

Why MassDOT is Wrong  
About the  
Casey Overpass Project  
and  
How it Has Misled the  
Politicians and the Public

By Bridging Forest Hills  
February 22, 2013

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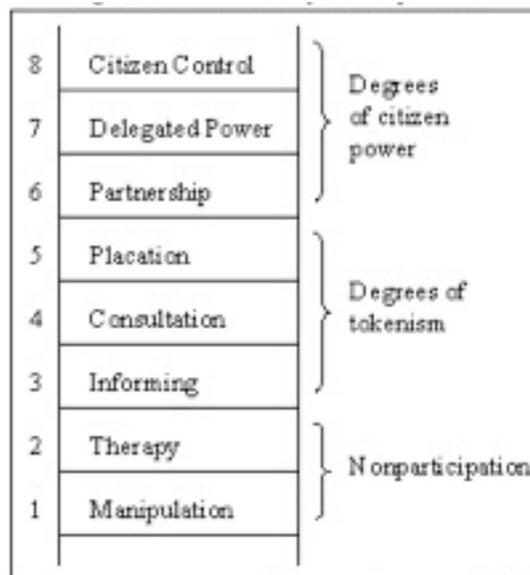
## **Conclusion**

# MassDOT's CASEY OVERPASS PLANNING AND CONCEPT DESIGN STUDY WAS SERIOUSLY FLAWED

## 1. Dysfunctional and Skewed Public Process

The Working Advisory Group ("WAG") set up by MassDOT was a process that MassDOT survived and moved on from. MassDOT never intended it to be a collaborative effort between the agency and the members.

Sherry Arnstein's classic analysis, the "Ladder of Citizen Participation," captures what MassDOT did here. The WAG was stuck on the Manipulation rung, occasionally climbing to the Consultation rung on the Tokenism level.



(Source: Arnstein, 1969)

WAG meetings were painful. Held in a room at the State Lab building that was too small to accommodate all attendees comfortably, the meetings were long, boring, hot and, frustrating. Lacking relevant handouts from MassDOT, WAG members frantically scribbled information to try to keep up. What was the result? Less than one-half of the members showed up.

"Homework" assignments for WAG members were "busy work" and many required an advanced degree to complete. These assignments were so obtuse that, on average, less than one-half of the attendees did them. Result: waste of valuable time. And MassDOT wasted paper on these "assignments" but refused to print technical data for WAG members.

In addition to the specific areas of concern about the process detailed below, there were numerous other issues with the WAG process, any one of which casts great doubt on MassDOT's constant refrain that the WAG process was "robust and involving":

- Elected public officials at the state and local level were excluded from the WAG member appointment process

- Two Forest Hills area business people were appointees to the WAG but both declined at the outset and were not replaced with other local business people, yet the MassDOT website still refers to these people as participants in the WAG.
- The first WAG meetings were spent creating “Measures of Evaluation” (“MOEs”). This was difficult for the group reasonably to do since the members had no experience planning something like the Casey Overpass replacement project.
- DOT did not permit WAG members to review or amend meeting agendas
- There were generally no handouts at or prior to WAG meetings with key information on them
- Given the crowded set up of the meeting room, Power Point presentations with key information were unreadable.
- Misleading renderings were never changed nor were they removed from the MassDOT website
- Too much time was spent with MassDOT talking at WAG meetings about peripheral matters, and only a half hour presentation on traffic impacts near the end
- Questions not addressed at one meeting typically were not answered subsequently
- Not an iterative process of refinements once the two alternatives were created
- The “split bridge” option was dropped with no discussion

## **WAG MEETINGS WERE POORLY RUN**

WAG meetings were scheduled for dinner time, 6:00 p.m. to 8:30 p.m.; often went much longer than advertised, frequently until 9:00 p.m. and did not allow time for discussion among the members. Agendas were poorly planned, overloaded with too many topics. No timeframes were noted on the agendas for each item allowing things at virtually every meeting to run behind schedule.

Not one WAG agenda included “discussion” at the end of the meeting, a time for WAG members to have the floor and raise questions and give suggestions. This is standard procedure. Result: Poorly run meetings that drove members away; not allowing a discussion period for WAG members was antidemocratic and got in the way of the group gelling as a cohesive committee.

## **NO HANDOUTS TO HELP VOLUNTEERS UNDERSTAND ISSUES**

Despite repeated requests, no handouts of technical information were provided until over halfway through the process. No other MassDOT technical study or project in Jamaica Plain that relied on volunteers has refused to provide handouts. WAG members were told to get the material off the website and print 11” x 17” color plans at their own expense. MassDOT claimed that that was MassDOT GreenDOT policy [Note: GreenDOT policy does not call for eliminating handouts to save paper]. Result: WAG members frantically tried to write everything down on a sheet of paper at meetings and had no printed materials to show the

groups they represent after meetings. Occasional handouts provided at public meetings were often poor quality--see attached "Handout at Final Public Meeting 11/21/11" for a good example.

## **TIME NOT USED WELL**

Despite the "hurry-up" demands imposed by MassDOT, WAG (and public) meetings dwelled on goals, principles and peripheral elements such as Shea Circle, and MOEs. Of the 12 WAG meetings, more than one-third dwelled on review-after-review of study goals and how to evaluate the alternatives that had not been developed.

For a study whose critical issue is traffic and how to accommodate close to the 39,000 vehicle trips per projected by MassDOT for 2035, alternatives were not developed until the sixth WAG meeting. Four meetings later the traffic analysis of the alternatives was presented. In the intervening time, meetings were devoted to what MassDOT refers to as "placemaking," MOEs and MassDOT staff and consultants talking about what the single meeting on traffic impacts would cover. No MassDOT study or project in Jamaica Plain has ever limited discussion about traffic or transit operations to a single meeting with no opportunity for input and subsequent revision. Is not the point of getting input and ideas to make a better plan?

Result: By the time the traffic impacts were presented to the WAG, on October 25, 2011, there was no opportunity for meaningful input on traffic. MassDOT presented and concluded. Its meeting notes show that MassDOT's John Romano berated Rep. Russell Holmes for asking for more data to help him begin to trust the traffic numbers. ("...Our team of experts says it works and you have to decide if you believe them...") The truth is that only part of one WAG meeting was spent on the regional traffic modeling results and only one meeting was spent on the traffic impacts of the alternatives. This is not an acceptable way for MassDOT to have proceeded.

## **REQUESTS FOR INFORMATION IGNORED**

Requests for backup materials, complete and useful meeting notes, handouts, etc. were ignored. Representative Malia's office requested backup files for the pedestrian and bicycle analysis in early February 2012. A Public Records Request followed by an appeal to the Secretary of State's office due to MassDOT inaction finally produced some of the requested materials in June 2012. The Nov. 21, 2011, meeting "transcript" was posted without including 201 comments sent in to MassDOT via e-mail and comment sheets. The "amended" meeting "transcript" was still missing at least a dozen comment sheets sent to MassDOT's Thomas Broderick. Despite requests, no explanation as to where they are has been given. At least five requests for handouts at the meetings were ignored. Requests to correct incorrect meeting notes from the March 2012 meeting were flat out refused.

## **LITTLE OR NO FOLLOW UP ON QUESTIONS**

Questions were asked at WAG and public meetings and MassDOT told participants they would get them the answers (e.g., what are the discrete costs of upper Washington Street improvements?). Responses were not disclosed for six weeks and then were buried in the 177-page (now 620-page) public meeting "transcript." And on and on.

