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February 23, 1987

Dear Susan,

Would it be possible for you to distribute
this to all of the members of the City Council?

This is our response to the Alewife Draft

EIR.

Thanks,

Peter Koeck

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North Cambridge Stabilization Committee
c/o Community Development Department
City of Cambridge
Cambridge, MA 02139

February 22, 1987

Mr. James Hoyte, Secretary
Massachusetts Executive Office of Environmental Affairs
Saltonstall Building
100 Cambridge Street, 20th floor
Boston, MA 02202

Attention: MEPA Unit

Re: EOE #5869, Alewife Center Draft Environmental Impact Report

Dear Secretary Hoyte:

The North Cambridge Stabilization Committee is a city-sponsored group of North Cambridge residents which functions in an advisory capacity to the City of Cambridge and its various boards and departments on a variety of issues. The Committee has met with the developer a number of times, has sponsored several community meetings, and has appointed a subcommittee to convey to your office in this letter the concerns and comments which have arisen from these meetings and our own review of the DEIR.

We are very pleased to have the opportunity to comment on the DEIR for Alewife Center. We are eager to see the site cleaned up and developed in a manner that meets the needs of the community, and we would like to thank the developer for the amount of time and effort already spent in meeting and working with the community. Nevertheless, we believe that major questions still need to be addressed before the development should go forward. In particular, our primary and repeated areas of concern relate to the proper handling of the hazardous wastes on the site and the impacts of traffic. Other major concerns relate to housing and to project design.

Our specific comments on these and other areas are as follows:

Hazardous Waste

Our primary concern is that the questions about contaminated soil, ground water, and emissions into the air during construction must be resolved to everyone's satisfaction before development proceeds. This includes the information requested by DEQE (see the Notice of Responsibility dated February 9, 1987 and the letter of comments on the DEIR dated February 17, 1987) as well as any requests which may be made by the City. As the

immediate neighbors of the site, we are particularly concerned that development is carried out in a way that does not endanger our health.

Specific environmental concerns raised at community meetings include:

1. The draft EIR generally reports contaminant levels only for the portions of the site planned for building construction. We believe that the developer should test and propose methods for cleaning the entire site. Given the concerns noted below about possible shifts in groundwater flow, we are concerned that contaminants outside the building areas might flow into the neighborhood. Specific concerns expressed in the meetings include:

a. Is the 12' depth of the test pits too shallow? Might groundwater carry contamination from deeper levels? If the level of the basement parking areas is lowered as is being suggested by the Cambridge Community Development Department P.U.D. design review, then all of the test pits will need to be redug to a lower level. What is the effect of the piles proposed to be sunk to levels below 12'?

b. If the entire site is not cleaned up, will there be plans for identifying and cleaning up "hot spots" of contamination that are not on the building sites? What is the justification for not cleaning up the entire site?

2. Neighbors of the site experienced dust during the MBTA construction, are aware of the ill effects this dust caused to construction workers, and are concerned about similar air-borne releases during construction of this development. Specific questions include:

a. What will be the effect on asthmatics living in the area?

b. What measures are planned for dust control?

c. The Draft EIR notes that workers may be required to wear respiratory protection. What does this imply for near neighbors of the site?

3. We are concerned about both groundwater quality and the flow of groundwater during and after construction. In particular, the developer must provide evidence that construction of the sunken portions of the parking garages will not direct groundwater (possibly, contaminated groundwater) into the neighborhood and particularly into neighbors' basements.

4. In general, as noted also in the DEQE letter cited above, we are concerned by the inadequate documentation of conclusions and rationale in the environmental portion of the report (see Chapter IX-12). There is often a substantial leap from the actual evidence that is presented to the conclusions that are drawn.

5. Other specific questions were raised by neighbors at community meetings and in meetings of the subcommittee:

a. Neighbors were skeptical of the reported finding that Jerry's Pond is free of contamination.

b. One neighbor suggested that the developer be required to post a bond to pay for any damage due to release of contaminated material.

c. A random sample should be done by an independent third party to verify the validity of Haley & Aldrich's core samples, since W.R. Grace's credibility is weak as a result of its track record on contaminant information in other communities.

d. The use of composite core samples appears to have occurred in some instances which would be misleading.

