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December 12, 2019

Dear Mr. McEwen and Mr. O'Dowd,

We appreciate the opportunity to comment on the Allston I-90 NEPA Scoping Report, a document that will shape the outcome of this once-in-a-generation project. You have an incredibly important role to play and we urge you to accept the public's comments wholeheartedly and integrate them into the report, especially those from task force members who have dedicated countless hours to the process and betterment of Greater Boston. Along with many of these task force members, the Charles River Conservancy has signed on to a joint letter to provide comprehensive feedback to the FHWA and MassDOT on the Report.

Additionally, as an organization that strives to make the Charles River and its parks a well-maintained network of natural urban places, we write to emphasize that **improving the quality and extent of the parkland, the storage and treatment of stormwater, the ecological health of the river, and human access to the river's edge must be included in the Project Purpose.** In the last 25 years, tremendous progress has been made in improving the health of the Charles River, thanks to many of the same federal, state and local agencies that are behind today's Allston Multimodal Project. To exclude these elements from the Project Purpose would contradict decades of work and public investment.

Acknowledging ecological restoration and resiliency in Project Purpose will fundamentally and necessarily change the approach to the river and parkland to date, enabling:

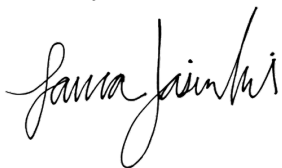
- **Consideration of a build alternative with three westbound Turnpike lanes** to reduce the impacts on the Charles River during construction and expand the width of the narrow riverside park in the final build condition. Automatic electronic tolling data now available suggests that this lane reduction is feasible without additional travel impact from the west and should be evaluated further.

- **Inclusion of the Agganis Way bicycle and pedestrian bridge connection to Paul Dudley White Path.** Access to the Charles River has long been a priority of many stakeholders, including the Charles River Conservancy, and the opportunity to create a new connection at Agganis way was a key reason for Secretary Pollack’s selection of the Modified Hybrid throat alternative. To ensure that this important connection is made, it must be fully integrated into the design, budget and construction phasing of the project.
- **Thorough analysis of constructability from an ecological impacts perspective.** As noted in our September 16th letter to the MassDOT and Fiscal Management Control Boards, we are very concerned about the impacts of the trestle bridge proposed in the Charles throughout 10 years of construction. Sediment disruption from the installation of pilings, water quality degradation from construction and direct runoff from the realigned Soldier’s Field Road, increased growth of invasive plants, disturbance of bird and fish habitat, and further negative impacts to the Charles River ecology will be twofold with the installation *and* removal of the structure. The bridge will also have serious negative social and economic impacts, threatening events like the Head of the Charles, which brings thousands of tourists to our region each fall. And a generation or more of rowers and other river users will be discouraged by this massive intrusion. The consequences will be far from *temporary* and MassDOT must attempt to first avoid and minimize these impacts.
- **Consideration of (modest) fill to restore the riverbank and expand park land to encourage active, sustainable modes of transportation along the Charles River.** The current state of the parkland and Paul Dudley White Path within the project boundaries is deplorable. To undergo decades of construction and negative impacts to the river, only to replace a similarly narrow stretch of parkland within the throat – not even wide enough to support separated paths with a planted buffer and tree canopy for 600 feet or more – is unacceptable. MassDOT must use this opportunity to 1) restore a man-made, eroded riverbank; 2) facilitate stormwater infiltration with soil design and native plants; and 3) improve the health of the river and public experience of the parkland. This can be accomplished with a modest amount of fill, importantly not enough to restrict watershed recreation, and needs to be included in the alternatives analysis. The river’s width does not define its health, and we need to make room for the green infrastructure that can improve the Charles.

It is imperative that the current Scoping Document expand its current alternatives analysis. While the Project benefitted from the work of the Independent Review Team in 2018, it only focused on one section of the project area and did not thoroughly evaluate constructability or impacts to the river, evidenced by the proposed trestle bridge. The IRT report cannot be a substitute for this federal review. At the heart of NEPA and Section 4f regulations is the requirement to consider a reasonable range of alternatives that accomplish the purpose and needs of a project while avoiding, minimizing, and mitigating impacts. To only consider one “Build” alternative directly conflicts with the spirit and purpose of the process. We cannot find the best built alternative without anything to compare it to.

Thank you for your close review of our comments. The Charles River Conservancy looks forward to remaining a dedicated task force member as a wider range of alternatives are evaluated.

Sincerely,



Laura Jasinski
Executive Director, Charles River Conservancy