



WalkBoston

February 4, 2008

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

**RE: Draft Environmental Impact Report (DEIR)
The Commons at Prospect Hill
MEPA # 13952**

Dear Mr. Bowles:

WalkBoston is the Commonwealth's leading advocate for pedestrians and safe walking. We work throughout the state – encouraging walking, advocating for pedestrian improvements and working for design improvements. We have extensive experience helping residents and local government with pedestrian issues, safe routes to school, and safer street crossings.

We have reviewed the DEIR for The Commons at Prospect Hill in Waltham, a proposed mixed-use retail and office redevelopment at the site of the former Polaroid buildings. We note that walking appears to be encouraged as a major organizing feature of a portion of the development - a worthy initiative. We are commenting because we think that, though this is a good start, there is an immense potential for incorporating more extensive pedestrian access in mixed-use suburban development throughout Massachusetts, and on this site in particular.

The Commons at Prospect Hill includes approx. 1.69 million sf of mixed-use development. It appears to consist of two basic elements: 1. A concentration of Class A office space and small-scale lifestyle retail space near the entrance to the project on Main Street; 2. Anchor and destination retailers at the north and east sides of the project. As part of the project, the proponent will construct a segment of the Wayside Rail Trail in the former rail right-of-way that abuts and passes through the land.

The central, high-density area of the proposed Commons at Prospect Hill comprises 450,000 sf of office space, with about 2540 garage parking spaces adjacent to the offices. Retail space related to the office space is located at ground level both on the ground floor of the two office buildings and in a rank of two rows between the office structures.

The destination retail area of the project includes 3350 surface parking spaces. Retail and restaurant uses totaling 1,240,000 sf are divided between the high-density central area and the destination retail area.

Summary of Comments:

1. Trips generated by pedestrians seem notably high. These trips can be encouraged by making a thorough analysis of pedestrian circulation and safety needs and adjusting the physical layout of the project to encourage walking.
2. WalkBoston salutes the proponent on including a walking/biking trail as an important element in the plan. The spine of the trail could become a basis for even further walking possibilities on the site, and should be used as a focus for building entrances to encourage

walking and biking trips. As presently diagrammed there do not seem to be any places where pedestrians could access new buildings from the trail without crossing driveways or parking lots.

3. A relatively high density of development is proposed for the entrance areas near Main Street. This component of the design is the basis for a pedestrian-friendly precinct within the parcel.
4. The scale of the remaining development is sprawling, with large 1-2 story retail structures surrounded by parking. This layout is not conducive to encouraging pedestrian trips. In the future, any additional office structures added to the development should be connected to a plan for overall pedestrian facilities.
5. The abutting Prospect Hill Park and the 20-acre Berry Farm parcel offer opportunities for recreation walkways linked to the development on this site and connected to the Wayside Rail Trail.
6. The project proposes to abandon Hillside Road, an existing roadway through Prospect Hill Park and replace it on the proponent's site. Opportunities for reuse of this land might contribute to greater walkability of the site.
7. If changes are made to the Route 20/117 interchange with Route 128/195 which remove the existing railroad bridge over Route 128/195 - the proposed location of a future long-distance rail trail from Boston to western Massachusetts - the project should provide a replacement bridge to serve this future connection.

Trip Generation

Projections of non-auto mode trip generation indicate that walking in this semi-suburban location will have a relatively high proportion of 4.56% of the anticipated trips. (See Table 5-21, Non-Auto Mode Trip Generation) This high proportion demonstrates the proponent's determination to encourage walk-in trips from the surrounding neighborhoods, and to promote on-site walking circulation. This very exciting prospect underscores the need to design and develop pedestrian facilities within the site that will accommodate these trips and make walking on-site easy to do, safe and pleasurable.

Pedestrian spines

Several components of pedestrian facilities serving the site are outlined in this DEIR. Existing pedestrian facilities include sidewalks on both sides of Main Street (Route 117) (See Fig. 5.9 - Existing Pedestrian Accommodations Off Site).

