and allow for fewer roadway lanes in the new streets proposed for Allston. Building these ramps before Allston construction would reduce the impacts of construction as fewer drivers would need to access I-90 via the Allston ramps. MassDOT should be required to study how such ramps would reduce damage to the environment and mitigate temporary and permanent impacts even though these ramps would be outside the project area.

3. MassDOT proposes to immediately introduce into Allston a new facility for mid-day storage of trains. These trains would need to navigate the single track in the opposite direction from the commuter flow, further complicating rail operations, as well as disrupting the I-90 construction process. The locomotive activity at this layover facility would increase noise and air pollution in Allston, degrade conditions for walking and bicycling, and preclude environmentally-friendly transit oriented development on those acres. MassDOT should be required to provide proof of the “ghost trains” that it claims to run without passengers due to a lack of layover space. MassDOT should be required to study using those trains to increase mid-day service instead of parking them in Allston.

4. One or more bus connections between South Cambridge Street, the I-90 ramps, West Station, and Commonwealth Ave is an essential element that needs to be included in the Supplemental DEIR. Preventing this bus connection will do significant damage to the environment by limiting options for public transportation on the Harvard-Allston-Longwood-Dudley route. This route was identified as one of the Five Prime Corridors for Boston BRT[14] and current operations of this route are severely hampered by the conditions in Allston.

5. Possibilities for Bus Rapid Transit require further study including how Stadium Way can be connect directly from North Harvard Street to the I-90 ramps and the use of Bus-Only or Bus-Bike lanes throughout the project area. Increased express bus service from Allston to downtown via I-90 should also be studied for the reduction in single-occupancy drivers that it could bring.

6. The DEIR is inadequate in its analysis of construction impacts, alternatives, and mitigation.

    a. West Station could be installed at the start of construction with bus connections to Harvard Square, Kendall, and Longwood Medical area to provide for some transit options for western passenger rail riders to avoid the construction disruption and to encourage some turnpike drivers to shift to public transportation.

    b. The Paul Dudley White Path can be relocated onto a new structure in the River. By relocating the Path out of the construction zone, the construction process can have more room, be less disruptive, and take less time to complete. The relocation would also permit a more generous path for pedestrians, joggers, and bicycle riders, buffered from the noise of high-speed traffic.

    c. Any mid-day storage of commuter rail trains in Allston must be postponed until after the I-90 construction is complete to avoid further disruption of passenger rail service and disruption of construction. Instead, mid-day service schedules should be increased during construction to minimize and mitigate the construction impacts.

[14] http://www.bostonbrt.org/the-brt-report/

d. The project is to be built using a competitive design-build technique and the competing teams must be provided with reasonable constructability conditions to avoid excessively high bids, pressure to modify designs and objectives, and substantial delay (similar to what occurred with the Green Line Extension). It is particularly important that the Supplemental DEIR and FEIR deal adequately with constructability to avoid the risk that some or all of the environmental process might need to be repeated if significant changes are required to facilitate construction. More immediately, responsible bidders will be reluctant to bid unless they see a project that can be built with sufficient certainty and predictability, with environmental approval in hand, and adequate flexibility built into the design for the design-build teams to identify and pursue the most cost effective methods to complete the project.

e. The DEIR construction staging proposes to relocate active rail use to the southernmost tracks to increase the space available to build the new eastbound turnpike roadway. This relocation is compatible with the maximization of the footprint of the land to be made available to the contractor for lay down space and is a positive feature. It could also be consistent with the construction of West Station as a very early action to provide passenger rail customers with the opportunity to transfer to bus services to Commonwealth Ave and Longwood and mitigate the disruption of both road and rail service and damage to the environment that will be caused by the construction by traffic delays and increased cut-through traffic seeking longer routes that avoid the construction area. But the DEIR does not provide for such an early action West Station, nor the early connection via Malvern street for bus service which has widespread support. This must be corrected in the Supplemental DEIR. Every western commuter who can use rail instead of the auto will make the constructability better, and every rail passenger who can use shuttle bus service to Longwood Medical Area, Harvard Square, or Kendall Square makes the roadway conditions more reasonable during construction. Establishing from the very beginning of construction rail and public transportation options to encourage more public transit and less auto reliance will support good constructability conditions.

f. The DEIR proposes that the Grand Junction Rail connection should be in service throughout the reconstruction process. But this places an active rail running diagonally across the area between the Beacon Park Yard/ contractor lay down area, and the Throat. The Supplemental DEIR should instead consider two alternatives:

    i. Suspend operations of the GJR during reconstruction using the technique used by MBTA in the past of doing most commuter rail equipment light maintenance at AMTRACK facilities near South Station, doing DownEaster light maintenance at the Somerville MBTA facility, and shifting Freight service to Pan Am services at convenient locations further west such as Worcester or even Schenectady. This has already been successfully done. What did it cost and could it be used during the I90 project?

    ii. Alternatively, the GJR connection could be relocated along the relocated Soldiers Field Road and via the Houghton spur (crossing orthogonally under temporary rebuilt ramp connections to Cambridge street) to the Romar track to access Beacon Park Yard.

