

June 19, 2020

Stephanie Pollack
Secretary and CEO, Massachusetts Department of Transportation
10 Park Plaza, Room 4160
Boston, MA 02116

Jeff McEwen
Division Administrator, FHWA
55 Broadway, 10th Floor
Cambridge, MA 02142

MassDOT Board of Directors

MBTA Fiscal and Management Control Board

Dear Secretary Pollack, Administrator McEwen, MassDOT Board of Directors and MBTA Fiscal and Management Control Board:

We appreciate that you will take our comments into account in the decision making process that leads to a final Allston Multimodal Project design. We want to be your partners and allies in building support for a truly bold, visionary and future-focused reconstruction of this area. We believe that the opportunity exists to set the stage for meeting the needs of the next ten years while also working toward the transformation of our transportation system and riverfront to meet the needs of equity, climate change, and environmental resiliency.

This is more than a viaduct replacement project. We hope that this project will be transformative and help knit the community of Allston back together and connect it to the Charles River. Therefore, we feel strongly that replacing the MassPike viaduct is not a viable or appropriate option - even if it is technically feasible.

While much collaborative work is needed with MassDOT, FHWA, advocates, residents, and other agencies to develop the final project design we agree on: 1) the alternatives that should be analyzed; 2) a set of common criteria to form the basis for evaluation; and 3) the project components that should be included in every alternative.

We fully recognize that this is a complex project and that there are no straightforward solutions. Therefore, in order to ensure the best possible outcome for those who live in the community and who utilize I-90, we recommend that you study both the surface option and hybrid option as briefly described below.

We agree that the following roadway options should be studied in the throat area.

1. All at-grade roadways with a total of 12, 11, 10, 9 and 8 total vehicle lanes, using the narrowest feasible lane and shoulder widths. A 12-lane cross section would include 8 lanes on the MassPike and 4 on SFR. Because reducing I-90 to 6 lanes for several years of construction is feasible, study is needed to consider why I-90 capacity should be increased by one-third when construction is completed.

The reduction in the number of lanes could be accomplished through elimination of lanes on either roadway. An 8-lane option would include 6 lanes on the MassPike and 2 on SFR.

As we understand from the many sketch alternatives produced over the last 5+ years, a 12-lane cross section would require approximately 30-feet of encroachment on the Charles River (for a length of approximately 700 feet) to provide space for riverbank restoration and the provision of separate walking and biking paths. The elimination of a vehicular lane would yield approximately 10 feet of roadway width – thus an 11-lane cross section would reduce encroachment into the river of approximately 10 feet. A 9 or 8-lane cross section would likely allow the riverbank restoration and PDW paths without any encroachment into the river.

2. A modification of the “Modified Hybrid” scheme identified by the Independent Review Team that includes a slightly below-grade MassPike and with SFR on a viaduct above the eastbound MassPike, including the lane counts mentioned above. This alternative can be modified to significantly reduce its impact on the Charles River and its parklands, simplify its construction process, and make it a useful alternative for evaluation.

The common criteria for analysis of each alternative should include the following elements.

1. Improvements to public health, active recreation, and transit-oriented urban design
2. Mode-shift from single occupancy vehicles to transit, biking, and walking
3. Environmental and travel impacts of construction
4. Environmental and transportation impacts and benefits of the completed project
5. Construction and post-construction mitigation of project impacts
6. Climate impacts including flooding impacts to the project site and surrounding areas from sea level rise and precipitation in 2030 and beyond
7. Location of construction
8. Duration of construction
9. Total lifecycle cost of construction
10. Annualized maintenance costs

We agree that the following project elements should be included in all project alternatives.

1. Enhanced public transit

- 4 tracks at West Station
- 2 tracks on the Worcester Line remaining open throughout construction
- 2 tracks dedicated to a Grand Junction connection
- Reconstruction of the Grand Junction Bridge over Soldiers Field Road
- Design of a Grand Junction Bridge over the Charles River, with 2 rail tracks and walk/bike space
- Anticipation of electric trains and high frequency service.
- A reassessment of the need for a layover yard given Regional Rail service on the Worcester Line as called for by the FMCB
- Worcester Line modernization to encourage mode-shift during and after construction (high level platforms, two-track stations, expanded parking or other forms of improved access at suburban stations)

2. Bike and pedestrian connections so that neighbors and neighborhoods would be reconnected to the river and transit.

- By adding pedestrian/bike connections in Allston: one in the vicinity of Agganis Way; one at the BU Bridge/Comm Ave nexus; and one serving the new neighborhood east of Cambridge Street.
- The People’s Pike walk/bike path from the Franklin Street Footbridge to West Station and the Agganis Footbridge.
- Paul Dudley White (PDW) path in service throughout construction.
- A final design that includes a Paul Dudley White path with separated walking and biking trails.
- PDW path in the river during construction and permanently should be studied but could be justified only if it can be accomplished in conjunction with river and riverbank restoration in a way that improves the overall ecological integrity of the river.
- The number of lanes in the street grid and on/off ramp in Allston should be reduced to reflect the existence and use of the West Station transit facilities which will reduce vehicle trips and increase walking and biking trips.

3. Any encroachment into the river should be for the primary purpose of ecological restoration; no vehicular encroachment into the Charles River during construction and in the final design.

