



May 25, 2010

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Via Fax 617-626-1181

Secretary Ian A. Bowles
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Deirdre Buckley, EEA No. 14590
100 Cambridge Street, Suite 900
Boston MA 02114

Re: The Station at Riverside – Scoping Comments

Dear Secretary Bowles and Ms. Buckley:

The Riverside Station Neighborhood Coalition (RSNC) is an organization that advocates for the residents of the areas most affected by the proposed 25-acre development of the Riverside Station on Grove Street in Auburndale. The RSNC urges you to issue a full scope for a Draft Environmental Impact Report (EIR) and a Final EIR on The Station at Riverside. Its effects on the surrounding neighborhoods are many, as discussed below, and deserve the most careful of review and the best of mitigation.

The RSNC was created by the three neighborhood associations that surround the project site-- the Auburndale Community Association (ACA), the Lasell Neighborhood Association (LNA), and the Lower Falls Improvement Association (LFIA). The RSNC is led by a nine-member Steering Committee. Each of the neighborhood organizations provides three members to the Steering Committee. Additional volunteers participate in working groups, such as Outreach, Traffic, Zoning, and others. The RSNC was created in response to the proposed development at the Riverside MBTA Station. The RSNC advocates for neighborhood residents with the goal of maximizing the positive aspects and minimizing, or eliminating where possible, the negative effects of the development at Riverside Station. Further, the RSNC facilitates communication between the developer and the neighborhoods and between the City of Newton and the neighborhoods.

The cover letter for the Environmental Notification Form (ENF) states that the developer has captured the concerns of the community and the only remaining concern is traffic. We do not agree. In fact the developer recently canceled, on less than 24 hours notice, a critical community meeting just before the filing of the ENF. Therefore, they have not presented their current plans and their traffic study to the community and engaged in a dialogue with the community. The only items addressed in ENF in response to the neighborhoods' position papers

appear to be elimination of big box retail, addition of potential access to the Charles, and attention to pedestrian circulation through the site.

We have provided some history of development in the area and request that the overall impact of all of these developments to the neighborhood be taken into consideration and reviewed.

History

In the past ten years, there have been several major development projects in the Auburndale, Lower Falls and Lasell College Neighborhood sections of Newton that have increased the volume of traffic in the area.

- 275 Grove Street, Riverside Center: 500,000 Square Foot Four Story Class A Office Space – this was the substantial renovation of an existing long vacant Jordan Marsh Warehouse with parking for over 1,000 vehicles. This was the largest commercial project ever approved in Newton back in 2006. On any given day, there are no empty parking spaces and a recent Boston Business Journal Article referencing the project said “although people check the box that they want to be near MBTA, people still drive their cars because of the convenience of the highway access.” Developer: Cabot, Cabot and Forbes, currently owned by Equity Office. Note: This development provided three entrances and exits on Grove Street, road widening with a turning lane, a street light, greening to the roadway and a permanent police presence during rush hour.
- Lasell Village: A retirement community on the Lasell campus including 148 private residence units in interconnected buildings and 44 bed skilled nursing facility built 2000-2006 in several phases.
- Lasell College expansion including several new residence halls, classroom spaces, the Yamaki Center, and new and improved athletic fields. The College is continuing to add buildings and is contemplating a parking garage.
- Redevelopment of Holiday Inn/Days Inn to Hotel Indigo in 2009.
- Cordingly Dam Assisted Living Facility and office buildings on Route 16, Washington Street. Currently owned by Benchmark Senior Living.
- Starbucks – Route 16 Washington Street (formerly a gas station). Developer: National Development of New England.
- Arborpoint at Woodland Station, Route 16 built 2006-2008, 180 mixed income rental units. Developer: National Developer of New England.
- Grossmans Site, Route 16 Washington Street: In final stages of permitting: 33,000-square-foot building for retail and office space and 138 units for seniors – 20 percent of them affordable. Developer: National Development of New England.

Project Design

The developer states that the design is only 15% complete, therefore one cannot reasonably assess all the environmental impacts; a full Draft and Final EIR will be needed. In fact, there is no information on the types of uses in the office buildings such as professional office, doctor's offices, or day care centers, all of which generate different vehicle trips. Other areas such as water usage or wastewater discharge cannot be reliably calculated until the project program is better understood and the design is more advanced.

