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February 9, 2018

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs
Attn. MEPA office
Alexander Strysky
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Dear Secretary Beaton,

Thank you for the opportunity to comment on the I-90 Allston Interchange project, We are submitting these comments on behalf of the Charles River Conservancy (CRC).

We are an 18-year old organization with over 40,000 supporters and volunteers. We work from the Boston Harbor to the Watertown Dam with the mission to make the urban Parklands more active, attractive, and accessible. The I-90 Interchange Project has the opportunity to improve the Charles River Parkways in each of these three categories:

> **Active** – We advocate for the active use of parklands. This idea includes walking and cycling and to this end, we have long advocated for improvements to the Paul Dudley White path and elsewhere along the River's edge. This mission to activate the parklands also includes promoting the active engagement of adjacent neighborhoods with the River by providing opportunities for learning and play. As we learn more and more of the dangers of our collective sedentary lifestyles, providing opportunities for actively engaging the outdoors becomes increasingly important. The City of Boston's Open Space and Recreation Plan 2015 – 2021 (https://www.boston.gov/environment-and-energy/open-space-and-recreation-plan-2015-2021) speaks to the need within Allston for additional parks and open space to meet the growing community needs:

> *As this part of the community redevelops and converts industrial uses to commercial, office, residential and institutional uses, the lack of park facilities will be increasingly felt. Prioritizing the creation of meaningful, usable, open space as Allston continues to densify is essential. (page 157)*

Two acres stretched at the edge of Soldiers' Field Road (SFR), while an improvement upon what exists now, does not sufficiently increase parklands enough to host a range of active and passive uses.

Attractive – The Charles River is an asset to the entire Boston Metro area. With its history of green spaces and promenades, the landscape of the river should look and feel like a world class park. For those who have driven along SFR or traversed the Dr. Paul Dudley White (PDW) path, the existing landscape feels much more like an afterthought: unsightly, unkempt, and unsafe. We are particularly concerned with the landscape of the Throat area, where the roads come nearest to the Charles. To this end, we have been collaborating with WalkBoston and Sasaki Associates to develop alternative landscaping strategies for that area. See below.

Accessible – The Charles River is a public amenity and as such, should be easily accessible to all. Providing safe and direct access to the River from Allston and Brookline must be a priority of any plan. These neighborhoods have long been cut off from the River by the viaduct and rail lines. The tangle of the Pike's on and off ramps has also made pedestrian and cycling connections untenable. Current transportation options are very limited. For these reasons, we strongly advocate for better connectivity through multi-modal transportation and through multiple connection points between Brookline and Allston to the River.

> *Open space connections, particularly to and along the Charles River, must be a central component to these plans. A strategy for long term protection of these future open spaces should be developed and an open space planning process to ensure a mix of recreational facilities and uses should be employed. (City of Boston Open Space and Recreation Plan 2015 – 2021, page 158)*

To successfully transform a highway and rail interchange into a vibrant new neighborhood takes thoughtful planning and concerted effort. As long-time advocates of the River and the Department of Conservation and Recreation (DCR) parklands, we fully appreciate the significant challenges that this project presents. However, as a city and region, we have one chance to set the framework for this neighborhood. To simply replace the viaduct with another one in kind is to look backwards to the previous century's engineering solutions. As this region courts Amazon and other tech industries, we need to embrace the opportunity this project represents as the start of new era for Boston that fosters and advances outdoor living, and integrated transportation design.

Members of the board and staff of the CRC have been actively engaged in the planning for this project over the last several years, and we also had a representative involved in the official Task Force. We represent the users of the parklands.

We encouraged our directors and advisors, as well as donors and stakeholders to attend meetings and to comment on the DEIR because we strongly believe that this project is a once-in-several-generations

opportunity that is not being given the multimodal, transformational planning that is needed and fails to provide parks along the river with adequate and safe walk and bike trails.

We are urging your office to require MassDOT to submit a Supplemental DEIR and continue engagement with the Task Force and the public and the CRC to address the issues described below.

We have the following collective chief concerns with the DEIR:

1. The need to build and operate West Station with commuter rail service and north-south bus connections as early as feasible in the construction process to help mitigate construction period impacts, to lessen overall traffic in the project area, and to help ensure that new development in Beacon Yards will be as transit-focused as possible.

