January 28, 2003

Secretary Ellen Roy Herzfelder
Executive Office of Environmental Affairs
Attn: MEPA Office
William T. Gage, Environmental Analyst, EOEA No.12928
251 Causeway Street, Suite 900
Boston, MA 02114

Re.: Comments on ENF, Chestnut Hill Square

Dear Secretary Herzfelder:

Thank you for the opportunity to comment on the Environmental Notification Form (ENF) for Chestnut Hill Square, 200 Boylston Street (Route 9), Newton, Massachusetts.

A summary of the City's comments are included below, with more detailed comments and scoping recommendations included in the attached document. The City of Newton's comments are intended to ensure that a comprehensive environmental analysis is performed and that such an analysis will be used to inform the City's elected officials as they begin their development review and approval processes.

Summary of Comments

1. The concept of a mixed-use project is preferred over the alternative of any single "as-of-right" use of the Site, but the proposed project appears to have significant adverse impacts that will need to be addressed and mitigated. The EIR should include meaningful mitigation measures and build alternatives that limit the various components of the plan, as well as the overall project size.
2. A more detailed description of the project and proposed uses should be included in the EIR, along with a statement of actual existing conditions. In our opinion, the ENF does not indicate accurate existing conditions. Once established, the actual existing conditions should be used to establish a baseline before accurately forecasting future conditions in the EIR.
3. Vehicle trip estimates in the ENF need better documentation before any comments can be made regarding the reasonableness of the numbers. The EIR should clarify the expected vehicle trips associated with the proposed project and proposed uses, and should include a traffic study to clarify the implications of anticipated traffic changes on Route 9, Hammond Pond Parkway, Florence Street, Heath Street, Langley Road, Hammond Street and any public road impacted from traffic generated by the proposed development.
4. Because this portion of the Route 9 Corridor, and the collector streets that feed this corridor, is already *heavily* congested, this project should not be approved by the Executive Office of Environmental Affairs unless and until the developer conducts a critical analysis of the existing and proposed traffic and parking impacts along this portion of the Route 9 Corridor and proposes a mitigation program that does no harm to the current situation. Additionally, the EIR should include a travel demand management program to discourage use of single occupant vehicles accessing the Site.
5. The EIR should address how the project can be designed to fit in with the existing neighborhood character, including building mass, scale, setback, and transition of uses from most intensive to least intensive. The EIR should also describe the project commitments to provide public open space, including the percentage of land area devoted to different types of open space on a project-wide basis.
6. The EIR should elaborate on the necessary zone change, special permits and other zoning relief that may be necessary for the proposed mixed use project, as the City is particularly concerned about how any proposed zoning changes will impact the adjacent properties on Route 9 and the surrounding residential neighborhoods.

The EIR should be explicit as to consistency with the City's Framework plan and should illustrate a master plan for this Site in the context of its neighborhood.

7. The ENR incorrectly assumes that the proposed development project will meet thresholds related to adequate water supply. The ENF also incorrectly indicates that there is sufficient capacity in the existing sanitary sewer system for future expansion. The EIR should address the City's concern that the Site have sufficient water volume and pressure for fire suppression. Additionally, the EIR should provide a quantitative analysis of the existing sanitary sewer system and description of the sanitary sewer infrastructure improvements that will be required to serve the development. The EIR should provide a life cycle costing for the proposed sanitary system. Additionally, the EIR should confirm that all feasible methods of reducing impervious surfaces, including underground parking and/or more compact Site layouts, have been explored.

Thank you for your consideration of these ENF review comments. If you have any questions regarding this subject, please call me at 617-796-1130.

