

THE GENERAL COURT OF MASSACHUSETTS  
STATE HOUSE, BOSTON 02133-1053

January 18, 2018

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

RE: I-90 Allston Interchange Draft Environmental Impact Report

Dear Secretary Beaton,

We want to thank you for this opportunity to comment on the I-90 Allston Interchange Draft Environmental Impact Report. This project is not simply a realignment of the Mass Pike in Allston but is a major catalyst for economic development in the Greater Boston area. The proposed phasing of the project does not reflect that reality. Our hope is that you will consider these comments as you move forward and know that we are here to help and assist in making sure that this project is as transformative for our suburban neighbors as they commute into Boston as it is for our constituents whose neighborhood they have to travel through to get there.

## **WEST STATION**

### **History of Transportation Projects in Allston**

We want to express how utterly disappointed we are to hear that MassDOT wants to delay building West Station until 2040. When we heard 2040 we immediately translated that to mean "never". This is totally unacceptable to us and more importantly to the people we represent in Allston. The reason for that is very simple, for over a 100 years Brighton and predominantly Allston have been treated as a pass through for people going to Downtown Boston. Beginning in

the 1890s with the installation of the Boston and Albany rail lines, followed by construction of Storrow Drive and extension of Soldiers Field Road in the 1940s, the later integration of the Charles River Speedway into Soldiers Field Road in the early 1950's, followed further by the elimination of all commuter rail service in the 1960's, and finally - and perhaps the most devastating of all - the construction of the Mass Turnpike Extension in 1964, this neighborhood became more isolated as mass transit access to Downtown Boston was increased for residents of Metro West communities.

On one side, the Mass Pike Extension runs through Allston and Brighton isolating our constituents from friends, family and services in other parts of their neighborhood. On the other side of the neighborhood a highway separates our constituents from access to one of our states most treasured public parks, the Charles River Reservation. These transportation projects have formed a concrete and asphalt moat around the neighborhood for the sole purpose of facilitating automobile and passenger access from the suburbs into Downtown Boston with little regard for the residents of our community.

West Station will knit Allston together for the first time since the Boston and Albany Railroad laid tracks over 120 years ago and 60 years after the construction of the Mass Pike Extension created the impassable scar that cleaves the neighborhood. Over the years Allston has been included in transportation plans such as the Urban Ring that have either never been realized or shelved. We are now seeing a repeat of that process by "delaying" the building of West Station. This is not a once in a generation or even once in a lifetime opportunity - it is a once in a century opportunity to do it right. To ignore this chance to increase and enhance mass transit choices for so many commuters in the greater Boston area would be shortsighted and just plain wrong. West Station was envisioned as a transportation hub with commuter rail service to Back Bay and South Station, as a north-south stop for bus routes from Cambridge to Longwood, and as a potential rail link for western suburbs to North Station and Logan Airport along the existing Grand Junction Railroad. That vision will be lost if the station is not included in Phase 1.

### **Financing West Station**

West Station has partners that have agreed to help with the cost of building the station. **Harvard University** is one on the wealthiest Corporations/Non-Profit in the world with an endowment of almost \$40 Billion and to their credit has never backed off their commitment to fund 1/3 of the entire cost of this station. We would be negligent in our duties if we didn't point out that while this is generous it isn't entirely altruistic. Harvard University is the single biggest beneficiary of the realignment of the Mass Pike Extension and when completed will gain full control of 90 acres of developable land. **Therefore, we believe that Harvard University should pay more than 1/3 of the cost and instead follow the example that New Balance set at Boston Landing**

**by covering almost the entire cost of the station construction.** When you consider the significant taxpayer investment in this project, the many streets that will be created, the sewer, water and electrical lines that will be put in place, and the amount of developable land they will have after the realignment of the Mass Pike Extension is complete, it is really not a lot to ask of Harvard University.

**Boston University** with a \$1.9 Billion endowment is also willing to partner with the state and contribute approximately \$8 million for the construction cost of West Station. We have been encouraged by their continued effort to knit their campus into the fabric of our community, first with the Commonwealth Avenue Phase II project and now with West Station. To be fair Boston University will potentially have some additional headaches at the end of this project. They will surely have more cars, buses, and pedestrians traveling through their campus that are not affiliated with the University. Given Boston University's history on acquiring the state armory and the negative impact their expansion had on the G.A.P. (Gardner, Ashford, and Pratt Street) neighborhood the minor inconveniences associated with West Station are again, not a lot to ask. In the end their \$8 million contribution will give them a commuter rail and bus hub that will provide public transportation connections to take their students and faculty anywhere in greater Boston faster and more conveniently.

## **West Station/Transit Oriented Developments**

### **Office/Retail/Hotel**

If there is any doubt we should integrate public transit into large scale projects you need look no further than Boston Landing which is 1/10 the size of the West Station Area. The Allston/Brighton community with the amazing financial support of Jim and Ann Davis knew this and insisted on creating a destination/transit oriented development that has proven to be tremendously successful. In a recent *Commonwealth Magazine* article detailing the success of this development, the director of New Balance Development provided the following quote: "For us, we have always felt that having adjacent, reliable commuter rail service at Boston Landing is a prerequisite to building the full vision of Boston Landing, as a mixed-use, transit-oriented-development." Their vision is working. In addition to being the world headquarters for New Balance, Boston Landing now counts Mass Innovation Labs, Bose, the Boston Celtics and Bruins as tenants. The vision is not limited only to office and lab space but also includes shops, restaurants, a hotel, and 295 residential units.