Result: The supposedly "exhaustive public process" with dysfunctional meetings, unresponsive personnel, and insufficient time to reach the MassDOT's originally stated goal

of consensus. This process was little more than window dressing and confuses effort (“we had 12 meetings”) with results (in-depth understanding of issues and tradeoffs and agreement on a course of action).

## **SKEWED AND BIASED REPRESENTATIONS**

The public process involving the WAG was skewed away from reviewing the legitimate transportation benefits of a bridge in favor of opinions of single-interest bike and park advocacy groups. The facts noted below present the true picture of the public involvement process engaged in by the members of the WAG and conducted at MassDOT’s direction.

On page 4 of MassDOT’s Environmental Notification Form (“ENF”), MassDOT stated that it “... undertook a robust public involvement process: a 37-member Working Advisory Group (WAG) was established and convened in thirteen WAG meetings; eight general public meetings and seven open houses were also held.”

Not only are these meeting numbers incorrect (see MassDOT Casey WAG Composition and Attendance Analysis below), but also the description, “robust public involvement,” misrepresents what actually occurred. MassDOT’s running of the WAG process was a failure.

DOT claims in its Environmental Notification Form (“ENF”) at p. 4, that “The purpose of the Casey Overpass Planning and Concept Design Study was to work with the community to explore a series of designs and recommend a final alternative to be advanced into the design stage.” (Emphasis added.). However, MassDOT did not work with all segments of “the community” and did not respond to the concerns of many of the stakeholders.

The membership of the WAG was weighted toward single-interest groups at the expense of community representation. This resulted in inordinate amounts of time being dedicated to their single-interest viewpoints. The true stakeholders, residents in the close by neighborhoods, Forest Hills businesses, bridge users from outlying communities, the handicapped, school children, municipal services (Fire, police and EMT’s) and transit dependent commuters, were given little or no time for the discussion or inclusion of their issues. The close by neighborhoods and those farther away communities that depend on the Casey Overpass to avoid the north-south traffic at the South Street-Washington Street and the Hyde Park Avenue intersections on their way to work or home were denied equal treatment of their concerns and issues.

While bike lanes, pedestrian paths, open spaces, landscaping and sight lines should be elements in the selection process, they do not outrank the creation of a viable transportation system through Forest Hills. In the WAG process, however, the single interests won out. The time consumed by MassDOT’s presentations on these other issues precluded the WAG members from engaging in a meaningful selection process for an at-grade versus a bridge option.

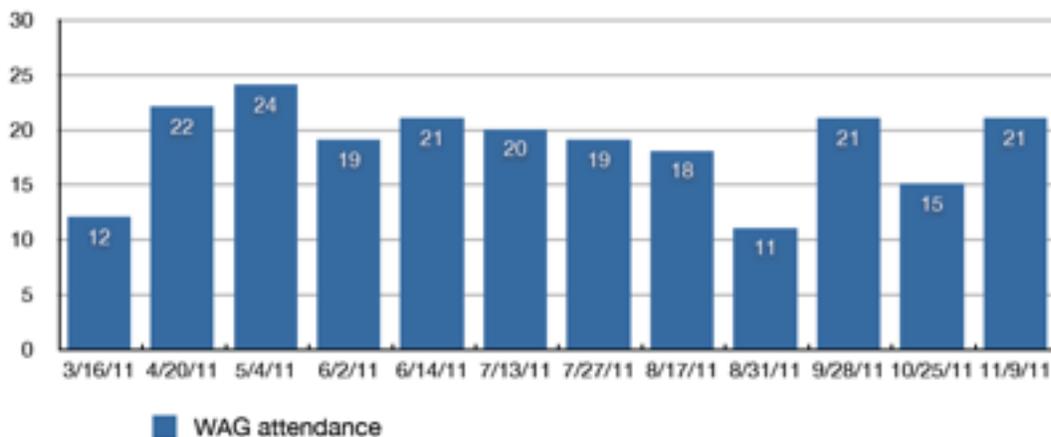
MassDOT was more concerned with meeting an unrealistic schedule rather than dealing responsively with the interests of all stakeholders. Less than an hour was devoted to the important issue of traffic and its impact on the movement of cars, buses and trucks and this information was presented only at the end of the WAG process.

<b>Neighborhoods</b>	<b>WAG Representative(s)</b>	<b>Meeting s Attende d</b>	<b>Notes</b>
<b>Jamaica Plain</b>			
Jamaica Pond Assn.	None	0	
Bourne/Walk Hill neighborhood	None	0	
Weld Hill neighborhood	None	0	
South St neighborhood	None	0	
W Roxbury Court House Nbhd. Ass'n	Liz O'Connor	6	
Asticou/Martinwood/South St. Nbhd. Ass'n	Eliz. Wylie & David Hannon	10,9	
Stony Brook Association	Allan Ihrer & Fred Vetterlein	9,8	
Washingtonian Court Condominium	Kathy Kottaridis	1	condominium association
Forest Hills Neighbors	Eric Gordon	3	not a recognized nbhd. assn.
Arborway Gardens	Wendy Williams	8	condominium association
<b>Roslindale</b>			
Lower South Street Neighborhood Assn.	Josephine Burr	4	
Longfellow Area Neighborhood Assn	None	0	
Ridge Street Neighborhood Association	None	0	
Rowe Street Neighborhood Association	Cathy Slade	5	
<b>Hyde Park</b>			
no identifiable groups on the WAG	None	0	
<b>Mattapan</b>			
West Seldon St. and Vicinity Nbhd. Ass'n	Barbara Crichlow	3	
Woodhaven/Colbert/Regis Nbhd. Ass'n	Lisa Dix	6	
Dorchester/Mattapan Nbhd. Ass'n	Mary Burkes	2	
Wilmore/Norfolk Nbhd. Ass'n	Wesley Williams	2	
<b>Interest Groups – Businesses</b>			
South Street Business Community	Charles Fiore	1	Declined appointment to WAG
JP Business & Professional Association	Michael Reiskind	5	
Washington St Business Group	Andy Schell	0	Declined appointment to WAG
Forest Hill Business	None	0	
Roslindale businesses along South St	None	0	
Roslindale businesses along Hyde Park Ave	None	0	
<b>Interest Groups – Affected Employers</b>			
West Roxbury Court	Kathleen Coffey	1	first meeting only
State Lab	None	0	
Arnold Arboretum	None	0	
Forest Hills Cemetery	None	0	
Faulkner Hospital	None	0	emergency response provider
Longwood Medical and Academic Area	None	0	emergency response provider
Shattuck Hospital	None	0	
Shattuck Shelter	None	0	
City of Boston E13 Police	None	0	emergency response provider
City of Boston Fire Department	None	0	emergency response provider
Area E Police Advisory Board	Tom Dougherty	1	
Boston Police JP Traffic and Parking Committee	Michael Halle	9	
<b>Interest Groups – Schools</b>			
City of Boston Public Schools	None	0	
English High School	None	0	
Area Charter Schools	None	0	
<b>Interest Groups – Open Space, Bikes and Pedestrians</b>			
BNAN (Boston Natural Areas Network)	Genie Beal	6	
Arboretum Park Conservancy	Nina Brown	6	Does not represent the Arboretum
Arborway Coalition	Sarah Freeman	11	

Emerald Necklace Conservancy	Mary Hickie	8
Franklin Park Coalition	Suzanne Monk	11
MassBike	David Watson	7
Boston Cyclists Union/JP Bikes	Bob Dizon	8
Livable Streets	Kevin Wolfson	10
WalkBoston	Don Eunson	7

**Interest Groups – Other Community Groups**

Public Housing – South St, Beech St and Archdale	none	0
Transit Advocates	none	0
CPCAY – Community Planning Comm. for Arborway Yards	Bernard Doherty	8
Southwest Corridor PMAC	Jeffrey Ferris	10
Friends of Healy Field Neighborhood Association	Bob Mason	5
Arborway Committee	Kevin F. Moloney	11
Boston Center for Independent Living	Karen Schneiderman	1
J.P. Neighborhood Council	Emily Wheelwright	8
JP Cente/South Main Streets	Mike Epp	8
Ethos Care	Dale Mitchell	1



This chart shows that maximum attendance at WAG meetings averaged 19, less than one-half of the appointed WAG members.