Sincerely,

Michael Kruse, Director

Cc: Mayor David Cohen
Brooke K. Lipsitt, President, Board of Aldermen
Members of the Board of Aldermen
Representative Ruth B. Balser
Senator Cynthia Stone Creem
Patricia A. Otis, President, Chestnut Hill Association
Don Quinn, Chair, Bowen Thompsonville Neighborhood Association
Robert J. Duffy, Town of Brookline, Director of Planning and Community Development
William R. Cronin, Jr., Vice President, New England Development
Kevin Walsh, Environmental Reviewer, Executive Office of Transportation and Construction
Marc D. Draisen, Executive Director, Metropolitan Area Planning Council

Chestnut Hill Square
Environmental Notification Form (ENF) Comments
EOEA No. 12928

City of Newton

January 28, 2003

GENERAL COMMENTS

- The proposed 900,000 sq.ft. mixed-use development project at 200 Boylston Street (Route 9) Newton, Massachusetts (the "Site") is proposed to be constructed on 9 existing lots that currently are situated in three different zone districts (SEE ATTACHMENT "A"). The Site is approximately 10 acres is size, with access off Route 9 to the north, and Florence Street to the south. Florence Street crosses into the Town of Brookline approximately 180 ft. to the east of the Site and becomes Heath Street. Immediately across Route 9, to the north, lies the existing The Mall at Chestnut Hill (the "Mall"), and east of the Mall is the Chestnut Hill Shopping Center. The Atrium Mall is located to the west, on the south side of Route 9. The Chestnut Hill portion of the Route 9 Corridor contains approximately 1,113,595 sq. ft. of retail space. Route 9, as well as the collector streets that feed this corridor, is already heavily congested. *This project should not be approved by the Executive Office of Environmental Affairs (EOEA) unless and until the developer conducts a critical analysis of the existing and proposed traffic and parking impacts along this portion of the Route 9 Corridor and proposes a mitigation program that does no harm to the current situation.*

- The proposed development is reflective of the City's interest in concentrating mixed-use development along the Route 9 Corridor. The concept of a mixed-use project is preferred over the alternative of any single "as-of-right" use of the Site.

- Given the magnitude of the proposed mixed-use development, it is reasonable to anticipate phasing construction of separate uses over several years. It is of particular concern to the City that development of infrastructure improvements follow a schedule and is completed in such a manner so as to not adversely impact service to abutters, the surrounding neighborhood in Newton and Brookline, and traffic along the Route 9 Corridor and collector streets that feed this corridor.

- Ms. Brooke Lipsitt, President of the Newton Board of Aldermen, has submitted separate comments on this ENF (SEE ATTACHMENT "B"). Mr. R. Lisle Baker, Newton Ward 7 Alderman, has also submitted separate comments on this ENF (SEE ATTACHMENT "C").

SCOPING RECOMMENDATIONS

The City of Newton recommends that the Secretary include the following elements in the scope for the Chestnut Hill Square Environmental Impact Report (EIR)

LAND USE

- **Use:** The ENF indicates that the proposed project will be located on nine separate lots in three different existing zone districts. As proposed, this project is not consistent with the City's existing zoning regulations, and must undergo rezoning. *The EIR should address how the rezoning will comply with the City's Zoning Ordinance, and Newton's Framework Plan. The EIR should also address how the project can be designed to fit in with the character of the surrounding neighborhood, including building mass, scale and setback.*

- **Open Space:** The existing site is predominantly impervious surface, however, there are several scattered stands of mature trees along the western and southern property lines. The City is concerned about the lack of green space in the proposed development plan and the proposed increase of impervious surface. *The EIR should elaborate on specific mechanisms that will be employed to ensure that the existing mature trees will remain and be supplemented with additional green space, with substantial landscaping. The EIR should describe the commitments to provide public open space, including the percentage of land area devoted to different types of open space (i.e. plazas, as opposed to sidewalks and pedestrian ways) on a project-wide basis, and assurance that open space will be implemented in tandem with development during project buildout. The EIR should describe the legal mechanism by which the greenspace will receive Article 97 protection in perpetuity. The EIR should also show how on-site open space could be linked to City of Newton and Town of Brookline parks and with other elements in the local and regional public open space network. The EIR should include shadow impact analyses of the open spaces and major pedestrian areas, and include birds-eye and eye-level perspective views of open space and building configurations, set within the area-wide context.*

- **Regional Plan:** The ENF's Land Section, III.B., states that the Regional Policy Plan of an applicable Regional Planning Agency is "Not Applicable." The City is aware that the Metropolitan Area Planning Council (MAPC) is, in fact, the Regional Planning Agency concerned with the proposed development. *The EIR should elaborate on how the proposed development is consistent with MAPC's Regional Policy Plan. The EIR should also elaborate on how the proposed development is consistent with the Town of Brookline's Comprehensive Plan.*

