



April 24, 2009

Secretary Ian Bowles  
Executive Office of Energy and Environmental Affairs, MEPA Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: Comments on the Expanded Environmental Notification Form (EENF) for the Proposed Riverwalk Redevelopment in Lawrence.

EOEA #14389

Dear Secretary Bowles:

Thank you for the opportunity to comment on the Expanded Environmental Notification Form (EENF) for the Proposed Riverwalk Redevelopment in Lawrence. We are pleased to see redevelopment where it can bring significant economic benefits, and especially where it affords the opportunities for new or expanded pedestrian facilities. Our understanding is that the project is looking for a Phase I waiver to allow initial demolition and construction of relatively modest buildings. These initial moves set the stage for the larger Phase II.

Riverwalk is located on the banks of the Merrimack River, but is separated from the river by a strip of land owned privately and occupied principally by a very wide municipal easement, consisting of a large sewer pipe, covered by a wide granite slab. This strip of land has long been planned by the City to be a pedestrian walkway along the Merrimack, and its existing design condition lends itself well to this purpose.

We are concerned that the Riverwalk project may be turning its back on the City's proposed riverfront pedestrian improvements. The project as shown in this document could be substantially improved to ameliorate this situation. We suggest the following improvements:

1. One driveway in the project now occupies much of the waterfront side of this property on the north. This driveway appears to be designed primarily for truck access to one existing building (the Cotton Mill) and one proposed structure (the proposed commercial building of 3 stories.) It will be a lost opportunity if the site's entire river frontage becomes pavement to serve this truck access. Consideration should be given to relocating most of the truck access further into the site interior. While trucks will continue to need access to the redeveloped Cotton Mill, it is on the east side of the site and can be accommodated by a service road connection that leaves options open for further use of the river frontage of the site.
2. If truck access were removed from most of the river frontage of the site, more benign pedestrian-oriented use could be made of this advantageous waterfront location. Parkland could be added, and if a large commitment of outdoor space can be made, it can provide amenities for employees and visitors to existing and proposed buildings on a scale that is difficult to find in other cities.

3. If parkland could be provided along the riverfront, the layout of the site might be reconsidered to focus all of the buildings toward the river, its views and its amenities. In practice this would suggest that pedestrian walkways be added between all the site's buildings and the water's edge. For example, walkways across the large parking lot might be provided and emphasized with landscaping to provide a major pedestrian connection between the river and the Wood Mill. We understand that sidewalk access from the Cotton Mill to the river already exists on the east side of the site. River access from all proposed new buildings should also be provided through the use of a sidewalk network that connects to all parts of the site and its buildings. In some cases, this may mean that the sidewalks might have a dedicated right-of-way that is not located alongside a new street.
4. Where roadways are proposed on the site, they should include sidewalks, and most of the proposal indicates that to be the case. However, along the frontage of the Wood Mill (included in Phase II), no sidewalks are provided. As the project moves into more detailed design, truck and pedestrian access will be clarified. At that point, sidewalks should be provided to the principal entrance on the parking lot side of the Wood Mill.

Thank you for the opportunity to comment on the EENF for the Proposed Riverwalk Redevelopment. Please contact us for any clarification or additional comments that you may need.

Sincerely,

Wendy Landman  
Executive Director

Robert Sloane  
Senior Planner