



SMART GROWTH AND REGIONAL COLLABORATION

July 24, 2015

Matthew A. Beaton, Secretary  
Executive Office of Energy & Environmental Affairs  
Attention: MEPA Office – Holly Johnson, MEPA #14590  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: The Station at Riverside, MEPA #14590

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, the GreenDOT initiative, consistency with Complete Streets policies and design approaches, as well as impacts on the environment.

BH Normandy Riverside, the Proponent, proposes to redevelop an MBTA property at Riverside Station on Grove Street in Newton, off Exit 22 of Interstate 95 (Route 128). Since the Draft Environmental Impact Report (DEIR) filing in 2011, the proposed project has been downsized, but still is a significant development project in Greater Boston. The current proposal is for a mixed-use redevelopment in and around the current parking lot for the MBTA's Riverside Station, the western terminus of the MBTA Green Line "D" Branch light rail line.

The project site is defined as the 22.35 acres owned by the MBTA, which currently consists of the MBTA rail yard operations, a Green Line maintenance facility, a bus terminal facility, and surface parking. A 9.38-acre parcel will be leased to the Proponent for redevelopment. An Intermodal Commuter Facility (ICF) will be constructed on approximately 2.11 acres and will be operated by the MBTA. The MBTA will continue its operations on the remaining approximately 10.86 acres.

The proposed building program will comprise 963,790 square feet (sf) (580,200 sf of buildings and 383,590 sf of structured parking) and 2,014 parking spaces. Of the 2,014 parking spaces, 1,005 will be for transit commuters (replacing the 960 surface spaces) and 1,009 for office and residential use. The project includes the following key components:

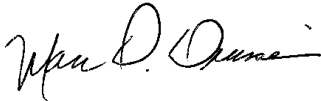
- Office: An approximate 225,000 sf building with 571 structured parking spaces.
- Residential: An approximate 290-unit residential apartment building comprising 329,000 sf with 438 structured parking spaces.
- Retail/Community: An approximate 26,000 sf building with retail, restaurant, and community space.
- ICF: A parking facility with 1,005 parking spaces.

The project is expected to generate approximately 5,052 new vehicle trips during an average weekday, with 501 new vehicle trips during the weekday morning peak hour and 566 new vehicle trips during the weekday evening peak hour. Access will be improved by creating a new ramp off an existing collector-distributor road to serve as the main way in and out of the site, relieving congestion on the Grove Street entrance and exit.

While MAPC commends the Proponent for including 15% affordable housing within the project to help meet local and regional housing needs, MAPC does have recommendations to improve transportation access and reduce single occupant vehicle (SOV) trips. MAPC has reviewed the Final Environmental Impact Report (FEIR) and our comments primarily address strengthening components of the Transportation Demand Management (TDM) program by requiring the provision of a shuttle as well as enhancing pedestrian and bicycle access. The intent of these recommendations is to encourage a greater shift of auto trips to transit, bicycling, or walking. MAPC respectfully requests that the Secretary incorporate these recommendations into the Certificate.

Our more detailed comments and specific recommendations can be found in the attached document. Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc D. Draisen". The signature is fluid and cursive, with a prominent initial "M" and "D".

Marc D. Draisen  
Executive Director

cc: James Freas, City of Newton  
David Mohler, MassDOT

**Metropolitan Area Planning Council (MAPC) comments on  
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Transportation Demand Management Strategies

MAPC is pleased that the Proponent has committed to a strong Transportation Demand Management (TDM) program that includes components such as joining the 128 Business Council, providing preferential carpool and/or vanpool parking, providing charging stations for electric vehicles, supporting car-sharing services, and subsidizing transit passes. MAPC is also pleased that the Proponent agrees with the concept of unbundling parking from residential tenant leases and will provide this option to future tenants. Unbundling parking is an effective strategy that encourages households to own fewer cars and rely more on walking, bicycling, and transit. In addition, unbundling parking allows allocation of space for other components of a building's design which would have otherwise been allocated for parking.

The following are additional TDM measures MAPC recommends be implemented to ensure the success of this site as a transit-oriented development (TOD):

Shuttle to Commuter Rail

As the site is located only three-quarters of a mile from the Auburndale Station (Worcester commuter rail line), MAPC recommended in our DEIR comment letter that a peak-hour shuttle be provided to offer access between the commuter rail and Riverside Station. Given the mixed-use nature of the Riverside Station site, the shuttle would be functional in both directions. During the morning peak hours, residents of the site would be dropped off at Auburndale Station and office employees would be picked up, and vice-versa during the evening peak hours. This shuttle would provide direct transit access between Riverside and destinations to the west (Worcester, Framingham, Natick, Wellesley) and to the east (downtown Boston, including the Longwood Medical Area, the Back Bay, and South Station).

MAPC is discouraged that the Proponent has responded to this comment by simply stating that they will work with the MBTA and that funds from Newton's mitigation fund could be applied, if the City deems necessary. The owners and tenants of the future office and residential buildings as well as Hotel Indigo, an adjacent building owned by the Proponent, should all collaborate and contribute to providing this shuttle service. The importance of providing such a shuttle is paramount and has the potential to significantly reduce SOV trips to and from the site. We encourage the Secretary to require this mitigation step in his Certificate, separate and apart from other uses of the Newton mitigation fund.

Parking Fees

Since the site is located at a transit station, MAPC endorses an aggressive parking fee structure or offering a parking cash-out incentive for office employees. Charging parking fees will encourage transit use and discourage SOV use. MAPC would like to bring to the Secretary's attention that the Proponent did not respond to the agency's recommendations regarding parking fees or a parking cash-out incentive. These recommendations should be required by the Secretary.