- **Zone Change:** The ENF's Land Section, III.C., states that the proposed project will require a change of zone, special permits and site plan approval under the Newton Zoning Ordinance. *The EIR should elaborate on the necessary zone change, special permits and other zoning relief that may be necessary for the proposed mixed use project. The City is particularly concerned about how any proposed zoning changes will impact the adjacent properties on Route 9 and the surrounding residential neighborhoods. The EIR should clarify any necessary and expected zone change(s) for the proposed project and explain how a zone change can accommodate all of the land use elements of the proposed development project.*

- **Building Height:** The ENF shows buildings of 127 feet in height. Current height limits in the Business 1 (BU1), Limited Manufacturing (LMD), and Mixed Use 2 (MR2) zone districts are 24, 26, and 30 feet, respectively. The City has concerns about the impact of the proposed

building height upon the surrounding properties on Route 9 and the surrounding residential neighborhoods. The shadows from these buildings may have serious negative environmental impacts on the abutting properties. *The EIR should include shadow studies and an explanation of mitigation measures the developer proposes to implement to ensure abutting properties and roads will not be negatively impacted due to shadows projected by the proposed buildings. The EIR should also include a view of the final build out in the context of the Route 9 streetscape. Alternative build scenarios at a reduced size and scale should also be considered.*

- **Project Phasing:** The ENF indicates that the proposed completion of the project is 2004-2006. *Because this project is to be built out over 2 years or more, the EIR must address how a phased build out approach to environmental review can be applied to this project. The EIR must identify proposed phases, both in terms of program and by showing site plan configurations. It will be particularly important to demonstrate that traffic on Route 9, Florence Street, Heath Street, Hammond Pond Parkway, Langley Road, Hammond Street and other collector streets that feed this corridor, is not impeded at intermediate stages of development. The EIR should also address appropriate trigger points at which mitigation would be provided. The EIR should address the City's concern that there be adequate water capacity and pressure for fire suppression during, as well as after, construction. The EIR must address how water disposal will be accommodated during construction. The EIR should address how erosion and drainage control measures will be implemented on the steep slope of the site.*

- **Adjacent Uses:** There are several large-scale development projects that are either under way or are planned to commence in the near future that are located in close proximity to the planned development at Chestnut Hill Square. These projects include two residential developments ¼ mile to the west of the Site on Route 9, and one residential development on Langley Road, 1/3 mile to the north of Route 9. Additionally, the "Park Inn" site, just 225 ft. to the east on Route 9, is likely to be developed into approximately 270 apartments concurrently with the proposed Chestnut Hill Square project. There are numerous infrastructure complications posed by the construction of five large developments, including: roads, water, sewer, stormwater, parking, traffic, mass transportation, etc. *The City requests that the EIR be conducted with the understanding that multiple projects, not simply one, will likely be developed in close proximity to one another at a location that has inherent complexity and infrastructure deficiencies. The EIR should establish a baseline for the Route 9 Corridor, as well as identify and address the combined impact on the infrastructure, traffic, and parking of multiple large development proposals located in close proximity on Route 9.*

SEWER/WASTEWATER/STORMWATER

- **Grease buildup:** The City of Newton and the Town of Brookline are aware of a history of grease build-up on a portion of the sewer under Florence Street. *The EIR should address the quality of the current flow of sanitary sewer lines along Route 9 (Boylston Street), Hammond Pond Parkway, Moody Street, Florence Street, and Heath Street. The EIR should include a description of the sanitary sewer infrastructure improvements that will be required to serve the development and address how the improvements will be coordinated with the City of Newton and, where appropriate, the Town of Brookline.*

- **Master plan:** *The EIR should provide a master plan and schedule of the sanitary collection system improvements.*

- **Life Cycle Costing:** *The EIR should provide a life cycle costing for the proposed sanitary system.*

- **DPW approval:** *The EIR should include designs of all sanitary system improvements that will be owned/transferred to the City according to City specifications, and improvements must be approved by the Commissioner of Public Works.*

