



Charles River Watershed Association

Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201

Attn: Gerald Autler

June 1, 2006

Re: Harvard University Allston Campus IMPNF

Dear Mr. Autler:

Charles River Watershed Association (CRWA) has reviewed the Institutional Master Plan Notification Form (IMPNF) submitted by Harvard University (Harvard) and offers the following comments to assist the Boston Redevelopment Authority (BRA) and Harvard as the planning process evolves.

It is our understanding that Harvard is in the process of preparing a new Institutional Master Plan (IMP) to incorporate plans for its entire new campus in Allston, and that the new IMP will be submitted to the BRA by the end of this year. The proposed Amendment to the existing IMP is intended to be an interim measure, allowing Harvard to move forward expeditiously on the three projects described in the IMPNF, while the larger scale IMP planning process takes place.

Nevertheless, the Amendment to the existing IMP is an important planning tool and a significant element in the BRA's regulatory program: the content of the Amendment will guide planning until a new IMP is approved. We recognize that the BRA's Scoping Determination will set out the requirements of the Amendment. The BRA has made the commitment not to approve the IMP Amendment until the new IMP is filed. However, the Scope for the Amendment has to be detailed and thorough to truly "provide a basis for evaluating...the impact on the surrounding neighborhoods of the Institution's current and future projects" (Section 80D-3). Also since the Adequacy Determination will be issued based on the Scoping Determination, the Scope for the IMP Amendment must ensure that "nothing in the Institutional Master Plan will be injurious to the neighborhood or otherwise detrimental to the public welfare, weighing all the benefits and burdens" (Section 80D-4).

While CRWA appreciates Harvard's need to move forward in the near term with design of these specific projects, and recognizes that the IMP Amendment will include far more detail, only limited information is provided in the IMPNF, and CRWA is concerned about the lack of commitment expressed in it to the larger planning concepts that have been agreed to in principle by so many stakeholders during the past several years. This lack of information makes it very difficult to comment on the submitted IMPNF in a meaningful way.

We urge Harvard and the BRA to ensure that the Amendment includes an assessment of how these projects will fit into the larger campus plan, and indeed, into the restoration efforts for the entire neighborhood. It is particularly important that the science building, major new construction, will not be simply incorporated into the existing IMP as a stand-alone project. This would contradict the scope, purpose and function of the BRA's IMP process.

CRWA believes the Amendment should contain sufficient detail about Harvard's campus plan, including approaches to open space, stormwater management, transportation, energy, and utility infrastructure so that the design of the sites fits within a campus plan context. Design of the building sites should include consideration of stormwater management at a sub-watershed scale; open space corridor plans; transportation networks; utility plans; and energy planning.

Infrastructure planning for the new campus - water supply and wastewater generation, stormwater management, energy systems and other aspects related to infrastructure – is particularly important and should not be considered at the site-specific scale. The first three projects, to be covered under the Amendment, must be evaluated within the larger context of the coming development, and the infrastructure planning, design and development should match the long-term needs of the campus and the neighborhood. Economies of scale are especially relevant, and opportunities should be sought through the planning process to design infrastructure improvements at a long time scale and a large spatial scale.

The Scope should require Harvard to address how the projects are promoting environmental restoration at a neighborhood scale rather than simply mitigating the impacts at a project scale. Instead of addressing sustainability as a stand alone section, the Scope should require Harvard to spell out how the approaches and indicators of sustainability will be incorporated in each of the areas that the project will impact: transportation, environmental protection, urban design, historic resources and infrastructure. Specific standards need to be adopted at a campus-wide level for a variety of environmental quality aspects, and metrics must be developed to reflect how impacts are being measured and the approaches being adopted to achieve these standards cumulatively. CRWA's specific recommendations are as follows.

Project Area

The Scope should require more specific detail about the aerial extent of land that the Amendment is to cover. While the three buildings described in the text of the IMPNF are at specific locations, the graphic in the IMPNF depicting the area to be covered in the Amendment includes substantially more land than those buildings appear to require. In particular, there is one parcel that has no apparent designated use (the parcel behind the Genzyme building). The Scope should require a clear description of all land parcels to be included in the Amendment, and a plan for their use. If no use is yet planned for a parcel, or a portion of a parcel, it should not be included in this Amendment, but should rather be included in the new IMP to be filed later this year.

Transportation

The detailed transportation analysis that will be submitted as a part of the IMP Amendment should go well beyond documenting how “the proposed projects will not result in significant changes in traffic generation and parking as compared to the existing

conditions,” and instead include recommendations to “significantly improve” the existing conditions. The preliminary analysis that Harvard has carried out based on which it is claiming the above should be substantiated with detailed studies and data collection. Since transportation infrastructure and parking (especially given the extent of underground parking being considered) have huge impacts on stormwater management, these two aspects of the master plan should be designed in tandem to ensure that the opportunities for integrative planning are maximized to the extent possible, and that there are no unforeseen long term impacts.