A significant new pedestrian access way will be created when the proponent constructs the Wayside Rail Trail on the old railroad alignment that partially abuts and partially passes through this parcel. (See Figure 5.27 - Site Circulation Plan: Proposed On-Site Pedestrian Facilities). This new trail will lead directly to the highest density portion of the proposed development and will be used by individuals accessing the site.

With the Wayside Trail and Main Street sidewalks in place as major east-west pedestrian spines, the proponent has laid out further connections for pedestrians or bicycles into the site. Sidewalks along proposed access streets – Primary and Central Driveways - bracket the proposed 8-story office building at the entrance to the site and link many of the office, retail/restaurant and parking sites. (See Figure 5.27 Site Circulation Plan: Proposed On-Site Pedestrian Facilities). Sidewalks are recognized as an important and integral element of the overall design, with the plan showing extensive sidewalk connections throughout the portion of the site closest to Main Street.

On all pedestrian spines, signage should be installed to help direct pedestrians into and through the site on all routes, whether they come or go via the Wayside Trail and Main Street or are making connections between the parking areas and on-site buildings.

Entrance roadways

In the Preferred Alternative, there are three vehicular driveways into the site: 1. Primary Driveway (Opposite Stow Street); 2. Central Driveway (Opposite Cutting Lane); 3. East Driveway. All three of these cross the existing and proposed Main Street sidewalks on the north side of the street. Each access way also crosses the Wayside Rail Trail. Only one of these – the Primary Driveway at Main and Stow Streets - has a traffic signal that will provide a protected crossing for users of Wayside Trail. (See Figure 5.27 Site Circulation Plan: Proposed On-Site Pedestrian Facilities).

Signals are provided at two of the entrance drive crossings of Main Street sidewalks. The third entrance drive – the Central Driveway – has no signals indicated.

Each intersection of the Wayside Rail Trail and the entrance driveways has been laid out as a right-angle crossing for appropriate sight angles for both motorists and pedestrians/bicyclists. However, no method of protection at these crossings is noted on the plan (Figure 5.27). Stop signs or other traffic calming measures may be needed to make the Trail crossings safer, based on estimates of Trail use and traffic volumes on each of the drives.

The high-density area

Eight of the proposed 12 buildings are concentrated in the portion of the site nearest Main Street (Route 117):

- Building 4 – a small retail/restaurant building
- Building 5 – a small retail/restaurant building
- Building 6 – a 6-story office building
- Building 6 parking garage
- Buildings 7 & 8 – 2-story retail/office buildings facing one another
- Building 9 – an 8-story office building
- Building 10 – restaurant on Main Street

Concentrated in this corner of the site, these buildings form a relatively high-density area of office buildings, garage and retail/restaurant uses. Taken together, the two office towers and the retail buildings between them offer a major opportunity to make a pedestrian-friendly environment. Significantly, the proponent shows extensive sidewalks in this area. (See Figure 5.27 Site Circulation Plan: Proposed On-Site Pedestrian Facilities).

The proponent's main sidewalks link Building 9 (office) at the entrance to the site to Building 6 (office) and its garage via paths that serve Buildings 7 and 8 (retail and restaurant). The overall shape of this area is a dumbbell, with the two office towers and parking garage linked by the two lower buildings that contain services for the office workers and presumably will attract visitors from outside the site. The two retail buildings, facing each other, are provided with sidewalks and are separated by angled surface parking spaces.

