CAMBRIDGE
REDEVELOPMENT
AUTHORITY

P 617-492-6800 | F 617-492-6804
255 Main Street | 4th Floor | Cambridge, MA 02142
cambridgeredevelopment.org

Matthew Beaton, Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs
Attn.: Alex Strysky, MEPA Office
EEA No. 15278
100 Cambridge Street, 9th Floor
Boston, MA 02114

Dear Secretary Beaton,

The Cambridge Redevelopment Authority (CRA) appreciates the opportunity to comment on the I-90 Allston Viaduct Project's Draft Environmental Impact Report (DEIR).

The CRA, in its role of administering the Kendall Square Urban Renewal Plan since the 1965, has a deep interest in the I-90 Allston Viaduct replacement and West Station. This Allston Viaduct Project (the Project) is a once-in-a-generation opportunity to re-use former industrial and railroad land to create the next regional innovation district to complement Kendall Square. More importantly, as a transportation project, this Project can establish connectivity between major nodes in the Boston region, which have been disconnected by existing transportation infrastructure. The CRA feels that the Project should be revised to support the transportation mode share and greenhouse gas emissions (GHGs) policies of the Commonwealth as well as the sustainable transportation goals of Boston and Cambridge. Unfortunately, the CRA finds the Highway Viaduct alternative, and the current project phasing plan to be detrimental to future transit-oriented development in Alston and regional, multi-modal connectivity.

The CRA requests that the Secretary of Environmental Affairs issue a certificate for the DEIR that requires the early phasing of West Station and pursues an alternative design that enhances transportation connectivity across the project site.

Below is a list of detailed recommendations in underlined text supported by accompanying paragraphs which the CRA strongly advises the Secretary of Environmental Affairs and MassDOT to consider for the DEIR certificate:

1. West Station

West Station should be completed in Phase One.

It is essential that West Station be prioritized and implemented in the first phase of the project. The station is fundamental in creating a transit-oriented neighborhood with sustainable transportation rather than auto-centric development.

The CRA has significant experience facilitating transit-oriented development (TOD) to spur economic growth. The success of the Kendall Square Innovation District is dependent on two primary geographic factors; its location next to MIT and its position on the Red Line. As the MEPA requirement of a 1994 amendment to the Kendall Square Urban Renewal Plan, the CRA has conducted over 20 years of annual traffic counts. During the 2000's, Kendall Square added over four million square feet of new development, yet vehicular traffic decreased by 14% due to strong transit connectivity, street designs that supports walking and biking, and municipal transportation demand management policy. Kendall Square developed around an existing rail transit station into a model for TOD and the MassDOT should take provide the Allston Yards neighborhood the same opportunity.

The DEIR's Purpose and Needs chapter notes that the Project prioritizes smart growth development, as well as functioning as a "connecting link" for the area. Constructing West Station in the first phase is the only way for the project to achieve these stated DEIR goals. The infrastructure that is put in place before development will influence its growth, form, and operation. Retrofitting this new multi-million square-foot urban district for transit later will be an irreversible short sighted missed opportunity the state and region cannot afford.

The CRA asks that the Secretary of Energy and Environmental Affairs require in the DEIR certificate that the transit portion of this project is fully integrated into Phase One in the Final Environmental Impact Report (FEIR).

2. Grand Junction Railroad Bridge

Rebuild the Grand Junction Railroad Bridge over Soldiers Field Road as part of the I-90 project to accommodate two tracks in the future, with 14-foot shared-use path along the side.

One of the most significant omissions to the Highway Viaduct (HV) alternative is the rebuilding of the Grand Junction Rail bridge over Soldiers Field Road and the Charles River. West Station should become a major transit center that connects commuter rail and local buses. This project should accommodate the upgrade of the Grand Junction Rail line to link West Station to MIT, Kendall Square, Cambridge Crossing, and North Station in the future. Two tracks in the redesign of the bridge will be essential to facilitate urban passenger rail on the Grand Junction corridor. An adjacent 14-foot shared use path connection to Cambridge will be essential to facilitate non-motorized modes of transit.

Rebuilding this rail bridge has the added benefit of eliminating the need for the circuitous and small boardwalk that exists today which routes the Paul Dudley White Path (PDW Path) around the base of the bridge. This would eliminate a significant choke point and safety hazard on the high-traffic PDW Path.

The track alignment going into the bridge in the HV alternative creates a very slow track geometry with a reverse curve that would restrict reasonable urban transit rail speeds in this area in the future and may preclude the opportunity for two tracks going on and off a new rail bridge.

A 14-foot shared-use path cantilevered off the side of the new rail bridge would give several opportunities to create connections to the Commonwealth Avenue intersection, as well as West Station, the PDW Path, and the Boston University campus. These are not possible in the HV version.

