



SMART GROWTH AND REGIONAL COLLABORATION

December 9, 2019

Kathleen Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Page Czepiga, MEPA #15334
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: I-90/I-495 Interchange Improvement Project, DEIR, MEPA #15334

Dear Secretary Theoharides:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews proposed projects for consistency with *MetroFuture*, the regional policy plan for the Boston metropolitan area, the Commonwealth's Sustainable Development Principles, consistency with Complete Streets policies and design approaches, as well as impacts on the environment.

MAPC has a long-term interest in alleviating regional traffic and environmental impacts, consistent with the goals of *MetroFuture*. Furthermore, the Commonwealth encourages an increased role for bicycling, transit and walking to meet our transportation needs while reducing traffic congestion and vehicle emissions. Additionally, the Commonwealth has a statutory obligation to reduce greenhouse gas emissions (GHG) by 25% from 1990 levels by 2020 and by 80% from 1990 levels by 2050.

A Draft Environmental Impact Report (DEIR) has been filed with EOEEA by the Massachusetts Department of Transportation (the Proponent) to improve safety and operational efficiency at the interchange of I-90 and I-495, two nationally and regionally significant interstate highways (the Project). The I-90/I-495 Interchange serves as a critical regional access point that allows automobiles and trucks to move between Boston, Worcester, and major suburban centers in the MetroWest area, functions as a critical connector for commuters throughout the Greater Boston region, and facilitates significant amounts of interstate travel and commerce. According to the DEIR, about 75,000 vehicles use the I-90/I-495 interchange, and within the Project limits, 100,000 vehicles use I-90, and 110,000 vehicles use I-495. Located in the towns of Hopkinton, Southborough, and Westborough, the Project will increase safety for all movements within the Project area and address deficient traffic conditions for the movement of people and goods.

Since the Environmental Notification Form (ENF), the Proponent has refined three Build Alternatives¹ and developed an additional concept, Alternative C-2. The Proponent identified Alternative C-2 as the Preferred Alternative based on engineering analysis, potential environmental impacts, public and stakeholder input, and interagency coordination. The DEIR for the I-495/I-90 project is comprehensive and provides a thorough review of the study area. As outlined in the DEIR, Alternative C-2 is a viable outcome resulting from an in-depth analysis and refinement from prior Alternatives.

MAPC looks forward to seeing the I-90/I-495 Interchange Improvement Project advanced to improve safety. However, we do have the following recommendations pertaining to proposed mitigation, and connectivity for the proposed Boston Worcester Airline Trail (BWALT):

Proposed Mitigation Strategies

MAPC urges MassDOT to consider the cumulative construction impact of this Project and the I-90 Allston Multimodal Project located in Boston, as the construction periods for both projects are projected to overlap with each other. The I-90 Allston Multimodal Project, which proposes to address the deficiencies at the I-90/I-495 Interchange extending approximately one mile in each direction, is also a project with significant regional impacts. Construction on the I-90 Allston Multimodal Project could begin as early as mid-2022 and is projected to continue over a period of 8-10 years². The DEIR for the I-90/I-495 Interchange Improvement Project assumes a construction start in mid-2022 with a construction duration of approximately 4-4.5 years. Commuters traveling into Boston from the I-495 corridor and points west will experience construction related impacts at both locations.

MAPC highly recommends planning for alternative commuting options during construction other than by SOV travel. MAPC proposes a range of mitigation strategies to be implemented during construction which include:

¹ Alternative 14-4, Alternative 14-5, and Alternative 22-3.

² [MassDOT Allston Multimodal Project Fact Sheet](#)

- Increasing availability of public transit (e.g., the Worcester Regional Transit Authority and the MetroWest Regional Transit Authority) through and proximate to the Project area.
- Improving and expanding MBTA Commuter Rail service along the Framingham/Worcester Line, which includes 18 stops between Boston and Worcester and serves all communities abutting the rail corridor that parallels I-90.
- Including priority lane options such as bus on shoulder or HOV lanes during peak travel periods to reduce congestion.
- Providing Park & Ride Facilities in convenient locations (e.g., the area of Computer Drive and Research Drive that parallel Route 9 just northwest of the I-495/I-90 interchange).

If deemed successful, these mitigation strategies could be continued after Project completion to continually reduce SOV travel.

Connectivity for the Proposed Boston Worcester Airline Trail (BWALT)

MAPC strongly encourages the Proponent to provide a connection through I-495 for the future Boston Worcester Airline Trail (BWALT) shared-use cycling and walking path. BWALT is a proposed multi-use trail that will provide a safe route parallel to Route 9 from Framingham to Worcester for cyclists and pedestrians. Located almost entirely in the old trolley line right-of-way, the total trail length would be approximately 20 miles.

To provide this necessary connection, the preferred alternative would be to construct an underpass under I-495 on the former trolley right-of-way. Another alternative would be to improve the existing underpass adjacent to Flanders Road. Both alternatives would allow for a connection between Southborough and Westborough and linkages to the regional trail network.

Multimodal Transportation Improvements

It is worth noting we recognize that within the context of freight the DEIR states, "Multimodal transportation improvements are a critical component of the I-90/I-495 Interchange Improvements Project." (p I-3) However, by expanding MBTA Commuter Rail service along the Worcester Line, emphasizing the availability of public transit, and providing walking and bicycling opportunities by advancing the BWALT will further advance the multimodal transportation component of this Project.

MAPC respectfully requests that the Secretary incorporate our recommendations as part of the Certificate issued in response to this DEIR, urging MassDOT to address the issues we have raised in this letter.

Thank you for the opportunity to comment on this important regional project.

Sincerely,



Marc D. Draisen
Executive Director

cc: Norman Khumalo, Town Manager, Town of Hopkinton
Mark J. Purple, Town Administrator, Town of Southborough
Kristi Williams, Town Manager, Town of Westborough
Janet A. Pierce, Executive Director, CMRPC
Jim Montgomery, Acting Commissioner, DCR
David Mohler, Executive Director of Planning, MassDOT
Jeremy Thompson, Manager of Policy and Planning, 495/MetroWest Partnership