Environmental Protection

In addition to detailed impact analysis on various elements such as wind, shadow, daylight, solar glare, air quality, water quality, wetland, flooding, geotechnical and groundwater, solid and hazardous waste, noise, construction impacts, and wildlife habitat, the IMP should focus on how each of the elements is being improved or restored (approximating pre-development conditions). Given that a major part of the land under Harvard’s ownership was marshland and there are now major drainage issues stemming from the way the area was developed, a restorative approach is critical to ensure that the drainage problems are not further exacerbated and that past mistakes are remedied to the extent possible.

Urban Design

Each and every aspect of the design and planning for the campus, whether it relates to public realm improvements, density or massing considerations, or even the open space framework, should take into account the functioning of the natural landscape and systems that govern it. Accordingly, the interface of land and water, both on the surface and underground, should guide development from improvement of existing conditions to creation of new buildings, streets or open spaces. Wherever possible, re-development should seek to restore the natural hydrology and landscape processes at the sub-watershed level, which will ensure that long-term sustainability can be achieved. CRWA strongly believes that environmental restoration should be at the heart of the design approach here and detailed analysis and recommendations should be included as a part of the IMP Amendment.

Historic Resources

The Scope should include an assessment of the impacts that the proposed projects will have on Charles River parklands. These impacts will include transportation impacts on Soldiers Field Road; on the Harvard Bridge and the Western Avenue Bridge; pedestrian impacts on the pathways, walkways and bikeways; pedestrian and vehicular impacts on intersections; and active and passive recreational uses in the parks. The Scope should also require a plan to mitigate impacts that are identified and a long-term plan to improve and restore the parklands to the extent possible. The numerous planning documents that have been prepared to date can provide excellent guidance on options to mitigate the impacts of increased use.

Infrastructure

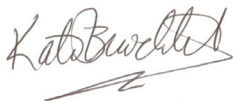
The information in the IMPNF does not reflect system-wide planning for infrastructure. The Scope should require an analysis of neighborhood-scale infrastructure, and detail what upgrades, improvements or redesign may be needed to accommodate not only the three buildings in the Amendment but the total anticipated campus needs over the coming decade. The infrastructure assessment should include an analysis of what opportunities there may be to reduce impacts on infrastructure, either through conservation measures,

alternative infrastructure elements, or innovative technologies. We suggest the following be required in the Amendment:

- 1 Water Supply: an institutional water audit; an assessment of options for reducing demand; managing peak demands; finding alternative water supply sources for irrigation and other non-potable water uses; assess the potential for reuse.
- 2 Stormwater Management: assessment of existing stormwater runoff conditions (quality and quantity, for the 2-, 10-, 20- and 100-year storms) from the areas in the current IMP and those to be included in the Amendment; potential stormwater management designs at the three new building sites to minimize pollutant loads and runoff volumes from the same areas; potential retrofits or larger scale stormwater management approaches to managed stormwater runoff from all of the area covered under the existing IMP as well as the areas to be included in the Amendment; and identification of opportunities for shared stormwater management projects with potential partners including Boston Water and Sewer Commission, Boston Department of Public Works and the Department of Conservation and Recreation.
- 3 Wastewater: assessment of wastewater generation; assessment of existing wastewater infrastructure and opportunities to improve carrying capacity, reduce Inflow and Infiltration (I/I) and reduce loading during potential CSO events; an assessment of the alternatives for wastewater management, including potential construction of small-scale package treatment plants, wastewater greenhouses, and other innovative wastewater management technologies.
- 4 Other infrastructure: energy and transportation infrastructure should be evaluated in the context of the numerous alternative design approaches that may be taken. Low Impact Development (LID), Leadership in Energy and Environmental Design (LEED) and other 'green' approaches may significantly reduce the demands on the energy, water and transportation infrastructure as the new campus develops.

In sum, the scoping determination should address these areas in a comprehensive manner. CRWA appreciates the opportunity to comment on this project through the Article 80 review process and we look forward to working with the BRA and Harvard as the planning moves forward. Please feel free to contact either of us if you have any questions.

Sincerely,



Kate Bowditch
Director of Projects



Pallavi Kalia Mande
Urban Restoration Specialist

cc: Allston Development Group
Harvard Green Campus Initiative
Allston Brighton CDC
Allston Civic Association
City of Boston Environment Dept.
Boston Water and Sewer Commission