MassDOT repeatedly has asserted that it engaged a 37-member advisory group. In fact, 37 people were not engaged in the process; some appointees declined to serve, yet their names remain on the WAG member on the MassDOT website to this day and some never attended a single meeting.

This sad record shows that that MassDOT’s WAG process has been a failure. A new process with involvement of the local and regional stakeholders must take place.

**2. BIASED AND ERRONEOUS RENDERINGS AND PLANS**

MassDOT misled the public and the elected public officials with biased and erroneous renderings and plans. Through flawed and misleading renderings presented by MassDOT to the WAG, to the public, and through the local newspaper, MassDOT exhibited an

overwhelming bias for an at-grade plan and to that end, manipulated its planning process to generate support for it.

MassDOT Secretary Davey admitted in an interview with the Jamaica Plain Gazette that through its “planning process,” MassDOT lost the trust of the community. The report published by the Gazette (July 20, 2012), of an interview of Secretary Davey, was headlined “We’ll fix the ‘trust issue’.” According to the Gazette, Secretary Davey had told the paper that, “We have to continue to work hard to earn the community's trust, so they don't expect the worst from MassDOT. We're going to double down in improving that trust and openness.”

In addition to its false claim of a “robust public involvement process,” MassDOT asserted that in the WAG process, MassDOT “incorporated full disclosure and documentation of the process on the project web site to maximize public participation in the planning process. “ This is misleading and incorrect. In addition to the flawed make-up and functioning of the WAG (see #1, above) and the subjectively interpreted and flawed Methods of Evaluation (“MOEs”) (see #3 below), MassDOT exhibited an overwhelming bias for an at-grade plan.

That MassDOT manipulated the WAG and the “public participation in the planning process” to gather support for its preferred at-grade plan, is proved by an examination of the renderings of the at-grade and bridge alternatives that MassDOT presented to the WAG, the public and the Jamaica Plain Gazette. They are compelling evidence of the deceptive steps MassDOT took to achieve its goal.

Set out below are examples of the consistent failure and refusal of MassDOT to present renderings that were fair and accurate representations of what they were purported to be especially when presented as a means to compare MassDOT’s preferred at-grade plan with the bridge alternative. (All renderings shown below were included in MassDOT’s Appendix A to its ENF)

### **VIEW #3: ILLEGITIMATE COMPARISON**

At the WAG meeting on August 31 2011, and later at the “open house” and public meeting on September 13, 2011, MassDOT presented the following comparison.



View 3 is an illegitimate comparison rendering because:

- The two lane street of the bridge alternative for west bound cars (at the left in the above bridge rendering to the right) is shown as wider than the three at-grade lanes for west bound cars in the at-grade rendering above at the left, which, in fact, are necessary elements of the at-grade plan;
- The car heading west (at the left side of the above at-grade rendering) is shown behind and east of the blue cross-walk that is shown; and the car appears considerably smaller than the car shown heading west and positioned where no cross-walk is shown in the bridge rendering;
- There are three cross walks shown in blue in the at-grade rendering and only one and a half and narrower cross-walks are shown in white in the bridge rendering;
- More of the leafy trees and green grass are shown on the left side of the at-grade rendering than are shown on the left side of the bridge rendering; and,
- Most significantly, the rendering of the bridge plan stresses through the use of the dark brown and black colors a close similarity to the much larger size, scope and length of existing Casey Overpass, which is not the case of the narrower and shorter and less high bridge actually proposed, while the at-grade rendering does not even begin to suggest the reality of the six lanes on the ground that will be necessary under the at-grade plan to accommodate the 24,000 east-west and the 12-14,000 north-sought vehicle trips per day.

## VIEW #2: ILLEGITIMATE COMPARISON

Also at the August 31, 2011, WAG meeting and at the September 13, 2011, “open house” and public meeting, MassDOT presented the following comparison:



View No. 2 is an illegitimate comparison rendering because:

- The actual three lanes of the at-grade plan (on the left above) are shown to be of the same width as the two lanes of the bridge plan;
- The width of the three lanes for the west bound at grade plan are minimized; and,
- Most significantly, the rendering of the bridge plan stresses through the use of the dark brown and black colors a close similarity to the much larger size, scope and

length of existing Casey Overpass, which is not the case of the actual bridge plan, while the at-grade rendering does not even begin to suggest the reality of the six lanes on the ground that will be necessary under the at-grade plan to accommodate the 24,000 east-west and the 12-14,000 north-south vehicle trips per day.

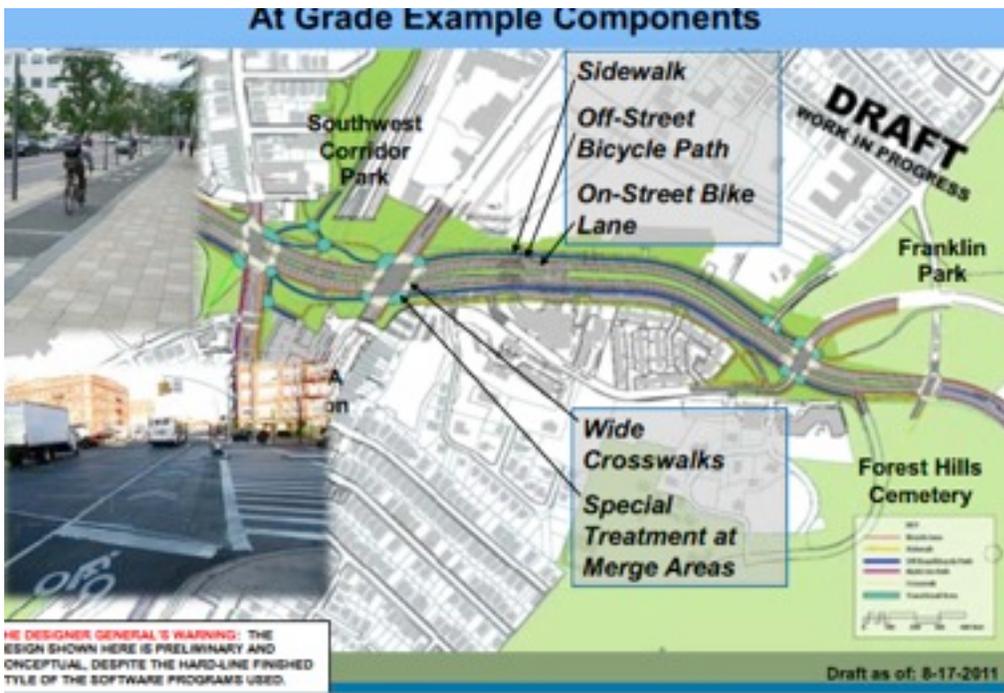
### **CORRIDOR PEDESTRIAN AND BIKE CONNECTIONS: SHOWN ONLY FOR AT-GRADE**

At the public meeting on September 13, 2011, MassDOT presented further biased renderings. In particular, MassDOT presented a rendering entitled, "Corridor Pedestrian and Bike Connections-At Grade," shown below, which included at the top left corner a copy of an 1892 Olmstead drawing and at the bottom a photo of a green and leafy walkway. No rendering entitled "Corridor Pedestrian and Bike Connections-Bridge Alternative" was presented.



