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Massachusetts Department of Transportation

10 Park Plaza #4160

Boston, MA 02116

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Re: Task Force Input on Strategic Review Priorities and Process

The undersigned individuals and organizations appreciate the Massachusetts Department of Transportation (“MassDOT”)’s commitment to developing the Allston Multimodal Project (“Project”) in a way that maximizes transportation benefits for all users. While the loss of \$327 million in funding from the Reconnecting Communities and Neighborhoods grant poses challenges, it also presents an opportunity to reexamine plans for the Project’s designs, financing, and construction – while still maintaining momentum.

In the interest of our mutual goal to plan, design, and ultimately construct the best possible Project, we submit this letter with two objectives: (1) to provide input on the priorities and focus areas for the upcoming Strategic Review and consultant solicitation process, and (2) to request that MassDOT convene a steering committee of select Task Force and Project Team members that would meet regularly (i.e., weekly or bi-weekly) to provide oversight and advice on the selected consultant’s work to achieve deliverables on a tangible and transparent timeline. Below we provide more details on what this could entail.

Input Regarding Strategic Review Priorities and Focus Areas

We believe that the priorities and focus areas of the Strategic Review should include the following:

- **The scope of “transportation benefits” should be broad and holistic.** These benefits should include, but not be limited to, increased transit access and service, exemplary paths for pedestrians and cyclists, and improved roadway safety for all users. Increased transportation benefits are inextricably linked with a broad set of additional benefits, such as housing availability, business opportunity, recreation access, environmental protection, climate resilience, and the like. These co-benefits should be considered accordingly.
- **Transportation benefits should be considered in terms of overall timeline, not just post-construction.** This includes having a robust plan for mitigating impacts to transportation in and around the Project area during construction. Such mitigation should prioritize any opportunities to increase transit service—including local transit and increased commuter rail service. Mitigation during construction is a goal in itself, but would also serve to prepare people for additional transit improvements to come once the Project is constructed. This would advance both the Project’s own goals and concurrent plans to shift our Commuter Rail system to a Regional Rail model in the coming years. Such mitigation analysis should also plan to minimize pass-through traffic through the Allston-Brighton community. Robust transit commitments will help ensure that

- congestion and delay in the community are not the norm, protecting the economy, the environment, public health, and the overall quality of life.
- **Transportation benefits should be analyzed in the context of fulfilling the Commonwealth's Global Warming Solutions Act climate targets**, which require reduced emissions from the transportation sector. Key strategies for reducing emissions include reducing Vehicle Miles Traveled by shifting transportation behaviors towards transit, pedestrian travel, and cycling, and less reliance on automobiles.¹ Key assumptions and analyses, including any additional modeling of anticipated future Project area conditions, should include MassDOT's obligation² to fulfill these targets. These benefits should also satisfy requirements for environmental protections under all applicable federal, state, and local laws.
 - **To the extent that transportation benefits are measured in the context of any cost-savings analysis, the focus should prioritize review of the key elements of the Project design that have been points of contention**—such as layover tracks, eliminating potential redundancy in West Station track layout, and lane conditions (total number, opportunities to reform from general purpose to transit-dedicated, etc.) along the Turnpike and Soldier's Field Road in later stages of construction.
 - **Early action items should be a priority for construction sequencing** - both to minimize costs and to demonstrate commitment to the Allston neighborhood.
 - **The determination of what constitutes "available resources" should produce multiple financing plans with varying assumptions regarding the state of construction material pricing and state funding sources.** This should include, but not be limited to, pursuing Fair Share Amendment funds for the Project's public transit capital elements.
 - **The Strategic Review should be incorporated into any relevant supplemental draft environmental review reports ahead of final reports.**

In addition to the above considerations, when selecting the consultant, we urge that the solicitation process be conducted with a clear delineation in mind between the roles played and tasks assigned to current consultants and any new consultants retained for this Strategic Review.

Further, we urge the Project Team to continue the environmental review process. The current consultants were poised to assist MassDOT in publishing draft reports in the fall of 2025. Although the loss of the Reconnecting Communities and Neighborhoods grant poses a challenge, the Project Team should move forward with publishing a draft. Publishing a draft within this calendar year would keep the overall work on track and would subject the design to robust public input. This public input will also prove valuable since it can also be utilized to inform subsequent work of all parties involved, including the new consultant. This draft should include an alternative without commuter rail layover, and the layover should be removed from the no-build alternative.

¹ See Massachusetts Executive Office of Energy and Environmental Affairs, *Massachusetts Clean Energy and Climate Plan for 2025 and 2030*, Ch. 4, June 30, 2022, available at <https://www.mass.gov/doc/clean-energy-and-climate-plan-for-2025-and-2030/download>

² M.G.L. c.6c §10.