The assertion in the DEIR that the at-grade options replace the bridge would require a three-year shut down of the Grand Junction rail corridor and cause a 100-mile detour for servicing vehicles between North and South Stations is exaggerated. The past performance of MassDOT conducting major bridge replacements overnight or over weekends in order to minimize disruption of rail or highway traffic proves a rapid bridge replacement can be done with creative design and contract execution. Additionally, when the Grand Junction rail bridge was shut down on short notice for an emergency repair in 2012, Amtrak and MBTA conducted vehicle maintenance at each other's facility. A thoughtful engineering and operational design solution should be able to design scenarios to significantly reduce the operational cost of that closure.

The CRA requests that the Secretary of Environmental Affairs require in the DEIR certificate that the rebuilding of the Grand Junction Railroad Bridge over Soldiers Field Road and the Charles River with two tracks and a 14-foot shared use path be required scope items included in any final alternative. In order to protect the value of the Grand Junction Corridor as a critical future transit, bike and pedestrian link to Kendall Square, the CRA favors either the Amateur Planner or the ABC alternatives or a combination of the alternatives.

3. Bicycle and Pedestrian Connections

Off-street bicycle and pedestrian connections should be created in the project to accommodate links between the Grand Junction multi-use path to the Paul Dudley White Path (PDW Path) and West Station, as well as creating a Paul Dudley White Path connection under River Street Bridge.

Bicycle and pedestrian connections are critical to support healthy transportation options, to reduce greenhouse gas emissions, and to promote smart growth development. To meet those intentions, incorporating a bicycle and pedestrian connection across the Grand Junction Rail Line to West Station and to the Paul Dudley White Path should be a required component of all scenarios. This would bring the project closer to compliance with the DEIR's Purpose and Needs section which indicates the project prioritizes safe, non-motorized modes of transportation. The AMP development plan provides a pedestrian and bike link to both West Station, while the ABC and HV options only include pedestrian and bike connection to the Paul Dudley White Path, and not West Station.

The project seeks to redevelop the intersection at River Street Bridge and Soldiers Field Road, eliminating the left turn into Cambridge, and creating a wider shared-use bike and pedestrian path that crosses River Street. Creating an additional path that continues at the level of the Charles River and wraps around the arch of the River Street Bridge would allow a safer and more expedited crossing for path users and reduce intersection conflicts. Due to the substantial investment and construction work required at this intersection in the project, this safety enhancement should be integrated into the project. This would bring the project closer to compliance with the DEIR's Purpose and Needs section which notes that the project prioritizes safe, non-motorized modes of transportation. Both Cambridge and Boston have signed the Vision Zero pledge to eliminate fatalities on roadways.

The Secretary of Energy and Environmental Affairs should require in the DEIR certificate that any alternative that advances to the FEIR must include connections from the future Grand Junction shared-use path to the PDW Path as well as to West Station, and must include a path connection under the River Street Bridge to increase safety at the River Street intersection. These connections are necessary in order for the project to be in alignment with its stated Purpose and Need and the Vision Zero goals of Boston and Cambridge.

4. North-South Bus Connections

Include the Malvern Street Bus, Bike, Pedestrian Only Bridge to allow North-South bus connections from Harvard to Longwood Medical area in Phase One.

The need for North-South bus connections from Harvard to Longwood was identified by I-90 Task Force members and representatives from Cambridge and Boston. The Longwood Medical area is one of the top destinations for people in Kendall Square to travel to and from, which is shown in many travel demand surveys and historic work on the Urban Ring project. Bus connections would be fundamental in improving the regional and local transportation system.

The DEIR does not include recommendations or plans on how West Station will be integrated into existing bus route schedules or how bus routes across Boston, Cambridge, and Brookline would change to serve this new hub. It is important to have a more complete understanding of demand for West Station, as well as the need for a North-South bus connection.

The CRA requests that the Secretary of Energy and Environmental Affairs include in the DEIR certificate a requirement that the preferred alternative that advances to the FEIR include a Malvern Street Bus/Bike/Pedestrian only bridge and an analysis of bus routes through the site within a thorough transit demand study.

5. Transit Modeling

The project should be required to perform a comprehensive transit study and demand analysis using revised maximum build-out numbers for development, and include existing roadway physical constraints in adjacent municipalities.

The DEIR's transit analysis is inadequate for a project of this potential impact. The DEIR's estimate of 250 daily riders at West Station in 2040 significantly underestimates future transit demand. It only considers commuters using the Worcester Rail Line under a significantly depressed development projection. It does not plan for transit riders travelling to West Station via existing or new bus routes or using urban rail on the Grand Junction corridor

between North Station, Cambridge Crossing, and Kendall/MIT. The transit estimates also do not accommodate the scale of development under consideration. A comprehensive transit study that includes bus and urban rail on the Grand Junction corridor should be implemented by the I-90 project, allowing input from the City of Cambridge, the City of Boston and MAPC. This study should accommodate transit-oriented development in Allston and districts connected to the future West Station and it should model scenarios with high transit mode share expectations.

The CRA requests that the Secretary of Energy and Environmental Affairs include in the DEIR certificate a requirement that a comprehensive transit study be a commitment within the FEIR.