### **EXAMPLE COMPONENTS: SHOWN ONLY FOR AT-GRADE**

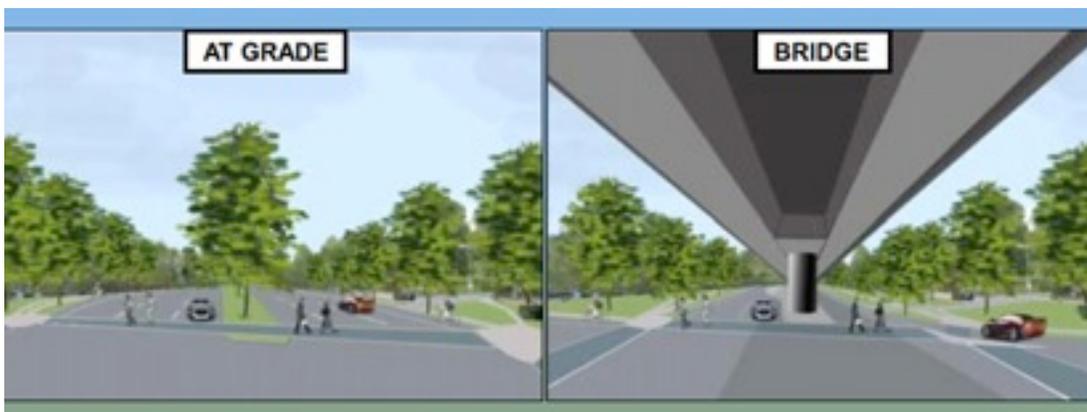
Moreover, the renderings presented at this September 13, 2011, public meeting for the at-grade plan included message boxes with notes of special features such as shown below in the rendering entitled, "At-Grade Example Components." No rendering entitled "Bridge Example-Components" was presented.



**VIEW #5: STRONG BIAS**

At the public meeting on November 21, 2011, MassDOT, presented to the public once again the above referred to View 2 and View 3 and presented the following additional renderings, each of which shows the strong bias of MassDOT in favor of an at-grade plan.

The size, scope and breadth of the six at-grade traffic lanes are de-emphasized and the proposed bridge (to carry only one lane each way) is made to appear as large as, if not larger than the existing Casey Overpass. Moreover, the one point perspective view would lead the viewer to conclude that the new bridge (actually only one lane each way) would be as wide as the six lanes of asphalt of the at-grade plan. Note also the larger size of the red car in the foreground of the bridge rendering and the smaller size of the red car in the at-grade rendering.



**VIEW #6: ILLEGITIMATE COMPARISON**

In View No. 6, below, also was presented by MassDOT at the public meeting on November 21, 2011, is an additional illegitimate comparison of the at-grade and the bridge alternatives because the width and scope of the six lanes of the at-grade plan are de-emphasized and made to look no wider than the four on the ground lanes of the bridge plan, to which is added a bridge of the size, scope and bulk of the existing Casey overpass.



### **BIASED IMAGES INFLUENCED PUBLIC OPINION**

Most importantly, for impact upon the community at-large, the Jamaica Plain Gazette, as shown below, published, on December 2, 2011 (“Illustration Courtesy of MassDOT”) a copy of MassDOT’s View No. 5 in its above-the-fold front page story about the MassDOT’s plans:



Was not this rendering intended by MassDOT to cause Gazette readers to rally to the peaceful bucolic scene at the left rather than to the looming dark grey and black bulk of a Casey-sized duplication of the existing overpass that is presented at the right?

### **3. MISLEADING AND SUBJECTIVE EVALUATION OF ALTERNATIVES**

The Measures of Evaluation (MOEs) used by MassDOT to compare the bridge and at-grade alternatives were incorrect, misleading, and subjective. The MOEs and the scoring done exclusively by MassDOT were useless. For example, the goal of increasing space for community gatherings was evaluated by estimating off-peak vehicle speeds on a bridge and at-grade. This is absurd! The MOEs cannot be used to fairly compare the alternatives and appear to have been developed to justify selection of the at-grade alternative.

The following analysis establishes that they were not developed to provide an opportunity to objectively compare a number of feasible at-grade and bridge alternatives. Instead, the MOEs distort information for the purpose of raising the score of the at-grade scheme over that of the bridge scheme.

The MOEs as developed by MassDOT are inherently subjective and therefore can be re-scored at will for any desired outcome. Here they are re-scored by Bridging Forest Hills.

At-Grade			Bridge		
	DOT	Bridging Forest Hills		DOT	Bridging Forest Hills
Mobility	7	-4	Mobility	3	9
Livability	13	10	Livability	0	7
<b>Total</b>	<b>20</b>	<b>6</b>	<b>Total</b>	<b>3</b>	<b>16</b>

#### 4. FALSE APPROPRIATION OF OLMSTED'S 'VISION'

##### WHAT WOULD OLMSTED DO?

We in the community love Olmsted's design presence in our neighborhood. Yet, to suggest, as MassDOT has done, that Olmsted would find it appropriate to overlay a 19<sup>th</sup> century parkway design over a 21<sup>st</sup> century transit hub is wrong. It so clearly flies in the face of all design principles that one can only conclude that evoking Olmsted was done to manipulate public sentiment.

The Emerald Necklace was disrupted at Forest Hills for a reason. Shea Circle in 1926 and Casey Overpass in 1951 were both designed to accommodate the realities of massive volumes of multi-mode travelers in and around Forest Hills Station. These conditions post-date Olmsted who would NEVER design a six lane surface road mixing together transportation modes. He, of course, would separate the modes as he did notably along Boston's Emerald Necklace and in New York's Central Park.

Perhaps most importantly, Olmsted and Vaux's plan for the park created ways for pedestrians and carriages to enjoy the park without disturbing each other. The design's transverse roads, considered revolutionary, allowed vehicular traffic to cut through the park without substantively detracting from the park

experience. After the Greensward Plan was adopted, Olmsted was appointed Chief Architect of Central Park.

<http://www.nycgovparks.org/about/history/olmsted-parks>

The indirect course of the park-way, following the river bank, would prevent its being much used for purposes of heavy transportation. It would thus, without offensive exclusiveness or special police regulation, be left free to be used as a pleasure route.

Frederick Law Olmsted, "Suggestions for the Improvement of the Muddy River", City Document No. 12, 1881, pp 13-16. <http://www.muddyrivermmoc.org/html/NecklaceLinks/history.html>

"Pleasure route" and "heavy transportation, according to Olmsted himself, do not go together.

Olmsted's vision was to make places that people can enjoy without the intrusion of heavy transportation. A greenway connection under a smaller lower overpass can knit together the Emerald Necklace beautifully.

We suggest that Olmsted would take 21<sup>st</sup> century Forest Hills vehicular transportation below grade but since that is not possible due to AMTRAK train infrastructure and the culverted Stony Brook, he would take the traffic over on an aesthetically designed bridge. Fewer cars and less asphalt on the ground leave more room for greenway connections and safer movement for ALL modes.

