MAPC
METROPOLITAN AREA PLANNING COUNCIL

SMART GROWTH AND REGIONAL COLLABORATION

February 9, 2018

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Alex Strysky, MEPA #15278
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: I-90 Allston Interchange Project, MEPA #15278

Dear Secretary Beaton:

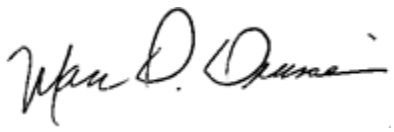
The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews proposed Projects for consistency with *MetroFuture*, the regional policy plan for the Boston metropolitan area, the Commonwealth's Sustainable Development Principles, consistency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

The Massachusetts Department of Transportation (the Proponent) proposes to replace the existing I-90 Allston Interchange, reconstruct the roads connecting to the interchange, move I-90 closer to the existing Worcester-Framingham Commuter Rail Line, add rail layover storage, build a West Station on the Worcester-Framingham Line, and address the deteriorated I-90 viaduct (the Project). The location of the Project is the area of the former Beacon Park Yard (BPY), historically a rail yard, a portion of which was partially utilized to construct the Massachusetts Turnpike, the original Allston interchange, and toll plazas.

MAPC has reviewed the Draft Environmental Impact Report (DEIR) and has concerns that primarily address challenges of the various design options in an area known as "the throat," future transit service to support proposed transit oriented development (TOD) in the Project area, and the scale and street widths of the new connecting streets. These issues, proposed recommendations, and questions are detailed as an attachment to this letter. MAPC respectfully requests that you consider our comments closely as you issue a Certificate for the Draft Environmental Impact Report (DEIR).

Thank you for the opportunity to comment on this Project.

Sincerely,



Marc D. Draisen
Executive Director

cc: David Mohler, MassDOT
Chris Osgood, City of Boston

MAPC recognizes that the key objective of the Project is to replace the deteriorating and structurally deficient I-90 viaduct, and to address vehicular congestion at the intersections of the I-90 ramps, Cambridge Street, and Solders Field Road during the morning and afternoon peak periods. We also recognize that the Project will create perhaps the largest undeveloped parcel in the City of Boston with a network of fully constructed streets subdividing this undeveloped land, and with the potential to shape development in Allston for the next 50 years or more. It is possible, as a result of this opportunity, to improve the public realm dramatically, including connections between the Allston neighborhood and the Charles River park system, while also improving transit, bicycling, walking, and recreational resources for visitors from far and wide.

MAPC believes it is critical that these once-in-a-lifetime opportunities should not be sacrificed by developing a roadway system that is too wide, with too many lanes, or so highly elevated that it effectively walls off the neighborhood created by opening up this undeveloped land. MassDOT should take a longer term view and create a Project that helps to meet the Commonwealth's goals for increasing the share of people using transit, cycling, and walking.

Unfortunately, we believe that the current Project design focuses primarily on accommodating vehicles and increasing the capacity of this highway to allow for free flow conditions. As a result, the current Project proposals all leave a significant barrier between neighborhoods and the Charles River, with designs that create 12 to 14 vehicular lanes and 4 to 8 railroad tracks along the realigned I-90 turnpike. These configurations were designed based primarily to accommodate current and expanded vehicular traffic, and will make it more difficult to build a sustainable, vibrant, urban neighborhood with a narrowed urban highway and clear connections to the river, parks, and paths. Whatever short-term improvements in congestion the Project may achieve will evaporate as more drivers choose to use the roadway instead of other modes.

Rather, the goal should be to develop the roadway and the spaces around it in such a way as to maximize use of alternatives modes of transportation, specifically transit, biking, and walking, while optimizing the connections between Allston and the Charles River.

I-90 Throat Alternatives

One of MAPC's chief concerns is that the existing I-90 highway and viaduct are a barrier separating the residents and workers in Allston from the Paul Dudley White Path and the Charles River. A goal of this project should be to increase the amount of park space, including bicycle and pedestrian paths, along the river, even if that means pushing into the shallows of the river, and to create better connections to the river from neighborhoods in Boston and Brookline.

The area where these issues come into play, between the current highway and the Charles River, has become known colloquially as "the throat." MAPC supports additional evaluation of all three alternatives as the Project moves into design, and believes all the proposed alternatives should include an evaluation of impacts on (and possible improvements to) the Charles River park space, the possibility of adding park space into the river, and the important goal of establishing separate bicycle and pedestrian paths, with greater separation from each other and from adjacent roads.

