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Maeve Valley Bartlett, Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
Holly Johnson, EEA No. 15278
100 Cambridge Street, Suite 900
Boston MA 02114
RE: I-90 Allston Interchange Multi-Modal Transportation Project

December 10, 2014

Dear Secretary Bartlett,

Thank you for this opportunity to comment on the recently filed Environmental Notification Form for MassDOT's I-90 Allston Interchange Multi-modal Transportation Project.

Our organizations appreciate the enormous opportunity this project presents to enhance a narrow and desolate segment of the Charles River Parklands, while at the same time greatly improving transit, pedestrian, and cycling connections at a central location within the metropolitan area, and laying the groundwork for a valuable and vibrant new city district. In view of these historic opportunities, MassDOT's initial filings fall distressingly short of realizing anything like the full potential for this project. Inasmuch as the river, its parklands, the daily flow of many thousands of people through the site, and the future development of a major urban district all depend on good planning at this stage, we urge that, in the interests of the overall environmental health of the region, you require MassDOT to study major additions and improvements to the project in the context of this MEPA review. In particular:

- 1) The proponent should be required to study the **realignment of Soldiers Field Road as far south as possible, away from the river**, both along the section of roadway that borders the I-90 viaduct and along the section that extends westward from the viaduct to the River Street Bridge. A 35 mph design speed for this re-built roadway should be used for this study.

Such a realignment would allow for the creation of a wider and more attractive pedestrian and cycling greenway, and also a **waterfront park** known in planning

proposals as **the Allston Esplanade**. This proposal represents perhaps the most exciting possibility we will see in this century to improve the Charles River Parklands, to provide connection to the river for all the eventual users of this new district, and beauty to the many commuters who will pass through it. The additional parklands, facing the river and looking across it to Magazine Beach in Cambridge, will create a natural setting as beautiful in its way as Boston Common, and like it a vital center for cultural and leisure activities that will bring vitality and character to this new urban hub.

- 2) The proponent has proposed constructing a **new footbridge for cyclists and pedestrians** to cross over Soldiers Field Road to the Allston Esplanade. The appropriate location of this footbridge should be studied in conjunction with the relocation of Soldiers Field Road between the I-90 viaduct and the River Street Bridge, in order to identify the most direct path to the Allston Esplanade.
- 3) The proponent should be required to study ways to widen the **Grand Junction rail bridge** below the BU bridge to accommodate **two tracks and a pedestrian/cycle path**, so that this essential connector, which has the potential to join West Station and the People's Pike pedestrian/bicycle path to East Cambridge, Kendall Square, and beyond, is fully in place in advance of the main I-90 construction, and available to meet the full requirements of future transit and carbon-free transportation modes.
- 4) Many advocates and Allston residents have supported a "People's Pike" path parallel to the newly aligned I-90, with multiple treadways to serve both pedestrians and cyclists. The Boston Society of Architects team organized by NBBJ Architects has proposed that this path or linear park should have **dimensions and style similar to the Commonwealth Avenue Mall** in Boston's Back Bay, and should connect directly to the Allston Esplanade. The proponent should be required to study the feasibility and desirability of this proposal and consider how it can promote pedestrian and cycling travel as well as best practices for storm-water management.
- 5) The re-alignment of Soldiers Field Road westward from the I-90 viaduct to the River Street Bridge, along with the proponent's proposed new Soldiers Field Road on-ramp south of the DoubleTree Hotel, creates opportunities to **reduce the Soldiers Field Road off-ramp** at the River Street Bridge from two lanes to one. This lane reduction would allow widening the narrowest portion of the Dr. Paul Dudley White bike path, which occurs just downstream from the River Street Bridge, and would greatly encourage use of the path both for recreation and carbon-free commuting. The proponent should be required to study this proposal.
- 6) The proponent has proposed locating the Houghton Chemical rail-line along the immediate western edge of Soldiers Field Road in its current alignment. As this would be in conflict with the relocation of Soldiers Field Road mentioned above, the proponent must study alternative locations for this Houghton Chemical rail-line.
- 7) The I-90 viaduct must **not be allowed to encroach permanently on the Charles River Parklands**, particularly where this is done to meet federal interstate standards that are not in place on other sections of the urban interstate highway system. The proponent must study ways to avoid this adverse impact.

- 8) The proponent should be required to study **surface vehicular connection to West Station and the Turnpike from the south, i.e., from Commonwealth Avenue**, so that the project connects North and South Allston, at and through the station, not just for pedestrians and cycles but for vehicular traffic. This traffic will otherwise continue to load increasing and unacceptable traffic volumes on the surface street grid on and around Harvard Avenue, with disastrous consequences to north-south traffic flow.
- 9) The proponent should be required to study ways to **lower the height of rail and I-90 throughways** so that north-south connections to and through West Station are not unacceptably steep, as currently proposed.
- 10) The proponent should be required to study ways that rail and Turnpike throughways, and the rail storage and maintenance facilities proposed for the site, can be **fully decked in advance of construction**. This proposal is essential to ensure that good urban design and connectivity principles will be implementable as the district surrounding West Station and connecting to the river is developed.
- 11) The proponent should be required to study possible ways to design **on- and off-ramps from the Turnpike** at or near Beacon Street **to serve the Longwood Medical Area** in order to relieve increasing volumes of surface traffic to that employment hub. These improvements must be in place before the major construction project further disrupts traffic trying to reach the Longwood Medical Area from the Turnpike.
- 12) The proponent must study methods for proper **removal and disposal of contaminated soil** so that healthy development of the site can proceed.
- 13) In procedural terms, the ENF fails to provide for the ongoing oversight of the citizens' Task Force, which represents numerous neighborhood and civic groups and brings essential public concerns to bear on the project. The proponent must be required to provide for this **ongoing citizens' advisory role**.

As you can see from this lengthy list of requests, our organizations believe MassDOT needs to greatly enlarge the scope of its planning. We continue to believe that, properly conceived, the I-90 Interchange project will contribute enormously to the healthy growth of our metropolitan region. The possibilities to enhance not just vehicular traffic flow but public transit, pedestrian, and bicycle transportation are abundant and wholly feasible. The potential for increased access to the Charles River and for enhancement of its parklands is historic in scope, and stands to make this project one of the great transformative moments that characterize Boston's development as a great city. We urge you to instruct MassDOT to explore these momentous possibilities, and we await the results with the greatest optimism for our city and its beloved riverway.

Respectfully yours,

Renata von Tscharnier
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