

6 September 2007

Secretary Ian A. Bowles  
MEPA, Attn. Briony Angus EEA #14069  
100 Cambridge Street, Suite 900  
Boston MA 02114

Dear Secretary Bowles:

LivableStreets Alliance appreciates the opportunity to comment on **Harvard's Expanded Environmental Notification Form for the proposed long-term development of the North Allston Campus as well as Harvard's application for a Phase One waiver for the Science Complex**. Though preliminary information regarding transportation and the public realm has been provided to the public by Harvard University, details are lacking and are too vague to make a reasonable determination at this stage. This project, involving about 200 acres, is too important to allow important details to go un-reviewed prior to approval. **We therefore urge you not to grant final approval to either of these requests until additional details are provided to MEPA and the public.**

Changes to the streetscape and public realm as a result of Phase One will be permanent. Therefore, without additional detail, it is not possible to make the determination that "the potential environmental impacts of phase one, taken alone, are insignificant," according to 301CMR11 § 11(4)(a). According to the ENF submitted by Harvard, vehicle trips per day will rise from about 1,000 to over 4,000— a significant increase that warrants detailed environmental analysis and adequate mitigation. In addition, it is clear that the roadway infrastructure is severely constrained, and none of the transportation infrastructure is ample to meet any of the transportation needs, as required by 301CMR11 § 11(4)(b) "...ample and unconstrained infrastructure facilities and services exist to support phase one."

Various documents submitted to the Boston Redevelopment Authority (BRA) regarding transportation and public spaces have supported improved access to the Harvard Allston campus by various modes and to mitigate the impacts of the project by improving the

public realm. LivableStreets Alliance agrees with the overall goals stated in the 2007 Executive Summary of the Plan for Harvard in Allston. Harvard is touting this as a premier sustainable project— while there is enormous depth to the details of building design, the transportation planning is conventional at best. A comprehensive sustainable transportation plan is needed to mitigate the negative environmental impacts of this development.

To evaluate Phase One of this project from a transportation perspective, a detailed understanding of how this phase will fit into the Master Plan is need, but is lacking. The Master Plan does not provide adequate details, in the following categories: (1) A transportation plan for the future of transit in the area (including bus, rapid transit, commuter rail) with clear strategy for connecting to regional transit initiatives; (2) a detailed bicycling master plan, pedestrian master plan, and discussion of the relationship between bicyclists and pedestrians; (3) streetscape design standards (including bicycle and pedestrian accommodation, paving materials, improved accessibility through Universal Design concepts, intersection design, signal timing, landscaping, vehicle design speed, traffic calming measures); connectivity to greenspace and openspace (e.g., Charles River paths). Phase One will significantly impact the remaining development. Designs for the much of the above for Phase One will set the tone and direction of future development. Academic Way is a critical piece of an off-road network, yet connectivity details are yet to be developed.

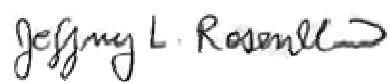
It would be shortsighted to move forward with such a large development without having a broader transportation and public space plan; otherwise the development will preclude options and better decisions in the future. The future of environmental protection includes the reduction of single-occupancy vehicle trips. This can only be accomplished by developing a comprehensive transportation plan and attending diligently to the public realm, including the development of quality public spaces as it pertains to creating a dynamic urban environment, to maximize its use by pedestrians, bicyclists, and transit users and minimize dependency on the motor vehicle.

Please feel free to contact us to discuss any of our comments in greater detail.

Sincerely,



Charles Denison  
Board of Directors  
LivableStreets Alliance



Jeffrey L. Rosenblum, PE  
Executive Director  
LivableStreets Alliance