2. The 3K-ABC at-grade option should be pursued as the preferred option for the "throat" section of the highway.

3. The need to provide the greatest opportunity to re-knit residents, students, tourists and workers to the Charles River, reduce the noise impacts of the highway on the Charles River Reservation and Cambridge, allow for long-term use of the Grand Junction rail line as a fully integrated element of the Boston area transit system, and provide mitigation of highway impacts along the riverbank by providing safe and attractive paths for walkers/runners/bikers in this heavily used active transportation corridor.

4. Boston and Cambridge are two of the most walkable and bikeable cities in the country. A great deal of the walking and biking occurs because, over more than 100 years, the state has wisely invested in paths to serve commuting and recreation needs in the densely developed portions of these cities along the Charles River. These paths now cover a 17 mile loop from the Science Park Dam to Charles River Road in Watertown.

5. The mile-long stretch of the Charles River within the area covered by the I-90 Interchange Project offers an amazing contemporary opportunity to expand upon the riverfront trails in a positive and cost-effective way. MassDOT has actively supported development and construction of multi-use trails throughout the state for several years as part of its responsibility to provide for all modes of transportation. The growing volume of non-auto traffic has led to new considerations of safety and the state Department of Conservation and Recreation has responded by designing paths along the river that separate bicycle from pedestrians. This project will allow MassDOT to support and strengthen these efforts.

6. The proposal described below involves using the shallows of the river's edge for the transportation needs of walkers, runners, and cyclists. The existing Paul Dudley White path edge is man-made and therefore already constructed. To rework it via earthwork or boardwalks to make a more meaningful and safer edge is to convey the importance of people over cars. The state should closely examine the possibilities that this proposal brings, because it can increase existing and future path use, and support anticipated development adjacent to the park.

7. We applaud the past efforts of the state to meet the growing needs of walkers and cyclists, and hope that MassDOT will seize this chance to mitigate the effects of highway construction on this area that is the narrowest part of the Charles River Basin parkland. We hope you will

examine our below proposal and give it serious consideration and support as a next step in developing the I-90 Interchange Project.

8. The need for the proposed street design to conform to City and MassDOT design guidelines and planning documents regarding the appropriate scale of streets in a dense urban area, and provide safe active transportation infrastructure to ensure that Beacon Yards becomes a hospitable, transit-oriented, and pedestrian- and bicycle-friendly neighborhood over the next 50 years.

9. The need for a full analysis regarding proposed project staging and construction.

The DEIR presented by MassDOT is an incomplete document. As presented in its current form, this project front-loads the highway elements that will induce traffic at the interchange and in the surrounding neighborhoods, and therefore create environmental damage. This project also unacceptably defers elements that would enable mode shift to more sustainable transit that would reduce traffic and thereby minimize and mitigate environmental damage from resulting transportation emissions.

The DEIR is inconsistent with the Environmental Justice, mode shift, climate change, and healthy transportation policies of the Commonwealth. As MassDOT officials and the Office of Energy and Environmental Affairs have stated, the transportation sector is a leading contributor of greenhouse gases in Massachusetts (as well as nationally), and, as demonstrated by last fall's MassDOT-EOEA jointly sponsored listening sessions, the Commonwealth needs MassDOT to be more aggressive in decreasing the reliance on private car travel in order to meet our stated emissions goals. By deferring the transit component of this project until 2040, the plans and construction phasing preferred by MassDOT fail to comply with the Commonwealth's own policies and directives.

This project and its DEIR fall short of state-level commitments such as the Global Warming Solutions Act (GWSA) of 2008, Massachusetts Executive Order No. 569, and Governor Baker's support for the U.S. Climate Alliance. The DEIR is incongruous with the existing and ongoing planning efforts of Focus40, Go Boston 2030, and Imagine Boston 2030. The DEIR fails to comply with the City of Boston's complimentary planning efforts of the 2016 Placemaking Report for the I-90 Allston Interchange Improvement Project. And the DEIR fails to include or analyze important components of the project discussed and supported by a consensus of MassDOT's I-90 Allston Task Force, residents, and elected officials over the past four years of public process.

Despite its exhaustive length, MassDOT's DEIR is an incomplete document requiring further study to bring to light the full impact of this $1 billion infrastructure initiative.