6. Street Design

Design local streets to have a minimal number of vehicular lanes and to include protected bicycle facilities and dedicated bus lanes.

The DEIR's Purpose and Needs section notes the project prioritizes safe, non-motorized modes of transportation. In recent years, the City of Cambridge and the CRA have spent significant resources to retrofit some of Kendall Square's roadways to enhance multi-modal transit options that were not adequately planned in the original development. To design a balanced and safer streetscape environment, local streets should be generally limited to one lane. Any wider streets for vehicle throughput should be thoughtfully designed to safely accommodate bicycles and pedestrians with protected intersections. A boulevard design might also be considered to carry traffic to and from I-90 while providing a lower volume to local side streets. The Allston district will struggle to provide a comfortable walkable neighborhood if all the street sections are sized for peak-hour congestion. This project could learn lessons from our experience over-building for private automobiles and then retrofitting its street system with raised cycle tracks and bus priority infrastructure.

The CRA requests that the Secretary of Energy and Environmental Affairs include in the DEIR certificate a requirement that the local street system be designed to include raised curb-level cycle tracks, dedicated bus lanes, and bus priority infrastructure.

7. Open Space

Achieve wider separated bike and pedestrian paths and open space on the river in the throat section. This includes creating a soft edge, or building platforms, over the Charles River to create greater space for a shared-use path and open space.

The CRA is interested in the enhancement of both sides of the Charles River and a shared natural and recreation resource for the region. The project should provide enough space for separate bike and pedestrian paths along the river in the throat section, as well as the other sections of the Charles within the project area. The benefits of extending a soft edge instead of rip rap/sea wall are significant. It can provide room for separate bicycle and pedestrian paths, the ability to add 30-40 feet of additional open space to the base condition, and a better tree and plant cover than exists today, thereby offsetting some of the heat island effect caused by the adjacent roadway infrastructure. Doing something like this reduces about 6% of the width of the river at one of the two widest points in the Basin.

The edge of the Charles in the project area is not a pristine natural river, as it has been modified many times over its history. Currently, the bank of the Charles River in this section is a sea wall made from concrete rip-rap with a narrow shared-use path along the roadway. It has an inadequate width to handle the current or future bike and pedestrian traffic. Restoring the edge of the Charles back to a more natural condition would make scenic and habitat enhancements while accommodating linear transportation and recreation facilities. The Allston Landing Chapter of DCR's 2002 Charles River Basin Plan calls for a wider soft edge using a combination of fill and platforms. Examples of similar strategies to enhance the riverfront on regulated water bodies are plentiful across the nation, including approvals by the Army Corps of Engineers.

In order to achieve this space for separate bike and pedestrian paths and open space, the I-90 vehicle lanes in all alternatives should be maintained at their existing lane width of 11.5 feet and shoulders should not be expanded to excessive widths. More space could be gained if a lane is dropped on the Turnpike in the eastbound direction, thereby matching the number of through-lanes that are present just beyond both ends of the project.

The Secretary of Energy and Environmental Affairs should include in the DEIR certificate a requirement that the project include the study of an expansion of a soft edge along the Charles River in order to accommodate separate bicycle and pedestrian paths and expand riverfront open space.

8. GHG Emissions

As designed and phased, the project does not adequately address GHG emissions and the goals of the Massachusetts Global Warming Solutions Act

According to the Massachusetts Global Warming Solutions Act, MassDOT and the MBTA must contribute to an 80% reduction of greenhouse (GHG) emissions by 2050. With nearly 40% of Massachusetts GHG emissions coming from the transportation sector, MassDOT and MBTA have a significant role in facilitating the state's requirements by 2050. However, MassDOT and MBTA are not maximizing the opportunity for this project to reduce GHG emissions if the transit portion is not committed, programmed, and fully implemented at the same time as the highway portion:

1. Pushing the transit portion of the project to 2040 significantly delays the emission benefits that accrue from growth in transit ridership;
2. The design of the project including local roadways, bike and pedestrian connections, and transit expansions as presented in the DEIR does not adequately catalyze a fully bicycle, pedestrian, and transit-oriented district projected to include millions of square feet of land development before 2040;
3. It does not include new north-south bus connections across the turnpike/tracks and Charles River;
4. It does not include future rail transit expansion on the Grand Junction rail corridor in the travel demand analysis;
5. It limits bicycle and pedestrian connections within the project area through the exclusion of pathways to and from the transit station and vertical connections to the Paul Dudley White Path PDW path in some scenarios. MassDOT and the Boston Region MPO are required to demonstrate its GHG emissions reductions under 310 CMR 60.05 – in order to do so, significant bicycle, pedestrian and transit improvements must be included with the highway portion of the project as an offset.

The CRA feels that absent of the full bicycle, pedestrian and transit elements described herein, this project is not facilitating the reduction of transportation sector GHG emissions and contributing to the 2050 GHG emission reductions requirements.

Thank you for the opportunity to comment on the DEIR. The CRA looks forward to the evolution of this critical project for the region.

Sincerely,

Tom Evans

Executive Director