



WalkBoston

January 5, 2007

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

Attn: Bill Gage

RE: Comments on Final Environmental Impact Report  
Chestnut Hill Square  
200 Boylston Street, Newton, MA

EOEA # 12928

Dear Mr. Bowles:

WalkBoston has reviewed the Final Environmental Impact Statement for Chestnut Hill Square in Newton, MA. The proposal will have significant impacts on future circulation in and near several malls and residential towers on Route 9, an essential regional artery. We conclude that the pedestrian aspects of the proposal may play an extremely important role in alleviating congestion.

We are pleased that the project proponent has made so many substantial efforts to integrate pedestrian facilities into the project. In general, we think it is a promising basis for a more complete pedestrian network on the site – one that draws its neighbors together. In addition, we have several concerns about the project which are described below:

- Assessing the market for walking in the area
- Encouraging nearby residents to walk
- Providing a comprehensive network of pedestrian pathways
  - The Florence Street frontage
  - The west boundary of the property
  - The east boundary of the property
  - The Route 9 frontage
  - Interior walkways
- Integrating access to public transit
- Assuring construction of pedestrian bridge over Route 9
- Establishing sidewalk construction standards

#### POTENTIAL WALKERS IN THE AREA

The site of Chestnut Hill Square is one with substantial potential for walk-in customers from nearby residential districts (within a 1000' radius or 2-3 city blocks). Transportation policy

#### MAKING OUR COMMUNITIES MORE WALKABLE

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and wise management would suggest that local residents should be encouraged to walk these short distances, rather than being required to drive such short distances because pedestrian infrastructure is lacking. Short very local trips add to the total number of vehicles on-street, exacerbating congestion that could instead be alleviated by pedestrian connections to nearby sites.

Within a 1000-foot radius of the site (less than  $\frac{1}{4}$  mile!), are high-density residential towers, townhouse developments and single-family homes accounting for more than 1,700 units.

<u>Location</u>	<u>Units</u>
On-site residences	226
Chestnut Hill Towers	423
Residences at Chestnut Hill	59
Imperial Towers	152
Avalon Bay at Chestnut Hill	204
Florence Court Condo (Seniors)	unk.
Farm at Chestnut Hill	74
Hammond Park Condos, w. side of Hammond Pond Pkwy/Rte 9 intersection	120
Hammond Garden Condos, e. side of Hammond Pond Pkwy/Rte 9 intersection	81
Project at Hammond Pond Pkwy and Glendale Rd., Brookline	36
Chestnut Hill Square	242
Single family units within 1000' radius of site	149
<u>Total residential units</u>	<u>1766</u>

Collectively, these units have a population of about 2,600 people (assuming an average occupancy of 1.5 persons/unit). These potential customers are within very convenient walking distance of the proposed retail development, and may readily be interested in walking access if it is encouraged. Assuming .5 trips/day/unit, if only half of these trips were made on foot, it could mean a reduction of more than 850 daily vehicle trips.

#### **ATTRACTING WALKERS TO THE SITE**

For the many nearby residents to walk to the site, a network of pedestrian facilities is essential, as is pointed out in the FEIR. Even with the infrastructure in place, these potential customers will need persuasion to walk to the center - to overcome ingrained driving habits and to be persuaded to try out the new walking routes. Specific walking encouragement could take the form of publicity about the site's walkability, offers of free delivery services (for people who purchase more than they can comfortably carry), sales of grocery carts, walking clubs based at the grocery store (or other retailers), or the provision of walking maps showing the pedestrian routes. Not only will walking help alleviate congestion, it may be an important marketing tool highlighting the convenience of the site.

#### **A COMPREHENSIVE NETWORK OF WALKWAYS**

The FEIR states that sidewalks and pedestrian promenade areas will be provided along all roadways within the site. (p. I-13, Section 6.2.1. and IV-24, Section 5.2.4.2.) Yet the Illustrative Site Plan (Fig. I.1-2) and the Pedestrian/Bicycle Circulation Diagram (Fig. II.1-7)

show sidewalks only in certain areas: along Boylston Street, along Florence Street, and in front of the entrances to the retail areas on both sides of the central east-west street. In addition a second-level walkway is proposed, (as diagrammed in Figs. I.1-2 and II.1-7) to supplement access from sidewalks at the lower level.

The on-site pedestrian network should include sidewalks along all roadways within the site, and all of the sidewalks should be of adequate widths. The widths may vary, depending on their intended uses. Considerable thought has been given to the retail-pedestrian precinct, where sidewalks are wide, reflecting the greatest concentration of outdoor pedestrian traffic on the site. Elsewhere it is unclear what sidewalk standards can or will be met.

Sidewalks are to be constructed so as to be flush with all garage entrances (p. I-13, section 6.2.1). We are pleased that this standard will be followed in the project.

The following sidewalks should be added to the site design:

- West boundary road (abutting the Capitol Grille and the rear parking lot.) A proposed roadway provides access between Route 9, the garages and the loading areas, but does not extend all the way from Boylston Street to Florence Street (a paved area is provided for emergency access only). A missing pedestrian link along the west boundary is a full connection between Florence Street and Route 9. This would be a convenient way for pedestrians to reach Route 9 if there is to be a pedestrian crossing at the at-grade signalized intersection between this site and the Mall at Chestnut Hill.
- Sidewalks on the east side of the site facing Milton's, Barnes & Noble, and Avalon Bay. A roadway is proposed here, to extend from Route 9 to Florence Street, but part of it is to be used only for emergency access. Only a very short segment of sidewalk along it is diagrammed in Fig. 1.1-2 or Fig. II.1-7, yet a sidewalk here would form a major element of a full pedestrian network. It could serve people walking to the lifestyle food center and other retailers from Florence Street, as well as residents of Avalon Bay and residential areas near Hammond Pond Parkway and Heath Street. A gracious touch would be to provide abutting properties such as Avalon Bay Residences and Milton's direct pedestrian access to this walkway. The Milton's building is clearly visible from the site (it forms a visual terminus of the central plaza access to the retail areas), and a fence between properties without pedestrian access seems inappropriate.
- Sidewalks on the north boundary of the site along Route 9. This is potentially the most difficult area for pedestrians. Sidewalks are in place along the Route 9 frontage between Hammond Pond Parkway and Florence Street. But, the heavy traffic on the roadway and the turning movements at numerous curb cuts make the environment unpleasant and threateningly dangerous.
  - The entrances and exits for Chestnut Hill Square pose potential conflicts with pedestrians. The one-way inbound west entrance will serve significant traffic volumes into the site. Pedestrians following Route 9 should be able to cross when turning movements into the site are not permitted by the signal.

- The east entrance and exit location is somewhat more difficult, as it is presently proposed to be unsignalized. Eastbound entering and exiting traffic may not be able to see pedestrians on the Route 9 sidewalks.
- The mid-site exit onto Route 9 (abutting David & Co.) is one-way outbound to the highway, incorporating both a truck loading zone and vehicles exiting the site from the west parking garage access points. This exit has pedestrian connections on the west side with the potential for significant conflict with pedestrians. It is not shown to have any signalized intersections.
- There is a proposed new on-site lane parallel to Route 9 for a bus lane/stop for the project (Fig. II.1-7). This lane may have a conflict of uses - a bus lane/bus stop serving the site and an acceleration lane for traffic entering Route 9. Pedestrian access to the bus lane and stop appears to be by way of the mid-site exit described above.
- In summary, the difficulties facing pedestrians on Route 9 sidewalks support the concept of constructing the central plaza as an attractive alternative route for pedestrians.
- **Sidewalk along Florence Street.** Sidewalks are clearly included along Florence Street. They are interrupted by three driveways into the site, but seem appropriate for the setting. The Florence Street sidewalks connect to residences along the length of Florence Street (Heath Street in Brookline) from Hammond Pond Pkwy to Route 9. The street may become less safe and attractive for pedestrians if it becomes a bypass for Route 9.

#### **INTERNAL WALKWAYS**

The retail center of the site is the focus of proposed internal pedestrian ways. The internal walkways at the central plaza look potentially interesting and lively, connecting numerous retail outlets, and both the east and west residences. The buildings are not isolated from the world by vast parking lots, and the central plaza is about 500 feet long – slightly longer than a city block - walkable and easily comprehended by pedestrians. The space is complemented by existing buildings at either end, with the Milton's store, backed by the Avalon Bay tower to the east, and the Capital Grille, backed by the high-rise Imperial Towers at the west.

This central space cries out for physical connections to the off-site buildings at either end. The proponent has indicated that conversations are underway with abutters to provide pedestrian links. (see p. II-6, section 1.4.3) We hope that this happens in conjunction with careful traffic controls on-site to ensure that the significant amount of site-generated traffic that may pass through the heart of the central plaza does not impede pedestrian travel. All traffic entering the site at the new signalized intersection from an eastbound direction and via the new turn lanes on westbound Route 9 will pass through the retail area eventually – primarily to and from parking areas. Traffic entering the site at the eastbound driveway from Route 9 can avoid passing directly through the pedestrian precinct.

In the DEIR, inhabitants of the Florence Street Residences appeared to have additional access through the interior of the adjacent parking garage into the retail areas via a second floor arcade. This connection is not shown on Fig. 1.1-2, and we hope that it will be provided.

If available, this route would also be attractive to off-site residents coming to the retail areas, as a weather-protected walkway.

#### **INTEGRATING PUBLIC TRANSIT ACCESS**

The addition of a bus stop at the site is very useful. As proposed, MBTA Route 60 would continue its present route to Langley Road, just past the new Chestnut Hill Square/Mall to the Chestnut Hill intersection on Route 9, and use the jughandle and signal as a u-turn location. The new bus stop should be coordinated with the bus stop on the opposite side of Route 9 (in front of the Mall at Chestnut Hill). This would help alleviate the need for transit riders to walk across Route 9 to reach either site.

The proposed shuttle service from the Green Line Station at Chestnut Hill is a valuable addition. This station is more than a mile away, and a shuttle would provide access for both employees and customers if provided on frequent headways. We hope that the proponent will work with area retailers to make the shuttle service a success.

#### **PEDESTRIAN BRIDGE OVER ROUTE 9**

Since it was suggested by the proponent, the possible pedestrian bridge over Route 9 between this site and the Mall at Chestnut Hill has engendered great interest. The proposal was made to provide a thorough integration of the two malls on opposite sides of Route 9. It would expand the shopping opportunities available, in much the same way that Copley Plaza and Prudential Center malls are related via the pedestrian connection over Huntington Avenue. The combination of retail opportunities at the two malls would create a significant concentration of shopping to attract both regional and local residents.

The bridge would eliminate the difficulties inherent in pedestrian at-grade crossings on Route 9. Even with a signalized intersection, this will not be a pedestrian-friendly location due to the speed and volume of traffic, and the width of the roadway.

Getting the bridge built may be difficult. There seems to be little likelihood that public agencies will fund the construction. Therefore, the proponent should pursue the steps outlined and make efforts to ensure that the bridge is constructed.

Thank you for the opportunity to comment on this FEIR. Please feel free to contact us for clarification or additional comments.

Sincerely,

Wendy Landman  
Executive Director

Robert Sloane  
Senior Planner