    Either of these would avoid the disruption of construction activity by active rail operations, leaving the access space for contractors from the Beacon Park Yard to the throat unimpeded, to support efficient construction.

g. The DEIR reconstruction sequence proceeds from West to East. This has several downsides:

    i. the most structurally deficient viaduct in the throat gets dealt with last.

    ii. the more progress the construction achieves in building the new turnpike replacement roadways, the less lay down area the contractor will have.

    iii. the reconstructed new turnpike roadways block the contractor access to deal with the most challenging viaduct replacement in the throat.

All three options in the throat would benefit from a construction sequence that deals with the throat before the Beacon Park Yard area so that the contractors will have maximum ability to use the lay down area while rebuilding the throat.

7. A proposal to flip the active rail and layup is included on Appendix A, Page 80. This includes shifting the active rail line away from the abutting homes. MassDOT never presented this option to its Task Force, and if it had I expect that it would be favorably received. This could be further improved by increasing the distance separating the abutting homes and nearest rail line to create an at-grade bike/ped path and a modest amount of landscaping. This would provide an appropriate buffer for the abutters and minimize and mitigate the environmental damage they suffer for having the increased rail and highway operations closer to their homes. It would also encourage more people to travel by bike instead of car by creating a safe, separated path from the Harvard Ave end of the new Franklin Street Footbridge to West Station and the Charles River (via a new footbridge constructed over the at-grade highway).

8. Rail and road facilities should be decked over from the outset, rather than wait for developers to come back later to develop “air rights”. Decking as part of the I-90 construction project will reduce air and noise pollution. MassDOT should compare the costs and benefits of decking as part of this project vs. doing it after the new highway is operational. It is completely inadequate for MassDOT to suggest that a 20’ sound wall next to abutters’ home will adequately minimize and mitigate the environmental impacts of this project.

9. MassDOT ignores that I-90 currently operates at approximately 20 miles per hour due to capacity constraints, roadway geometry, and too many cars both to the east and west of Allston. MassDOT should study how this reality relates to the number of highway lanes in Allston and the number of lanes in proposed new streets in Allston. While in an ideal world, vehicles on the highway may always travel 50+ mph, I-90 does not and will not function in that way. So MassDOT should study the possibility of having access to the highway function comparably to how it does at the Newton exits and if that would allow much narrower new roads in Allston that would be more conducive to encouraging more walking and biking and less land-use dedicated to asphalt roads.

10. MassDOT often explains that permits would be needed to make several positive improvements in this project that would minimize and mitigate damage to the environment. Many great projects in Boston and across the country have obtained permits. Boardwalks have been built in navigable rivers in New York City, Philadelphia, and Portland Oregon. The Chicago River is being partially filled to create new urban civic spaces. A boardwalk was built in the Charles River in Cambridge’s Kendall Square and a boardwalk was temporarily used in the Charles River during the reconstruction of the Bowker Overpass. A footbridge crossing the Mystic River is currently being planned. When MassDOT has mentioned permitting as a significant obstacle in the DEIR, please require that the Supplemental DEIR require additional information about precedents for similar permits and what can be done to permit these changes.

Because these and so many other issues need further design and analysis, a robust public process is needed to continue improving this project and complying with MEPA regulations. MassDOT’s I-90 Task Force should be required to continue meeting on a regular basis, perhaps monthly, through the submission of the Supplemental DEIR, Final EIR, and through the Design-Build and construction of this project.

Sincerely,

Harry Mattison, I-90 Allston Task Force member
28 Mansfield St
Allston MA 02134

ALEXANDRIA.

