Date

Via Email

Alexander Strysky, Environmental Analyst
MEPA Office
Executive Office of Energy and Environmental Affairs
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Boston, MA 02114
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Re: **Notice of Project Change for the I-90 Allston Multimodal Project**
EEA No. 15278

Dear Mr. Strysky:

I submit the following comments on the Notice of Project Change ("NPC") for the I-90 Allston Multimodal Project ("Project") filed by the Massachusetts Department of Transportation ("MassDOT") with the MEPA Office. I care deeply about the outcome of this Project because _____ [I live near the river, I boat on the river, etc... give your personal reason, whatever it is, that you care about this project].

Flooding

Of the three throat-area alternatives presented in the NPC, I am concerned that the at-grade design, which MassDOT has identified "as the agency's path forward," is the most susceptible to flooding, and MassDOT has not explained how the Project would address current and future flooding. Areas of I-90 and Soldiers Field Road ("SFR")/Storrow Drive already experience flooding during heavy rainstorms, and extreme precipitation is expected to increase as a result of climate change. It is not clear in the NPC that MassDOT has accounted for these current and future flooding risks. The Project also has a future risk of flooding associated with sea level rise ("SLR") and ocean storms in the next 30 years if the Charles River Dam were to be overtopped or flanked, as the City of Cambridge's 2017 Climate Change Vulnerability Assessment indicates will happen under certain future conditions. While the U.S. Army Corps and state Department of Conservation and Recreation ("DCR") are developing a study to assess the climate resiliency of the Charles River Dam, there are currently no firm commitments or plans for upgrading the dam and alleviating these future risks.

The current at-grade design does not address these flooding risks, nor is it clear where any future flood mitigation measures could be incorporated, especially given that MassDOT is

proposing to pave over almost all available land in the throat area to construct 12 lanes of roadway at and below grade. MassDOT also has not provided any information about emergency access/egress in the event of a major storm that flooded SFR and I-90 at-grade. MassDOT must provide more information to the public about all current and future flooding risks in this area and how they will be addressed by this Project.

River intrusion

In its preferred at-grade design, MassDOT is still proposing to add fill to the river to build Soldiers Field Road, as well as to restore the shoreline of the Charles River. MassDOT also proposes to build a bicycle and pedestrian boardwalk extending about 50 feet into the river on 250 piles. Among other issues, the structure extending into the river would pose a major hazard for rowers, and the addition of fill would significantly reduce the amount of existing watersheet (in addition to about an acre of watersheet being converted to a boardwalk). The NPC does not sufficiently analyze the impacts of such intrusions into the river on recreational users or the Charles River ecosystem. Restoration of the riverbank should be accomplished by working inland from the existing bank, not adding new fill and narrowing the watersheet in order to restore ecological functions. Finally, under no circumstances should MassDOT build a "temporary" roadway in the river to construct any of the alternatives. MassDOT must provide a thorough analysis of the effects of a boardwalk, fill, and/or "temporary" road in the river on recreational users and the river's ecosystem, including fish habitat and feeding grounds.

Stormwater and water quality

The NPC states that the at-grade version would allow for treatment of just 35% of the stormwater in the project area (compared to 97% for the highway viaduct version and 52% for the SFR hybrid). 35% treatment is completely unacceptable; it means that 65% of polluted stormwater would continue running straight into the Charles untreated, polluting the river and exacerbating harmful cyanobacteria (blue-green algae) blooms. This would result in fewer days for recreational users of the Charles to enjoy a healthy river, and quite simply, a dirtier river. MassDOT must incorporate space for stormwater management into the project design to ensure that the river remains safe and healthy for all to enjoy. Improving community connectivity to a Charles River polluted with runoff from this Project is not the resilient future we want.