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Dear Administrator McEwen and Director O'Dowd,

The Cambridge Redevelopment Authority (CRA) appreciates the opportunity to comment on the I-90 Allston Multimodal Project's (the "Project") National Environmental Policy Act (NEPA) Scoping Report.

As we expressed in our comments to the Project's Draft Environmental Impact Report submission, the CRA has a deep interest in the I-90 Allston Multimodal Project and its impacts on the transportation system of the metropolitan area. The redevelopment of the Allston area represents a unique opportunity to create a regional innovation district to complement Kendall Square. Further, this Project will be key to establish connectivity between major nodes in Boston and Cambridge. After reviewing the Scoping Report, the CRA feels the Project should be revised to better support public transit, pedestrian, and bicycle-oriented development, and regional connectivity between central Massachusetts, Boston and Cambridge, and that the analysis undertaken under NEPA should study those factors carefully. The Massachusetts Department of Transportation (MassDOT) and the Federal Highway Administration (FHWA) should also clarify their transit projections and mode-share goals for development in the area and adapt the Project to provide higher priority to transit facilities.

The CRA believes that without these amendments the Project will not support sustainable and transit-oriented development for the area. Below is a list of recommendations which the CRA advises the FHWA Division Administrator and the MassDOT Acting Director of Bridge Project Management to consider when writing the Environmental Impact Statement (EIS):

West Station

West Station should be completed in Phase One, its transit demand model methodology should be clearly described, and the station should accommodate four-track service for the Grand Junction and Worcester Main Line.

The Scoping Report is silent on the phasing of West Station. As the CRA has stated before, it is essential that West Station be implemented in the first phase of the project to ensure transit-oriented rather than auto-centric development. In fact, rail and bus transit connections through this area should be utilized to provide a transit-orient approach to mitigate the construction process.

The EIS should be transparent about the methodology used to complete West Station's transit demand analysis. Accurately measuring future ridership for the station is imperative for an urban development project of this potential impact. The Project should be informed by MAPC's West Station Area Transit study, and models should

include projections of transit riders traveling to West Station via existing or new bus routes or those using urban rail on the rapidly growing Grand Junction corridor. Estimates should also assess the complete scale of development under consideration in the Project and corresponding transit service, which will undoubtedly spur additional growth in adjoining neighborhoods.

To facilitate easier transfers to Kendall Square via that Grand Junction Rail and enable more frequent service, West Station should accommodate four track service. Trains to West Station should also operate at a greater frequency than once an hour during peak times and once every three hours during off-peak times.

Grand Junction Railroad Bridge & Bicycle and Pedestrian Connections

Rebuild the Grand Junction Railroad Bridge over the Charles River to accommodate two track service and a shared-use path with connections to the Paul Dudley White Path (PDW Path).

If designed and planned for appropriately, the Project will be a critical transportation node within the larger regional system. West Station will link north-south bus routes, and western Massachusetts via the Worcester Main Line to the future Innovation Hub planned in Harvard's Allston Development, and to Kendall Square and ultimately North Station via the Grand Junction rail corridor. To date, there is not enough information on the design of the Project in the Scoping Report to understand transit and multi-modal path connections fully. It appears the Project provides a few pedestrian and bike connections across I-90 and the rail yard, but that there are many missing links in this future network, specifically concerning connections between the PDW and Grand Junction multi-use paths.

In order to protect this vision and ensure Boston's regional transportation system will support the growing innovation economies in Boston and Cambridge, the Grand Junction Railroad Bridge over the Charles River must support two-track transit. The reconstruction of the Grand Junction Railroad Bridge over Soldiers Field provides a perfect opportunity to rebuild the Grand Junction Rail Bridge over the Charles River.

Bicycle and pedestrian connections to the PDW Path and West Station via the Grand Junction Railroad Bridge must also be part of the Project's plans. An adjacent shared use path connection cantilevered off the side of the new rail bridge would support multi-modal, intercity travel. If truly required for the construction of the Soldiers Field Road Hybrid Alternative, the area impacted by the temporary Soldiers Field Road trestle bridge extending over the Charles River, could provide an opportunity to enhance Grand Junction Rail and PDW Path connectivity and provide a more generous wetland open space environment between the river and the roadway infrastructure.

Mode-Share Goals and Estimates

Define more aggressive mode-share goals, and design the Project's infrastructure to achieve those standards.

The CRA strongly recommends the Project strives for and is transparent about a more aggressive mode-share goal, and that MassDOT and the FHWA design the new streetscape to achieve that standard. The new street system offers a unique opportunity to design a network that is accessible for all modes, including safe and comfortable pedestrian facilities (particularly connecting to West Station), roadway infrastructure that prioritize buses, and raised cycle tracks to facilitate multi-generational bike ridership. Instead the roadway designs seem to prioritize the storage of vehicles entering and exiting the freeway.

This project could learn lessons from the CRA's experience over-building surface roadways for private automobiles in Kendall Square during the 1980's. It has caused the CRA, the City of Cambridge, and MassDOT to spend significant resources to redesign Kendall Square's roadways to be multi-modal streets, retrofitting the street system with raised cycle tracks and bus priority infrastructure that should have been included in the original roadway designs. To avoid this mistake the CRA highly recommends that the local street system be designed to accommodate facilities that supports robust multimodal use.

Summary

The CRA feels that absent of the recommendations identified in this comment letter, that the Project will fail to be the regional transit node it has the potential to be, and will promote auto-centric rather than transit, bike and pedestrian oriented development. To summarize our comments, we suggest to following be included in the Project definition and NEPA analysis:

1. Plan to complete significant transit portions of the project in the first phase, and utilize those investment as part of the mitigation for congestion created during construction.
2. West Station's transit demand assessment methodology should be clearly explained, and consider the scale of development under consideration in the Project's surrounding areas and transit ridership traveling to West Station via existing or new bus routes or using urban rail on the Grand Junction corridor.
3. Include bicycle and pedestrian connections to West Station from the PDW Path and the Grand Junction Multiuse Path via the Grand Junction Rail Bridge.
4. Define more aggressive transit, bicycle, and pedestrian mode-share goals for the EIS, and design the streetscape system to support safer multi-modal surface roadway facilities.

Thank you for the opportunity to comment on the Scoping Report. The CRA looks forward to further review of this Project as it is refined, and hopes these changes will be made to ensure the Project will meet regional and local sustainable development expectations.

Sincerely,



Tom Evans

Executive Director