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Consulting Engineers
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November 24, 1986

Ref: 1360

Mr. James S. Hoyte, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Re: Responses to Comments on Final Environmental Impact Report, CambridgePark Phase 2, EOEA #5603

Dear Secretary Hoyte:

We believe that the filing of the FEIR and certificate of adequacy for our FEIR completed the statutory process. However, in the interest of supplementing the extensive body of information already provided in the DEIR and FEIR, and hoping that it will prove useful to the remaining commenters, we have enclosed a final set of responses to comments on the FEIR, in accordance with your request.

Since the proponent has now gone beyond the normal review and comment process, we trust that any other concerns can be addressed as part of other on-going studies in the Alewife area, particularly the EIS for proposed Route 2 improvements and EIR's for other development projects. We hope that you will agree that the project proponent has cooperated in this regard to the fullest extent possible, and understand his desire to proceed with project development

Thank you for your assistance and cooperation.

Very truly yours,

VANASSE/HANGEN, INC.

Francis S. O'Callaghan

Francis S. O'Callaghan, P.E.
Associate

FSO'C/dms

1360/1186/p11

RESPONSES TO COMMENTS ON THE
FINAL ENVIRONMENTAL IMPACT REPORT
FOR CAMBRIDGEPARK PHASE 2
(EOEA #5603)

COMMENT NO. 1 (MEPA):

"The response... should also extend the "carrying capacity" analysis done for Rindge Avenue/Alewife Brook Parkway to the other critical intersections in the study area."

RESPONSE:

The "carrying capacity" analysis was done specifically for the Rindge Avenue/Alewife Brook Parkway intersection in the FEIR because it is the most critical, i.e., has the highest existing volume-to-capacity (V/C) ratio at 0.99 during both the AM and PM peak hours. Essentially, it is the worst of the five locations identified as being at or over capacity in the 1992 Build condition, with or without Alewife Boulevard. The other four locations are all along Alewife Brook Parkway at the intersections of CambridgePark Drive, Concord Avenue, Massachusetts Avenue, and Route 2 (see FEIR Tables IV-A-4 and IV-A-5). "Worst" in this case means the one which, having the highest existing V/C ratio, has the least capacity for additional traffic from new development. Under conservative assumptions, it was demonstrated in the FEIR (p. IV-A-22) that almost 500,000 additional square feet of development could be accommodated before the intersection's V/C ratio increased to 1.0 (capacity). It was further shown (p.IV-A-23) that with attainable goals for higher transit use and vehicle occupancy rate, the buildable amount increases beyond 650,000 square feet. It can be stated with confidence that the other four critical intersections along Alewife Brook Parkway will have substantially more capacity to absorb additional development, since their V/C ratios during the worst peak hour range from 0.86 to 0.93, compared to 0.99 at Rindge Avenue.

COMMENT NO. 2 (A.O. WILSON STRUCTURAL CO.):

"We assume that the location of the buildings is conceptual and not precise and that this plan does not preclude Alewife Boulevard."

RESPONSE:

The site layout plan submitted in the FEIR (Fig. IV-A-6) was labeled as "conceptual" and does not foreclose alignment options for Alewife Boulevard. The proponent agrees that it may be advantageous to include the Boulevard as an alternate access connection in the future depending on the future area roadway network.

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COMMENT NO. 3 (CITY OF CAMBRIDGE):

"The proponent should, therefore, reevaluate the parking strategy for the project and consider limiting parking supply to 2.0 spaces per 1,000 square feet of development or a maximum of 2340 spaces for the 1,170,000 square feet of development contained in the combined Phase I and Phase II projects."

RESPONSE:

The project proponent has reevaluated and reconsidered the proposed parking supply at the project and has concluded that the proposed supply is required to successfully market the project. As noted in the FEIR (p.IV-A-30), several of the City's assumptions with respect to employee auto use during the day could easily underestimate parking demand. The proponent has, however, agreed to monitor use of the parking spaces already constructed as part of Phase I of the project. If an oversupply situation is identified, the proponent will adjust the number of spaces accordingly.

COMMENT NO. 4 (MYSTIC RIVER WATERSHED ASSOCIATION):

"Our DEIR comments with two letters of Rep. Mary Jane Gibson of April 3 attached are contained in part 1 of the FEIR immediately after those of the city of Cambridge. There is not a single word in part IV, Responses, of response to and consideration of our MRWA points raised."