We urge that the "No Build" option put forth in the DEIR be withdrawn from further consideration because it fails to meet stated project goals, and by widening the highway and introducing new commuter rail layup where none exists today, it is not in fact a "no build" option at all. This option was never discussed with the Task Force and, as described in the DEIR, would squander the opportunity to connect North and South Allston, would divide Boston from the Charles River parklands, and would preclude West Station while constructing an environmentally damaging rail yard. Additionally, the "No Build" option would cause significant disruption to existing passenger Framingham/Worcester Rail line. In light of the significant negative impact to the project's core goals, and unmitigatable damage to traffic flow and the inevitable spillover traffic in the neighborhoods, the "No Build" option should simply be eliminated from further consideration.

Moreover, MassDOT must acknowledge the current deleterious effects the I-90 highway has on the residents of Allston and accept responsibility for mitigating the enormous health impacts associated with living near highways. We are fundamentally in disagreement with MassDOT's statement that this project is not aiming to repair the damage caused by the 154,000 vehicles that pass through Allston daily, regardless if this project "will not increase the severity of any existing violations." It is the Commonwealth's responsibility to tackle these violations as they exist today, and address the inequity and all the challenges that they cause. This project is our opportunity. Cutting down on our Commonwealth's dependency on automobile traffic can be the greatest means for seriously limiting the harmful impacts of vehicular emissions – now, not in 2040.

We are asking for action and leadership from our officials and representatives on the following points.

1.) West Station and north-south bus connections must be built and operational as early as feasible in the construction process to help mitigate construction period impacts and to help ensure that new development in Beacon Yards will be as transit-focused as possible.

- **An "early-action" West Station must be included as the first phase of the project**. Enabling mode shift by providing transit options is essential to mitigate the worsening traffic problems in our community caused by continued growth in congestion on I-90, and the spillover traffic that will result during the years of highway construction, which the DEIR fails to document, analyze, or consider. A modest, first phase West Station should not cost more than $20-25 million dollars. We estimate that with Harvard and BU each paying one third of this, as previously proposed, the cost to the Commonwealth would be approximately $7 million dollars or less.

- **Further analysis is needed to understand transit capacity at West Station.** Traffic analysis of the multimodal connections between Commonwealth Avenue and Cambridge Street using Malvern Street to connect north/south, including connections to I-90 and West Station, shows that significant relief of traffic congestion on Brighton Ave (-29%), Linden Street (-61%), Harvard Avenue (-24%) and Cambridge Street (-16%) would result. Due to concerns raised by Brookline and Boston University, the DEIR focuses on bus-only connections, particularly via Malvern street, but then inexplicably concludes that the project would provide only pedestrian and bicycle connections to West Station, thereby adding no capacity for transit to pass through this project area. Such a desired route has been frequently cited by Task Force members, residents of Allston, Brookline and Cambridge, and the communities at Longwood Medical Area and Harvard.

- **The operation of West Station must also take into consideration recommendations from existing, ongoing, and upcoming studies and plans**. The City of Boston has included West Station in its Placemaking Study related to this project, as well as its Go Boston 2030 and Imagine Boston 2030 plans. MassDOT will also be studying future models of rail service to this area in its Commuter Rail Vision study to complement its Focus40 planning for long-range investment in the MBTA rapid transit network. Each of these studies have placed emphasis on regional rail-style frequent and rapid service on the commuter rail network, and increased Worcester Line service is critical to this end. The analysis for both an interim station in the first phase and a final-condition West Station must be coordinated with the recommendations of these recent and ongoing local and regional planning efforts.

- **The need for and phasing of a rail layover yard has not been adequately analyzed**. The introduction of a layup facility in this area is questionable and is not properly analyzed in the DEIR. The South Station Expansion FEIS stated that there are three options for commuter rail layup: Widett Circle, Readville, and Allston, and that the Allston option would be subject to environmental review as part of the Allston Interchange project. But the DEIR does not provide the necessary analysis to understand and evaluate whether there should be layup in Allston at all, and if so, when it should be introduced. Task Force members have made proposals that, rather than parking trains during the midday, increased service frequency during the off-peak period would better serve the Commonwealth. A full analysis of the need for and impacts of rail layover in Allston, as well as the merits of increasing commuter rail service rather than requiring off-peak layover, should be included in a Supplemental DEIR.