There are several concerns about pedestrian safety in this high-density area:

- The lifestyle shopping area. Proposed Buildings 7 and 8 form the basis of an outdoor shopping area with sidewalks, streets and parking that emulate older shopping areas. However, the buildings are located relatively far apart, with difficult street crossings on all major pedestrian routes. The area seems to be too oriented to street traffic and parking and not enough to pedestrian safety and appeal.
- Through traffic. Most of the project's traffic is concentrated on the Primary Driveway. A secondary route is the Central Driveway. A major concern is that a third driveway is inserted between Buildings 7 and 8 (retail/restaurant) in the area that has potentially the highest pedestrian volumes. It is unclear what the purpose of this street is, other than to serve angled surface retail parking.
- The street between Buildings 7 and 8 is very wide – perhaps 80 feet between building facades. The parking area between Buildings 7 and 8 which faces Building 6 and its parking garage is even wider – perhaps 150 feet. These large expanses of parking and paving will not help to create a safe and attractive pedestrian environment.
- Number of parking spaces. Much of the great width of the streets is dedicated to angled parking. This parking may be related to the office parking needs of Building 9 or the retail/restaurant needs of Buildings 7 and 8. However, these parking areas should be reconfigured in a way that would promote pedestrian safety, allow buildings to be closer together, and encourage movement between office structures and retail/restaurant uses.
- Circle between Buildings 7 and 8 and the façade of the Building 6. The plan is not clear about the intended use of the circle. If this area is redesigned as a pedestrian zone, a circle could provide a nice focal point for the project. If this is a traffic circle, it will create multiple street crossings for pedestrians.

The retail destination area

The retail destination areas are the three or four outlying big box buildings that are surrounded by parking fields. The proponent shows sidewalks connecting to each of the large buildings, but distances between all these large buildings, and between them and the retail and office areas of Buildings 7, 8 and 9, are so extensive that few pedestrians would be inclined to walk.

Buildings 2 and 11 (both big box retail) could possibly be moved closer to the center of gravity of the high density portion of the site to become more effectively tied into the pedestrian network at more reasonable walking distances. As currently shown, these retail areas are significantly far from the heart of the project. Access to them is proposed via shuttle bus because of the great distances and the potentially unsafe routes that would be taken by pedestrians. This is unlikely to create a pedestrian friendly and truly mixed-use environment.

Taking a longer view of the future of the site, it is possible that more intensive uses could ultimately replace the big box stores. If built, these structures could benefit by a connection into a plan that would link them to the office/retail heart of the project via safe pedestrian facilities.

Interchange Access

The preferred alternative to improve the Route 20/117 interchange with Route 128/195 (See Fig. 5.28) shows a future connection from the Primary Site Drive along the right-of-way of the former railroad to cross Route 128/195. On the west side of the highway, it makes a connection with Green Street which becomes the major access to and from Route 128/195. This construction removes traffic from the residential areas of Stow Street. However, the

right-of-way chosen would also remove the existing railroad bridge over Route 128/195 that has long been considered as a major facility on the axis of the future rail trail from Boston to the western part of the state. If this interchange is to be constructed and the existing bridge removed, access for bicycles and pedestrians must be an integral part of the crossing.

Effects on adjacent parkland

Both Prospect Hill Park and perhaps the Berry Farm, immediately adjacent to the site, afford potential recreational assets for occupants and workers on the site. Existing paths within Prospect Hill Park are very near the boundary and might be connected with proposed pedestrian ways on the site.

Prospect Hill Park now includes a portion of the street right-of-way (and paving) for Hillside Road. The proponent's plan removes Hillside Road from the park. This will be of benefit to both the park, where it will modestly increase available open land. It may also be of benefit to the proposed development, as it is very close to Building 6 and its Parking Garage and the pedestrian routes that pass through the high-density area. Perhaps it can become a walking path for workers on-site, or a place for picnics or outdoor recreation.

The park benefits from reconstruction of a major feature of site - the power line that passes through the site (more than 4000 feet). The Preferred Alternative includes a proposal to place the transmission line underground to eliminate its visual impact on the site. (Table 4-3) This proposal relocates the NStar right-of-way along the boundary line between the site and the Prospect Hill Park. The new lines will be underground, and will afford a major improvement to the site and its potential connections into the Park, and potentially a route for a walking/bicycle trail through the site.

Thank you for the opportunity to comment on this document, which offers promise for improvements for pedestrians in a suburban setting. Please feel free to contact us for clarification or additional comments.

Sincerely

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Executive Director

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