February 13, 2018

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

Alexander.Strysky@ state.ma.us

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

Dear Secretary Beaton:

We are pleased to submit the following key comments on the above referenced project. We fully support the selection of the All At-Grade variation as the Preferred Alternative for the Allston I-90 Interchange project, and that it be used as the base for further development of the design. We appreciate that this base could be amended and enhanced to more broadly address additional goals of various stakeholders, and we urge MEPA to require that MassDOT explore opportunities to collaboratively further design of the All At-Grade and select it as the Preferred Alternative in the Final Environmental Impact Report. TA-1

We believe that the All At-Grade variation is by far the best solution because it:

1. Is the lowest-cost option.
2. Minimizes construction disruption and schedule risk.
3. Best enhances pedestrian/bicycle connectivity and safety.
4. Supports complimentary river's edge modifications requested by stakeholders.
5. Allows for development and place-making opportunities above the highway.

The reconstruction of the Massachusetts Turnpike interchange in Allston has the potential to be one of the most dynamic, transformational opportunities we have had in decades for Allston and Cambridge, for Boston and Harvard Universities, and for Greater Boston as a whole–but success turns on getting MassDOT to fairly and objectively evaluate the All At-Grade variation for the followings reasons:

1. Lowest Cost Plan

The All At-Grade the best choice to control cost, minimize construction disruption, deliver superior travel opportunities for all transportation modes, provide support for future complimentary environmental benefits, and allow for future transformational air-rights opportunities. A most compelling argument is that even with these superior transportation, environmental, and place-making benefits, it is also the lowest-cost option.

Alexandria Real Estate Equities, Inc.
400 Technology Square | Cambridge MA 02139
TEL 617.661.6962 | FAX 617.661.1658 | www.are.com

Building new highway at ground level instead of on viaducts is much less expensive, as the several DEIR cost summaries demonstrate. Additionally, the life-cycle costs of at-grade highways are much lower than viaduct structures that require more intensive annual maintenance and must undergo full reconstruction much sooner. We understand that despite repeated appeals to include life-cycle costs in the DEIR from various stakeholders, the document fails to include nor acknowledge such requests.

The DEIR says the All At-Grade will save $67.1 million dollars and is the lowest-cost option to build, yet that doesn't include: (a) The $10 to $20 million-dollar cost to rebuild an aged railroad bridge above Soldiers Field Road that was included in the All At-grade but omitted from the next cheapest alternative; and (b) The significant savings MassDOT will continue to accrue for each year over the total life-cycle of this new facility. It seems clear that the total cost savings of the All At-grade are well in excess of $100 million dollars.

We ask that MEPA direct MassDOT to fairly and objectively quantify the total differential life-cycle cost savings that MassDOT will accrue annually–under the All At-Grade variation–for each of the next 75-years or so. TA-2

2. Minimizes disruptive construction duration and schedule risk

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

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

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

We ask that MEPA direct MassDOT to fairly and objectively quantify the total differential construction duration and consequential impacts in both disruption (to motorists, mass transit riders, and neighborhood residents and businesses) and the regional economy under the complex rebuild of the aged Highway Viaduct variant as compared to the simpler construction of all new surface roadway under the All At-Grade variant. This analysis should include realistic updated costs and schedules and involve alternative measures studied for both the Highway Viaduct and All At-Grade to reduce construction costs, simplify construction staging, increase cost reliability, and limit schedule and cost risks borne by MassDOT and the MBTA. TA-3

3. Best enhances pedestrian/bicycle connectivity and safety

Building the All At-Grade's new roadways on the ground, it becomes possible to build new footbridges over the highway and rail lines to directly connect Boston University, Commonwealth Avenue, and Brookline to the Paul Dudley White path ("PDW") along the Charles River. We understand the All At-Grade option calls two new north-south pedestrian/bicycle promenades specifically adjacent to each end of the Throat, with proposals for:

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

Both of these new promenades are among the most highly desirable features of the All At-Grade option, and are shown in the superb sketch attached to this comment letter that was prepared jointly by A Better City and the architecture planning firm NBBJ. Indeed, the Highway Viaduct option would preclude them. We enthusiastically support these two pedestrian/bicycle features. We understand A Better City presented these to the MassDOT back in July 2017, and also discussed them at various Task Force and community meetings, and we believe it's fair to state that these key pedestrian/bicycle benefits under the All At-grade were widely supported by Task Force, community, and other stakeholders.

Yet despite this prior work and discussions, the DEIR failed to include these two proposed promenades in the descriptions, designs, and determinations related to the All At-grade option, or even note that these elements could be implemented "by others" if budget constraints were a concern.