## **HISTORIC SHEA CIRCLE WILL BE DESTROYED**

Shea Circle is a historic resource that is valued by the community, preservationists, conservationists, and historians. It contributes to the Morton Street Historic District in ways that would be permanently undone by MassDOT's plan to plow a six-lane highway through Forest Hills rather than replace the Casey Overpass with a well-designed smaller, shorter bridge that can carry the 24,000 cars over and through Forest Hills while the surface roads retain the historic connections to surrounding greenspace. What MassDOT asserted in the ENF as a "reconfigur[ation]" of Shea Circle will be a complete obliteration of it, with nothing remaining of the contributing historic elements that were cause for National Register nomination just XX years ago.

## **5. NO EVALUATION OF LOCAL MICROSCALE AIR QUALITY IMPACTS**

Impacts to local air quality were not evaluated despite repeated requests. The City of Boston requires a more comprehensive air quality analysis for development projects than MassDOT did for this project that will increase vehicle miles traveled, travel time, and not improve intersection operations much. More traffic signals will lead to vehicle delays and idling.

Although the project will not exceed regional air quality thresholds, the impact of adding two to three times more traffic than existing to surface streets and four additional traffic signals has not been analyzed. Despite repeated requests, MassDOT did not quantify local air quality impacts.

## **6. NOT CONSISTENT WITH REGIONAL PLANS**

DOT's Casey project at-grade plan is not consistent with other transportation, park, and land use plans for the area. Studies done by the City of Boston for Forest Hills and the Arborway emphasize the need to keep regional traffic away from local traffic in Forest Hills. City transportation policies include keeping regional traffic off neighborhood streets. MassDOT's plan at Forest Hills puts all traffic—local shoppers and workers headed to and from Dorchester, Route 3, and more—on the surface streets— in the aggregate, over 36,000 vehicle trips per day.

## **6. NO COMPARISON OF LEVELS OF SAFETY**

“Improve safety for all modes and users” was identified as a “fatal flaw” criterion, so important that alternatives not addressing safety would be dropped. However, MassDOT never compared the levels of safety of six travel lanes of at-grade traffic intersecting with the north-south traffic with the levels of safety presented by a bridge plan that would carry the east-west traffic away from the city streets.

## **8. NO ACKNOWLEDGEMENT OF THE VALUE OF A BRIDGE**

WAG members and the public were never shown a bridge alternative with two-thirds less traffic on the ground than the selected at-grade scheme, one that worked better for cars, buses, bikes and pedestrians. MassDOT never developed the best possible bridge alternative and never acknowledged the value of a bridge and the better multi-modal level of service that it would provide. Rather, MassDOT made sure both alternatives would result in about the same minimal acceptable level of service.

It is such a dubious claim that we deserve to have MassDOT explain in detail, if it can, how it cannot make conditions better by removing 24,000 vehicle trips per day from the local streets.

Many bridges are built to provide access over a barrier like water, a freeway, or a rail line. Others are built to separate local and regional traffic such as along Memorial and Storrow Drives where they facilitate safe and efficient movement of traffic. This is the situation at Forest Hills where many roads converge:

- Washington Street from north and south
- South Street from the north and south
- Hyde Park Avenue. from the south
- The Arborway from the west
- Morton Street from the east
- Circuit Drive from the northeast
- Walk Hill Street from the southeast just a few blocks away.

Forest Hills is surrounded on three of four sides by fabulous open green spaces: the Arnold Arboretum to the west, Forest Hills Cemetery to the east, Franklin Park to the northeast, and the Southwest Corridor Park to the north. The remaining adjacent areas are primarily moderately dense urban neighborhoods. There is only one alternative route less than a mile away, and that is the congested Centre Street to the Jamaicaaway CENTRE STREET ISN'T PARALLEL. All other alternative routes are a mile away or more.

Forest Hills is a transportation hub. Every mode of transportation funnels through this node

AMTRAK trains, cars, delivery trucks of all sizes, bicycles, walkers, runners, MBTA buses, school buses, taxicabs and more. It is a vital public transportation center serving the Orange Line, MBTA commuter rail, and numerous buses including the very busy Route 39 bus that replaced the former Arborway Green Line. There is a lot going on at Forest Hills with no nearby alternative routes.

The MassDOT engineers completely ignored the fact that the value in bridges is that they alleviate congestion, and they improve safety and traffic flow. This is especially germane to the Forest Hills area, a busy, vibrant and vital transportation hub. Instead, the public was told the two final alternatives were designed to meet a minimum acceptable LOS with the minimum amount of pavement. MassDOT made no effort to create the best possible bridge alternative.

## **7. TRAFFIC NOT SEEN AS A DIFFERENTIATOR**

DOT claims that, "Traffic works the same in both alternatives," but this focuses too narrowly on automobile traffic and ignores impacts to buses, bikes and walkers.

At the December 13, 2012, MEPA hearing MassDOT stated that "Traffic is not a differentiator" between the at-grade and bridge alternatives and that its decision was made on all the other "amenities." This is the exact opposite of what should have happened.

All of the "amenities" can be provided with or without a bridge. Traffic should be the differentiator, and a bridge design could be created that does this. MassDOT has already has shown the bridge to be a better result because the six to seven-lane at-grade road without bike lanes or normal left turns is already inferior to the lower volume three-lane surface plan with a bridge. Smaller roads with less traffic are inherently safer for all users, especially the pedestrians and cyclists.

DOT did not look carefully at how to further improve level of service with the bridge concept. For example, consider the width of the west intersection with South Street. With the existing bridge, the Arborway on/off ramps are separated 80' by the bridge. This width complicates the traffic signal timing, requiring many phases within one cycle. The proposed bridge concept shows different placements of the new east and west abutments. The east abutment is much further back from the intersection allowing for the east-west travel lanes to be closer together, improving function of the Washington Street/ Arborway intersection. The east abutment is placed very close to the South Street intersection, keeping the width of the intersection very wide. Addressing this would be one of many ways that LOS could be improved over what was shown. A return the drawing board is needed to look at how a new bridge can improve traffic flow and safety for all.

A better planning process would have been more iterative with continued evaluations and discussions with, rather than presentations to, the WAG members to refine and improve the designs.

A more credible alternatives analysis would have thoroughly compared and evaluated more than one plan for each concept. But MassDOT's October 2010 Scope of Services for its consultant, McMahon, specifies that "This evaluation will include ... four alternative build conditions (including a two-lane overpass and three alternatives without an overpass). It is clear that MassDOT had no intention of developing a bridge alternative that was better than an at-grade plan.

The WAG was presented with a split-bridge concept, which was explained to the group as primarily to improve bike and pedestrian access onto the bridge. However it would also create the narrowest Arborway/South Street intersection with the east-west travel lanes adjacent to each other. The smaller that intersection can be made, the better Level of Service can be created and safer crossing for pedestrians.

Below is shown the scale of a six lane highway (Route One Saugus). It is completely inappropriate for a residential neighborhood surrounding a major transportation hub. Note the barrier down the median. MassDOT's renderings show 25 year growth trees in the median; after frustrated pedestrians start crossing mid-block those trees will give way to an ugly barrier like this one or the one on Route 9.