- **Water Run-off:** The ENF Site Plan indicates the proposed project will have a high percentage of impervious surface. *The EIR should include a study of the proposed project's surface water run-off relating to Hammond Pond, and it should consider the potential for ponding of water and the potential for mosquito breeding, pollution, etc. The EIR should include at least a conceptual drainage plan, and should discuss the consistency of the drainage infrastructure plan with the DEP Stormwater Management Policy. The EIR should confirm that all feasible methods of reducing impervious surfaces, including underground parking and/or more compact site layouts, have been explored.*

- **National Pollution Discharge Elimination System (NPDES) permit:** The ENF's Land Section, Impacts and Permits: IIH, IIK, addresses impervious surface and site runoff. At the time the ENR was authored the city of Newton was not subject to the State's Phase II, National Pollution Discharge Elimination System (NPDES) permit. The permit submittal to the Department of Environmental Protection (DEP) is due on March 10, 2003. The ENF incorrectly assumes that the existing storm drain will provide sufficient capacity for site runoff. The drain system in question often surcharges under normal frequency storm events, which jeopardizes the public health and safety. The DEP/NPDES permit requires a water quality management plan describing pre-construction and post construction measures/elements that will improve area water quality. The plan will address short and long-term maintenance issues/concerns and responsibilities. The ENF describes several measures, which are themselves inadequate to meet State policies and standards. (Note: State permit mandate – development can not impact historical sites.) *The EIR should address water quantity in regards to available capacity in the Newton municipal system and/or on-site detention.*

- **Water Supply – Threshold/Permits: IA**
  The ENR incorrectly assumes that the proposed development project will meet thresholds related to adequate water supply. Section I.A. should have been checked "yes," requiring quantitative analysis. The developer will be subject to the City's cross connection control program (back flow prevention). *The EIR must answer, at minimum, Section IIA, IIB, IID, IIG, and Section III. Note: Hydraulic report (Insurance Services Office, Inc - 10/13/99) indicates that the area does not have sufficient fire flow capacity. The EIR should address the City's concern that the Site have sufficient water volume and pressure for fire suppression.*

- **Wastewater – Thresholds/Permits: IIB, IIC, IID, IIE**
  The ENF incorrectly indicates (Section II.B.) that there is sufficient capacity in the existing sanitary sewer system for future expansion. *The EIR should include a quantitative analysis addressing the following:*
    - *Section IIC (capacity to dispose) must be verified with the Massachusetts Water Resource Authority (MWRA).*
    - *Section IID can not make the assumption that no on-site treatment will be required till a concept site plan design is approved.*
    - *Section IIE: The effluent will have inter-basin transfer and therefore must be coordinated with MWRA.*
    - *The developer will be subject to the City of Newton's cross connection control program (sanitary to storm).*
    - *The developer will be subject to the City of Newton's inflow/infiltration removal and mitigation program.*
    - *Effluent conveyance goes through the Town of Brookline prior to tie to the MWRA interceptor. This infrastructure link will require inter-municipal agreement.*

HISTORICAL

- **146 Florence Road:** The proposed Chestnut Hill Square project proposes the demolition of two structures at 146 Florence Road that have been surveyed by the City as potential historic resources. The demolition of these structures requires the review and approval of the Newton Historical Commission under the City's Demolition Review Ordinance. *The EIR should include an analysis of the historic structures on site and discuss plans to work with the Newton Historical Commission.*

- **7 Hammell Place:** 7 Hammell Place has been surveyed by the City as a potential historic resource. The ENF Site Plan indicates that 7 Hammell Place will remain and be located uncomfortably close to the two proposed, tall, residential towers. *The EIR should include clarification about the future status of the structure at 7 Hammell Place and, if the structure is to remain as part of the proposed project plan, explain measures that will be taken to protect the dwelling, and its garage, from being damaged or negatively impacted during construction of the project.*

- **Hammond Pond Parkway:** Hammond Pond Parkway runs north/south 900 feet to the east of the Site. Hammond Pond Parkway is slated to be on the National Register of Historic Places. *The EIR should address how the proposed development will not negatively impact the historic character of Hammond Pond Parkway.*

