



SMART GROWTH AND REGIONAL COLLABORATION

September 13, 2022

Beth Card  
Secretary of Energy and Environmental Affairs  
MA Executive Office of Energy and Environmental Affairs  
Attn: Alex Strysky, MEPA Office  
100 Cambridge Street, 9th Floor Boston, MA 02114

Re: I-90 Allston Multimodal Project Notice of Project Change, EEA No. 15278

Dear Secretary Card:

The Metropolitan Area Planning Council (MAPC) has reviewed the Allston I-90 Multimodal Project Notice of Project Change (NPC). We hope the following comments will assist MassDOT as it undertakes the Supplemental Draft Environmental Impact Report (SDEIR). We provide these comments in the anticipation that the Project should support the goals in MAPC's recently adopted regional plan, **MetroCommon 2050**, including *reducing vehicle miles traveled and the need for single-occupant vehicle travel through increased development in transit-oriented areas and walkable centers, and improving accessibility and regional connectivity*. We also provide these comments having just completed the **West Station Area Transit Study**, [www.mapc.org/resource-library/west-station-area-transit-study/](http://www.mapc.org/resource-library/west-station-area-transit-study/), which quantifies the reduction in auto trips from greater bus and rail service, as well as improved bicycle infrastructure and policies that constrain free parking in the Project area.

### **Project Purpose and Need**

MAPC appreciates that the Project Need now includes addressing transportation deficiencies across all travel modes within the Project area, including the need for new transit connections (bus and rail), improving substandard bicycle and pedestrian infrastructure, and providing safer access to the Charles River Reservation.

We are disappointed that the NPC still uses Levels of Service (LOS) of peak-period automobile traffic as the principal measure of "mobility and transportation access." The Project's Purpose should be expanded to cover all aspects of sustainability, resiliency, and equity that are so critical to the Commonwealth. For example, we believe that the reduction of Vehicle Miles Traveled (VMT) should be included as a Project Need, since reducing VMT will be needed to meet the Commonwealth's climate goals outlined in the Global Warming Solutions Act, the Roadmap Act, and Boston's transportation goals in GoBoston 2030. Furthermore, the Project itself will open up over 150 acres of land for development. Saying that it merely "supports" economic development is insufficient, since the Project itself is essential to future development and decisions made during project design will have long-term impacts on travel options and behavior. There is a need to ensure that economic development is sustainable, resilient, and equitable. Therefore, advancing sustainable non-auto transportation to and through this new development district should be an express purpose and a high priority of the Project.

Furthermore, the construction of I-90 and its current operation had and continue to have profoundly negative impacts on the surrounding Allston neighborhood. As a result, residents in Allston are exposed to noise, traffic, and poor air quality, and there is a need to improve these conditions. Mitigating these impacts and taking affirmative steps to correct the harms caused by the highway should also be an express purpose and high priority of the Project.

### **I-90, Soldiers Field Road, and the Paul Dudley White Path along the Charles River (the Throat)**

We are disappointed that the NPC states that there will be no further evaluation of reduced travel lanes in the footprint of I-90 and Soldiers Field Road. MAPC recommends the SDEIR include a scenario of reduced travel lanes on Soldiers Field Road combined with improved bus and rail transit services to better evaluate how this scenario might have a lessened environmental impact.

### **Transportation Analysis and Assumptions**

A major tension among various aspects of the Project is balancing the desire to accommodate automobile throughput with space for cyclists, pedestrians, and buses. Getting the infrastructure right to accommodate these modes equitably will have a big impact on environmental outcomes, including the ability for the state to meet its climate reduction goals. We choose the word “equitably” intentionally because we believe the interests of a single bicyclist, pedestrian, or transit rider should be no less important than the interests of a single automobile rider. The physical constraints of the Throat have dominated much of the discussion of the Project over the past five years, but similar issues exist in and around West Station. Making sound planning assumptions on what future transportation conditions will be like is imperative to forecast traffic volumes, VMT, mode share, and other outcomes accurately, with the goal of ensuring the Project is meeting its purpose and need.