# **SPECIFIC ISSUES WITH MASSDOT'S MISLEADING REPRESENTATIONS IN THE ENF**

## **1. GENERAL PROJECT INFORMATION ERRORS**

### **UNDERSTATES AREA'S IMPORTANCE AS TRANSIT HUB AND HOME TO FUTURE ARBORWAY YARD**

The Project Description fails to mention the planned Arborway Yard development. This adjacent 17 acre parcel houses 118 buses and also is planned to include some mixed-use retail/housing development. The Project Description downplays the MBTA transit hub with subways, buses and commuter rail and a major bus terminus and the additional circulation of school buses, taxis, private carriers, and kiss-and-ride commuter transport.

### **MISREPRESENTATION OF THE PUBLIC PROCESS**

The ENF (page 4) states that MassDOT "undertook a robust public involvement process: a 37-member Working Advisory Group (WAG) was established and convened in thirteen WAG meetings; eight general public meetings and seven open houses were also held".

The words "robust" and "involvement" are subjective (see Issues with the Casey Overpass Planning and Concept Design Study; Dysfunctional and skewed public process). The facts about these events are as follows:

- twelve NOT thirteen WAG meetings
- five general public meetings NOT eight
- The "five open houses" were not additional events. They took place in the half hour before the 6:30 public meetings at a time when people were hard pressed to leave work or make arrangements for their children in time to attend.
- Typically, material on display at optional MassDOT "open houses" is covered in the public meetings. In the Casey project experience, many times "open house" material was NOT presented during the full public meeting and NOT posted to the MassDOT website. Apparently, this material was unimportant filler that was not worth presenting to the great majority of the people who arrived at or after 6:30 pm.

### **SELECTIVE EDITING OF REFERENCES TO THE EMERALD NECKLACE NATIONAL REGISTER NOMINATION**

MassDOT states in the ENF, at p. 4, that, "According to the National Register nomination the overpass "obliterated the short portion of the [Arborway] from the east end of the [Arnold] Arboretum to Franklin Park." MassDOT showed its bias by not including the fact that the National Register Nomination document had cited not only the Casey Overpass but equally the "new road patterns" as the cause.

### **MEASURES OF EVALUATION WERE NOT OBJECTIVE**

The ENF implies the WAG participated in the final MOE scoring. This is not the case. Scoring was done by MassDOT and the WAG was never given an opportunity to review the final scoring in November 2011. While the ENF (at page 5) states that the WAG developed the MOEs, the MOEs are so complex, dense, and non-intuitive that the WAG actually participated little in writing the specific language that was spun to create the desired outcome for MassDOT.

The ENF (at page 5) states that the MOEs provided an “objective basis for comparing alternatives.” The points and backup that follow demonstrate that not only were these MOEs severely flawed, subjective, and in many cases immeasurable, but they also show a bias against a bridge alternative.

- **FOUR MOEs RELIED ON UNSUPPORTABLE AND SUBJECTIVE MEASURES/ EVALUATION AND SHOULD BE ELIMINATED FROM THE ANALYSIS:**

- Three goals [5.02a, 5.02b, and 5.02c] dealt with “enhancing value of commercial and residential buildings through improved visual or aesthetic changes.” This requires an economic development expert or qualified real estate analyst to evaluate. Neither was used on this project. This goal instead was measured using an urban design analysis of open or blocked views, distance from roads, and visual analysis. The result is gibberish.
- One goal was to “promote modal connections that reduce use of personal vehicles” [3.02]. It was measured by the square feet of bus waiting area and drew a completely unsupportable and subjective connection between square feet of bus waiting area and transit ridership.

- **THE REST OF THE MOEs ARE SUBJECTIVE.**

DOT modified and contorted how the MOEs were measured to ensure a favorable score for the at-grade scheme. The subjective nature of the MOEs and the way they were scored by MassDOT begs re-scoring. Examples of the subjectivity of the MOEs are:

- Goal 2, “Improve access, modal, and intermodal local and regional corridor connections to promote transportation choices” with an objective of improving bike and pedestrian access an overall connectivity was measured by the number of lanes crossed north-south. But MassDOT’s scoring modified the measure to “number of lanes crossed between refuge areas” even though the crossing the street would be done in one cycle making the presence of the median refuge irrelevant.
- Goal 3, “Remove barriers for neighborhood connections and integrate transit into economic centers and residential areas” with an objective of supporting access to future development was measured by MassDOT by how an alternative would strengthen neighborhood sightline connections north-south. This is a mish-mash of jargon and does not measure the objective or the goal.
- Goal 6, “improve visibility connectivity, and access to open spaces,” was measured by MassDOT by how an alternative creates a central focal point that identifies the area. Measure is not related to the goal.

- **MOBILITY GOALS AND OBJECTIVES NOT SCORED OR INADEQUATELY EVALUATED**

- MOE 1.01, “Minimize local street impacts of cut-through traffic,” focused solely on regional east-west movements and evaluated only one potential cut-through route. The fact that the at-grade alternative would increase travel time by should rank the at-grade lower than the bridge alternative.
- 1.02a and 1.03a, “Projected Pedestrian LOS,” were not scored because “Current methodology for analyzing pedestrian movements is ineffective in differentiating among the alternatives. Exploring new criteria that will capture crossing times and pedestrian travel distances.” Bridging Forest Hills applied criteria typically used by WalkBoston and other pedestrian advocacy groups that state that narrower roads with lower traffic volumes are superior for pedestrians. MOE 1.02a was not scored and MOE 1.03a was scored incorrectly by MassDOT.
- MOE 1.03c, “Projected Bicycle [Levels of Service]” states that the bicycle experience would be the same under each alternative because of the presence of east-west bike lanes. It ignores the influence of two-thirds more traffic degrading the experience for cyclists. The Highway Capacity Manual 2010 Chapter 5 on “Quality and Level-of-Service Concepts” states on page 5-13 that higher vehicle volumes act to decrease a bicyclist’s perceived comfort and traffic exposure. Smaller roads with fewer cars improve the quality of service for cyclists. This MOE was scored incorrectly by MassDOT.

- **ERRORS**

- MOE 5.01a: “Increase space for community gatherings or activity and create a sense of place” did not score the bridge alternative higher even though it would create 75% percent new open space than the at-grade scheme. [The 5.6 acres new acres created in the bridge scheme is 75% more than the 3.2 new acres created in the at-grade scheme.]
- MOE 2.02b erroneously states that the “current median is not sufficiently wide enough to provide pedestrian refuge” and scores the at-grade scheme higher than existing because of the presence of the median. However, the existing median is six feet wide, the minimum suggested by the Boston Complete Streets guidelines. The at-grade scheme would require pedestrians to cross three to four lanes before reaching median.

- **CORRECTIONS FOR MassDOT BIAS**

- MOE 1.02b, “Type and quality of off-street bike path N-S” first mentions on-street bike lanes, than states the at-grade is the only alternative that provides a bike path on upper Washington Street. The bridge scheme could have included a bike path here, too, but MassDOT did not include it with the result that the at-grade scheme was scored higher.
- MOE 1.04b, “Improve roadway and intersection operations for vehicles” was measured by “Simplify network – number of turns between specific destinations [sic].” However, the MOE was cleverly modified over time to include “Minimal turn restrictions with

alternate route provided within project limits,” a key change to prevent the at-grade from scoring -1.

