



The Commonwealth of Massachusetts

Executive Office of Environmental Affairs

100 Cambridge Street

Boston, Massachusetts 02202

MICHAEL S. DUKAKIS
GOVERNOR

September 25, 1987

JAMES S. HOYTE
SECRETARY

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS
ON THE
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME : Brattle Square Development
PROJECT LOCATION : Cambridge
EOEA NUMBER : 6666
PROJECT PROPONENT : CWT/Brattle Square Associates
DATE NOTICED IN MONITOR : July 27, 1987

Pursuant to the Massachusetts Environmental Policy Act (G.L., c.30, s.61-62H) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that the above project requires the preparation of an Environmental Impact Report.

In order to give consideration to an alternate access from Mifflin Place, the ENF review was extended. The intent of that longer review was to provide an opportunity to analyze the combined effects of this project and the Poorvu project on Mifflin Place, with respect to traffic and parking operation and design changes, noise impacts on abutters, and shadow effects from the Brattle Square project. While this environmental review has answered a number of outstanding questions, it also has raised others, which should be addressed prior to the MBTA's release of the air rights over the MBTA tunnel.

The EIR must include at least the materials submitted during the extended ENF review. Additionally, it should provide response to my comments, below, and to those in the attached correspondence. Given the extent of the materials reviewed to date, it is my hope that the EIR will be sufficiently responsive that I may invoke 301 CMR 11.09(1) and treat the Draft EIR as a Final.

Mifflin Place Access

An access to the subterranean parking garage via Mifflin Place shifts the associated impacts away from Brattle Square,

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particularly the two buildings listed on the National Register--the Brattle Theater and the Brattle House.

According to the comment from the Cambridge Historical Commission (August 7, 1987), the elimination of the loading dock from Brattle Street would provide space for pedestrian access with shops. In turn, "by enabling the developer to eliminate an internal atrium in the Brattle Square project it would allow the developer to reduce the bulk of that project by one full floor."

The supplemental information, specifically the shadow study, did not show a project scale reduction for the Mifflin Place alternative. Since the height and bulk of the project have been a key issue with respect to this project, a clarification with respect to the potential for reducing the building height by one floor must be provided.

The Waverly Trust comment (August 14, 1987) questioned the legality of the access for the Brattle Square project from Mifflin Place. This question was not addressed, and in the event that an access from Mifflin Place is not possible, the MEPA Unit should be notified of this project change according to 301 CMR 11.17.

Noise Impacts

The noise study does not explain why different assumptions were used to estimate daytime and nighttime construction noise. The maximum daytime noise levels have been pooled, and an 84 dBA value was selected to represent noisiest levels expected during excavation. The nighttime noise estimates consider demolition, excavation, and augering noise levels separately. No explanation of the nighttime noise levels derivation has been given.

At very least, the differing approaches are confusing. For example, Section 5.0, Construction Activities notes that "(t)he noisiest phase of construction is likely to be during excavation." However, upon examination of Table 3, it would appear that augering is at least as noisy.

The mitigation measures proposed in Section 9.0 of the Noise Analysis may not be sufficient to mitigate for the proposed construction activities, especially during nighttime hours. The noise analysis has made an assumption that with windows closed there will be a 27 dBA sound reduction. Ordinary 3/16 inch glass has a sound transmission class (STC) rating of 25 dBA, which suggests that the analysis was not as conservative as it should have been. Using the lower STC glass rating suggests that interior noise levels at Waverly Hall would exceed 45 dBA during the proposed nighttime construction activities.

It is possible that the windows in Waverly Hall, for those units impacted, should be replaced with double glazed windows, at a higher STC rating, to achieve a quieter interior environment, not only during construction but when the Brattle Square loading dock area is in use.

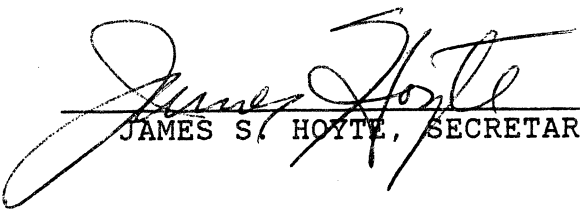
Traffic Operations/Parking

Tenant subsidies to employees for mass transit use should increase ridership and decrease automobile use. Nonetheless, the traffic study should have discussed the level of public transit use achievable and compared it with other mixed use developments in the Harvard Square area. Absent those data, it is very difficult to evaluate the adequacy of the traffic study and the parking demand generated by the project.

The potential for conflicts between trucks at the loading docks and MBTA busses has not been completely addressed. The traffic study did not estimate the number of busses utilizing the tunnel during hours when the loading dock would be in use. Further, the study should have explained the loading dock use split between the two docks proposed. This information should have been taken into consideration, prior to a determination that the conflicting vehicle movements are minimal. Since this issue, above all others, could effect the MBTA bus operations, it is in that agency's interest to ensure that impacts are minimal before the air rights are relinquished.

The EIR, when complete, should be circulated as required in 301 CMR 11.24 and copies should be provided to the authors of the attached comments. I also strongly recommend that the proponent continue to actively participate in and contribute to the local public process, especially in light of the Community Development Office and the Harvard Advisory Committee plans to coordinate all currently proposed projects.

September 25, 1987
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JAMES S. HOYTE, SECRETARY

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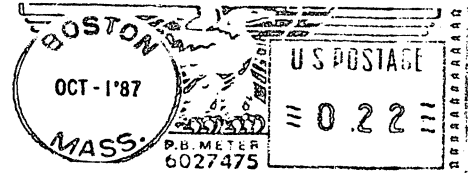
9/4/87	DEQE, Vic Karian
9/17/87	MAPC
9/17/87	Bracken and Baram
9/11/87	Cambridge City Council

9/14/87	Cambridge Community Development
8/14/87	Waverly Trust
7/28/87	Harvard Square Business Assoc.
9/2/87	MWRA
8/17/87	MAPC
8/6/87	Burns & Levinson
8/11/87	Cambridge Historical Commission

JSH/NB/nb

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Office of the Secretary
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100 CAMBRIDGE STREET
BOSTON, MASS. 02202

Selectman's Office
City of Cambridge
795 Massachusetts Ave.
Cambridge, Mass. 02139





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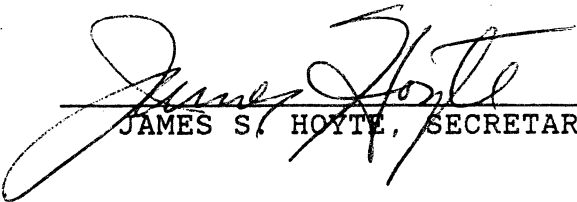
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JSH/NB/nb

S-599

Comm. from James S. Hoyte, Sec., Mass. Exec. Office of Environmental Affairs, transmitting a copy of the "Certificate of the Secretary of Environmental Affairs on the Environmental Notification Form" stating that the Brattle Sq. development by CWT/Brattle Sq. Associates requires preparation of an EIR.

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In City Council,

October 19, 1987

Placed on file