



May 25, 2010

Secretary Ian Bowles
Executive Office of Energy and Environmental Affairs
MEPA Office

Attn: Holly Johnson, MEPA Analyst
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: EEOA #14590

Dear Secretary Bowles:

WalkBoston welcomes the opportunity to comment on the Environmental Notification Form for the Station at Riverside Project in Newton, a very interesting project, designed expressly around a transit station with stated goals of adopting the concepts associated with transit-oriented development.

Our comments are as follows:

1. Density. Transit-oriented design allows opportunities for increased density in locations that are well served by public transportation. This site's characteristics make it well-suited for higher density uses: a large MBTA transit, bus and regional bus stop, a site that stands well away from adjacent neighborhoods, and adjacency to Route 128/95. The highest density of office and residential uses should be located adjacent to the MBTA station in order to maximize the convenience for transit users and create a site plan that is attractive for pedestrians. More intensive uses should also line the street connections to the adjacent community to create comfortable and interesting walking connections. Parking should not occupy the most prominent and accessible portions of the site, and should be placed away from existing residential or commercial uses. Parking that is to provide access for MBTA users should have carefully sited walkways to ensure safe walking connections.
2. Mixed uses. Site development should not be so compartmentalized that it results in sharp separation of land uses. Of particular note is the proposed large parking garage directly adjacent to the MBTA station entrance. Parking at the MBTA station is of course a great service to a segment of patrons using the Green Line, but we would suggest an alternative that the site also house other uses, which in turn might generate MBTA riders that do not access the site by car. For example, offices or residential units could be planned for air rights above the garage, and can be constructed as demand develops. Depending on density, these air rights uses might over time become more important as generators of patrons for the MBTA than the parking spaces standing alone.

3. Greening the project. The project is very close to wetlands and the Charles River. It should make use of environmentally-friendly installations such as green roofs on parking garages or other structures. Permeable paving might also be considered to allow rainwater to go directly into the soil and avoid overtaxing drainage facilities leading to the river and its surrounding wetlands.
4. Local and regional bus services. Existing bus services connect directly to this site, including MBTA bus routes and Peter Pan regional services. These services have already-established relationships to the MBTA station and the available parking. It is unclear if they are to remain and where their passenger stops will be located. If such services are related to the MBTA Green Line stop, the connections should be as convenient as possible. Perhaps this means providing a multi-modal bus-rail facility on the ground floor of the proposed parking garage.
5. Convenient retail facilities. The site may not be large enough to support a great deal of retail activity, but the throughput of passengers on the Green Line and users of the regional buses suggest the possibility of retail services that would also benefit the transit patrons and residential and office occupants. Such uses should be located close to the MBTA station, and help to create a walkable core for the greatest density of site users.
6. Street frontage. Site development plans do not tell the full story of what will be located on the Grove Street frontage. For example, two unidentified buildings stand between the Grove Street frontage of the site and the parking garage. It is unclear what functions the buildings are intended to perform, but they are located well to provide retail sites, to enliven the street frontage and to help form a positive image of the site. Without these buildings, the parking garage would be the only structure visible from Grove Street, but these more visible buildings may in effect become the signature structures of the site. The project also calls for extensive pedestrian activity on a landscaped portion of the Grove Street frontage, connecting these two buildings and the proposed residential structure with the MBTA station.
7. Regional trails. The existing railroad rights-of-way on two sides of the site should be explored as potential locations for regional walking and biking trails.

Thank you for the opportunity to comment on this important project. Please feel free to direct questions to me at 617-367-9255 or bsloane@walkboston.org.

Sincerely,



Robert Sloane
Senior Planner