- **Any rail layover facilities should be introduced in the final phase of the project construction.** The graphics included in the DEIR show that the lay down area for construction purposes is located in the same location as the proposed layup area for commuter rail. This strongly suggests that, if layup is to be provided, it should be introduced at the end of the reconstruction process, when the most complicated construction, including a final-condition West Station, will have been completed. The proposed Phase II layover yard seems to interfere blatantly with appropriate planning for the passenger rail service and its patrons. Phase II is particularly inappropriate because it will become an obstacle in both cost and constructability to the final development of West Station. Therefore, the layover yard should be designed as an adjunct to West Station, and this project should give priority to a functional station so that passenger rail service is given priority over train storage on this site.

2.) The 3K-ABC at-grade option should be pursued as the preferred option for the "throat" section of the highway.

- Three "throat" area options are presented in the DEIR, thanks to a MassDOT decision to explore two suggestions from participants in the I-90 Task Force (3K-AMP train viaduct and 3K-ABC at-grade). The three options have distinctive characteristics, and result in a wide range of environmental impacts. However the DEIR fails to provide a fair and equal comparison among the three proposed "throat" options with regard to cost, construction phasing, and the expected adverse impacts on the existing Framingham/Worcester Rail line.

- **The 3K-ABC at-grade option opens opportunities for air rights development.** In their Institutional Master Plan, Boston University has detailed an academic/research building at the northwest corner of Commonwealth Avenue and the BU Bridge, which becomes feasible with the 3K-ABC at-grade option. Moreover, this planning solution makes it possible to build pedestrian and bicycle bridges that could be built over the highways to connect BU and Brookline with the Charles River paths. Having the opportunity to make these vital connects to open space and the river should, within their own right, be considered mitigation measures. The 3K-HV Highway viaduct option would effectively preclude the possibility for these connections, therefore we urge MassDOT to pursue the 3K-ABC at-grade option for the "throat" section of the highway.

- **The three "throat" area options presented in the DEIR are not directly comparable when considering the rebuild of the Grand Junction Rail Bridge over Soldiers Field Road.** The 3K-HV Highway viaduct option does not include a rebuild of the Grand Junction line bridge over Soldiers Field Road. However this bridge is included in the construction and cost analysis

of both the 3K-AMP train viaduct and 3K-ABC at-grade options. Therefore the cost analysis of all three "throat" options does not put the analysis equally. The rebuild of this bridge is crucial for establishing a two-track Grand Junction line as it crosses the Charles River between West Station and Cambridge. We ask that MassDOT provide further analysis on rebuilding the Grand Junction Bridge over Soldiers Field Road, and that this cost be added to the estimated $100,000,000 difference with the 3K-HV highway viaduct option.

- **The DEIR neglects quantifying the full costs of each "throat" option over time.** The 3K-HV highway viaduct option will have maintenance costs over time that we can only assume are greater than the 3K-ABC at-grade option. By MassDOT's own admission, the current viaduct costs ~$800,000 per year in maintenance costs, and a new highway viaduct will have similar annual costs over the next 50 years; estimated at $40,000,000 solely for maintenance. However, these are only estimates gleaned from best guesses, therefore we ask that MEPA require MassDOT to provide the lifecycle costs for each "throat" option so we have an accurate depiction of full project costs to the Commonwealth over the next 50 years, 75 years, and 100 years.

- **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 3K-AMP train viaduct and 3K-ABC at-grade options. These costs must be quantified and made available as a consideration in choosing the best option for the "throat" area.

- **The DEIR must detail the disruption of travel to and from points west, for both the Framingham/Worcester Rail line and I-90 highway, when comparison the "throat" options.** The 3K-HV highway viaduct option requires the disruption of rail service on the Worcester Line from the very beginning of construction, reducing the available two tracks down to one, with trains operating at slower speeds to meet construction safety requirements, while at the same time reducing I-90 to six lanes for construction activity, thus disrupting the movement of western corridor residents either by rail or road. Analysis in the DEIR suggests the 3K-ABC at-grade and 3K-AMP train viaduct plans retain two-track Framingham/Worcester rail functionality in most of the early roadway reconstruction, and will reduce the available tracks to one for twelve months near the end of construction when the new Turnpike will be completed and operating at a greater capacity. In order to effectively compare the "throat" options, MEPA should require MassDOT to detail all impacts on service for regional transportation through the corridor throughout the construction process.

3.) The need to provide the greatest opportunity to re-knit residents to the Charles River, reduce the noise impacts of the highway on the Charles River Reservation and Cambridge, allow for long-term use of the Grand Junction rail line as a fully integrated element of the Boston area transit system, and provide mitigation of highway impacts along the riverbank by providing safe and attractive paths for walkers/runners/bikers in this heavily used active transportation corridor.