We ask that MEPA direct MassDOT to properly describe and portray the proposed pedestrian/bicycle benefits of the All At-grade, and that the two-new north-south pedestrian/bicycle promenades as shown in the attached PDF labelled "All At-Grade Base Concept", A Better City/NBBJ dated 2/5/18 be incorporated into all applicable work product undertaken to further this project in the environmental and design process. TA-4

4. Supports complimentary river's edge modifications requested by stakeholders.

MassDOT deserves credit for the Task Force process they've used to further the conceptual design of this project, and Task Force members and key Stakeholders advanced key suggestions that compliment and build upon the All At-Grade variant. We encourage MassDOT to acknowledge and fairly evaluate these suggestions which complement and enhance the All At-Grade. MassDOT should be required to further study All At-Grade options based on these key Stakeholder recommendations.

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

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

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

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

<u>We ask that MEPA direct MassDOT</u> to acknowledge requests and suggested enhancements relative to key river's edge modifications that compliment and build upon the All At-Grade variant, and to appropriately include options to the All At-grade that support and fairly evaluate these complimentary river's edge modifications requested by stakeholders, including the better river's edge, added greens-space, and safe and welcoming PDW paths as shown in the attached PDF TA-5

labelled "All At-Grade w/ Added Green-Space Concept", A Better City/NBBJ dated 2/5/18 into all applicable work product undertaken to further this project in the environmental and design process.

5. Allows for development and place-making opportunities above the highway

This project can and should be much more than about new highways, mass transit, green-space, and parklands opportunities. This project also offers the opportunity to revive tens of acres of space formerly trapped under an outmoded viaduct and upgrade tens of acres of former railroad yard into a new neighborhood connected to a revitalized Charles River.

The All At-Grade's focus on ground-level rebuilding will eliminate the highway viaduct that has blocked several Boston and Brookline neighborhoods from the Charles River.
The flat profile reduces truck noise and emissions by eliminating the climb up to the viaduct. This ground-level plan will also allow for more development in the future by creating decks over the roadways — while being the least costly of the three Throat variants.

Therefore, we support the All At-Grade because it simply just unlocks all these wonderful things. Even if they're not done as part of this project, they could still be done over time. But once you build a new highway viaduct, it's there forever (or at least 75 years) and you can never improve it.

We ask that MEPA direct MassDOT to appropriately include options in further studies that support and evaluate the wide range of additional development and place-making opportunities that are unlocked under the All At-Grade but are precluded by the Highway Viaduct. TA-6

In summary, we ask that MEPA direct MassDOT to:

1. Quantify the total differential life-cycle cost savings that MassDOT will accrue under the All At-Grade variation as compared to the Highway Viaduct.

2. Adequately account for the total construction duration and impacts under the complex rebuild of the aged Highway Viaduct variant as compared to the simpler construction of all new surface roadways under the All At-Grade variant.

3. Accurately portray the proposed two-new north-south pedestrian/bicycle promenades as shown in the attached PDF rendering labelled "All At-Grade Base Concept", A Better City/NBBJ dated 2/5/18 be incorporated into all future work product. And properly note the Highway Viaduct variant precludes these promenades.

4. Recognize requests and complimentary river's edge modifications requested by stakeholders, including the better river's edge, added greens-space, and safe and welcoming PDW paths as

shown in the attached PDF labelled "All At-Grade w/ Added Green-Space Concept", A Better City/NBBJ dated 2/5/18 into all future work product.

5. Fully assess options in further studies that support and evaluate the wide range of additional development and place-making opportunities that are unlocked under the All At-Grade but are precluded by the Highway Viaduct.

We thank you again for this opportunity to comment on this important transportation and potentially transformative city building, green-space, and place-making initiative.

Sincerely,

Thomas J. Andrews
Executive Vice President, Regional Market Director
Alexandria Real Estate Equities, Inc.

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

Jonathan Gulliver, Highway Administrator, MassDOT
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THE GENERAL COURT OF MASSACHUSETTS
STATE HOUSE, BOSTON 02133-1053

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office Alexander Strysky, EEA#15278
100 Cambridge St., #900, Boston MA 02114
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Re: Allston I-90 Interchange DEIR

Secretary Beaton:

We are writing to express our serious concerns regarding the Massachusetts Department of Transportation's (MassDOT) Draft Environmental Impact Review (DEIR) for the Allston Interstate 90 Interchange project. We represent the communities along the I-90/Worcester Commuter Rail line west of Allston, so while our districts do not directly include the project itself, it is of utmost importance for the hundreds of thousands of our constituents who pass along this corridor daily by road and rail. The concerns raised in this letter pertain to the construction's impact on our constituents, who already face long commutes on congested roadways, crowded trains, and the only tolled Interstate corridor into Boston. Because it has been proposed that this project be partially funded by the tolls our constituents pay, we feel it is important to make sure that it has minimal negative impact on our communities, and is as fiscally-responsible as possible.