- MOE 2.03a, “Improve bus operations” states that overall travel time improvements will offset the increased distance the Route 39 bus will travel, yet ignores the 1.5-minute delay vehicles will experience in Forest Hills with the at-grade scheme.
- MOE 5.01d, “Increase space for community gatherings or activities and create sense of place (e.g., parks, farmers/artists markets, outdoor public gathering space, or similarly uses)” bizarrely was measured by “off-peak vehicle speeds” which measured off-peak speeds on the bridge. There are no parks or farmers/artists markets on the bridge, so this measure is wrong.
- MOE 6.02b, “Evaluation of Emerald Necklace Connections” was measured by how alternatives created “an opportunity for a central focus point that identifies the area and provides guidance to local destinations (Emerald Necklace, business areas).” This nonsense jargon focused on the New Washington Street block between South Street and Hyde Park Avenue, and the ability “to see across and along the corridor to significant features such as existing storefronts, proposed development, the MBTA station and park entrances.” Hyde Park Avenue is at least 15 feet lower than New Washington Street. The bridge is not blocking the views of storefronts, the trees and the grade are.

## **CONCEPTUAL ALTERNATIVES NOT THOROUGHLY EXAMINED**

The bridge option was not adequately evaluated. The Split Bridge option was dismissed by MassDOT with little explanation. Elimination of the split bridge alternative was not on the agenda but was announced at the end of one of the WAG meetings, which precluded any discussion of the matter by the WAG. The ENF states that this was dismissed because it was “more expensive and creates additional issues such as a more complex ramp system and requires more space.” However this option would provide the greatest benefit allowing cyclists and pedestrians crossing over the bridge, and would produce the narrowest intersection at South Street.

Currently bikes and pedestrians can use the sidewalk on the Casey Overpass, but accessing requires crossing a busy Arborway travel lane at each end. The access at the Arboretum Forest Hills gate is particularly dangerous due to the high speeds of cars exiting Arborway there. Using the sidewalk gives the bikers and walkers the same benefit the cars get on the Casey: completely avoiding two major surface intersections when traveling east-west. It provides fabulous views and can be used as an Emerald Necklace connection.

The sidewalk at the northwest corner of the Casey (closest to Hampstead Road) currently dead ends, but there are plans to develop a path through the nearby Arborway Hillside. This would make another new fabulous Emerald Necklace connection on the north side of the Arborway from this area to Franklin Park without having to cross any major intersections.

The split bridge keeps the surface travel lanes contiguous, thus minimizing the north-south crossing distances for South Street and Washington Street. This can only improve the Level of Service for cars and the shortest safest possible crossing distance for pedestrians.

Yes, this has a more complex ramp system and takes more space than the single bridge, but neither of these was a fatal flaw. How the size and space for the bridge could impact design was never presented to the WAG. Clearly the benefits the split bridge provides would offset its added size, but it was never fully evaluated.

The actual dollar costs were never presented, so we have no idea how much more expensive this would have been. And without a full analysis, we cannot consider if the benefits justify the cost.

We do know that the scope of work for the consultants only called for one bridge scheme to be evaluated. This clearly shows MassDOT’s bias against really evaluating how a creative bridge could benefit both transportation and park connections.

## **SHEA CIRCLE WILL BE DESTROYED NOT RECONFIGURED, AND AN HISTORIC RESOURCE WILL BE LOST**

In the ENF MassDOT states (at page 6) that the “project proposes to reconfigure The James B. Shea Memorial Circle...into a standard four-legged signalized intersection that will be known as Shea Square.” Designed in 1926, Shea Circle is a contributing element to the Morton Street Historic District. MassDOT’s plan will not “reconfigure” it but will permanently destroy it.

The National Register nomination form lists Shea Circle’s areas of significance as: Community Planning and Development; Engineering; Landscape Architecture; Transportation. The ENF states (at page 7) that the open space in the middle of the circle will be ‘redistributed’ to

make it more accessible. Accessibility of that open space was not part of the original design and is not what is valued in this historic resource.

Shea Circle's open space is designed as a visual coda for Morton Street, for movement of vehicles around the rotary, and for trees that contribute to the park-like feel of the Historic District. Destroying it and its 50–75 year old oak and maple trees and replacing it with a conventional square intersection will NOT enhance the Emerald Necklace Historic District as the ENF states (page 7).

Destroying Shea Circle and converting it to a signalized intersection, is a by-product of design contortions to manage the sheer volume of at-grade traffic that will be co-mingled once the Casey Overpass comes down. The Casey ENF cites goals developed by the WAG as justification for permanent changes to historic Shea Circle. ENF (pages 7) states "all the mobility and livability goals developed by the WAG...including safety, modal access and circulation, and Emerald Necklace connections....DOT anticipates that the signalized intersection will reduce the high accident rate and address community concerns." Participants in the WAG process know that safety was not one of the goals that was measured in the final at-grade v. bridge comparison and that not one goal was developed that specifically dealt with Shea Circle and livability and mobility.

Preservation of the important features that make Shea Circle a contributing element to the Morton Street Historic District is possible. The ENF (page 6) points out that "... three options ... were designed to be compatible with either the at-grade or the bridge alternative." Two of these value Shea Circle as a contributing element; one does not and will permanently destroy this feature. That is the design option proposed by MassDOT. Despite concerns expressed in the WAG about this historic resource, MassDOT did not further develop the design options that would avoid destroying Shea Circle.

## **2. LAND**

### **INCONSISTENT WITH THE FOREST HILLS TRANSPORTATION ACTION PLAN**

The Final Report (Nov. 25, 2008) from the Forest Hills Improvement Initiative Transportation Action Plan identifies numerous short-term improvements for paving marking, signage, crosswalks, bus stop locations, bike racks, etc. Several long-term improvements were reviewed, including a major circulation change to make a one-way loop around Forest Hills.

The ENF states that "Many of the improvements proposed by the Casey Arborway project are similar" to those in the Action Plan. This is a stretch in that the Casey Arborway project will address these short-term maintenance-type fixes—new pavement markings and signs, etc. The Action Plan report does not suggest eliminating left turns, adding median U-turns, dramatically widening the street, relocating the Route.39 bus berth at Forest Hills as MassDOT proposes to do. To imply that the Casey project is consistent with, and implements, the recommendations of the Action plan is misleading.

Further, there is no factual basis for the MassDOT statement in the ENF that "These improvements are anticipated to increase the number and range of local retail and service businesses in the Forest Hills Area." The purpose of the Action Plan and the recommendations were not to increase businesses but to improve traffic. The firm that conducted the study, Traffic Solutions, did not include economic development specialists. The Executive Summary in the report states the focus of the study was to improve

transportation conditions and to “identify improvements that are relatively inexpensive to implement and will have an immediate effect on traffic operations.” The effects of transportation improvements on economic development were not evaluated by either study.

MassDOT claims in the ENF (p. 14) that the Action Plan “noted that the Overpass may need to be removed and that the disturbance to the Forest Hills Area should be minimized to the extent possible. Additionally the plan noted that there are several improvements needed to streetscapes in the Forest Hills Area.” This is incorrect. What the Action Plan actually states (on p. 40) is: “The location and physical size limits the number of options that maybe implemented on the Street level.”

Further, the ENF fails to mention that the Action Plan states, on p. 40, that “the overpass serves a critical function for the area—it keeps the through traffic out of the area....”

MassDOT claims on p. 14 of the ENF that “The project will allow for easier pedestrian and bicycle access to adjacent open spaces areas from Forest Hills Station.” This is incorrect. Actually, the project will makes access worse for pedestrians and cyclists at several key crossings from Forest Hills station to the Southwest Corridor Park.

