



December 12, 2019

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Re: Allston I-90 NEPA Scoring Report

Mr. McEwen and Mr. O'Dowd,

The Esplanade Association is a privately-funded nonprofit organization that works in partnership with the Massachusetts Department of Conservation and Recreation (DCR) as a steward for the historic Charles River Esplanade park, and is dedicated to enhancing the experiences of the more than 3 million visitors who enjoy the park on an annual basis.

We write today regarding the Allston I-90 NEPA Scoping Report and our concerns for the project's likely influence on public parks and pathways adjacent to the proposed project. Along with many other local non-profits, the Esplanade Association has endorsed and signed on to a Joint Mass Pike Task Force letter dated today and sent separately to you to provide comprehensive feedback to the FHWA and MassDOT on the Report.

In addition to signing on to that letter, we write a letter of our own to further highlight several of the concerns we have as an organization dedicated to revitalizing, enhancing, maintaining and programming the Charles River Esplanade. Further, we are concerned with any project that impacts the public's access to, and the environmental condition of, the Charles River. Considering the immense scope of the I-90 Interchange Project, and the impacts it will have on the historic Charles River Esplanade, the Esplanade Association hereby requests that the final Scoping Report also include the following:

- I. **A greater emphasis on environmental justice.** The Esplanade Association recognizes that the many communities that will be impacted by the I-90 Interchange Project have, historically, been subject to damaging noise and air pollution. We ask that the Project's Purpose is expanded to include improvements to noise and air quality conditions. By mitigating these negative impacts, communities would see many worthwhile health benefits as well as an improved experience on the Esplanade.
- II. **The inclusion of Additional Build Alternatives.** An analysis that focuses on a single build alternative omits several other fruitful configurations that would lessen project impacts upon the river and its park frontage. These include eliminated the need for Soldiers Field Road to be located on a deck in the Throat area. This and other alternatives that should be considered are described in section II of the Joint Mass Pike Task Force letter.
- III. **An assurance that the Project will work to improve, or at least prohibit further degradation of, the ecological health of the river, as well as the public's access to it.** The Report and the Project should further

analyze, acknowledge, and work to prevent and/or mitigate the negative impacts of the Project on the water quality and ecological conditions of the Charles River in addition to the parkland pathways that run along it. In order to consider these concerns duly acknowledged, the Esplanade Association would hope to see full documentation of:

- a. The need for the trestle structure in the "Modified Hybrid" Throat Alternative,
- b. The impacts of constructing and, separately, removing the trestle,
- c. A comprehensive evaluation of alternative design options as listed in sections II.C.2 and II.D.4 of the task force letter, and
- d. A comprehensive environmental mitigation plan as noted in section II.E.1 of the task force letter.

- IV. **A comprehensive plan for improved bicycle and pedestrian connections to the riverfront park paths.** The Esplanade Association considers this to include at least two particular areas of interest for several of our peers: creating a bicycle and pedestrian bridge from Agganis Way and Franklin Street to the Paul Dudley White Path and a significantly improved connection from Commonwealth Avenue at the Boston University Bridge to the Paul Dudley White Path. The Esplanade Association has been deeply engaged in promoting enhanced multimodal transportation options within the park that prioritize safety and build connectivity from outside the Esplanade. Our work has included efforts to separate lower-speed pedestrian/runner and higher-speed bicycle traffic to promote safer commuting conditions and wider usage. Our goal is to minimize conflict and ensure that bicycle and pedestrian infrastructure meets the growing demand on the pathway system.

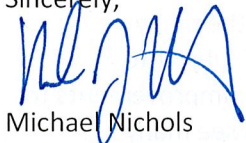
The Charles River Basin is a critical nexus in the metropolitan transportation network. According to a 2014 Pedestrian and Bicycle Connective Study for the Charles River Basin, the path systems that frame the riverbanks and the bridges are used by as many as 10,000 cyclists, pedestrians, and runners per hour. As projects recommended in the study are completed by the state and adjacent municipalities to improve access, multimodal traffic and park visitorship will grow. The I-90 Interchange Project provides a once-in-a-generation opportunity to further the earlier study's conclusions by seamlessly linking this new neighborhood in Allston to the existing and improving riverfront transit network on the Esplanade.

Additionally, though the Charles River Basin's current configuration was manmade, the ecological significance of the ancient watershed that it was built upon remains, and must be protected. We strongly encourage the Project to further analyze and provide plans for ecological and parkland mitigation efforts.

We appreciate the opportunity to comment on the I-90 Interchange Project, as well as your consideration in ensuring that the final Report will prioritize the above-mentioned additional work products. We encourage you to include the considerations listed here and in the jointly signed task force letter as part and parcel of the I-90 Interchange Project.

Thank you.

Sincerely,



Michael Nichols
Executive Director
Esplanade Association

cc: Interim Commissioner Jim Montgomery, DCR