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Stephanie Pollack
Secretary of Transportation
State Transportation Building
10 Park Plaza
Boston, M A 02116

November 30, 2018

Dear Secretary Pollack,

As advocates for the Charles River, specifically access to and along the river's parklands, the Charles River Conservancy (CRC) is invested in the improvement of the river's edge as part of the I-90 Interchange Project. We have followed the Independent Review Team's analysis of the "Throat" closely, paying particular attention to the public experience along the Dr. Paul Dudley White Path. We understand the complexity of the assignment, especially within the time constraints, and appreciated the opportunity to meet directly with the team as they gathered information. Overall, we think that they were successful in their pursuit to improve each of the three DEIR options, but still feel strongly that there are significant issues to address before moving forward. Below are the CRC's comments to the IRT's Technical Report, outlining issues that need to be resolved as part of MassDOT's selection of a preferred alternative for the Throat.

To address regardless of preferred alternative:

None of the original options or variants fully address the project's purpose and need statement because they do not address river bank restoration or consider the positive benefits of fill, which would improve the ecological health of the river and the public experience. Instead, the PDW path and active transportation modes continue to be demoted relative to I-90 and Soldier's Field Road.

The IRT Scope of Review includes "the need for and the opportunity to **restore and expand** the parkland" as one of the three significant themes for

exploration, but too quickly dismisses the exploration of fill or a boardwalk, temporary or permanent. The report states that these options are “un-permittable under state and federal wetlands regulations, despite the attractive recreational and ecological benefits they might provide based on consultation with DEP,” (6.1.4.2). However, this reasoning has not been backed up with an explanation of what “un-permittable” means in terms of potential costs or the extent of permitting delays. Furthermore, our own consultation with DEP suggests they would see a significant difference between permitting fill to accommodate an interstate highway and permitting fill for parkland that could support active, non-carbon emitting, transportation and resiliency.

In advance of the FEIR, MassDOT should explore at least one alternative that places additional fill in the river to re-establish a more natural bank and increase “end of pipe” infiltration as part of a larger stormwater absorption and restoration system. They should do so in close communication with DEP to fully understand the options and implications. This type of collaboration, at the highest levels of our State Government, is the only way to develop truly resilient solutions.

Continuous, safe passage for pedestrians and cyclists needs to be provided along the Dr. Paul Dudley White Path both during and after construction. The IRT report “assume[s] the Paul Dudley White Path will be closed during the entire construction period, though not required,” (5.2.5). This is not acceptable. The Boston-side path must be maintained during the entire construction period, be it on fill or a boardwalk, as the proposed detours are infeasible. The proposed BU Bridge detour forces users to carry bicycles up and down stairs of the footbridge and travel on the Commonwealth Avenue sidewalk. This should not be considered viable from an accessibility standpoint. The proposed Massachusetts Avenue Bridge detour is very crowded, with poor surface conditions and difficult visibility at night from headlight glare. The inbound bike lane on the Mass. Ave. Bridge does not connect with the ramp to the Charles River parkland on the westbound side of the bridge. Neither of the detour routes consider user experience or time spent at additional crossings. As illustrated by The Esplanade Association’s recent efforts to separate walking and biking paths in the park, the Charles River is a major thoroughfare for active transportation that needs to be maintained at a high level throughout the I-90 Improvement Project.

Park and public realm improvement standards need to be clearly defined and reflected in project costs. “The creation of new DCR-controlled parkland along the river,” is mentioned several times throughout the IRT report, but is not evident in the cost comparisons outlined in Section 7.2. There is an immediate need for MassDOT, in partnership with the Taskforce and experienced landscape architects, to establish standards for the public realm including Visual Quality of Riverfront and Open Space (3.2.6.3), Physical Quality of Open Space and PDW (3.2.6.5), and Quality of Riverfront Access Points (3.2.6.7), and to allocate resources accordingly.

In order to adequately address the issues above, and many more from the Taskforce, mitigation for each variant must be determined before an option selected, as required by Section 4(f). All of the original options and IRT variants have different circumstances and impacts on the Charles River and surrounding neighborhood and would therefore require different mitigation. While the IRT report references some opportunities for mitigation, it fails to include specific mitigation measures. Not only it is essential to know the feasibility and effectiveness of mitigation as part of the decision process, it is required. Therefore, along with many other members of the Taskforce, The CRC insists that Section 4(f) requires MassDOT to determine

mitigation packages for each scheme *before* selecting a preferred option. Doing so afterward will inevitably provide reactive and insufficient relief.

Evaluation of alternatives:

Without mitigation and further study of the riverbank, we believe it would be a serious procedural mistake for MassDOT to select a preferred alternative. Absent this critical evaluation, we believe that the Hybrid Variant exhibits the most potential and continue to adamantly oppose the Highway Viaduct. The CRC's priority is to improve connections along and access to the Charles River and the PDW path. The only scheme to date that would satisfy the later by allowing for pedestrian bridges over the I-90 and Soldier's Field Road was the at-grade option. The IRT's Hybrid Variant reduces the overall vertical profile by stacking SFR over a depressed I-90 while also reducing the horizontal footprint of the roadways. This enables important North-South pedestrian and cyclists access points and increases the width of buffer and parkland next to the river, making the hybrid variant the most appealing of the options produced thus far. We encourage MassDOT to take this scheme one step further and study the feasibility of moving the elevated SFR over I-90 *eastbound*, which would move stacked, high-speed traffic further away from the river and the PDW.

Ultimately, the success of this scheme lies in design development and phasing. The CRC's support is contingent on MassDOT making the following commitments at the time of selecting a preferred option for the Throat:

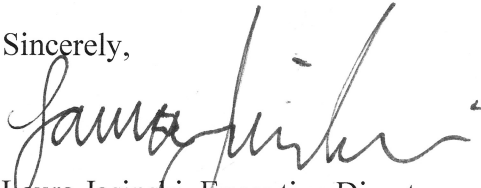
- The overall height of the Hybrid Variant will be maintained throughout design development so as to allow for ADA compliant footbridges to pass over the roadway and rail lines to safely connect to the PDW path.
- Footbridges at or near Agganis Way and Commonwealth Avenue will be built over the roadway and rail lines in the first phase of the project.
- Any and all increase in the shoulder width of I-90 through the Throat, as may be required by the Federal Highway Administration, will be absorbed to the south on the BU easement rather than to the north, which would reduce the overall area of the buffer and parkland.
- Barrier(s) are provided to minimize the noise and visual impacts to the surrounding neighborhoods, including Magazine Beach across the river.

While we appreciate A Better City's ingenuity and pursuit of a better, "outside the box" solution, the CRC has significant concerns about elevating the PDW above the shoreline or traffic. Proximity is an important piece of the public's experience of and connection to the Charles River, which is very different at 1 foot above the watershed and 14 feet above. We believe that the best way to continue evaluating the all-at-grade concept is instead with a combination of fill and/or boardwalk.

From our work in the Charles River parklands, assisting the DCR with maintenance, we also know that supporting plants and other landscape elements on a platform above heavy traffic would be horticulturally and operationally difficult. For these reasons, we feel strongly that the PDW path should remain at-grade and connected to the landscape and that MassDOT should include shoreline restoration and a boardwalk as part of these options.

We appreciate the work of the IRT and look forward to making progress towards a truly transformative I-90 Improvement Project. Thank you in advance for incorporating these comments and the comments of many more taskforce members into MassDOT's design and decision making.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Jasinski". The signature is fluid and cursive, with a large initial "L" and "J".

Laura Jasinski, Executive Director
Harry Mattison, Board Member
Charles River Conservancy