SUSTAINABLE DEVELOPMENT AND DESIGN

- **Energy use:** Given that the developer will be creating a large mixed-use site with new infrastructure and new buildings, a major opportunity exists to ensure that buildings are designed and constructed in a manner that minimizes their impact on the environment both locally and beyond. In particular, the developer should consider the relationship of building design to energy use, resource impacts of building materials, indoor air quality, toxic materials, water use efficiency, and waste management. For example, given the east-west direction of the surrounding streets (Route 9 and Florence St.) many buildings on the project

site can have southern exposures. The developer should be encouraged to design buildings that can take advantage of the solar gain and maximize the passive use of sunlight to minimize building energy use in heating and lighting. Buildings could also be designed to minimize stormwater runoff by using roof gardens and green roof technology as well as runoff collection systems that recycle water for landscape irrigation and other uses. Greenroof technology also may significantly reduce solar heating of the roof and, therefore, lower the cost of cooling buildings during the summer months. *The EIR should assess the alternatives for "green" building design throughout the development and propose a process to ensure that high-performance buildings are constructed. One option would be to utilize the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) rating system to guide building design processes.*

HAZARDOUS WASTE

- **Asbestos removal:** The ENF indicates the potential for asbestos in at least one of the existing buildings and that an asbestos abatement permit may be required. *The EIR should include the locations and addresses of the buildings to be demolished which may require asbestos, lead and dust control measures.*

- **Solid Waste:** The ENF does not indicate how the proposed project will collect solid waste from the many uses on the site. Given the intensity of uses proposed for the relatively small site there is a potential for environmental damage from solid waste. The site-constraints may require that solid waste be stored in compactor units rather than traditional dumpsters. The City has an established recycling program and a new source reduction program, both of which are strategically placed in the Solid Waste Master Plan. *The EIR should include a detailed explanation of how the uses will control solid waste through recycling, compaction and removal. The EIR should reference the requirements of the City's Solid Waste Master Plan for the environmental management of site waste. The EIR should provide estimates of the expected solid waste generation by weight and volume for each of the uses proposed for the site (apartments, hotel, office, retail, etc.). Consideration should be given to peak volumes of solid waste generated on holidays.*

PARKING

- **Parking Calculations:** The parking calculations on the ENF Site Plan are incorrect. The ENF Site Plan indicates that the developer proposes to offer only 1,201 of the 1,791 required parking spaces due to a "1/3 deduction." The ENF mistakenly lists 1,791 as the number of parking spaces required by the City's Zoning Ordinance when the actual number should be much higher. Residential parking requirements listed in the ENF were only ½ of the spaces required by the Zoning Ordinance. The 1/3 deduction mentioned in the ENF is currently not allowed and may not be appropriate because there are not currently sufficient public transportation alternatives to the Site to justify reducing the parking requirements. *The EIR should include correct parking calculations based upon the City's Zoning Ordinance, and not be based upon a presumed "reduction" in spaces, unless the developer is able to provide transportation alternatives to the Site.*

- **Parking Needs Asessment:** The City is aware that abutting properties currently utilize parking at the Site. The parking calculations should be based upon the actual anticipated

demand for residents, visitors, employees and customers at the Site. *The EIR should include a parking needs assessment. The developer should explain the nature of the on-site parking (for example, quantify how many employee, resident, commercial/visitor spaces are proposed, and the number of underground and surface spaces); identify turnover rates for employees and others and discuss projected overlap of parking needs by different site uses; and include an analysis of parking supply, demand and pricing in the project area. The parking needs analysis should include an overall assessment of the parking needs and supply in the project area. Included should be an analysis of the number of vehicles from abutting property uses that currently park on the Site. Additionally, the City is concerned that the actual number of existing spaces has been greatly overestimated in the ENF; the existing number of spaces must be clarified in the EIR. The EIR should also discuss parking availability during interim buildout stages, and demonstrate that parking ratios will remain consistently low during all phases.*

- **Parking Plan:** The ENF did not include drawings of the proposed parking structure or of the proposed layout and the number of parking stalls. *The EIR should include plan view and elevation drawings all underground and above ground parking facilities and spaces.*

- **Parking Price:** *The EIR should discuss the proposed parking pricing structure for the development, and should disclose whether any parking subsidies (overt or effective) will be provided to employees, patrons or residents.*