Our concerns are as follows:

See Newton City Council Comments NCC-1 thorugh NCC-4 and NCC-8.

Worcester Line Impact During Construction

The Worcester Line is one of the busiest Commuter Rail corridors in the Commonwealth, yet the decision matrix between the three potential options for replacing the viaduct does not take into account the full impact to the Worcester Line. (It has a high level of detail for the impact to the non-revenue Grand Junction track, which does not serve any passenger rail traffic, but no commensurate detail for the Worcester Line impact.) MassDOT's assumption is that the highway will be reduced to three lanes and that the *Worcester Line will be reduced to one track.* This is unacceptable to communities which have been fighting for decades for better train service. When the second track was finally put in to service in Allston last year, it led to significantly faster and more reliable service. Yet the DEIR assumes that a single track bottleneck will be acceptable during construction, and does not analyze the differences between the proposals in this regard. This point must be addressed, especially considering that the highway will have reduced capacity because of construction during this time. NCC-1

Our legislative leaders and constituents have fought for decades for improvements to the Worcester Line, and now is not the time to renege on these improvements. We believe that the at-grade "ABC" alternative would be built with **minimal disruption to Worcester Line service**, while MassDOT's viaduct option

NCC-2

would require several years of strangled, single-track operation. This must be fully addressed as a major construction impact—on par with, if not ahead of the Grand Junction—in the final alternative decision, and a supplemental DEIR may be necessary to fully account for these impacts.

Traffic Modeling

The traffic model used by MassDOT makes several assumptions about transit ridership which are hard to reconcile with reality, resulting in automobile-centered development which increases traffic volume and congestion on the Turnpike. Even members of MassDOT and the MBTA Fiscal Management and Control Board have publicly voiced questions about the accuracy of this traffic modeling analysis. The model shows most traffic in 2040 in the development coming and going by car. Such a car-centric Allston will be one which requires more people to drive, adding to the already heavy traffic on the Turnpike. A **reliable traffic model must be investigated** to assure that 7 million square feet of new construction is not served chiefly by highway traffic and takes into account new connections in the Allston area to minimize any increase to congestion on the Turnpike. Such planning would also fly in the face of our state-level emission goals, as well as Governor Baker's commitment to the US Climate Alliance in support of the Paris Climate Agreement. NCC-3

Cost Considerations

The Allston project is state funded, and much of this money will come from the tolls Turnpike users pay every day. We believe it is imperative that the state make a fiscally prudent choice in selecting a final alignment for the project. MassDOT's original highway viaduct alternative is significantly more expensive than the at-grade "ABC" alternative (by nearly $100 million dollars, although simplifying construction staging for this alternative may bring costs down further). Furthermore, the DEIR does not take in to account any *life cycle costs for the viaduct*. The current viaduct costs $800,000 annually to keep in a safe, usable state. A new viaduct would cost less to maintain at first, but it would still cost more to maintain—and have a shorter life span—than an at-grade alternative. NCC-4

We believe that an **at-grade alternative—already the least expensive to construct, according to MassDOT—is the best path forward**. We urge the state to provide a full life-cycle cost estimate for each alternative, to make sure that the citizens of the Commonwealth, and the toll payers on the Turnpike in particular, do not overpay for an unnecessarily complex highway. NCC-8

Sincerely,

Representative Kay Khan
11th Middlesex District

Representative Chris Walsh
6th Middlesex District

Representative David Linsky
5th Middlesex District

Representative Alice Peisch
14th Norfolk District

Representative Carmine Gentile
13th Middlesex District

Representative Mary Keefe
15th Worcester District

Representative Frank Smizik
15th Norfolk District

Representative Ruth Balser
12th Middlesex District

Representative Jeffrey Roy
10th Norfolk District

Representative Jonathan Hecht
29th Middlesex District

Representative Brian Murray
10th Worcester District

Representative Jennifer Benson
37th Middlesex District

Representative Jim O'Day
14th Worcester District

Senator James Eldridge
Middlesex and Worcester District

Senator Michael Moore
Second Worcester District

Senator Karen Spilka
Second Middlesex and Norfolk District

Senator Cynthia Creem
First Middlesex and Norfolk District