Request for Steering Committee to Advise and Oversee Consultant's Strategic Review

We strongly believe a steering committee is needed to further inform the Strategic Review process, achieve intended outcomes, produce a tangible and transparent workplan, and strengthen public engagement. The Task Force is an invaluable asset and should remain an integrated arm for executing this Project. However, a separate, frequently scheduled steering committee comprised of MassDOT, institutional stakeholders, and advocate stakeholders could accomplish more at this crucial moment of Strategic Review than could be accomplished exclusively through the broader Task Force, which presently meets only monthly.

One of the first tasks of this committee would be to co-create robust definitions and valuations of transportation benefits to be utilized by the consultant(s) for their Strategic Review exploring available resources, considering construction staging scenarios, generating alternatives, and other such work. In the mid- to-long-term, this steering committee would enable a seamless continuation of work between the Project Team and a diverse set of stakeholders. If the consultant's progress were brought to the full Task Force on a monthly basis, such topics could predominate the conversation, taking valuable time away from other topics. We believe this committee would also increase the productivity of future Task Force meetings by properly delegating certain work to the steering committee. This would allow for deeper stakeholder engagement throughout the entire process.

There is precedent for the use of such advisory committees in the past and they have led to the successful completion of major transportation work. For example, in the early 1970s, an advisory committee of persons from diverse viewpoints was created for the Boston Transportation Planning Review ("BTPR") program, an initiative that changed the foundations of transportation planning in Boston and beyond. This advisory committee was created to avoid transportation planning conversations between state agencies and communities that "end in paralysis and stalemate rather than in creative reconciliation and decisive implementation."³ BTPR ultimately included the addition of a community liaison and technical assistance component that helped facilitate the Red Line Extension through Davis Square and the prize-winning Southwest Corridor Park. BTPR also established a 5-person "editorial group" that conducted detailed reviews of every draft environmental document before they were made public. If a new contract was going to be negotiated that was as significant as the one now expected for this Project, the advisory group would name a small contract review committee to help draft the scope and review the consultant selection process. Although we are not asking to participate in consultant selection, there is precedent for a committee of this type to produce positive outcomes for major transportation projects such as Allston Multimodal.

The Longfellow Bridge restoration project provides a more recent example of the type of committee we request here. A working group was convened to focus on the restoration project's design. This coordinated body of diverse stakeholders was able to substantially improve the initial design and do so with the broad agreement of many members of the Task Force—including members who began the process skeptical of any outcome ending in broad agreement.

Lastly, MassDOT's Fall 2024 Allston Multimodal working groups serve as another example. We thank MassDOT for its leadership in creating these working groups and the progress that was made through them. The advisory committee we are now requesting would go a step further by

³ Walter Hansen, *The Boston Transportation Planning Review*, Transportation Research Board, Highway Research Board Special Report, Issue No. 143, p.22 (1973), available at <https://onlinepubs.trb.org/Onlinepubs/sr/sr143/sr143-003.pdf>.

meeting more regularly and avoiding the segmented work of the Fall 2024 Working Groups—where topics were separated and meetings infrequent.

If MassDOT were to establish this steering committee to provide oversight and advice for the selected consultant's Strategic Review, we respectfully suggest it include representatives from MassDOT, MBTA, the City of Boston, Harvard University, Charles River advocacy organization(s), and the Conservation Law Foundation, as well as a community representative from Allston and a representative from Metro West (potentially from Senator Spilka's office). Once the members have been selected, they would promptly work with the Project Team to maintain the Project's momentum while integrating and expediting stakeholder review on topics including maximizing transportation benefits through design, exploring financing plans and available resources, integrating public feedback from environmental review processes into relevant Project changes, and other steps as needed to complete the Strategic Review.

Conclusion

We submit these recommendations for Strategic Review focus areas and this request for a committee in the interest of partnership and designing the best possible Project. Ultimately, the best way to evaluate transportation benefits in terms of costs and public preference, in a way that "ensure[s] that all those affected by such a decision are aware of the true consequences and that the decision-maker is aware of the range and magnitude of the public's reaction to the proposed action,"⁴ is to create the dedicated committee as we are requesting.

We appreciate your consideration and look forward to your response.

Undersigned,

Seth Gadbois, Task Force Member
Clean Transportation Attorney, Conservation Law Foundation

Harry Mattison, Task Force Member
Community Representative

Brendan Kearney, Task Force Member
Executive Director, WalkMassachusetts

Anthony D'Isidoro, Task Force Member
President, Allston Civic Association

Laura Jasinski, Task Force Member
Executive Director, Charles River Conservancy

Dira Johanif, Task Force Member
Climate Resilience Manager, Charles River Watershed Association

E. Fred Yalouris, Task Force Member
Cambridge Community Representative

⁴ *Id.* at 23.

Fred Salvucci, Lifelong Brighton Resident

Jack Wofford, Cambridgeport Resident