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Stephanie Pollack, Secretary & CEO
Massachusetts Department of Transportation
10 Park Plaza
Boston, MA 02116

Re: I-90 Allston Interchange Improvement Project (AIIP)

December 22, 2016

Dear Secretary Pollack:

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As stewards of and advocates for the Charles River and its urban parklands, we are writing in response to the most recent Allston I-90 plan, "Urban Interchange – Concept 3K," which was presented to the community on December 8, 2016. The Conservancy has worked with other taskforce members on many aspects of the project. The items that are particularly important to the Charles River Conservancy and its constituency required this separate letter to cover.

We recognize and appreciate that the plan has evolved from previous iterations, showing much improvement. In this letter, we want to focus on three specific elements that can bring the plan closer to its full potential:

- 1 - The importance and size of the Allston Esplanade
- 2 - Stormwater and climate change preparedness
- 3 - Connections between the river and Brookline in the throat area

1. The importance and size of the Allston Esplanade

We much appreciate the "Place Making" effort by the City of Boston. To us, "Place Making" means capturing and emphasizing the special qualities of a place and making full use of that asset in the planning process. While the project has to satisfy a critical transportation need, a 100-acre parcel of new urban development affords a once-in-a-lifetime chance to provide other vital community benefits.

In the case of the I-90 ASIIP, the presence of the Charles River stands out as the highest “Place Making” opportunity and should therefore be a priority. A new river front civic space would have the potential to become a region-defining landmark, especially as it is framed by Magazine Beach on the other shore. The currently proposed 2.4 acre green strip does improve the current situation of the Dr. Paul Dudley pathway, but it would be a lost opportunity to create a usable and memorable green space. A space of at least 5 acres is necessary to accomplish that “Place Making” goal. The name “Allston Esplanade” for that green space could be a good one only if it were big enough to offer space for passive and active recreation and for civic and cultural events.

We ask for a spatial analysis and scale comparisons for green spaces of different sizes that will help explore the number of people and types of uses that this area might accommodate.

We support the removal of the River Street off-ramp from Soldiers Field Road and conversion of the existing off-ramp into new parkland.

2. Stormwater and climate change preparedness

In a post-Sandy age, the dearth of planning for storm water management, integrated or otherwise, seems problematic and shortsighted. Integrating such measures into the transportation plan and urban design at the beginning creates a more holistic and comprehensive plan. The most effective sustainable measures are those that are embedded into construction projects rather than retrofitted later.

This question of the relationship between “Place Making” and climate change preparedness is important, and one where we would hope the Allston I-90 planning team and the City of Boston might look to learn from the lessons of previous Boston planning efforts. The Seaport District has engendered a good deal of commentary regarding its lack of storm surge and storm flood preparedness, as well as, the inadequate provision of green space, relationship with Boston Harbor, and a lack of human-scaled streets.

During the Task Force process, the CRWA presented strategies for integrating landscape and storm water management practices into large-scale developments. At the last public meeting there was no mention of any sustainability strategies, save for a brief comment about storm water mitigation within the Beacon Yards parcel. We ask that MassDOT presents the proposed approach to storm water management, water quality, and climate change.

The integration of green infrastructure and rainwater design measures can provide a model for sustainable development for the region and beyond.

3. Connections between the river and Brookline in the throat area

The presenters and commenters at the public meeting spent much time on north-south connectivity and integrating the new development into the existing neighborhoods (which are all very crucial). However, there was no discussion of connecting the Charles River with the BU campus and Brookline at the so called throat area.

We appreciate that MassDOT has added the ABC and the Citizen Planner versions into their evaluations, but by not presenting that element at the public meeting, we are concerned that the at-grade solution that would provide a connection at the throat area is being short-changed.

While traffic (both for vehicles and trains) needs to flow, to separate a whole neighborhood from the river does not provide the improvement that the I-90 AIIP project could offer. The at-grade version would allow for the construction of overpasses and overlooks, adding a whole set of new opportunities to the river for access and enjoyment.

While we are interested to hear the results of the noise analysis of the three options, it is already clear that a viaduct version would continue to put the shoreline and the river pathway along it in the shade.

Thank you for the opportunity to comment on the three aspects we feel will make the biggest long-term impact on the region and the Charles River-- a 5+ acres Allston Esplanade, the inclusion of climate preparedness measures and green infrastructure, and improved connectivity to the river-- and how these measures might be integrated into the plan.

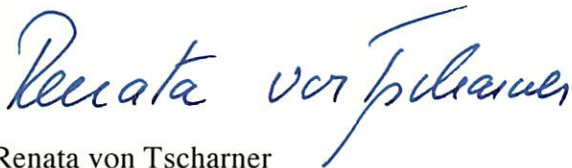
This project represents the most exciting possibility we will see in the 21st century to improve the Charles River Parklands, to create a new neighborhood, and to break down the barriers to the river that now exist.

We can learn from the mistakes made elsewhere, and together we can create an urban jewel of a riverfront neighborhood.

We are ready to work with you.

Thank you for your consideration. We look forward to hearing from you soon.

Sincerely,



Renata von Tschärner

Founder and President

Charles River Conservancy

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