The NPC notes that 2019 AM peak period vehicular traffic counts for both I-90 and the Allston interchange ramps are lower than the 2015 traffic data used in the DEIR. The NPC also notes that 2019 PM peak period traffic counts on I-90 increased compared to 2015 data, but decreased on the Allston interchange ramps (NPC, p. 24). MassDOT’s own I-90 vehicular traffic data show that 2022 peak period traffic is lower than 2019 levels, which were in some areas lower than the 2015 traffic counts.<sup>[1]</sup> Given the uncertainty regarding future commute patterns and travel demand, MassDOT should test scenarios for prevalence of Work from Home (WFH) and its effect on traffic volume, to determine whether the proposed interchange capacity and street capacity are necessary if WFH becomes more common. The revised regional travel demand model by the Central Transportation Planning Staff (CTPS) has the capability to implement this scenario evaluation and MAPC is available to assist CTPS in this effort.

Additionally, the NPC makes no mention of the assumptions for parking availability, pricing, or other policies to constrain free parking. MAPC’s West Station Area Transit Study found that charging \$18 per day could reduce the number of AM peak period auto trips by 13%, and VMT by 17%, versus “free” or unpriced parking. We believe that having a daily parking cost in the Project area is a sound planning assumption for the travel demand modeling efforts, and suggest that MassDOT work with Harvard University and the City of Boston on establishing a baseline in the SDEIR for parking pricing and availability for the Project area. Setting sound parking policy

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<sup>[1]</sup> 2022 v. 2019 weekday daily traffic counts, I-90 stations AET12 and AET13, <https://mobility-massdot.hub.arcgis.com/>

assumptions in the Project Area will also support the City of Boston's new maximum parking ratios set for transit-oriented development (TOD) in areas like West Station.<sup>[2]</sup> This is an important planning consideration because parking availability is one of the most important factors that influences auto mode share in an urban environment. We believe that in order to meet the state's climate goals, municipalities will need to limit and price publicly available parking in the future. Finally, the public transit forecasts upon which the NPC relies are based on current commuter rail service levels on the Worcester/Framingham Line. MAPC's West Station Area Transit Study found that higher rail frequency has a big impact at reducing auto trips to and from the area around West Station. The SDEIR should include both near-term rail service assumptions and an alternative with more frequent service as envisioned in Rail Vision scenarios 3 or 4.

Taken together, higher rates of Work from Home, reasonable policies regarding parking availability and pricing, and more frequent rail service are all factors that could contribute significantly to achieving Commonwealth and City of Boston goals regarding traffic safety, public health, and climate. Considering the impact such factors could have on travel mode share should be an important element of the analysis process. The data derived through this analysis can help this project to meet its goals and also inform policy decisions regarding longer-term development in the neighborhood.

### **Pedestrian and Bicycle Connections**

MAPC's West Station Area Transit Study found that a high-quality, lower-stress bicycle network is key to reducing VMT and automobile trips, and that 30 to 40 percent of the trips to or within Allston Landing South could be made by walking and cycling. The SDEIR should include clear cross-sections of the proposed streets to show which streets will have fully-protected bicycle lanes. MassDOT should also detail the proposed intersection design for a new surface roadway network to demonstrate that the proposed roadway layout will be conducive to safe and pleasant pedestrian travel. Given the complexity of the site, MassDOT should conduct a Multimodal Level of Service Analysis evaluating how pedestrians and cyclists will connect from and through the Station to various key points such as Commonwealth Avenue, the Charles River, and Cambridge Street. The scope of this review could be managed by identifying a half-dozen specific "desire lines" such as Paul Dudley White path to Boston University or West Station to the Enterprise Research Campus, and then evaluating the facilities and barriers likely to be experienced by non-motorized travelers making that trip.

Per our recommendations in the West Station Area Transit Study, MassDOT should provide a shared-use path from Cambridge Street to Agganis Way, the so called "People's Pike," even if it is narrow. The NPC notes MassDOT will include an express track and will "continue to advance development of a shared use path" in the area; we request that MassDOT include a full evaluation of the benefits and challenges of both the proposed express track and the east-west path connections, and the trade-offs between the two. The SDEIR analysis should also include information on how the various cycleways and trail options would connect to the regional bicycle and trail network in Boston and Cambridge.

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<sup>[2]</sup> <https://www.boston.gov/departments/transportation/maximum-parking-ratios>

## **West Station Access and Design**

The SDEIR should include a careful evaluation of options for seamless connections of bus, rail, pedestrian connections in and around West Station, including study of the vertical circulation, multimodal connections, and operations at the Station.

