



March 31, 2015

Secretary Matthew Beaton
Executive Office of Energy & Environmental Affairs
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: EEA# 15334 - I-90/I-495 Interchange Improvements Project - Environmental Notification Form

Dear Secretary Beaton:

On behalf of the 495/MetroWest Partnership, please accept the following as our official comments regarding the Environmental Notification Form for the I-90/I-495 Interchange Improvements Project.

The 495/MetroWest Partnership is a non-profit regional economic development organization serving thirty-five communities, over half a million residents, and an employment base of approximately \$19 billion/year. The Partnership seeks to address regional needs through public-private collaboration by working to enhance economic vitality, improve quality of life and sustain natural resources. The Partnership focuses on helping to alleviate regional constraints and limitations, and conducts numerous initiatives on transportation, workforce housing, brownfields, and water resources.

The 495/MetroWest region has experienced significant growth over recent years which has resulted in opportunities and benefits, as well as presented a series of complex and conflicting transportation challenges. If ignored, these challenges threaten the quality of life and economic wellbeing of a region that has become an economic engine for the Commonwealth. Our regional transportation challenges affect the state's ability to remain economically competitive.

The Partnership was formed, in part, to address large scale infrastructure needs in a region where MPO and other jurisdictional boundaries meet. Addressing the I-90/I-495 Interchange has been a long term priority for the Partnership given its congestion and safety challenges, environmental constraints and impact on other key interchanges within our region like the I-495/Route 9 Interchange. In fact, it was the Partnership who worked with Congressman McGovern's office to secure federal funding to study both interchanges as part of the I-495/Route 9 Interchange Improvement Study conducted by MassDOT's Office of Transportation Planning and completed in 2013. Subsequently the Partnership was asked to form a public-private collaborative stakeholder Working Group to advance the recommendations of the Study. As such we were pleased to learn of the ENF filing for the I-90/I-495 Interchange.

The Partnership has a consistent record of advocacy for the needed improvements at this Interchange, most notably in our comments on the Long Range Transportation Plans for both the Boston MPO and Central Massachusetts MPO. Additionally, the I-90/I-495 Interchange was identified

on both our 2004 and 2014 Top Ten Transportation Nightmares for the region. While we trust MassDOT and their consultant to narrow the three conceptual designs to find the best solution with the greatest return on investment for the Interchange, we feel strongly that the “no-build scenario” is not an option. This is especially true given the move to All Electronic Tolling on I-90, which will result in new weaving and safety challenges. We encourage continued transparency on the part of MassDOT and their consultant as the process moves forward to determine a preferred alternative and the Partnership is happy to help with hosting meetings and conducting outreach to engage regional stakeholders in the process.

While we are aware that MassDOT and their team are incorporating the impact of this project on the nearby I-495/Route 9 Interchange into their evaluations, we urge continued consideration and coordination as potential projects are advanced to address the safety and congestion at 495/9. We also ask that queuing data be included as part of the determination for a preferred alternative, specifically how the three concepts improve the congestion at 495/9 from drivers heading South on I-495 to I-90.

Additionally, strong planning and coordination is needed for construction management and phasing at I-90/I-495 given its direct impact on Route 9 as an alternative and the resulting pressures on the interchanges at I-495/Route 9, and I-90/Route 9. Existing traffic capacity is already strained during peak travel hours at all three interchanges and will no doubt become more of a challenge during construction periods.

A construction project of this magnitude will also require detailed coordination with the abutting communities and affected property owners. Staging will be a critical element of the project given the environmental constraints and sensitivities of the project area. We encourage continued dialogue and transparency with all stakeholders as future phases of the project progress.

The Partnership is eager to see a project move forward at the I-90/I-495 Interchange, given its importance to our regional economy and to the Commonwealth's continued economic growth. The no build scenario shows that safety and congestion problems at this interchange will only continue to worsen. With appropriate considerations to ensure this Area of Critical Environmental Concern's future, we feel this project merits approval. We look forward to working with your office and MassDOT toward determining a preferred alternative and advancing funding for this project.

We appreciate your consideration of our commentary on the ENF for this Project.

Sincerely,



Paul F. Matthews
Executive Director



Jessica L. Strunkin
Deputy Director

Cc: Renata Welch, P.E., Environmental Services Section, MassDOT
Jonathan Gulliver, MassDOT District 3 Highway Director