



CITY OF CAMBRIDGE • EXECUTIVE DEPARTMENT

Robert W. Healy, City Manager

Richard C. Rossi, Deputy City Manager

July 30, 2002

Secretary Bob Durand
EOEA, Attn: MEPA Office
Jay Wickersham, EOEA No. 12376R
251 Causeway Street, Suite 900
Boston MA 02114

Re: Comments on Environmental Notification Form
EOEA No. 12376R; Frontage Road Office/R&D Center, Belmont

Dear Secretary Durand:

The City of Cambridge submits the attached comments on the Environmental Notification Form (ENF) submitted by the O'Neill Properties Group for the proposed Frontage Road Office/R&D Center. Given the project site's location in Belmont near Cambridge and Arlington, the Route 2 corridor, and the Little River/Alewife Brook system, the potential impacts are regional in nature. In particular, the City of Cambridge is concerned about potential impacts on traffic, flooding, water quality, and open space.

The City supports the preparation of an environmental impact report in order to coordinate the evaluation of the project among the multiple jurisdictions that may be affected. If there are any questions regarding these comments, please contact John Bolduc, Environmental Planner, at 617-349-4628. We appreciate this opportunity to comment.

Sincerely,

Robert W. Healy
City Manager

City of Cambridge

COMMENTS ON ENVIRONMENTAL NOTIFICATION FORM
FRONTAGE ROAD OFFICE CENTER, BELMONT
EOEA NO. 12376R

General Comments

The City of Cambridge is concerned that the proposed project will have significant impacts on already congested roadways in Cambridge and cause spillover traffic effects in Cambridge, Arlington, and Belmont neighborhoods. In addition, the proximity of the project site to the Little River/Alewife Brook system is potentially significant in its impacts on water quality, flooding, open space, and biodiversity.

The proponent previously filed an Environmental Notification Form for this site, which was subsequently withdrawn. The project described in the current ENF appears to be substantially the same as the previous project. The two ENFs compare as follows:

	<i>Previous ENF</i>	<i>Current ENF</i>
New acres of land altered	5.5 ac.	7.0 ac.
Acres of impervious area	3.5 ac.	4.4 ac.
Gross square footage	291,936 s.f.	245,000 s.f.
Maximum height	80 feet	98 feet
Vehicle trips per day	3,474	2,642
Parking spaces	910	796
Gallons/day of water use	24,100	20,210
GPD wastewater generation	21,900	18,375

The City commented on the previous ENF. The current proposed project does not appear to be responsive to those comments, particularly those concerning single occupancy vehicle mode split, reduction in parking spaces, and commitment to a transportation demand management plan.

The City supports the preparation of an EIR for this project and commends the proponent for consenting to do so. Given the regional impacts that this project will have and the lack of zoning jurisdiction in Arlington and Cambridge, an EIR will facilitate coordination among the affected communities and state agencies.

Traffic Impacts

The ENF states that the proponent is committed to the development of a comprehensive transportation mitigation plan that is designed to reduce single occupant vehicle (SOV) travel to the project site and encourage alternative modes of transportation. The City supports and encourages this goal. However, the proposal to provide parking for 100 percent of the site's employees and visitors seriously undermines the proponent's credibility and commitment to a meaningful transportation mitigation program.

- Given the project site's proximity to the MBTA Alewife Station and to regional bicycle paths (e.g., Minuteman Bike Path), the City believes the proponent should be able to achieve, at a minimum, a non-SOV mode split of 41 percent. This expectation is based on the Journey to Work census data for the area and the experiences of nearby businesses.
- If the proponent proceeds to construct 796 parking spaces, any efforts made to increase non-SOV travel to the site will be negated. The City believes that the parking supply should be reduced by at least 289 spaces to a total of no more than 507 spaces (based on 245,000 square feet x 3 employees per 1000 s.f. x 0.59 SOV mode split x 1.17 adjustment factor for visitor and HOV trips).

The proponent is quoted in the media as stating that improvements to the Route 2 ramps serving the site are necessary. If this is the case, these improvements should have been proposed in the ENF so that reviewers could adequately assess the potential impacts on the environment. This portion of the project should be addressed in the scope of an EIR.

The proposed conditions plan included in the ENF indicates one driveway entrance to the project site will be located in Cambridge. If this feature is retained, the proponent should consult with the Cambridge Public Works Department and the Cambridge Conservation Commission regarding permitting requirements.

Stormwater & Flooding Impacts

- It appears that some work is proposed within the 100 foot Buffer Zone of wetlands located in Cambridge. The proponent should consult with the Cambridge Conservation Commission regarding the need to file a Request for Determination of Applicability or Notice of Intent for this work.
- It appears probable that the project will cause temporary wetland impacts during construction. These impacts should be identified and mitigation should be proposed.
- The ENF indicates filling will occur within the 100-year floodplain and that compensatory flood storage will be provided. If the detention basins are being planned to serve as compensatory flood storage, the proponent needs to explain how flood water will reach the basins. If the basins are also expected to provide stormwater mitigation, they should not serve the purpose of flood storage at the same time.

- It is unclear how the underground detention facility will function. The proponent should describe the water quality protection features and any pumping systems and how they will function in the event of power outages.
- The drainage system, including the swales, should be designed to maximize storage of small storms (1 to 2 year storms) and pollution attenuation. The swales should be designed so that they do not hold standing water. Other stormwater best management practices should be identified and incorporated into the project plan.

Open Space

The project site abuts the MDC's Alewife Reservation and contains an area of silver maple woodland. Large specimens of silver maple have been observed on the site. Alternative site layouts should be evaluated to preserve as much of the silver maple woodland as possible.

