



SMART GROWTH AND REGIONAL COLLABORATION

December 26, 2018

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Alex Strycky, MEPA #15946
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: NEXUS at The Allston Innovation Corridor, MEPA #15946, Environmental Notification Form

Dear Secretary Beaton:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews proposed Projects for consistency with *MetroFuture*, the regional policy plan for the Boston metropolitan area, the Commonwealth's Sustainable Development Principles, consistency with Complete Streets policies and design approaches, consistency with the requirements of the Global Warming Solutions Act (GWSA), as well as impacts on the environment.

NEXUS at The Allston Innovation Corridor (the Project) comprises three buildings containing approximately 539,400 square feet (sf) of research and development/office space, 21,100 sf of ground floor retail space, 40 residential units, and 1,900 sf of civic space. The Project site includes two parcels with a combined site area of approximately 4.29 acres. One parcel, 305 Western Avenue, is located at the northeasterly corner of the intersection of Western Avenue and Everett Street. The second parcel, 250-280 Western Avenue, extends along Western Avenue from Riverdale Street west to the Century Bank building at 300 Western Avenue and south to Westford Street.

The Project is expected to generate approximately 3,194 net new adjusted trips per day¹. During a typical weekday, the Project is expected to generate an estimated total of 121 and 127 new a.m. and p.m. peak hour trips, respectively. The Project will also include 884 parking spaces.

The MBTA operates six bus routes – 57, 64, 66, 70, 70A, and 86 - in close proximity to the Project site, including 3 that run along Western Avenue adjacent to the Project site. The Project is about 0.5 miles from the MBTA's Framingham/Worcester Commuter Line at Boston Landing Station. The Project is also about one mile from the MBTA's Harvard Square Station and 1.5 miles from the Central Square Station, both on the Red Line.

¹ Unadjusted daily trips are 7,088.

**Metropolitan Area Planning Council (MAPC) comments on
NEXUS at The Allston Innovation Corridor, Environmental Notification Form, MEPA #15946**

MBTA Bus Capacity Analysis

MAPC respectfully requests that the EIR (Environmental Impact Report) include a line haul analysis for MBTA bus routes 64, 66, 70, 70A, and 86 to determine whether the addition of future No-Build and Build trips will exceed policy capacity as defined by the MBTA's Service Delivery Policy, which measures acceptable levels of crowding on transit vehicles by mode and for each 30-minute time period of the day.

Water Quality Impacts

With respect to water quality impacts, the ENF states that:

Causes of impairment include: metals (other than mercury), noxious aquatic plants, nutrients, oil and grease, organic enrichment/low dissolved oxygen, pathogens, priority organics compounds, taste, color and odor, and turbidity. The Project is not anticipated to have negative impacts on the water quality of the Charles River and through the introduction of stormwater controls and infiltration will improve the quality of stormwater flowing into the Charles River.

MAPC notes that, although "nutrients" are included on this list, the ENF does not specifically call out phosphorus, which is a pollutant that must be strictly controlled under the DEP's Lower Charles River Total Minimum Daily Load (TMDL). Existing phosphorus levels in the Charles River currently exceed the TMDL limit, and must be reduced by over 50 percent. The Draft EIR should clearly spell out the phosphorus control measures to be included in the stormwater management plan for the Project, and demonstrate the degree of phosphorus control to be achieved in order to comply with the TMDL target for phosphorus reduction in the Lower Charles River watershed.

The ENF provides a general description of stormwater management measures to be included in the Project, including deep sump catch basins, water quality units, and subsurface infiltration systems. The Draft EIR should provide a description and location of the site-specific Best Management Practices (BMP's) to be installed, and their estimated pollution-removal performance, as well as a long-term maintenance plan.

We thank you for the opportunity to comment on this Project, and hope that you will include the items we have recommended in the scope of the DEIR.

Sincerely,



Marc D. Draisen
Executive Director

cc: Tad Read, BPDA
Gerald Autler, BPDA
Commissioner Gina Fiandaca, BTM
David Mohler, MassDOT