The alternative proposed by A Better City (ABC) recommends placing both I-90 and the railroad primarily at-grade. The benefits of this alternative include eliminating the elevated structures, the potential for increased access to the river via pedestrian bridges, and creating the potential for air rights development over the long term that would reduce noise and visual impacts of the railroad and the highway. While this alternative would reduce the vertical visual barrier between Allston and the river, it would also create a railroad and highway footprint that is wider than the current configuration. This alternative, if constructed

without adding park space into the shallows of the river, would only provide a 9-foot path in the most constrained area along the Charles River, and eliminate the possibility of a landscaped buffer between the path and Soldiers Field Road. Additional analysis should include an updated cost estimate to account for life-cycle costs of elevated structures versus at-grade infrastructure, which could be an advantage of the ABC proposal. We also recommend analysis to determine if construction impacts could be lessened by building the at-grade roads while I-90 continues to operate on a viaduct.

MAPC also supports further evaluation of the highway viaduct alternative (HV) and the so-called "amateur planner alternative" (AMP). HV would carry I-90 over the railroad tracks on a reconstructed viaduct, while AMP would place the railroad tracks above I-90, providing for a lower profile of elevated structure.

The HV alternative allows for a widened, 12-foot Paul Dudley White Path and a landscaped buffer between the path and Soldiers Field Road. This alternative also allows for the greatest flexibility in commuter rail operations, including keeping the Grand Junction railroad open during most of the Project construction. However, MAPC has concerns that the new viaduct in MassDOT's preferred HV3 alternative will be approximately 20 feet wider than the current viaduct, creating a larger footprint and placing the viaduct closer to buildings on the Boston University campus.

MAPC recognizes that the current AMP alternative (railroad over I-90) would not allow the creation of a landscaped buffer between the Paul Dudley White Path and Soldiers Field Road without additional fill in the Charles River. The alternative would also limit some rail operations. For example, the DEIR states this alternative would restrict speeds for commuter rail and Amtrak trains passing through the area, and would require shutting down the Grand Junction railroad for an extended period during construction. However, MAPC recommends that additional design be conducted on this alternative to see if these impacts to rail operations could be mitigated. Finally, MAPC suggests that variation on this alternative be considered, such as stacking I-90 (eastbound and westbound on separate levels), or elevating portions or all of Soldiers Field Road over I-90. These design options could reduce the overall project footprint while increasing space for the Paul Dudley White Path and the park along the Charles River.

Regardless of which alternative (or modified alternative) is eventually chosen, MAPC recommends that a reduced highway footprint be considered, such as 11-foot travel lanes and 4-foot shoulders, which are common within urban settings including in adjacent sections of I-90 and should not substantially impact vehicular capacity.

West Station Design

The conceptual cost estimates of constructing West Station are approximately $90 to $96 million, depending on the Project design alternatives. The rail station concept currently includes a large bus port to be added above the tracks and rail platforms. We suggest additional analysis to determine if the station construction cost could be decreased by reducing the size of the bus port and evaluating a design that changes the east-west bus circulation area above the platforms to a north-south busway extending from Seattle Street Connector to Malvern Street. This option could have a smaller footprint above the tracks and rail platforms and therefore lower the capital cost, while also facilitating north-south buses and shuttles to connect Kendall Square and Harvard Square from the north to Longwood Medical to the south, with a stop at West Station.

More broadly, we realize that the question of whether and when to build a commuter rail stop at West Station is a serious issue, with strongly held views by MassDOT and the MBTA, the City of Boston, and community advocates. While MAPC generally supports additional transit stops, we recognize that this stop would be very close to other stops on the Worcester-Framingham Line, and could impact overall travel time on the line. We believe the question of whether and when to build the station should be determined based on additional transportation analysis and a consideration of potential land use scenarios in the area, which would help to determine the timing and level of transit demand, and help to decide on the design and configuration of the station. In the meantime, careful attention should be paid to ensure that the

final design and implementation of this Project will "do no harm" to future options for the development and viability of West Station.