RESPONSE:

The FEIR's intention was to respond to all issues and concerns. Review of correspondence from the MRWA and Representative Gibson indicates that there was general opposition to the project's scale and resultant impacts on traffic and the environment, without raising specific traffic concerns that should be addressed. The entire analysis in the FEIR was intended to provide additional information beyond that already included in the DEIR on traffic (environmental issues were not included in the MEPA scope), so that an informed decision could be made on project impacts. As such, it was a response to the concerns raised about project size.

One item in the MRWA letter which perhaps could have been responded to directly was with respect to the Secretary's directive to publish the project DEIR within four months of the Route 2 EIS. This was the original objective. However, the Route 2 EIS's publication has been delayed several times, which was of course beyond the control of the proponent. Nonetheless, several coordination discussions were held during the project DEIR's preparation with those working on the Route 2 EIS to insure that the most up-to-date information was included on that project.

COMMENT NO. 5 (WINN BROOK ASSOCIATION, BELMONT):

"Where are the proposed mitigation measures for Belmont?"

RESPONSE:

As noted in the DEIR (p.VII-A-7), improvements along study area diversion routes through residential neighborhoods (e.g., Brighton Street/Cross Street) were not recommended since they might induce even more bypass traffic. Recommendations for improvements were concentrated on the main commuter routes such as Alewife Brook Parkway and Route 2. Besides being outside the study area, Belmont's diversion routes were the subject of an earlier study by another consultant (TAMS) which looked at the feasibility of reducing traffic through Belmont by restricting access at the Route 2 interchanges. Belmont should review those proposals and work with the MDPW if they judge those proposals to be in the Town's best interest.

It should also be noted that the proponent's commitments to the demand reduction strategies outlined in the FEIR will have a benefit in all areas, including Belmont.

COMMENT NO. 6 (EOTC):

"Triangle Park Associates should explore alternative development options which are more responsive to the intense peak period congestion problems at the project site. Lower density alternatives should be seriously investigated. In addition, alternatives which incorporate a residential component or housing/retail uses should be given serious consideration."

RESPONSE:

The proponent considered alternative development possibilities, including a residential option, during the early phases of project planning and development and concluded that they were not viable alternatives for economic reasons. The site is not considered suitable for housing due to the surrounding land uses, both existing and proposed. The MEPA scope directed that an analysis be conducted only for the viable commercial option identified in the Environmental Notification Form. This included a possible hotel option in lieu of some of the proposed office space. This is still a possibility. A decision will be made on this at a later date. However, it was decided to study the most traffic-intensive option (all office) in the EIR as a worst-case condition. If the hotel option is adopted, it will generate less traffic within the study area.

COMMENT NO. 7 (EOTC):

"Project phasing in response to the traffic congestion problems at Alewife is another area that does not appear to be adequately addressed in the FEIR."

RESPONSE:

The proponent believes that the project has been phased with City and State improvements to the extent possible. Phase 1 of the project was timed to coincide with the new Alewife MBTA Red Line rapid transit station. Phase 2 will come well after implementation of the recently-completed improvements along Route 2, including the new signalized intersection at Alewife Brook Parkway and the new ramps to/from Route 2 and the MBTA station (Interim Access Plan). Additional future improvements could come in the form of Alewife Boulevard and a reconstructed Route 2 if the Local, State and Federal planning and review procedures for those facilities are expedited. These facilities have been discussed for some time and the lack of a firm implementation timetable makes project development planning difficult.

COMMENT NO. 8 (EOTC):

"Reduction of the availability of on site parking would be an effective demand management technique which should be more aggressively explored."

RESPONSE:

See the response to Comment No. 3 (City of Cambridge) which discusses this issue.

COMMENT NO. 9 (S. KAISER):

"Despite the fact that traffic counts exist, going back to 1975, the FEIR considers none of this historical trend data and uses a 2.5% growth figure for traffic in all directions in 1992. The report ignores the heavy growth at Alewife of reverse commuting."