- **The DEIR proposes no mitigation to offset the environmental impacts of the three "throat" options.** The DEIR suggests that the marginally expanded park proposed for the river's edge nearer the River Street Bridge would provide all the needed mitigation along the riverfront for the entire project area. However, the 3K-HV Highway viaduct option has no

noise or visual mitigation elements. DEIR consultants examined the highway and found no noise impact protections were required under federal regulations, and therefore none are included. In reaction to this disappointing conclusion, and because MassDOT's findings did not seem correct in their opinion, the City of Cambridge has commissioned its own noise analyses. Based on preliminary conclusions from this adjunct study, elevating Soldiers Field Road in the 3K-ABC at-grade option helps reduce noise impacts at they are felt across the river in Cambridge. The 3K-ABC at-grade option propose raising Soldiers Field Road and adding an 8' noise wall between it and the I-90 roadway to reduce noise impacts on the riverfront, Magazine Beach and Cambridgeport. Furthermore, the 3K-HV Highway viaduct option maintains a visual barrier between the river, Boston University and Brookline. The 3K-ABC at-grade option provides a clearer connection across the highways to the river. We ask that MEPA take into account that with the 3K-ABC at-grade option, nearby residents of Brookline, as well as the Boston University community, will be able to look down streets connecting to Commonwealth Avenue and see the river for the first time since I-90 was built!

- **The "throat" options have inadequate, narrow paths for pedestrians and cyclists along the Charles River**. Wider, safer paths for pedestrians and cyclists in the Charles River Basin should be provided as part of the regional active transportation network. The three "throat" options all have narrow paths – much like the existing, crowded substandard paths that are within feet of oncoming traffic of Soldiers Field Road and under the noise and shadow of the I-90 highway viaduct. Since all non-vehicular transportation in this project is also the responsibility of MassDOT, this project should strive to provide, more attractive and safer paths, as is common elsewhere along the Charles thanks to improvements provided by the DCR (Massachusetts Department of Conservation and Recreation), specifically at points upstream at Greenough Boulevard and downstream along MIT's campus. Dedicated space for bicycles and pedestrian paths, separated from each other and from the highway, are an essential component to safe and environmentally sound access to the Charles River parklands, and are in the purview of MassDOT, DCR, and MEPA. We suggest that paths could be provided on either floats or fill in the river to offset the impacts of the highways and to accommodate modern foot and bicycle traffic. Paths on or in the river do not presuppose that the 3K-HV highway viaduct option or either the 3K-ABC at-grade and 3K-AMP train viaduct options, and therefore these paths and improvements to the riverfront should be built at the same time as the I-90 Allston Interchange Project.

4.) WATERFRONT PATHS FOR WALKERS AND PEDESTRIANS:
This document provides several suggestions about opportunities to provide safe and attractive paths for pedestrians, runners and cyclists that should be considered during the planning and design of the I-90 Allston Interchange Project. The two options could be built in or over the shallows of the Charles River immediately adjacent to the elements of the highway project in the so-called "Throat" area. No matter which highway alternative is selected, both construction period and permanent mitigation of walking and biking facilities will be needed.

Facilities for walkers, runners and cyclists are a major MassDOT responsibility in this project

- MassDOT must include sidewalks and bike lanes as an integral element of all new streets in this project, in accordance with Boston's Complete Streets Policy.
- Off-street pedestrian and bike paths also play an important role in the commuting and recreation network.
- Off-street paths along the Charles River are among the most heavily used on the Commonwealth. DCR has been heavily engaged in examining the heavy volume of pedestrian, runner and cyclist traffic throughout the lower Basin over a 5-year period. *Charles River Basin Pedestrian and Bicycle Study: Non-motorized Bridge and Pathway User Counts, Alta Planning & Design, 2015*
- Riverfront paths in the I-90 project area are likely to see greatly increased use from students of 3 universities and residents of the surrounding densely populated area and from new development