MassDOT asserts in the ENF that the Action Plan said one of most significant issues in the area is pedestrian/bicyclist access to and from Forest Hills Station and that “The Casey Arborway project will address all modes and allow for easier access from Forest Hills Station to adjacent areas.” This is incorrect. The Action Plan does not state “that one of the most significant issues in the area is pedestrian/bicyclist access to and from Forest Hills Station.” It states, on p. 42, that “One of the largest challenges for pedestrians in the Forest Hills area is getting from one side of the Station to the other. Washington Street, on the west side of the Station, is approximately 15 feet higher than Hyde Park Avenue....”

## **INCONSISTENT WITH PATHS TO A SUSTAINABLE REGION PLAN**

MassDOT claims in the ENF that the Casey Arborway project is included in the MPO “Paths to a Sustainable Region” policy plan as a funded project under the Accelerated Bridge Program. In fact, the Paths to a Sustainable Region document mentions nothing about the Casey Arborway Project. It lists the Casey Overpass bridge on Table 8–4 (pp. 8–10) under Accelerated Bridge Program.

The ENF states that Paths to a Sustainable Region identifies the Casey Overpass as “a structurally deficient bridge that is not providing an efficient mode of transportation. The proposed alternative will provide a more efficient transportation system that will require less future maintenance.” A path to a Sustainable Region mentions nothing about the Casey Overpass being inefficient. In fact, the Casey Overpass is an example of efficient transportation in that it is “the immediate agent in producing an effect” of separating modes.

On open space impacts, the both the at-grade and bridge schemes would increase in open space and reconnect open spaces areas that were isolated by the creation of the Casey Overpass. In fact, according to MassDOT’s MOEs, the bridge alternative would provide a greater increase in open space than would the at-grade alternative (MOE 5.01a corrected for calculation error).

On compatibility with adjacent land uses, MassDOT claims in the ENF that removing the Casey Overpass and replacing it with a more functional at-grade street network the project area “will blend with the adjacent neighborhoods.” Six-lane highways do not “blend with the

adjacent neighborhoods. See Route 1 in Saugus and the Melnea Cass Boulevard–Massachusetts Avenue intersection.

## **CRITICALLY OUT OF SYNC WITH ARBORWAY MASTER PLAN**

The Arborway Master Plan, which was prepared for the Boston Parks and Recreation Department, 2004, states, at p. 106:

Removal of the Casey Overpass. Removing the Casey Overpass and displacing the traffic to these surface streets would more than triple traffic volumes. Due to the heavy cross-traffic on South Street Washington Street and Washington Street – Hyde Park Avenue under the Casey Overpass, accommodating this traffic on the surface streets would create unacceptable congestion. If the surface streets were widened to accommodate this traffic in even a marginal manner, the Arborway and New Washington Street in this corridor would have to be seven or eight lanes wide. This would be undesirable from an urban design standpoint, and have unacceptable impacts on the Forest Hills Station. Therefore, this option was rejected.

### **3. TRANSPORTATION**

MassDOT claims in the ENF that the project does not meet the threshold related to roadways or other transportation facilities, "Widening of an existing roadway by four or more feet for one-half or more miles 301 CMR 11.03(6)." Page 18 of ENF states that project length is at least 3,800 feet. Despite the fact that an elevated roadway is being eliminated, the surface streets are being widened considerably more than 4 feet for over one-half mile. The issue is the impact created by the widening, not that someone considers the widening trade for removing the overpass.

### **4. AIR QUALITY**

Although the project will not exceed regional air quality thresholds, the impact of adding two to three times more traffic than existing to surface streets and four additional traffic signals has not been analyzed. Despite repeated requests, MassDOT did not quantify local air quality impacts. The City of Boston requires a more comprehensive air quality analysis for development projects than MassDOT did for this project. The plan will increase vehicle miles traveled, travel time, and not improve intersection operations much. More traffic signals will lead to vehicle delays and idling.

### **5. HISTORIC/ARCHEOLOGICAL RESOURCES**

The MassDOT ENF states, at p. 20, that it is "DOT's intent to reconstruct the missing segment of the Arborway at-grade in a manner compatible with Olmsted's earlier design prior to the construction of the traffic circle which will enhance the State and National Register-listed Olmsted Park System Historic District."

This project goal is fundamentally flawed as Olmsted's designs of the 1890s pre-date the conditions that make Forest Hills an active and complex transportation hub requiring 21<sup>st</sup> century design solutions. The Emerald Necklace was disrupted at Forest Hills for a reason. Shea Circle in 1926 and Casey Overpass in 1951 were both designed with the realities of

massive volumes of multi-mode travelers in and around Forest Hills Station. These conditions post-date Olmsted who would NEVER design a six lane surface road mixing together transportation modes. He would of course separate the modes as he did notably along the Emerald Necklace and in Central Park.

Separation of transportation modes in park and parkway design is one of Olmsted's signature innovations. To suggest that a historic greenway would be enhanced by: a) creating six-seven lanes of asphalt and, b) permanently destroying a contributing element (Shea Circle) is plainly wrong for our community.

## **CONCLUSION**

The design and public process for MassDOT's plan to create a six to seven lane highway across a major transportation hub is flawed. Before MassDOT finally commits to this or any scheme for the Casey Overpass project, a full evaluation, including more alternatives, needs to be done. We deserve a thorough review of the alternatives analysis that brought MassDOT to the at-grade decision. This is why you must mandate that such an analysis be done.

The ENF filed by MassDOT contains a large numbers of errors and omissions and shading of language that careful examination leads many of us to conclude there is intent to deceive. We have outlined the most egregious of these issues with the ENF in this report. We believe the seriousness of these issues is enough to cast into great doubt the legitimacy of MassDOT's plan and reopen the process for more thorough review.

Moreover, the manner in which the process was carried out bolsters our belief that the agency never intended to replace the defunct Casey with a smaller scale, more attractive bridge. Instead cost appears to be the driver to minimize first costs and eliminate ongoing bridge maintenance costs. This is at the expense of public trust, quality of life and all under the guise of it being Olmsted's vision. Any number of the following issues would be cause for pause, but in total MassDOT's planning and design process was a complete failure.

1. Dysfunctional and skewed public process
2. Biased renderings and plans
3. Misleading and subjective evaluation of alternatives
4. False appropriation of Olmsted's 'vision'
5. No evaluation of local air quality impacts
6. Not consistent with regional plans
7. No comparison of levels of safety
8. No acknowledgement of value of a bridge
9. Traffic not seen as a differentiator

MassDOT did not make an effort to make conditions for ALL modes of transportation better with a bridge to keep 24,000 east-west regional vehicles per day off local streets, despite the strong recommendations of two prior reports (Arborway Masterplan (2004) and Structural Condition Investigation and Traffic Study - Casey Overpass (2008) urging keeping regional traffic off the ground. Each of these studies predicts gridlock with an at-grade design if the Casey were to come down.

"7.4 Traffic Requirements: Analysis of future conditions with and without planned development shows that traffic volumes would overwhelm any at-grade intersection configuration, resulting in poor levels of service, excessive delays, and probable gridlock. The

Arborway should remain in a grade-separated configuration.” [http://www.massdot.state.ma.us/Portals/24/docs/structural\\_traffic\\_092608.pdf](http://www.massdot.state.ma.us/Portals/24/docs/structural_traffic_092608.pdf)

MassDOT’s performance in this matter has raised too many questions to allow its untested at-grade scheme to proceed without a rigorous analysis of the issues discussed in this report.

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