RESPONSE:

Traffic volumes from reverse commuting are, by definition, occurring in the off-peak direction, which has substantially more available capacity for growth than the peak direction. Therefore, increases in reverse commuting trips, even somewhat larger than estimated, have little impact on the analysis condition at specific intersections. This was demonstrated on page IV-A-22 of the FEIR (also see the response to

Comment No. 1), where the Alewife Brook Parkway/Rindge Avenue intersection was shown to have the capacity to absorb from 489,000 to 659,000 square feet of additional development, even though it already has a V/C ratio of 0.99, because most of the new development traffic would flow opposite to the peak flow direction. Finally, the growth assumption was based on information obtained for employment growth projections in the Boston area.

COMMENT NO. 10 (S. KAISER):

"The diversion analysis still ends up with V/C ratios of 1.15, and does not respond to the Secretary's request that development and trip generation be reduced until V/C ratios of 1.00 (capacity) are reached. The issue of congestion leading to fewer possible trips overall and less practical development, appears to have been ignored in the Final EIR. The EIR states that trips may divert out of the study area, and does not deal with the impacts or implications of such impacts. Either the FEIR is not responsive to EOEA comments or the study area for the EIR was too small, and should be made flexible to include all traffic diversion routes."

RESPONSE:

The FEIR, as noted in the comment, stated that reduction of all V/C ratios to 1.0 or less would occur if some traffic shifted to off-peak hours or to roadways completely outside the study area. Discussions were provided for both of these phenomena, including qualitative concepts as well as quantitative lists of the number of diversions that would have to occur along specific routes to achieve a maximum V/C ratio of 1.0 (see FEIR pages IV-A-15 and IV-A-16). The supposition that congestion eliminates trips rather than diverts them in time and space does not appear to be born out by experience, since new development projects in congested areas (Boston, Route 128, Cambridge, etc.) are made either via auto (through increased ridesharing) or transit. The proponent believes that the FEIR was responsive to the Secretary's directive and appreciates his comment that he is "especially pleased with the depth and clarity of the diversion analysis".

COMMENT NO. 11 (S. KAISER):

"There is still no accounting of the influence of one intersection on another (local gridlock potential) nor the necessary observations of queues and delays in the area. The EIR reflects the common tendency by many modern engineers to prefer calculations and theory to direct measurement. There is no description of how the traffic will actually drive and what the impacts will be in real-world terms."

RESPONSE:

Again, the proponent believes that the very comprehensive traffic analysis of the many locations within a rather extensive study area has provided sufficient information for reviewers to make an informed decision on project impacts. The FEIR extended the capacity analysis of the DEIR to account for "real-world" conditions of turn blockage and intersection capacity calibration, which were noted as concerns by Mr. Kaiser in his comments on the DEIR. The Secretary has apparently concurred with "the more realistic approach to roadway capacity" in the FEIR.

COMMENT NO. 12 (S. KAISER):

"There is no commitment to specific mitigation."

RESPONSE:

The FEIR, on page IV-A-25 as part of the response to DEIR Comment No. 8, includes a commitment by the proponent to undertake a series of demand reduction measures to decrease the number of vehicles trips generated by the project. These are in the areas of ridesharing, increasing transit usage, alternative work schedules to encourage non-peak period travel, and others. As stated in the FEIR, in areas where the proponent has direct control to implement these measures, he will do so. In other cases, he will work with tenants, the City, and others as required to encourage implementation. The proponent has agreed to designate a staff person with direct responsibility to coordinate all of these mitigation efforts.

COMMENT NO. 13 (S. KAISER):

"Despite the EOEA requirement that the Final EIR "must provide a response to each of the points raised in the attached comments," my own comments were responded to only partially, and not point by point. Next time, I will number my DEIR comments specifically for FEIR response."

RESPONSE:

The FEIR had a notation which indicated that many of Mr. Kaiser's comments and concerns had been addressed in the responses to comments made by the Secretary of Environmental Affairs in its Certificate of adequacy. These responses included detailed discussions on background growth, capacity analysis, turn blockage, diversion, safety, and mitigation. Since Mr. Kaiser's comment letter included 18 pages of material, it was difficult to respond specifically to each point. It was felt, however, that the essence of his concerns was completely addressed.

S-707

Comm. from Francis S. O'Callaghan, P.E., Associate, Vanasse/Hangen, Inc., transmitting a copy of his letter to the Secretary of Environmental Affairs Re: responses to comments on Final Environmental Impact Report, CambridgePark Phase 2, EOEA #5603.

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