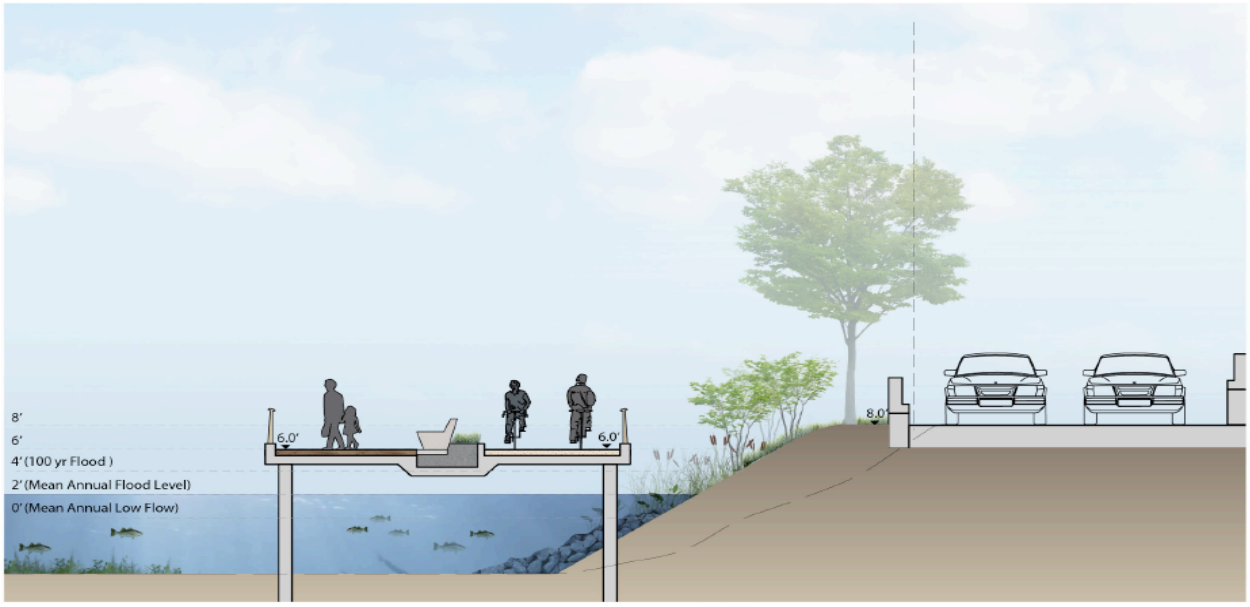
Design goals have been promulgated by the DCR for riverfront paths with separate paths for pedestrians and bikes are already in existence.

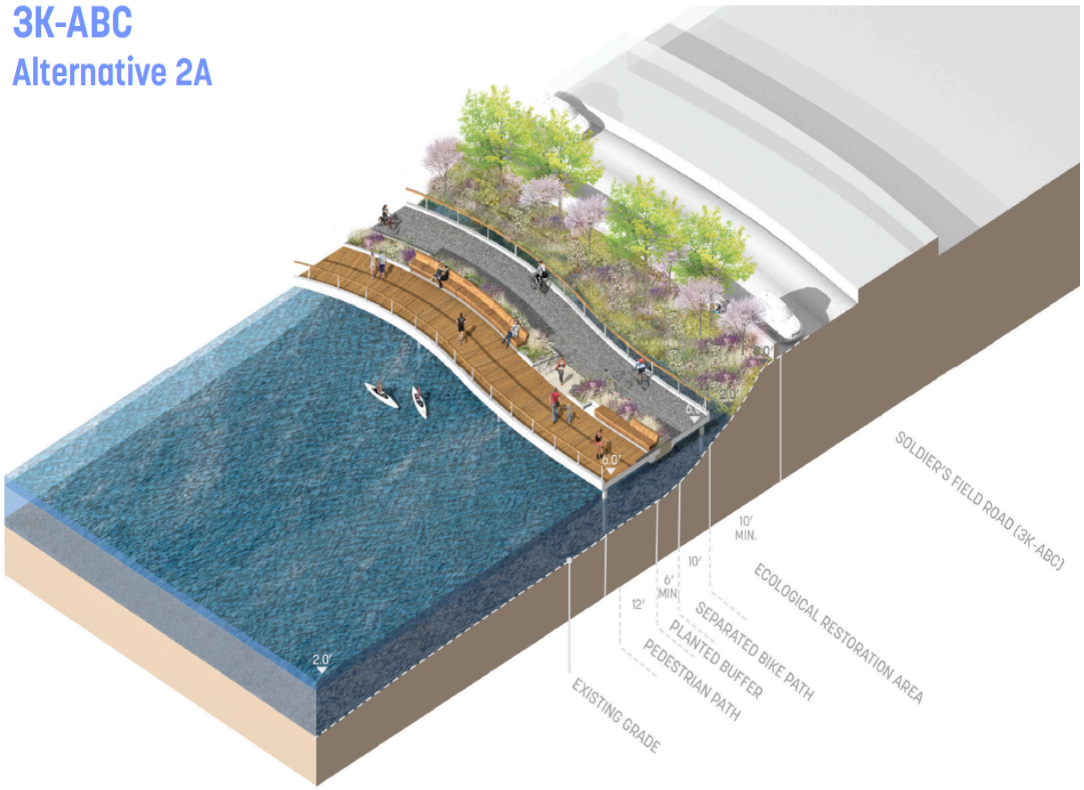
- In conflict with such goals, a substantial portion of the riverfront known as the "throat" co-mingle both pedestrians and bicycles in one path.
- Dual path systems are found both upriver and downriver from the throat portion of the I-90 project.
- The Esplanade Association and DCR are working toward separating bike and walking/running paths between the Science Park Dam and the BU Bridge
- Two miles of dual riverfront paths have been rebuilt along Memorial Drive in Cambridge.
- The I-90 project has already designed a two-acre riverfront park along Soldiers Field Road with dual paths.