MAPC's West Station Area Transit Study found that a high-quality regional bus rapid transit network would reduce the share of AM peak period automobile trips by 9 to 11 percentage points. However, this outcome assumes that buses can travel to West Station without being caught up in auto congestion in mixed traffic. The SDEIR should identify which streets will include separated and protected bus lanes connecting to West Station, and should include analysis of the number of peak-period buses and shuttles anticipated to ensure that West Station has the necessary number of bus and shuttle bays. Microsimulation should assess LOS for buses traveling to West Station through the site, and should quantify person delay due to traffic signals and congestion conditions where separated transit facilities are not available.

The SDEIR should also include a careful evaluation of how buses and shuttles will circulate in and around West Station, specifically how buses, pedestrians, cyclists and vehicles will interface around the Station and the I-90 interchange. The SDEIR should include analysis of how transit and non-motorized traffic will have priority when accessing West Station. One possible option would be to expand the footprint of West Station to create a separated bus plaza and public space north of the interchange, which would separate much of this traffic from the interchange on- and off-ramps. Given the complex circulation and operations at a future West Station, we suggest a separate team evaluate design options for bus, shuttle, pedestrian, bicycle, and rail operations at the Station, with input from the City of Boston, Harvard University, Boston University, MBTA, MAPC, and others.

## **Allston Landing South No Build/Build Assumptions**

We are pleased to see that MassDOT is using the development projections developed by MAPC, and we are available to assist with updates or clarifications on the projections from 2019. New projections prepared by MAPC for the 2022 Long-Range Transportation Plan will incorporate the most current assumptions about development in and around the project area. These projections will be ready in late 2022, at which point they will qualify as the most current planning assumptions. This set of projections should be used as the basis for the SDEIR modeling.

## **Climate Resilience and Flooding**

Since the DEIR was published in 2017, considerably more detailed and updated information on potential climate change impacts has been made available in Massachusetts. This includes the Massachusetts Coastal Flood Risk Model (MC-FRM), the Massachusetts RMA Climate Resilience Design Standards & Guideline, the Massachusetts State Hazard Mitigation and Climate Adaptation Plan, and the Boston Water and Sewer Commission's Flood Inundation Model. The NPC references all of these and provides a preliminary overview of potential impacts on project alternatives based on the MC-FRM's Sea Level Rise projections for 2050 and 2070. While it is encouraging that the SDEIR will use these latest tools to assess flooding impacts on the project, the most important function of the SDEIR will be the development of climate resiliency measures that will ensure the new infrastructure can withstand the impacts of extreme weather events. The scope

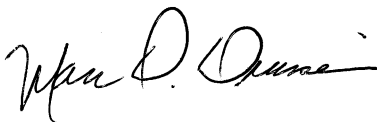
for the SDEIR should require a robust climate resiliency program commensurate with the significant size of this infrastructure project and the magnitude of future climate impacts.

The preliminary analysis of the NPC indicates that the most significant coastal flooding impacts on the project would be related to future overtopping or flanking of the Charles River Dam, caused by projected 2050 and 2070 Sea Level Rise combined with storm surges. According to the model, these flood events could be triggered by a 2% annual chance storm in 2050 and a 10% annual chance storm in 2070, a period only 20 to 40 years after the project is completed. This presents a unique challenge for a major new infrastructure project in the face of pending short- to mid-term climate impacts, but it may also present a unique opportunity for the Commonwealth to harmonize its major infrastructure investments with its climate adaptation efforts.

If the more detailed analysis of the SDEIR bears out the conclusion that the project faces significant future flood risks related to the Charles River Dam, but only minor flood risks absent any dam overtopping or flanking, the Commonwealth should consider resiliency improvements to the dam as a necessary component of mitigating impacts on the I-90 Allston Multimodal Project. Making the connection between these two projects would be somewhat unconventional, as two different state agencies are responsible for the Charles River Dam (DCR) and the I-90 project (MassDOT). Nonetheless, the analysis suggests that there is an inextricable relationship between these two projects, requiring multi-agency coordination and perhaps a higher-level state policy commitment to ensure that necessary mitigation is put in place before the time horizon of expected impacts.

MAPC suggests that the SDEIR explore ways that such a multi-agency mitigation program could be established following the approval of the I-90 project. This could take a form similar to the Lower Mystic Regional Working Group that grew out of the review of the Encore Casino, but in this case focusing on flood mitigation rather than traffic. The impetus to create the Lower Mystic Working Group arose from the joint initiative of the Secretaries of Transportation and Energy & Environmental Affairs, a process which could be duplicated to establish a similar working group to analyze these critical climate resilience issues and come up with recommendations, incorporating state agencies and other stakeholders in the Charles River Basin.

Sincerely,



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Executive Director

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