- **On-Street Parking:** On-street parking has historically been a concern of the immediate neighborhood, especially along Florence Street adjacent to the Atrium Mall. Many in the neighborhood believe that the Atrium Mall's parking garage is too small and residents do not want to see additional spill-over traffic from the Site parking on Florence Street, Heath Street or any of the side-roads in the vicinity. *The EIR should provide a study of the existing on-street parking on neighborhood streets south of Route 9, including Florence Street, Heath Street, Tanglewood Road, Louise Road, Craftsland Road, and Belmont Road (Brookline). The EIR should also discuss measures to be implemented to reduce, and possibly eliminate, on-street parking on these same streets.*

TRAFFIC & TRANSPORTATION

- **Widening of Route 9 (Boylston Street):** The ENF's Roadway's and Other Transportation Facilities Section, II.A., states that "Boylston Street will be widened to accommodate a signalized left turn lane into the site from Route 9 [westbound]. The length of the widening is to be determined." *The EIR should elaborate on how the proposed Boylston Street (Route 9) signaled left turn will impact the already burdened traffic flow on Route 9, the traffic entering and exiting the Mall, the existing intersection of Route 9 with Hammond Pond Parkway, and the existing intersection of Route 9 with Langley Road.*

- **Public Transportation:** The ENF does not discuss public transportation needs for the proposed development nor does it address the issue of access to transportation which is an objective of the City of Newton's Framework Plan. (SEE ATTACHMENT "D") The MBTA does operate the #60 Bus between Kenmore Square and Route 9/Hammond Pond Parkway via Brookline Village. Accessing the bus from the Site requires walking down an

exit ramp for Route 9, crossing Hammond Pond Parkway and standing at a sign located on an entrance ramp for Route 9 (eastbound). The MBTA Greenline stop nearest to the Site is the Chestnut Hill Station, located over 1 mile to the northeast. Pedestrian access to the Chestnut Hill Station from the Site would require 25-30 minute walk along Route 9 and along side-streets where sidewalks are often narrow, if they exist at all. *The EIR should discuss measures the developer will implement to increase the use of public transportation—including MBTA express buses, the MBTA Green Line, and the possibility of a shuttle systems that connects all the major employment centers in this portion of the Route 9 Corridor, as a means to reduce the burden on the already over-burdened Route 9 Corridor. The EIR should also describe the capacity of existing MBTA bus line service to the site to confirm that sufficient capacity will exist for all expected users to the site, at all hours of the day/night.*

- **Pedestrian/ Bicycle Access:** The ENF presents little information regarding pedestrian and bicycle movement around or to/from the site. The City agrees with the comments made by the Chestnut Hill Association, Inc. that the developer should have a comprehensive plan that would serve to link adjacent sites in meaningful ways. Pedestrian access should be encouraged between the proposed site and The Mall at Chestnut Hill, the Atrium Mall and all properties within 2,100 feet (1/2 mile) from the project's property lines. Current sidewalks are often narrow and in poor condition, if they exist at all. Pedestrian crossings on Route 9 and Hammond Pond Parkway are dangerous and not useful for the surrounding neighborhood. The developer should consider a pedestrian access bridge (or tunnel) across Route 9 to the Mall. The City agrees with comments made by the Chestnut Hill Association, Inc. that call for the developer to enhance the pedestrian experience to/from the Site with additional amenities such as green space islands and traffic calming devices in order to create a meaningful form of mitigation that could actually reduce the number of vehicle trips in the area. *The EIR should include an accessibility study of the existing sidewalks within 2,100 feet from the project's property lines, and a proposal for installation of new sidewalks and/ or pedestrian/bicycle pathways to/from the project site. The City recognizes that, on average, the limit for pedestrian movement is ½ mile. The topography of the Site should be considered when evaluating access on-site. The EIR should identify the proposed bicycle facility improvements included with this project, including bike lanes on existing streets, bike racks, and employee shower facilities. The EIR should investigate all bicycle path connections available to future users of the site. The EIR should elaborate on the proposed project's creation of a suitable environment for pedestrians and bicycles throughout the entire development site and development of pedestrian/bicycle access to the Chestnut Hill Shopping Center on the opposite side of Route 9. The EIR should explore possible incentives to encourage residents, employees & customers to walk or bike to/from Site.*