The Charles River Conservancy and WalkBoston, working with Sasaki Associates and funded by the Solomon Foundation have an alternative approach for better paths in the throat.

This approach offers distinct advantages to all of us:

- The new facilities provide safer and more attractive facilities for walkers, runners and cyclists.
- The new paths provide separate pedestrian and bicycle facilities to handle existing use and the anticipated growth in the number of users.
- Plans make use of and respect the river's edge and appearance.
- The proposed new paths would be an attractive, useful and environmentally sound addition to the riverfront.
- The new facilities would serve as mitigation for highway impacts.
- The plan for paths at the river's edge are independent of the choice of highway design for the throat. They work with any of the 3 options.
- The proposed facilities could be built with a funding plan that is separate from the highway portion of the project.
- New paths could be built on a separate schedule that does not interfere with the highway construction schedule.
- Plans for facilities in the river could have a distinctive permitting process, separate from the highway permits.
- Construction period mitigation will be required to provide walking and biking access throughout the lengthy construction schedule.





This recommendation from the Charles River Conservancy and WalkBoston for either the boardwalk or the expanded shoreline proposals are superior to the currently proposed, narrow and unsafe walkway.

Proposed single path with the highway viaduct option

Proposed dual paths with the expanded shoreline option

- **The DEIR does not explore the impact of the proposed People's Pike pedestrian and bicycle path between Franklin Street and the Charles River.** The proposed "flip" of West Station, as put forth by Harvard University, will allow for a buffer space between the Pratt Street neighborhood and the project sound wall, which will allow for the creation of a protected, uninterrupted pedestrian and bicycle trail through the buffer, extending from Franklin Street to West Station and potentially connecting to the Paul Dudley White Bicycle Path on the Charles River if valued with the 3K-ABC at-grade and 3K-AMP train-viaduct options. We ask that a protected multi-use path along the project edge to the south, referred to as the "People's Pike," be considered in a Supplemental DEIR.

- **Further analysis is needed for Cambridge Street/West Station Bypass Road**. The DEIR is deficient in not analyzing the Cambridge Street/West Station Bypass Road; a proposal made by the City of Boston placemaking study and promoted by Harvard University, which was very well received by the Task Force. A bypass road on the southern edge of the project extending from Linden Street to the proposed West Station appears to have the potential to significantly

reduce traffic in the street grid north of the interchange, and enable a reduced scale design on Cambridge Street and Cambridge St South. Additionally, a bypass road seems to promise a platform for decking over some of the rail and highway sections that might otherwise remain open for decades. The Cambridge Street/West Station Bypass proposal should to be complimented by a much better buffer and noise mitigation for the Pratt Street residential neighborhood and a safe and convenient bike and pedestrian path from the Harvard Ave/Lincoln Street/Franklin Street area to West Station and beyond to Agganis Way and the Paul Dudley White Path. These concepts were the result of the City of Boston placemaking study funded by MassDOT, but are simply referred to as "on the 'do not preclude' list." A Supplemental DEIR should be required to fully describe and analyze these possibilities for public comment and consideration.

