

November 10, 2015

FOR DELIVERY BY HAND

Dear Members of the Planning Board:

When considering the CRA's Zoning Petition to amend the Kendall Square Urban Renewal Plan, please consider the following problems of noise and light pollution and open space. While the promise of the amended plan is great, these elements need further work, both by the CRA and the City of Cambridge.

Noise. Noise is a known public health hazard. Noise from the types and intensity of development proposed here, including labs and bio-tech manufacturing, presents challenges Cambridge has yet to acknowledge and cannot now deal with. This petition responds to demands for more housing, especially for low- and moderate-income families. If approved as presented, it will cause residents, including children, to live with noise that impedes learning, disturbs sleep, and increases the risk of heart disease. Both Cambridge and the CRA need to focus on the proper regulation of noise.

Specifically, at 14.74 (e), the standard for minimizing noise from rooftop mechanicals is so vague as to be useless. There is no reference to an enforcing authority or enforceable standard. In Cambridge both are inadequate in any case.

- Noise from lab rooftop HVAC systems is necessarily tonal; Cambridge regulates dB(A), the spectrum average.
- No inspector at ISD is charged with vetting plans for noise mitigation. Instead, the city relies on the developer's Affidavit, subject to incompetence or lying.
- Enforcement is complaint-driven; the city lacks equipment to conduct tests for enforcing even dB(A) and relies on the developer's test after a complaint is lodged.
- If a violation is found, enforcement is not through the ISD's powers but through the courts—lengthy and expensive.

Not all systems vent at the roof, e.g., restaurant PCUs, refrigeration units, garages. 40 Ames Street has had a vent at street level.

At 14.23.2, Environmental Protection Standards, the petition says noise and vibration “shall not normally be perceptible without instruments at 100 feet from the premises.” In Kendall Square, where ambient noise from the existing uses is noxious, identifying a point source without an acoustical map is impossible even with attempted enforcement. The city has no such map. As it is, with each new building, the ambient level rises and dB(A) increases are muffled.

Light. Like noise, light is a form of air pollution with public health costs like those for noise. In Cambridge now, light from interior sources of any structure is unregulated. The city's Outdoor Lighting Ordinance Task Force's DRAFT omits it entirely for future construction. Quite apart from any exterior lighting, the proposed towers for labs and manufacturing 24/7 will be lanterns that pollute far beyond the city limits.

The public health costs of noise and light pollution are externalities the petition does not address.

Open Space. The definition at 14.41, of features "providing . . . a general appearance of openness." It includes, at 14.45.2, sidewalks, roof decks, elevated and enclosed shopping and pedestrian bridges and arcades. These count toward the 2.29 acres of open space required in the 43-acre district, slightly over 5 per cent among the towers, and a different vision of open space than is usually understood by the term. If problems of noise and light pollution remain unaddressed, it may be a blessing to have so much enclosed open space.

Yours sincerely,

Marilyn Wellons
651 Green Street
Cambridge, MA 02139