Shared Parking

Similarly, MAPC is disappointed that the Proponent has not responded to the question of addressing shared parking in the FEIR. An effective shared parking program has the potential to reduce the overall parking supply and vehicular trips. The Secretary's Certificate and comments from MassDEP, MassDOT, and the City of Newton have also requested that the Proponent address shared parking.

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Bicycle and Pedestrian Uses

While the Proponent does address bicycle and pedestrian access, these components of the building program could be strengthened. To promote these modes of transportation and reduce the number of SOV trips to the site, the Proponent should act to the following:

Bicycle Parking

- MAPC acknowledges that the Proponent proposes to include 138 bicycle parking spaces in the ICF. However, the FEIR does not specify the number of bicycle parking spaces for either the office or residential buildings. This lack of information was previously raised by MAPC, the City of Newton, and MassDOT. The Secretary's Certificate has also previously requested that the Proponent provide this information.

MAPC recommends a minimum of 290 secure bicycle parking spaces within the residential garage (one bicycle space per residential unit) and a minimum of 70 spaces within the office garage (0.30 spaces per 1,000 square feet). The recommended number of spaces is based on the City of Cambridge's zoning ordinance for bicycle parking. In addition, short-term outdoor parking spaces for bicycles should be included.

- As part of the monitoring program, if the demand for bicycle spaces exceeds the supply, then the building owner(s) should be required to provide additional spaces at either the ICF, office, or residential facilities. If a bike-sharing program (e.g., Hubway) extends to Riverside Station, then the building owner(s) should accommodate this request.

Potential Bicycle and Bus Conflicts

The Proponent has not addressed, as requested in the Secretary's Certificate, potential conflicts between buses and bicycles. As also requested in the Certificate, existing bicycle and pedestrian routes along Grove Street from Auburndale to Newton Lower Falls are not identified in a site-circulation plan. We urge the Secretary to encourage the MBTA, the City of Newton, and the Proponent to work closely to ensure that potential conflicts between buses and bicycles are addressed and that bicycle and pedestrian connections around the site integrate with the regional network.

Bicycle Access to Internal Parking

The City of Newton's DEIR comment letter raises the issue of safe bicycle access to the internal parking facilities. Specifically, the letter states, "It appears the only way to access the storage facility in the Intermodal Commuter Facility is via the bus loading and unloading loop driveway. Directing bicyclists through an active bus pickup and drop-off area is not desirable, and may be considered unsafe. The Proponent should make improvements to all of their proposed bicycle storage facilities to encourage safe bicycling to and from the site, including a safe cyclist connection through the site connecting the bicycle storage facilities inside the Intermodal Commuter Facility." While the Proponent did respond stating that "access to the ICF bicycle storage area from Grove Street does not require the cyclist to travel through the ICF or cross paths with vehicles within the ICF (p 8-32)," this is not shown in the site plan of Proposed Pedestrian and Bicycle Facilities (Figure 3.25, Proposed Pedestrian & Bicycle Facilities, in Chapter 3 of the FEIR). Access to secure bicycle facilities in the ICF, residential, and office buildings should be detailed and designed to involve minimal conflicts with vehicles at the site.

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### Access to Site

- In order to encourage fewer roadway crossings between Riverside Station and the office building, MAPC recommended that an analysis be performed to assess the feasibility of adding a sidewalk on the northern side of the interior road (on the same side of the road as the MBTA storage yard). The Proponent responded that this was seriously considered but determined to not be feasible due to insufficient space. Although the Proponent believes that the potential for vehicular/pedestrian and bicycle conflicts to be low due to slow travel speeds (posted at 15 MPH) it is critical that all walkways be clearly signed and striped, include in-pavement actuated delineators, and speed bumps.
  
- An exclusive pedestrian phase should be added at the site driveway on Grove Street to ensure safe and protected crossings. The City of Newton has also raised the same concern.

### Design Recommendations

To ensure safe access, MAPC recommends the implementation of the following design features for pedestrians and bicyclists:

- In addition to crosswalks, safety features and state-of-the-art devices (e.g., signs, reflectors, lights) for protecting pedestrians and bicyclists at the roundabouts must be installed. There should be particular focus in the areas where bicycle lanes transition at the roundabouts as well as at the trestles near Riverside Station on Grove Street.
  
- Wherever possible, separate five-foot bicycle lanes should be installed at the project site and surrounding roadways.

### Construction

Along with the construction of the ICF and roadway improvements in Phase 1, it is critical to also incorporate bicycle and pedestrian accommodations during this phase of the project. The construction of the buildings will commence starting with Phase 2.

### Post Development Traffic Monitoring Program

MAPC is pleased that the Proponent has committed to a traffic monitoring program. Specifically, the Proponent will conduct traffic counts semi-annually for five years following full occupancy of the site. In addition, the Proponent will coordinate with the MBTA and the Station at Riverside tenants to quantify transit ridership for the various components of the site. The traffic-monitoring program will compare traffic volumes, trip generation, trip distribution assumptions, adequacy of the mitigation including the effectiveness of the TDM program, as well as assessing the need for additional mitigation. However, the Secretary should also require the Proponent to develop mode share goals as part of its traffic monitoring program. Developing mode share goals is a central component delineated in the EOE/MassDOT Guidelines for Traffic Impact Assessments. Without such goals, a monitoring program will be far less effective.