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Mr. McEwen and Mr. O’Dowd,

Thank you for the opportunity to comment on the draft Allston I-90 NEPA Scoping report. Given the size and importance of this project and the impacts it will have on transportation in the Boston/Cambridge region, a thorough review of the project need, alternatives and their impacts will be an important step in finalizing the design and permitting for the Allston I-90 project. The draft scoping document provides a good base for reinforcing additional needs in the Purpose and Need of the project from the Cambridge perspective, which focus on mitigating impacts of the existing highway infrastructure and the replacement planned project.

Cambridge’s comments on the Purpose and Need of the project continue to focus on core elements which need to be included that have been continually identified by the City as project priorities:

- Priority and expansion of sustainable transportation including bus and rail passenger service and pedestrian and bicycle circulation
- Providing additional parkland as a space for people, watershed ecosystem, shade trees and climate resilience measures
- Noise mitigation of both existing and future transportation noise, including during construction, as well as buffering facilities with landscaping to reduce visual impacts

**Sustainable Transportation**

The Purpose and Need should clearly identify the expansion of sustainable modes including bus, rail, walking and bicycling as priorities, so that future development can meet mode splits anticipated by Go Boston 2030 and state goals. Current space constraints with existing infrastructure make it difficult to expand connections and facilities for these modes. Creating transit capacity through an expanded West Station with four track capacity for more frequent (minimum half hour headways) commuter rail and future passenger service to Cambridge on the Grand Junction and beyond should be a stated need.
Bridging the division created by the current viaduct by creating additional pedestrian and bicycle facilities should also be part of the Purpose and Need. While some connections are included in the current alternative, priority should be given to additional connections such as reconstruction of the Grand Junction river crossing, to connect with the planned Grand Junction Path through Cambridge, and connections to the Paul Dudley White Bike Path. Connections to Commonwealth Avenue for this path system are also important.

**Parkland**

While additional parkland is being considered in the alternatives, space along the river continues to be constrained in the “throat area” by the need for wider highway shoulders. Creating additional space for paths, trees and an improved riparian environment should be part of the Purpose and Need. Alternatives should also be included that look at filling a part of the river at its widest section to create additional parkland that can accommodate separate pedestrian and bicycle paths, trees and landscaping for shade to mitigate anticipated future temperature rise, as well as features that can clean stormwater and help to create a more resilient environment in the river basin, given forecasted changes in the intensity of storms and weather. This expanded space could be used in the short-term for construction staging in place of constructing a temporary viaduct in the river and avoiding its adverse effects on the river.

**Mitigation of Current and Future Noise and Transportation Impacts**

The Purpose and Need should acknowledge that when the current viaduct was constructed, substantial vehicle noise and associated pollution were created and that these affects should be mitigated by the project. Cambridgeport, including Magazine Beach Park (2nd largest park in Cambridge) experience noise and pollution from the Turnpike which could be mitigated through the inclusion of noise walls and other noise reducing technology. The preferred alternative has opportunities to includes some noise mitigation and this effort should be maximized.

**Additional Analysis to include in the DEIS**

For each alternative considered, there should be appropriate mitigation proposed for the impacts of that alternative. This is essential in order to evaluate each alternative and illustrate how well impacts, including during construction, can be mitigated. Enhanced transit and other sustainable mode improvements would greatly enhance mobility in the Cambridge/Allston area and should be proposed for the extended 8-10 year construction period.

Thank you for your consideration of the City of Cambridge’s comments on the scoping report and we look forward to working with Federal Highway and MassDOT during this permitting process. If you have any questions, please do not hesitate to contact me or Bill Deignan in the Community Development Department at wdeignan@cambridgema.gov, or at 617-349-4632.

Sincerely,

Louis A. DePasquale
Cambridge City Manager

Cc: Susanne Rasmussen, Director of Environmental & Transportation Planning