- The bottom of page 2 of the MEPA ENF lists the gross square footage of the current structure as 222,162. This is at odds with the City of Newton Assessor's Office database (<http://www.newtonma.gov/Assessors2003/search.asp>). The data base lists 399 Grove St (the current structure) as having 85,681 sq ft "gross building area." It also lists 191 apartments (must be hotel rooms). This works out to 430 sq ft per hotel room which looks reasonable. Where are the other 130,000 square feet in the MEPA ENF? Restaurant, swimming pool, garage? At a minimum, the math needs to be explained. The "change" is listed in the MEPA ENF as 869,000, which is just interior finished space and doesn't include parking garages.
- The height of the current structure is listed as 120 feet. The building has seven visible stories from the front, which means it's about 70 feet high from its most visible location. There are several basement levels, some visible from the back where the ground level is lower. At a minimum the height should be listed as 70 from the front and 120(?) from the back.

Rare Species

- The scope should include a study of the effects on rare species, since bald eagles have been seen in and around the Charles River in this area. In fact, on 2/7/2010 a sighting was reported at the Route 128 rest stop and on 2/21/2010 at Norumbega Park. Riverside Station lies between these two locations.

Critical Environmental Resources

- The site is adjacent to the Charles River, and the scope should include a full examination of impacts on the Charles River, with particular attention to storm water runoff. In addition, the developer has stated that it will provide access to the bordering wetlands. While such access can be beneficial for recreation, it should be assessed in the EIR to assure that there are no unanticipated adverse effects.

Infrastructure and Wastewater

- The ENF assumes that there is adequate City infrastructure and utility capacity. The EIR should document this assumption and provide assurance that the need for any additional infrastructure or utility capacity will not result in disruption of services to neighborhood residences and businesses or unusual public costs to upgrade utilities.
- Of particular concern is wastewater, since the hotel and proposed Station at Riverside Development share a wastewater line that has consistently discharged untreated wastewater to Lyons Field during significant rain storms. Lyons field is adjacent to Commonwealth Avenue in Auburndale and is a baseball field heavily utilized by children. In addition, this same pipe has backed up and released raw sewage in Waban on Quinobequin Road. This issue of wastewater discharge should be studied in detail in the EIR.

Zoning and Permitting

- The developer states that it is going to transform that site to housing, office, and retail. Under current zoning, none of these uses are allowed. In addition, the zoning that is referred to in the ENF mitigation section is incorrect; the property is zoned public use, not residential and manufacturing.

- There are numerous local boards and committees that need to review this permit including but not limited to:
 - Newton Housing Partnership
 - Scenic Roads Committee - The site is located on Grove Street that is designated a scenic road and local approvals will be needed.
 - Urban Tree Commission - The developer is suggesting widening Grove Street and removing mature trees directly across the street from our building. The City of Newton has a tree removal ordinance and permission will need to be obtained for this. There is no provision to replace these mature trees that provide an eco system for humans and animals in the area.
 - Urban Design Commission
 - Economic Development Commission

An EIR will help to inform these boards and committees in their deliberations. Each of their areas of concern should be included in the scope.

LEED

- The project does not state whether the residential buildings and parking garages will be LEED certified. Furthermore, the City of Newton has adopted the STRETCH Energy Code, so the developer will be required to meet this standard. These topics should be included in the scope of the EIR, as well as their effects on greenhouse gas emissions.

Economic and Fiscal Effects

- A no build alternative will result in no negative environmental effects and no negative economic and fiscal impact to the City.
- The community in its position papers has a higher stated goal of maintaining quality of life over anticipated economic impact.
- Furthermore, no economic impact study has been performed to date. Therefore, to suggest that the project will have a positive economic impact is without justification. No claim of positive economic impact can be considered reliable without a comprehensive study in the EIR.

Project Size and Alternatives

- The overall square footage of the development has increased from the December 2009 plan to the plan that was submitted with the traffic study in 2010.
- Community feedback has been consistent to date that the project is much too large for the neighborhoods and must be scaled back drastically. The EIR should consider smaller alternatives with less negative effect on the surrounding neighborhoods.
- The layout of the uses within the site and the associated parking facilities would appear to focus traffic toward the Grove Street entrance. Alternative site designs should be evaluated that focus traffic toward the Frontage Road.

General Traffic and Pedestrian Matters

The cover letter accompanying the ENF states that the submittal includes a complete traffic study taking into consideration the concerns of the community. The community concerns have not been taken into consideration, and we suggest that the traffic study be expanded considerably.

The history of development in the area noted earlier, coupled with changes to commuter patterns, has resulted in a longer rush hour period from 5:30-9:30 in the morning and 3:30-7:30 in the evenings. This has made the use of Grove Street by car and on foot an increasing challenge. This is further compounded by Red Sox traffic during evening rush hours and weekends.