6. Any area of the site used in construction (including staging areas) should be cleaned up as it is used.

7. Will the developer make available the Material Safety Data Sheets for each of the known contaminants so that we may have a frame of reference against which exposure to the various levels of contaminants can be measured?

8. The remaining underground storage tanks at the site should be removed.

9. Continuous oversight and monitoring of the site by DEQE during construction and after completion is essential.

Traffic and Transportation

The traffic congestion in the area is now quite extreme. We are uncertain whether a development of this size is warranted given the impacts both on the arterial and local streets. We believe that a minimum condition for supporting a development at the proposed size is that the final EIR show that the increased congestion will not force additional traffic onto local streets. However, at present, it is impossible to reach a conclusion as to the proper size of this development because the traffic section of the report is not fully credible.

In particular, the report inadequately addresses the following issues:

1. It does not analyze the impact of the development on local streets. For instance:

a. There are limited traffic counts on the individual streets north of Whittemore Avenue, which is a likely route for bypassing the increasing Alewife Parkway congestion. Residents believe current levels to be far higher than the report's derived figures (see below).

b. There is no analysis of the Mass Ave. to Cedar to Rindge bypass alternative.

c. There is no analysis of the Concord Ave. to Walden St. to Mass Ave. connection.

2. The report is based upon traffic counts which have not been actually measured, but rather are derived from previous

reports dating from 1980, 1982, and 1985. The figures are therefore out of date as well as being inferred rather than actual.

3. The forecast projections come from yet other sources than the estimates of current traffic. The result is that the existing traffic figures and the forecasted figures are inconsistent, sometimes to the point of being nonsensical. Often the "no build" figures for 1995 are actually lower than the "existing" figures for 1985, suggesting that background traffic levels will decrease over the next decade. This is clearly not going to occur. For example:

<u>Figure</u>	<u>West on Rindge at Sherman</u>	<u>South on Parkway at Rindge</u>
IV.4 existing AM peak 1985	368	2339
IV.8 no build AM peak 1990	350	2031
IV.12 no build AM peak 1995	330	2028

4. The "full build" traffic analysis cannot be accurate since the traffic generation of Alewife Center was added to the deflated base traffic count projected for 1995 as noted above.

5. The benefits of the LeHigh Metals access drive are not apparent. Although this will, as stated, relieve some of the burden of Alewife Center on the Route 2 intersection, it seems only to shift that burden to another intersection. The left turn out of this access drive will not be free-flowing, but rather restricted by the red light at the Rindge/Alewife intersection. The result will be enhanced gridlock at an already overly congested area due to the queuing of cars through the intersection attempting to make that left turn.

6. There are other anomalies in the traffic numbers of the report. For instance, the numbers exiting the site at the Route 2 interchange in Figure IV.15 do not add up. All of the numbers must be checked for accuracy.

7. It is now very difficult to get through the Alewife Corridor. With the Alewife Center development, the amount of time during which this artery is functioning at level F will increase, which in turn will increase the average commuting time of all drivers in the Corridor. This should not be discounted: it is a problem in itself and produces a further problem for the neighborhood as it changes the incentives of all drivers in the Alewife Corridor (not just those coming to the Alewife Center development) and encourages them to find routes on neighborhood streets. And possibly, the increased time may end up discouraging rather than encouraging use of the Alewife T station by drivers with Boston destinations, if reaching and entering the garage becomes ever more time-consuming. How long will it take a driver to get through these intersections in the future as compared to now?

There are additional mitigation measures that we suggest at this time:

1. There should be no access to the site from Whittemore Avenue. This will virtually eliminate the incentive to use the local streets to the north as a short-cut to avoid Parkway congestion.

2. Employees should be offered T passes free of charge, rather than only at a reduced rate (unspecified in the DEIR) to encourage the use of public transportation to the fullest possible extent.

3. There should be no charge for parking on the site to insure that none of the neighborhood streets will be used for that purpose. (If this conflicts with public transportation incentives, the alternative is increased police enforcement of resident parking in the area--which imposes a cost to the city that the developer should be prepared to bear.)