The proponent has indicated that a conservation restriction will be placed on undeveloped portions of the property. It appears that the restriction will be placed primarily on regulated wetland and floodplain resource areas since the proposed development will occupy most of the defined uplands on the site. The boundaries of the proposed restriction should be depicted and the terms of the restriction, including the party that the restriction will run to, should be described in detail.

Sustainable Design

The proponent should evaluate sustainable design measures, such as those described in the LEED green building guidelines of the U.S. Green Building Council. Measures such as landscape improvements, water conservation measures, green roof technology (e.g., vegetated roof), energy efficiency measures, and alternative modes of transportation should be considered in the design of the project.

EIR Scope

The City supports the preparation of an environmental impact report (EIR) for this project. We request the following be included in the EIR scope:

Alternatives

- It is the City's understanding that the project site was rezoned by the Town of Belmont to authorize the proposed office building use since the previous ENF was withdrawn. The EIR should compare the environmental impacts of the proposed project to a project that would have been allowed under the previous zoning, as well as alternative site layouts. Any structural improvements to the Route 2 ramps and roadways should be described and assessed. Alternatives should evaluate different site layouts in order to preserve as much of the silver maple forest as possible. Reduction in parking in conjunction with TDM measures (described below) may provide additional design flexibility.

Traffic

- The City requests that the proponent consult with the Cambridge Traffic, Parking, and Transportation Department on the scope and preparation of the traffic impact study.
- The project site has poor access from Route 2 eastbound and to Route 2 westbound. Eastbound commuters must: exit at Route 60 and use residential Lake Street through Belmont to access Frontage Road; exit at Lake Street and conduct a dangerous U-turn to Frontage Road eastbound; or continue past the site to exit onto Acorn Drive to the east. A new connection from the Lake Street exit into Acorn Drive should be provided. Commuters returning to the west on Route 2 must either use Route 2 east to Alewife to reverse direction or use Frontage Road to Lake Street in Arlington to access Route 2. Intersection improvements at Lake Street and Route 2 should be developed to better accommodate left-turns onto the Route 2 ramp.
- To protect Cambridge neighborhoods from spillover traffic, the traffic study should analyze the following intersections: Mass. Ave./Route 16, Mass. Ave./Lake Street, Route 2/Route 16, Blanchard Road/Concord Ave., both Fresh Pond rotaries, Frontage Road and Lake Street, Route 2/Acorn Drive, and Route 2/Lake Street.
- The EIR should propose traffic mitigation measures, including a Transportation Demand Management Plan and intersection improvements. Discussions of cost should be provided. The TDM plan should seek to achieve a non-SOV mode split of 41 percent at a minimum. A meaningful TDM plan cannot be based on the provision of parking to all of the development's employees and visitors. Improvements for pedestrian and bicycle access to the Alewife Station and the Minuteman Bikeway should be identified, evaluated and proposed. A shuttle bus, possibly operated in conjunction with Acorn Park, between the project site and the Alewife Station should be provided with frequent service during peak commuting hours. The EIR should evaluate other traffic mitigation improvements, including signalization and roadway modifications. Under the Cambridge Parking & Transportation Demand Management Ordinance, the City required the following TDM measures for the 200 Cambridge Park Drive development, which is located in the proximity of the Frontage Road site:
 - 1) 100% MBTA pass subsidies;
 - 2) Employee shuttle between site and MBTA station;
 - 3) Marketing of TDM opportunities, beginning at new employee orientation;
 - 4) Rideshare matching with other area businesses through CARAVAN for Commuters;
 - 5) Secure, sheltered bicycle storage (for both visitors and employees);
 - 6) Shower and locker facilities;
 - 7) Creation of a multi-use path connecting the Belmont path to the Alewife MBTA station;

- 8) Provision of on-site services (such laundry pick up, ATMs, fitness center, cafeteria, stamp sales, etc.) to reduce midday trips;
- 9) Flexible work hours to facilitate off-peak commuting; and
- 10) Commitment to an 59% SOV mode split, and annual monitoring/reporting on mode split achieved.

- The EIR should describe how commitments to TDM measures and structural improvements will be monitored and enforced given that multiple jurisdictions that are involved.

Sewer System

- The EIR should describe where the project will connect into the sewer system and whether sewage will be directed towards the Cambridge system. If sewage is directed towards Cambridge, the proponent should consult with the Cambridge Public Works Department.

Stormwater & Flooding

- Both temporary and permanent impacts on wetland and floodplain resource areas should be quantified and depicted on the site plans. Compensatory wetland and flood storage areas, as well as any other environmental enhancements, should be identified and evaluated.
- The design of the drainage system should be described fully and include details on depths to groundwater, surface water connections, planting plans, and pollution attenuation capacity.

Sustainable Design

- The proponent should evaluate sustainable design measures in the context of green building guidelines such as the LEED system.



CITY OF CAMBRIDGE • EXECUTIVE DEPARTMENT

Robert W. Healy, City Manager

Richard C. Rossi, Deputy City Manager

September 9, 2002

To The Honorable, The City Council:

In response to Awaiting Report Item No. 02-71, regarding a report on efforts to preserve the eight acres of maple forest abutting Cambridge, please be advised of the following:

The Cambridge Conservation Commission worked closely with the Community Development Department in commenting on the Environmental Notification Form for the proposed development of the Belmont Uplands. In addition, the Commission looks forward to holding public hearings under the Wetlands Protection Act for review and permitting of any aspect of the project that may affect wetland resource areas, including the 100-year floodplain in Cambridge.

I am attaching a copy of the comments for your information.

Very truly yours,

Robert W. Healy
City Manager

RWH/mec
Attachment

S-258

Consent Agenda #11

Awaiting Report Item
Number 02-71, regarding a
report on efforts to preserve
the eight acres of maple forest
abutting Cambridge.

In City Council September 9, 2002

PLACE ON FILE.