The traffic report states that even more cars will be added to the road. We are skeptical that the ameliorative efforts will actually work as described by the developer.

- The expansion of Grove Street from two lanes to four lanes takes a minor arterial connector residential road and turns it into a major connector road, thus altering the environment of the neighborhood. We ask that the traffic report provide an example of where two roundabouts and two traffic lights are utilized as suggested in their mitigation in a community and on a street similar to Grove Street at such short distances. We also ask that the report speak to the pedestrian safety of roundabouts and specifically to bikers or people with disabilities, such as sight, hearing, and mobility limitations and how this is an improvement over what currently exists.
- We note that the accident counts reported included those on Route 128, not just for Grove Street, and are therefore inflated.
- We ask the traffic report be expanded to demonstrate at what speed cars will be going around the roundabouts during rush hour and during the periods before and after Red Sox games. Please also require the EIR to examine the traffic count when Lasell College is in session and during the middle of Red Sox season when nights are warmer and attendance is at its peak.
- There is no evidence that a study was done to incorporate the impacts on the Williams Elementary School. Please require the EIR to examine the impact of traffic on Grove Street during the drop off and pick up times at Williams Elementary School (8:20-8:35 and 2:55-3:15).
- Given what has been proposed, has the potential for backups on Route 128 been examined? The EIR should examine all movements to and from Route 128 at Grove Street, including merging traffic, diverging traffic, and queues.
- The numbers for MBTA ridership are from 2006. The traffic study states that 10% of workers in the office buildings will be arriving via the MBTA. These assumptions are based on data from MBTA stations in the City, not from Riverside, at the end of the line. Most people taking the MBTA are taking it into Boston, not out of Boston to Newton. The traffic study should include a recent and actual count/percent of people taking the MBTA to Riverside and working at office centers such as Riverside Center or no credit should be taken for this for the office and retail uses.
- The elimination of the sidewalk on the eastbound side of the Grove Street bridge and expansion of the lanes on the bridge from two to four lanes is a bad idea. Emergency vehicles currently utilize the extra space during rush hours with an eye on Route 128. In addition, it leaves no room for snow to be plowed. If there is a large storm, and the road is taken up with snow, what will happen to traffic movement if it narrows again to two lanes? This should be examined in the EIR.
- The number of parking spaces is listed in the ENF as 1,220 existing and 1,500 additional parking spaces. Does the existing figure break down to 960 MBTA customers + 260 MBTA employees? According to Figure 4 of the ENF, the construction includes 725 (P1) + 1,040 (P2) + 715 (P3) + 240 (C) totaling 2,720, but what happened to the MBTA

employee parking? If the 260 MBTA employee spaces remain, then the total change is actually 1,760, not 1,500. This should be resolved in the EIR.

- The ENF question on trips is phrased in a narrow way “serving the site.” According to the table, only 1,100 net new trips will be generated to the site, yet up to 1,760 (1040+725+715+240-960) new parking spaces will be created. The decrease in volume reported west of Riverside entrance is only applicable to the roadway between existing entrance and Indigo roundabout. Please clarify this in the EIR.
- Page 16: Roadways and Other Transportation Facilities Section- I) Thresholds - VHB answered "No" to question I.A., but we believe the developer intends to remove at least seven living public shade trees of 14 or more inches in diameter at breast height on the west side of Grove Street between the Hotel Indigo and Riverside entrance. This appears to meet the review threshold as described in 301 CMR 11.03(6)(b)2.b, and this topic should be included in the EIR.

Traffic Study Area and Alternatives

- The VHB Traffic Study included 18 intersections. The existing traffic problems created by all of the development and the removal of the Route 16 tolls go far beyond just in front of Riverside Station and any amount of new cars will generate volume up and down Grove Street as commuters will exit Route 128 at Commonwealth Avenue or come via Route 16. Therefore, we would like the following Intersections studied:

Commonwealth Ave. & Lexington St.

Auburndale Square is already overburdened and this will be a nexus for cut-through traffic to/from Waltham.

Commonwealth Ave. & Auburn St. (at both intersections)

Intersection near boathouse is a cut-through point to/from Rte 30 and I95. Intersection near Lasell College is a cut-through point to/from West Newton I90 ramps. This traffic avoids the congestion and tolls at I95/I90 intersection.

Lexington St. & Auburn St.

Difficult to make left turns at this location, especially at peak hours.

Washington St. & Auburn St.

This is part of the same cut-through point to/from West Newton I90 ramps. This traffic avoids the congestion and tolls at I95/I90 intersection.

Washington St. & Commonwealth Ave.

This is a high volume intersection that will be impacted in both directions.

