CHARLES RIVER conservancy

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Stephanie Pollack
Secretary
Massachusetts Department of Transportation
10 Park Plaza, Suite 6340
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October 30, 2020

Dear Secretary Pollack

On behalf of the Charles River Conservancy, we want to thank you for incorporating the feedback MassDOT received from the City of Boston and others to improve the at-grade design for the Allston Multimodal Project. **We support the selection of this Modified-All-At-Grade Option as the Preferred Alternative to be advanced further.** We believe this design has the most potential to improve a degraded section of the Charles River and create an important connection to the Charles River Reservation for neighboring communities.

As an active participant on the I90 Task Force and signatory of the joint letters endorsed by transportation, environmental and civic organizations, we do not wish reiterate comments, but rather emphasize and elaborate on several critical points regarding resilience, public process and construction impacts.

Take a holistic approach to resilient design to fortify the Charles River, Allston neighborhood, and beyond from the impacts of climate change. The design analysis must acknowledge the many interrelated effects of climate change, rather than be limited to flooding. The most resilient design for the Allston Multimodal project is one that:

- **Reduces vehicular emissions during and after construction** by prioritizing high-functioning transit and active transportation options. This includes minimizing disruptions to the Worcester Line during construction, which would push commuters from the rail onto the highway, and enabling an efficient rail connection to Kendall Square via the Grand Junction Bridge. Encouraging mass transit and disincentivizing single occupancy vehicle trips is the single largest contribution the Allston Multimodal Project can make to advance the Commonwealth's ambitious and necessary carbon reduction and climate resilience goals.

- **Prioritizes the health and needs of neighboring environmental justice communities** that have been disproportionately affected by the existing I90 highway, including minimizing noise pollution.

- **Provides access to parkland to neighboring communities.** Countless studies connect access to green space with improved public health. We need to support resilient communities as much as we need to build resilient infrastructure.

- **Maximizes tree canopy and minimizes impervious surface to mitigate heat effects.** This includes reducing travel lanes and shoulder widths. The project's landscape design needs to include adequate space for tree pits, soil specifications and a maintenance plan for trees and other native planting to ensure the success and drought-resistance of the park and parkway.

- **Reduces flooding by providing adequate stormwater storage and treatment.** The Allston neighborhood periodically floods during heavy rainstorms, which are only expected to intensify, and riverine flooding will become an increasing threat over time. In addition to reducing impervious surface, the project needs to provide adequate space for green stormwater infrastructure, such as bioswales and constructed wetlands, supplemented by constructed storage to alleviate flooding.

- **Improves the water quality and ecology of the Charles River,** including but not limited to minimizing sediment disruption during construction, providing a vegetated riverbank to support aquatic life and treating all runoff to reduce nutrient loading.

- **Considers the carbon footprint** to source materials, build, maintain and eventually replace transportation infrastructure.

Incorporate and build upon the ecological design concepts recently presented by landscape architects and urban planners from Perkins & Will and CBT to achieve a more resilient Modified-All-At-Grade design (select slides attached). These interventions make great strides towards a healthier Charles River and positive park experience, but they need to be fully adopted by the MassDOT team to ensure seamless integration with the project's transportation elements. Rather than greenwashing the At-Grade-Design with acknowledgement of a general "living shoreline," these river's edge options, pathways and key connection points need thoughtful advancement to make sure they are not precluded by other design decisions.

Harness public input to improve the project outcome. Evidenced by the designs developed by Perkins & Will and CBT in collaboration with environmental and transportation advocates, harnessing community input can greatly improve the quality and support of the design. We urge MassDOT to continue the Allston Multimodal Task Force and to create smaller, focused working groups for design, construction and resiliency, but most importantly to seek out and value the lived experiences of residents in the surrounding environmental justice communities who have not been engaged in discussions and decisions. Far too many residents are unaware of this project and/or do not have the ability to attend evening meetings, in person or virtually, but have valuable insight to share.

Provide transparent, thorough analysis of construction methods and temporary environmental impacts. Much of the risk to the Charles River will occur during the projected six to ten year construction period. As the project progresses, the means and methods of construction must be fully and publicly vetted to avoid irrevocable harm to the river and surrounding parkland. Specifically, we request that documentation on the staging of each of the three design options be made publicly available for review and comment to prevent the inclusion of fatally flawed practices, such as building a trestle bridge in the Charles River.

Thank you for the extended opportunity to comment on the Allston Multimodal Project at this important juncture. We look forward to working with MassDOT through the rest of the permitting and design process, which we feel strongly should be focused on continuing to improve the **Modified-All-At-Grade**.

Sincerely,

Laura Jasinski
Executive Director, Charles River Conservancy