4. The access from Harvey Street across other lands owned by W.R. Grace should not be used. W.R. Grace must make this commitment.

5. The existing right of way from the site to Rindge Avenue must be extinguished.

Design

There are two statements in the DEIR which in our view deserve correction:

1. The report implies that the developer is entitled to an FAR of 2.0 as a matter of right when in fact he is only entitled to it as a privilege under the special permit process at the discretion of the Planning Board. The FAR is therefore in excess of that allowed by right, which is 1.0.

2. The report argues that the area lacks "a strong homogeneous context," which is then used to justify the introverted orientation of the design solution. We see the commercial area to the west and the residential area to the east as being highly homogeneous in themselves with the Alewife Center site being the key transition between them.

This means that rather than turning away from both of these areas, the site should relate to both of them equally well. We fail to see the design appreciably "varying at its four edges" to do this; instead, it seems too monolithic and out of scale with the residential neighbors on its eastern side. It should scale down towards Russell Field and not impinge on it. Furthermore, we share concerns voiced by the City Community Development Department that the design is too cold and inhuman and would look for some way of relieving that. This might mean a reduction in the size of the project.

Other comments made during community meetings about

enhancing public safety in these open spaces relate to this comment as well, since more street-level activity at a human scale will contribute to public safety.

We suggest the following additional mitigation measures:

1. Pedestrian access to the T station should be as direct as possible, preferably walking in a straight line from the neighborhood rather than having to walk around buildings.
2. Pedestrian access during construction must be strictly maintained.
3. A community design review process should be established to review each building as it is designed during the ten year build out. The building forms now are far too vague not to have such a process, which must be able to produce significant design modifications.

Wetlands

The principal concern of the community is that these areas be properly maintained. This particularly includes those areas to be owned by the MDC, whose record in the area for maintenance is poor: for example, the MDC pool nearby is rarely operational while the need for such recreational facilities is tremendous.

Utilities and Other City Services

We want to know that no additional services are required for this development, or if any are required, that they will be paid for by the developer. This includes any police (including MDC) or fire details which become necessary not only at the site but in the area due to the development.

Housing

Given the extremely tight housing market in Cambridge and specifically North Cambridge, we find the Draft EIR section on housing to be inadequate. In particular:

1. The draft EIR fails to address the development's impact on housing. The proposed figure of 20 units appears to be determined by convenience, not by any estimate of development impact. The final EIR should include an estimate of the effect of the development on housing demand and a specific plan to provide the number of units required to meet that increased demand.
2. The housing plan should specify the method of providing the units (direct construction by the developer, funding to enable the City of Cambridge to construct units, etc.), the timetable for the units to be available, and income levels (low, moderate, market rate). Because of the extreme need for affordable housing in North Cambridge and because additional

housing demand risks bidding up prices even further, we would expect to see low and moderate income units included in the developer's plan.

Conclusion

We wish to see the site cleaned up, and we appreciate the efforts of the developer to design a plan that will respond to the needs of the city and the neighborhood. However, we believe that considerable additional work is required to reach a final design that meets our concerns. In particular, we do question the size of the development given the concerns about traffic impact, design sensitivity, and housing demand; we believe it is up to the developer either to find and demonstrate effective mitigating measures or to scale down the plans. These questions, as well as the environmental concerns listed in detail above, require careful scrutiny, and we greatly appreciate the efforts of your office.

Respectfully,



Peter C. Kasch, Chairman
North Cambridge Stabilization Committee
48A Rice Street


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Peter Cignetti III

cc: David Vickery
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Cambridge Community Development Department
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Cambridge, MA 02139

Cambridge City Council

Cambridge Planning Board

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Comm. from Peter C. Kasch, Chairman, North
Cambridge Stabilization Committee, transmit-
ting a copy of the Committee's letter to the
Mass. Exec. Office of Environmental Affairs
in response to EOEA #5689, the Alfewife
Center Draft Environmental Impact Report.

In City Council,

March 9, 1987

Placed in file