Washington St. & Beacon St.

Additional traffic approaching site from the east, especially in the morning. Afternoon traffic is more likely to travel up Grove to Woodland and Commonwealth Ave. to Newton-Wellesley Hospital should be considered.

Frontage Rd. northbound & I90, Route 128, Rte 30 ramps.

Frontage Road already is overburdened during peak afternoon rush hour and MassDOT should be very concerned about added volume.

- We ask that traffic report developed for the EIR examine the use of a direct access ramp from Route 128 so northbound traffic could enter the site directly from ramp and how many cars would be alleviated on Grove Street by such an alternative.
- Another alternative we would like examined is eastbound traffic from Rte 30 and I90 could approach site via Park Rd. to Recreation Rd. The road exists, but is currently one-way for last 200 yards. If Route 128 southbound backs up, drivers can use this way into site and not use the Auburndale (Auburn St/Woodland Rd./Grove St) or Lower Falls (Park Rd./Concord St./Grove St.) cut-throughs in the morning.

Traffic Analysis Details

- Sight distances should be evaluated at the study intersections.
- Vehicle travel speed measurements should be provided for the study area roadways.
- Vehicle queuing along the Grove Street corridor and at the proposed modern roundabouts at the Grove Street/Route 128 ramp intersections should be modeled on a corridor basis given the potential for queues to extend toward the Route 128 mainline.
- The design of the Grove Street improvements and the modern roundabout intersections at the Route 128 ramp intersections combined with the site layout appear to favor the use of Grove Street as the primary access to the project. Alternative roadway and intersection designs should be developed in conjunction with site plan refinements that provide for Grove Street to serve a local access function only.
- Poor operating conditions were reported at the Grove Street/Woodland Road intersection. Recommendations should be provided to improve these conditions.
- A vehicle queuing analysis should be completed for the parking garage that accounts for the planned revenue collection system. Queuing at the garage has the potential to impact the travel route that motorists use to access the garage (i.e., Grove Street vs. Frontage Road).
- Additional details concerning access and circulation for buses and pick-up/drop-off operations within the site for the MBTA station should be provided as these conditions can also affect the distribution of traffic between the two access points.
- Safety of left turns onto four-lane section of Grove Street exiting from Indigo Hotel, Woodland Grove Condo, and Deforest Street should be examined.
- The responsible party and schedule for implementation of the proposed improvements should be clearly defined.

Wind, Climate, Noise, Air Quality, and Soils

- The way the traffic study reads now, traffic will be crawling or at a standstill during morning and evening rush hours and prior to and after Red Sox games, generating noise pollution and air pollution on Grove Street. In addition, the three parking garages will be generating noise from vehicles and exhaust from cars. The EIR should provide a study that shows the impacts to the neighborhood from air pollution and noise pollution and taking into consideration wind. Include the effects of sound bouncing off of the new buildings and reflecting back to Lower Falls and other neighborhoods.
- The overall effect of the carbon footprint of the site today should be compared to the proposed build out scenario. There is reference to mitigation to reduce greenhouse gases but no analysis is provided.

- There is concern over contaminated soils on site in and around railroad beds and repair areas, especially with the new parking garage behind Building C. The EIR should provide a complete Phase 1 and Phase II soil testing report in these areas. How will the developer address the possibility of contaminated soils dust being put into the air?

Shadows and Light

- The placement of a nine story parking garage at the level of the portico of the Hotel Indigo on Grove Street, directly across the street from the existing condominium, and of an office building directly behind the hotel of 12 stories will block light and cause shadows on the condominium building across Grove Street. We are concerned about the blockage of light to the mature trees along Grove Street, as well as the blockage of light to the condominium building which provides heat in the winter. The scope of the EIR should be expanded to include a shadow and light study as it impacts nearby buildings and vegetation.

Construction Effects

- There is no plan provided for construction vehicles entering and exiting the site which will provide noise and air pollution. Direct access to the site should be provided prior to any development of the site to protect impacts to the neighborhood by construction and other vehicles. Other requirements should be imposed to protect the neighborhood from dirt and dust.

The RSNC hopes that you will require a fully-scoped Draft and Final EIR to respond to these concerns and the concerns expressed by other commenters. Please let us know by e-mail at the addresses below if we can provide any additional information as you continue your review of The Station at Riverside.

Sincerely,

Josh Krintzman- President, LFIA
 Bill Renke- Member, LFIA
 Lynne Sweet- Member, LFIA
 Nick Nesgos- President, ACA
 Lynn Slobodin- Member, ACA
 Patrick Costello- Member, ACA
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