Multimodal Street Network and Transit Oriented Development

DEIR Section 5.8 summarizes a detailed vehicular level of service (LOS) for the AM and PM peak hour, with performance measure goals for vehicular LOS E at intersections. MAPC is concerned that the concepts shown in the DEIR are primarily five lane streets and intersections with 11- or 12-foot wide lanes in an area that is proposed to be transit-oriented development (TOD). The street design should follow nationally recognized Complete Street guidelines, as well as the City of Boston's Complete Street guide. This mean truly "urban streets" with fewer lanes, mid-block pedestrian crossings, and overall reduced lane widths. MAPC is also very concerned that this peak-hour vehicular analysis has helped to create a project that is 14 lanes wide at the interchange, including 4-lane highway access ramps. As currently designed, the interchange will create a wide barrier and severe difficulty for pedestrians connecting between West Station, future TOD north of the interchange, and the existing Boston University campus and Allston neighborhoods to the south.

There is no indication that an LOS or Quality of Service (QOS) analysis was performed for pedestrians, bicyclists, or transit riders in an area that is proposed to have 42 to 50 percent of trips using transit, walking, or cycling. As the Project moves into more detailed design, MAPC requests that MassDOT conduct a multimodal LOS/QOS analysis that will help to ensure that streets are not over-designed to accommodate primarily vehicular traffic for the morning and afternoon peak hours of the weekday. A multimodal LOS/QOS study should also consider good urban design, place-making, and level of service for transit and non-vehicular users, including ways to reduce the overall footprint of the streets and highway interchange in this area. There are multiple resources that can be referenced for a more holistic multimodal LOS/QOS, including the 2008 Multimodal Level of Service Analysis for Urban Streets (National Cooperative Highway Research Program Report 616), and the performance measures shown in 2013 Urban Street Design Guide (National Association of City Transportation Officials).

MAPC is particularly concerned that the primary pedestrian and bicycle connection between West Station and the redeveloped Beacon Park Yard site requires pedestrians and cyclists to travel through two major intersections that are part of the I-90 eastbound interchange (Seattle Street Connector and Cattle Drive Connector). This is different from the westbound interchange, which is completely separated from any West Station pedestrian, bicycle, and transit traffic. MAPC requests that MassDOT consider other interchange and street network options that would separate the heavy vehicular eastbound interchange traffic from West Station. If an alternative interchange design is not feasible, then the design of these intersections will be very important to ensure they meet the necessary quality of service for all users, and support the TOD proposed for the area. This would include reducing the number of lanes, lane widths, and curb radii, while improving crosswalks and traffic signal phasing.

Regional Land Use and Transportation Study

At the present time, none of the major landowners in this area have adopted or proposed clearly defined and detailed plans for the size, density, and mix of land uses that could occur on the parcels they own. Furthermore, the automobile and transit trips that pass through the study area are both local and regional in nature, including trips to and from downtown Boston, Kendall Square and Harvard Square in Cambridge, and the Longwood Medical area bordering Boston and Brookline. The uncertainty about development, as well as the substantial amount of current and projected traffic in the study area, has led to a vigorous discussion on the type and timing of transportation infrastructure that should be considered. In order shed light on the proper level and timing of investments in roadway, transit, bicycle, and pedestrian infrastructure, public entities should conduct a separate land use and transportation study to determine the level of service that would be needed to accommodate transportation demand across various land use scenarios. The scenarios should span all reasonably likely combinations of development in the area, and

should take into account efforts to make jobs in Allston accessible to people who live in other parts of the region, while also enabling residents of Allston to access jobs elsewhere (also known as an "accessibility analysis"). The study should begin to identify a range of possible infrastructure improvements that might help to meet the demand identified across the various development scenarios, while also considering how denser scenarios involving higher levels of development might increase the overall value of the underlying land, yielding additional taxes for public entities and additional value for local property owners.

MAPC, as the regional land use, transportation, and environmental planning agency for Greater Boston, pursuant to Chapter 40B Section 24 of the Massachusetts General Laws, respectfully offers to facilitate this coordinated land use and transit study with the Cities of Boston and Cambridge and the Town of Brookline, and respectfully requests the involvement of MassDOT and the MBTA in this effort. We will make all reasonable efforts to include local property owners in the study, which will include a public engagement element. MAPC believes that this coordinated land use and transportation study will provide the proper forum for addressing broader regional development and transit issues, in a manner similar to the study currently underway by the Lower Mystic Regional Working Group that was established as part of the Wynn Everett Project (EEA Number 15060).