For these reasons, we are urging your office to require MassDOT to submit a Supplemental DEIR and continue public participation in the ongoing process. It is our hope that by providing further information and analysis on these outstanding issues, MassDOT will be able to select a final design that will meet both the standards set by the Commonwealth's own Executive Order No. 569, and the needs of the communities impacted by this project. We would like to thank your office for reviewing this important planning initiative, which will impact the metropolitan area and the Commonwealth of Massachusetts for generations to come.

In summary, we are requesting that a Supplemental DEIR address the following issues:

- Any processes going forward must include public participation.
- An unwavering commitment from MassDOT to West Station as an essential mitigation measure in the first phase of the project. We ask you to require MassDOT to prioritize study of earlier phasing of West Station in light of additional financial support from Harvard University.
- Implementing improved bus service in the first phase as a means for mitigation, including connectivity between North to South Allston via West Station to the Cambridge, the Longwood Area and Kendall Square in the first stages of reconstruction.
- Re-assessing the projected West Station ridership with other critical factors included.
- Greater clarity for the need and interim phasing of rail layover yard.
- Assessing the "flip" option for the layover rail and West Station.
- The benefits and potential opportunities of being able to develop air rights available through the 3K-ABC at-grade "throat" option.
- A better understanding of the need for more environmental mitigation elements in the "throat" area, including access from Commonwealth Avenue to the Charles River and Paul Dudley White Bike Path.
- Greater clarity on what noise mitigation measures would be for the 3K-HV highway viaduct option.
- Efforts to expand the too-narrow bicycle and pedestrian paths along the Charles River for all three "throat" options.
- A more comprehensive, direct "apples to apples" comparison that fully explores each "throat" option - complete with full costs of reconstructing the Grand Junction Railroad Bridge over Soldiers Field Road, and full operational costs of each option over time.
- An analysis of how the different "throat" options would impact disruption of travel from east and west for all modes (car, bus transit, commuter rail, bike, pedestrian, etc.).
- A commitment to rebuild Franklin Street footbridge over I-90 as an essential mitigation measure at the onset of any construction.

- Greater clarity for the signalized intersections at the I-90 on/off ramps, and separation of highway traffic and throughput bicyclists as they traverse from Malvern/Babcock to the bicycle facilities on Cambridge Street South.
- An analysis of how the proposed street grid and road widths would impact walking and biking, including a study of a People's Pike multi-use path in the buffer area south of the project made possible by "flipping" the layover rail and West Station.
- Further analysis of the proposed Cambridge Street Bypass Road, in coherence of the City of Boston placemaking study.
- Further analysis of the Cambridge St/Harvard Ave intersection, and inclusion of this intersection in the project scope.
- A fair analysis of Framingham/Worcester Line Impact During Construction.
- Further analysis of constructability issues, construction staging, the risk of traffic disruption and spillover traffic into the neighborhood, with appropriate mitigation addressing each of these issues.

As a parklands advocate we also want to point out that all of the DCR owned land along the throat is legally a park, and today, because of decades of incremental road expansion, we have an 8 foot path and a bit of slope by the River. In section 4 f comments from Charles River Conservancy and Walk Boston, it might make sense to point out that along with a "re-parkwaying" the details of Soldiers' Field Road, and the addition of the boardwalk, along with the ABC plan for at grade turnpike and a bike and ped connection from the south side at Agganis to the River edge, the Allston interchange reconstruction could really live up to the spirit of the section 4 f statute that requires "all possible planning" to mitigate the damage done by the transportation expansion. The resulting parkway corridor would provide a dimension similar to what DCR owns as parkland, which has been so eroded over the years. It might make sense to include the section 4 f point in the comments to MEPA.

We appreciate the opportunity to submit comments and look forward to working with you to make the I-90 project a gain for the parklands, and pedestrians and Bikes as well.

Sincerely,

Renata von Tscharner
Founder and President of the Charles River Conservancy

Copied:
Congressman Michael Capuano
Senator William Brownsberger
Senator Sal DiDomenico

Senator Andrew Bettinelli
Senator Christopher Smith
Rep. Kevin Honan
Rep. Michael Moran
Mayor Martin J. Walsh
Oscar Lopez
Craig Cashman
Mark Ciommo
Michelle Wu

Ayanna Pressley
Michael Flaherty
Annissa Essaibi George
Warren O'Reilly
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