



October 14, 2020

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Secretary Pollack
10 Park Plaza, Suite 4160
Boston, MA 02116

Dear Secretary Pollack:

Please accept my sincere appreciation for advancing a version of the City of Boston/A Better City design as the all at-grade alternative to carry forward in the upcoming review process for the I-90 Allston Multimodal Project. We look forward to continuing to work with the MassDOT team to further refine the all at-grade concept—and to ensure that it is ultimately selected as the preferred alternative. As such, we offer the following suggestions:

First, we urge you to adjust the cross-section dimensions of the all at-grade alternative to move the northern point of Soldiers Field Road away from the edge of the river. As we've previously communicated in our formal correspondence to your team, we believe there are several ways to accomplish this, including retaining the existing lane widths on Soldiers Field Road, adjusting the shoulders on I-90, and/or working with Boston University to shift the alignment to the south and away from the river.

Second, we recommend that the Throat Area Alternatives Analysis spreadsheet immediately be opened up to an iterative and transparent public review process. As you may know, upon releasing the spreadsheet, MassDOT did not provide any back-up documentation, assumptions, or data to explain the conclusions presented in the spreadsheet and we are officially requesting that all relevant back-up analysis and documentation be made public within the next 48 hours to facilitate robust public review. We ask MassDOT to engage in an authentic, transparent public engagement process during which the agency receives *and* responds to public feedback. It is extremely concerning and disappointing that the agency has described the current public comment period as an "information sharing" exercise. This is not consistent with the transparent and deliberative process that the state has committed to uphold. The Commonwealth is poised to spend more than \$1 billion in taxpayer and toll payer dollars on this project and the process must therefore meet the public's interest. After six years, now is not the time to rush through the preferred alternative public process.



Third, in terms of substance, the Throat Area Alternatives Analysis spreadsheet itself is riddled with bias and inaccuracies and appears to treat all elements and measures with equal weight. Key concerns include the following:

- *Cost Assumptions:* Without more substantial back-up, we are skeptical that surface construction would cost roughly the same as viaduct construction—especially since two previous MassDOT-funded consultants (HNTB and the independent review team) described the all at-grade alternative as less costly than the highway viaduct alternative. Viaduct construction would involve maintenance of traffic operations on the existing viaduct during reconstruction with major structural changes underway. Clearly, life cycle cost for maintaining a surface highway would be significantly lower than for maintaining a viaduct structure. MassDOT and FHWA should disclose all relevant cost assumptions.
- *Permitting:* The basis for determining the square footage of impacts for the components at and in the Charles River is unclear. As you know, the Conservation Law Foundation believes that an all at-grade design can be permitted. MassDOT and FHWA should disclose the basis for all impact calculations.
- *Construction Staging & Impacts:* We provided a detailed conceptual construction staging plan to MassDOT, including sub-stages that illustrate how to build the all at-grade alternative. We have not seen the staging plan proposed for both the new modified highway viaduct or the new no-build and are not convinced that those viaduct reconstructions will require fewer stages than the at-grade alternative. Please explain the origin of the five versus thirteen stages of construction—and the associated unsupported claim that five stages are safer for the traveling public. Additionally, maintaining two-track service and increasing public transit capacity during construction is imperative and any option that fails to do so should be rejected. We have shown and described how to maintain weekday use of the commuter rail line for the all at-grade alternative. MassDOT and FHWA should present the new construction staging plans to the Task Force and public and should incorporate that feedback into its work and revisit its assumptions where necessary.
- *Stormwater Management and Utility Relocation:* We suspect that the stormwater management and utility relocation assessments reflected in the Throat Area Alternatives Analysis spreadsheet erroneously pertain to a previous version of the all at-grade alternative—the spreadsheet should be updated and adjusted accordingly to evaluate MassDOT’s new modified all at-grade alternative.
- *Safety:* The flatter and straighter characteristics of the all at-grade alternative make it superior to the reverse curves and steep grades of the highway viaduct, thus allowing narrower shoulders to provide equivalent sight lines and safety as a viaduct with wider shoulders—this is not captured in the Throat Area Alternatives Analysis spreadsheet and this important omission should be addressed.

In summary, we implore you to amend the all at-grade alternative to limit impacts to the Charles River, release relevant back-up documentation associated with the Throat Area Alternatives Analysis spreadsheet, amend the Throat Area Alternatives Analysis spreadsheet for accuracy, and recommit to upholding a truly transparent and deliberative public engagement process with a complete public comment period.

As you know, on September 23, 2020, the City of Boston sent a letter reaffirming its firm opposition to the highway viaduct and strong desire that the all at-grade option be selected as the preferred alternative. This letter is enclosed for your reference. At this juncture, we do not understand how MassDOT and the FHWA can



proceed with a highway viaduct option in defiance of the host jurisdiction's wishes.

This project will shape our region for the next century—it is our shared legacy. Together, we have an unparalleled opportunity to realize a truly transformational project that will advance accessibility, equity, and sustainability for the City of Boston, the region, and the Commonwealth.

Thank you for your steadfast leadership.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard A. Dimino'.

Richard A. Dimino
President & CEO

Enclosure

cc: Administrator Jeff H. McEwen
Mayor Martin J. Walsh
Chief of Streets Chris Osgood
BPDA Director Brian Golden
MassDOT Board of Directors
MBTA Fiscal and Management Control Board