### **Housing**

Mayor Martin Walsh anticipates that the City of Boston will grow to more than 700,000 residents by the year 2030, a number the City has not seen since the 1950's. Transit oriented

developments are helping to spur that growth. In response to this population increase, Mayor Walsh will help create 53,000 new units of housing across the city at a variety of income levels:

- 44,000 units of housing for the workforce
- 5,000 units of housing for our senior citizens
- 4,000 units to stabilize the market and bring rents and housing prices under control.

The opening of Boston Landing has already played a role in helping the Mayor reach that housing goal. The Boston Planning & Development Agency (BPDA) has nearly 2,200 residential units in the Allston/Brighton pipeline that can be directly linked to the mixed-use, transit-oriented-development of Boston Landing. We can only imagine the growth possibilities for affordable residential units when an area ten times the size of Boston Landing is complete and anchored by the West Station multimodal transportation hub.

### **Demand and Ridership Numbers for West Station**

A recent statement issued by MassDOT for a broadcast on WGBH for an episode of *Greater Boston* was extremely concerning to us. In it, MassDOT stated “Before new jobs and new residents arrive in the immediate vicinity of a future station, travel demand for the proposed West Station is unknown.” The idea that you build and plan public transportation around the current demand for public transportation is in our opinion shortsighted. If this was the case Boston would have never opened the nation’s very first subway in 1897. The history of Boston Landing has proven that when you have reliable, accessible public transportation in place you get a more diverse and economically robust development.

The MassDOT statement also went on to say “Data collected...indicate that the station is not needed to mitigate the traffic impacts...” To be frank, and by their own admission, travel demand and ridership on the entire system is unknown and anecdotal at best. The 2016 *MBTA STATE OF THE SERVICE Commuter Rail* PowerPoint report acknowledges ridership counts are not accurate and reported by conductors who focus on safety and not counting accuracy. The report points out that the last comprehensive count was done in 2012. To further re-inforce the lack of accuracy on counting current passengers, the *Boston Globe* reported on March 18, 2017:

“For years, the MBTA has relied on conductor counts to help form the foundation of its ridership numbers on the commuter lines. That means the same people who are busy checking tickets and opening doors are also expected to eyeball the number of riders...the MBTA’s acting general manager admitted the agency needs to do a better job counting commuter rail riders.”

If the MBTA doesn’t have a handle on current ridership, how can they project ridership for West Station? Perhaps a more accurate representation of overall ridership in this area can be found by

what is happening at Boston Landing. The same *Commonwealth Magazine* article mentioned above details how the Boston Landing Station has exceeded ridership expectations according to an independent consultant hired by New Balance. With half of the project completed, ridership is 80% above what they anticipated following the full build out. Integrating public transportation into the project development equation was something New Balance felt was absolutely necessary to the success of Boston Landing. In fact, Bose spokesperson Joanne Berthiaume told the *Boston Business Journal*, "We chose Boston Landing because it provides our employees with a desirable work location that's easy to access by public transportation...."

Realignment of the I-90 Allston Interchange is one of the most important transportation infrastructure projects in the Commonwealth with far reaching economic impacts for the local neighborhoods and Greater Boston area. Like Boston Landing, the land is primarily owned by one entity - Harvard University. The major differences are that this project has 10 times the developable land and a "promise" of a transportation hub in 2040. The Boston Landing transportation model is working to spur economic development and that same type of vision is required here. It is not the time to once again put the car in front of all other modes of public transportation. It is the time for a multimodal transportation plan and if implemented this project simply cannot fail. West Station needs to be included in Phase 1.

## **SECONDARY CONCERNS**

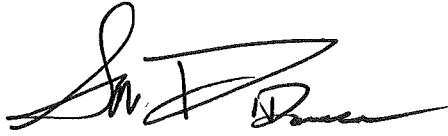
An additional concern in the DEIR is the exclusion and lack of consideration for a bypass road for access to the Pike proposed by the Boston Transport Department to mitigate traffic on Cambridge Street and facilitate neighborhood access to the Charles River. That proposal had the support of the Task Force, Harvard, and BU. The DEIR also failed to include any construction mitigation plans to lessen the environmental impact on the neighborhood.

In closing we respectfully request that your take away from this comment letter is that West Station must be incorporated into Phase 1 of the I-90 Allston Interchange realignment project. The original MassDOT Environment Notification Form (ENF), the Certificate from your office on the ENF, and early MassDOT informational meetings all included West Station as an essential component of the realignment project with a completion date of 2025. Our expectation is that the original concept for the project must be retained in its entirety and that West Station becomes fully operational in 2025.

We further request that MassDOT monetize the total benefits that Harvard University, and to a lesser extent Boston University, will receive from the completion of this project and leverage that information to increase their contribution to the construction of West Station.

Thank you in advance for your consideration to our concerns.

Sincerely,



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