October 30, 2020

Secretary Stephanie M. Pollack
Massachusetts Department of Transportation
10 Park Plaza
Boston, MA 02116

RE: Comments on Proposed I-90 Allston Multimodal Project

Dear Secretary Pollack,

As Legislators representing the Central Massachusetts region, we write to share our comments on the selection of a Preferred Alternative for the Throat Area within the 3L Re-Alignment Alternative of the Allston Multimodal Project.

We all recognize the necessity and urgency to replace the structurally deteriorated viaduct, the substantive benefits of realigning I-90 and building a new West Station, the long-term neighborhood quality of life improvements gained by the recreation and park improvements, and the immense opportunity to transform a largely vacant swath of land larger than the Seaport District into a vibrant development. We are also cognizant of the complexities inherent in the massive size of this project and the relatively small footprint to maneuver.

Each of the proposed alternatives under consideration will have a significant impact on commuters from our communities who rely on the corridor infrastructure to access the Greater Boston region. We do not support the option of simply rebuilding the viaduct in place - this would represent a tremendous missed opportunity. We also believe that your mandate for consensus among the many stakeholder groups has produced a clear preference for the Modified All At-Grade Proposal.

While we have made clear in prior correspondence our concerns about the impacts of the extended six-to-eight-year duration of construction on commuters, we again respectfully request that our concerns be recognized and responded to as the project proceeds:
Minimize Travel Lane & Track Reductions
It is essential to maintain the current highway capacity of at least four lanes of traffic in each direction on the Massachusetts Turnpike to the greatest extent possible. Specifications for the roadway should also meet recommended highway specifications, including necessary shoulders to ensure the safety of stranded motorists and first responders and limited disruption to the movement of traffic, and for the clearances necessary for snow removal.

During construction, four fully operational lanes of highway traffic and two tracks on the Worcester-Framingham commuter rail line must be maintained to the greatest extent possible. Any temporary closures on either the highway or rail line must be as limited in duration as possible and planned for low-traffic periods combined with transportation mitigation that offers additional options during periods of disruption. With respect to the rail line, we would like to reiterate that our strongest preference is that no reductions to a single track are planned for the commuter rail.

Provide Specific Impacts of & Mitigation for the Extended Closure of Grand Junction Rail
The Grand Junction Railroad is critical to the movement and maintenance of the rolling stock needed for reliable Worcester-Framingham line operations. Any extended closure may be impactful to passenger rail operations and cause delays to commuters. The summary analysis produced for the three alternatives indicates that for the Modified All at Grade alternative (and the SFR Hybrid) the Grand Junction will need to be closed for much of the project, however, it is not noted what the specific impact to commuters on the Worcester-Framingham line will be. The MBTA has indicated that the permitting and construction of a Southside maintenance facility will take a minimum of six years, opening past mid-way in the construction timeline of this project. It is imperative that any potential negative impacts be understood now and a plan to mitigate any impacts be addressed as the project proceeds. Grand Junction is the only way to move stock from the northside to the southside without a 101-mile roundtrip that may result in-service disruptions and delays, impacting on-time performance, and exacerbating a commute that will already be compromised by construction.

Fully Account for Project Impacts with a Formal Mitigation Plan
We recognize that the primary purpose of the Environmental Impact Review process is to evaluate the proposed alternatives within the framework of the project purpose and need. However, it is essential to reiterate the need for substantive, proactive mitigation planning to be incorporated into the design process and not left to a future time. Mitigation efforts should include alternative transit options tailored to the expected constraints created by construction, including, but not limited to, increased rail service during any periods of lane reductions, shuttle bus service and increased satellite parking/park-and-ride service, and carpool incentives. The long timeline for project construction and the potential for multi-project overlap with other existing projects, such as the I-495/I-90 Interchange Improvements, means that the adequacy of mitigation efforts will shape commuter experience over the next decade. We believe that inclusion of detailed mitigation planning is essential at this early stage of the design process.
Thank you for your consideration of the above comments and concerns. This massive, complex, and necessary project is one that cannot be successfully executed without thoughtful consideration and planning for the many long-term, wide-ranging impacts that this project will create. We thank you for your attentiveness to our concerns and look forward to continuing our strong partnership in assessing and implementing a transformative project that is responsive to the needs of our communities and constituents. We also thank you in advance for ensuring that while this project moves forward, MassDOT continues to allocate funding for other highway and transportation needs across the Commonwealth. We look forward to your response.

Sincerely,

Hannah Kane  
State Representative  
11th Worcester District

James O’Day  
State Representative  
14th Worcester District

Susannah Whipps  
State Representative  
2nd Franklin District

Paul Frost  
State Representative  
7th Worcester District

Donald Berthiaume  
State Representative  
5th Worcester District

Anne Gobi  
State Senator  
Worcester, Hampden, Hampshire, & Middlesex

Kimberly Ferguson  
State Representative  
1st Worcester District

Harriette Chandler  
State Senator  
1st Worcester District

Joseph McKenna  
State Representative  
18th Worcester District

Michael Moore  
State Senator  
2nd Worcester District

Brian Murray  
State Representative  
10th Worcester District