- River restoration measures should consider co-location of other public benefits such as stormwater mitigation and public access. Due to the project’s close proximity and significant impact on the Charles River and surrounding parklands, river restoration should be a key element of the project.
- The riverbank should be naturalized along the southern bank between River Street and the BU Bridge by creating a natural floodplain or living shoreline.

Why the time is right to evaluate a variety of roadway capacities in this corridor:

First, we believe an evaluation of post-COVID roadway demand is critical for all the options due to the massive change in commuting patterns and assumptions in the post-COVID era.

- Anecdotally, some businesses that never considered work from home policies are not only experiencing them but say they will never go back to requiring all employees to work on site.
- A recent MassINC poll found that 41% of workers who are able to do so said they would prefer to continue to work from home, and 29% said they would do so if asked. A previous Pioneer Institute poll found that 63% of respondents would prefer to work from home at least one day per week after COVID-19 vaccine is available, with most saying they would prefer to work from home 2 or 3 days per week.

Second, in light of Boston and Commonwealth stated transportation and greenhouse gas (GHG) reduction goals we believe that it is imperative to evaluate a variety of roadway capacities to determine how they will contribute to meeting these critical climate, health and transportation goals.

- The City of Boston’s “Go Boston 2030” set a goal of reducing the number of car trips in the city by half.
- Governor Baker’s Commission on the Future of Transportation final report made the following recommendations:
 1. *Prioritize investment in public transit.*
 2. *Transform roadways and travel corridors* - MassDOT, municipalities, and other roadway owners should redesign them to prioritize person-throughput rather than vehicle-throughput, so that limited corridor capacity is allocated to moving as many people as possible, while accommodating mobility alternatives.

3. *Better manage traffic congestion* - The Commonwealth must consider a full set of options to address roadway congestion, including improvements to public transit, better systems operations, and the consideration of congestion pricing. The Commonwealth should prioritize and target investments in public transit and other high-capacity transportation modes to make these more efficient, attractive, and reliable to reduce single occupancy vehicle (SOV) use, particularly on our most congested roads in the urban core.

The Future of Storrow Drive/Soldiers Field Road

During the course of the planning and design efforts undertaken for the I-90 Allston project, there has been discussion about the ways in which the Charles River Reservation from Leverett Circle to Watertown is compromised by the presence of a high-speed, multi-lane roadway with numerous underpasses and overpasses all of which cut the City off from the river. There should be a separate, serious, and concurrent study of the future of Storrow/SFR from Charles Circle to Watertown. The purposes and objectives of the study should be to explore ways to improve the parkway and surrounding parkland and the river that borders it to facilitate human enjoyment, natural restoration, and safe and effective travel for all modes of transportation.

The scope should include: methods to calm the traffic so it returns to a parkway (including potential for the use of signalized at-grade intersections); enhancement of pedestrian and bike travel throughout, specifically to achieve dual ped and bike lanes for as much of the length as possible; restoration of the river edge to enhance the ecological health of the entire river; enhancement of parkland along entire length; the number of lanes and width of roadway for entire length; financing mechanisms that could involve substantial public/private partnerships to supplement state funds for this underfunded parkway area; significantly improved access for peds and bikes at all intersections including underpasses for bikes and peds at bridges where none currently exist (River, Western) and where design is 25% complete and approved by the Massachusetts Historical Commission (Anderson).

The results of this study should be integrated into the I-90 Multimodal Project in the area from the BU Bridge to Western Avenue in a timely manner with the ongoing federal and local process for the Allston Multimodal Project. The work should be managed jointly by MassDOT and DCR, with committed funds from MassDOT. The scope should be developed collaboratively with active participation by municipalities, other state agencies (such as DEP), major private institutions along the river and parkway, abutting neighborhoods, groups concerned about the river, parks, and parkway, and others. The study should meet strict deadlines so results from this study and I-90 can move forward in a compatible manner. The study should be funded with sufficient resources to enable the hiring of a multimodal consultant staff to reflect the broad purposes of the study, to create a continuing, active, and meaningful advisory process and to conclude with an action plan to implement specific improvements.

Conclusion

The reconfiguration of the Allston interchange is the chance of the century to transform the options for multi-modal transportation, help the Commonwealth meet its absolutely necessary climate goals, and rectify long-standing deprivation of public amenities and degradation of the environment

by transforming the Allston section of the Charles River Basin into a stunning urban park with a restored river's edge that is connected to adjacent communities and that enhances, rather than pollutes, the river itself.

Thank you for your consideration and we look forward to turning this vision into reality.

Allston Brighton CDC, Jason Desrosier, Task Force Member

Allston Civic Association, Anthony D'Isidoro, President, Task Force Member

Charles River Conservancy, Laura Jasinski, Executive Director, Task Force Member

Charles River Watershed Association, Emily Norton, Executive Director, Task Force Member

Conservation Law Foundation, Staci Rubin, Senior Attorney

LivableStreets Alliance, Ari Ofsevit, Task Force Member

Massachusetts Bicycle Coalition, Galen Mook, Exec. Director, Allston Resident and Task Force Member

WalkBoston, Wendy Landman, Senior Policy Advisor, Task Force Member

Harry Mattison, Allston resident, Task Force Member

Jessica Robertson, Allston resident, Task Force Member

Steven Miller, Cambridge resident, LivableStreets Alliance

Fred Salvucci, Allston/Brighton resident

Bob Sloane, Brookline Resident, WalkBoston

Jack Wofford, Cambridge resident

Douglas Arcand, Allston resident