- **Vehicle Trips:** Vehicle estimates in the ENF need better documentation before any comments can be made regarding the reasonableness of the numbers. The mix of uses should be better defined to assure that estimated trip generations are as accurate as possible. *The EIR should clarify the expected vehicle trips associated with the proposed project and specify whether trips are one-way or roundtrips. The EIR should include the volume and classification of trips by trip purpose, e.g., employee trips, service and delivery trips, visitors, residents, shoppers and the expected mode of access to the development.*

- **Traffic Flows on Florence Street:** Site design includes 3 access points in and out onto Florence St (one through a proposed inter-connection with the Capital Grille site) as well as a 'drop-off' area for the residential towers. Vehicles turning right will end up on Route 9 eastbound, further west than the subject property. It is reasonable to presume that the vast majority, if not all, of the vehicles exiting onto Florence Street will turn left to Hammond Pond Parkway & Route 9 (east or westbound). *The EIR should include realistic analysis of the flow of traffic leaving the Site, and turning onto Florence Street. The EIR should include a study of any possible conflicts between the drop-off loop and the Florence Street/Louise Road intersection.*

- **Volume of Traffic:** The City has concern with the validity of the existing trip generation estimates in the ENF. Are these based on I.T.E. or site observational data? Site is currently underutilized so existing trip generation should be based on actual counts not I.T.E. standards. When studying traffic flows to/from Site, need to consider the percentage of trips to subject property where destination is one of abutting or neighboring sites (i.e. Miltons, Barnes & Noble, offices, Capitol Grille, Atrium Mall, etc.). *The EIR should include analysis of the volume of traffic that is trespassing on the Site, and include analysis of the volume of traffic that can be expected to trespass on the Site after completion of the proposed project.*

- **Traffic Issues and Roadway Improvements:** The ENF does not detail the infrastructure improvements associated with the proposed widening of Route 9. *The EIR should include a traffic study to clarify the implications of anticipated traffic changes on Route 9, Hammond Pond Parkway, Florence Street, Heath Street, Langley Road, Hammond Street, Jackson Street, Daniel Street, Beacon and any public road impacted from traffic generated by the proposed development. Issues and concerns to be addressed include:*

    1. *A study of the traffic levels of service and queues on Route 9, east and west, and Hammond Pond Parkway, north and south during AM peak, PM peak, average weekday, and average weekend day. This study should include Route 9 from 128 to the Boston City limits.*
    2. *Safety issues related to increased response time and accessibility of fire and emergency vehicles using roadways in the vicinity of the development site.*
    3. *Impact of multiple new curb cuts into proposed development on Route 9 traffic.*
    4. *Degradation of current vehicular access to other shopping centers served by the Route 9/Hammond Pond Parkway intersections.*
    5. *Provisions for other than vehicular access between the three major shopping areas centered on the Hammond Pond Parkway/Route 9 intersection.*
    6. *Impacts on the Langley Road/Route 9 intersection.*
    7. *Impacts on surrounding local streets, including: Florence Street, Heath Street, Jackson, Langley Road, etc.*
    8. *Traffic study should include all pending & approved projects along Route 9 and within the immediate neighborhood, both in Newton & in Brookline. Study should*

include The Terraces (Langley Road), The Residences (Boylston St.), The Suites of Chestnut Hill (Boylston St.), and Avalon Bay (Boylston St.).

9. *Traffic study should take into account actual traffic patterns & should acknowledge that a percentage of drivers do not comply with existing access restrictions (i.e. "no left turns," etc.).*

- **City of Newton Framework Plan:** Many modes of transportation exist in Newton and the City is committed to supporting all modes without sacrificing some to the service of others. *The EIR should address how the proposed development will conform to this objective.*

- **Travel Demand Management Program:** *Consistent with the City's Framework Plan for transportation, the EIR should include a travel demand management program to discourage use of single occupant vehicles accessing the site. A variety of elements could be part of this program including: limitation of commercial and residential parking spaces, parking pricing, transportation shuttle services for hotel and retail patrons, establishing a TMA (transportation management association), consideration of alternative transportation services for the development including specific options for employees. The EIR should also include an automatic traffic counting system installed and maintained by developer. Data from this system could be used to monitor traffic flows in and out of the site and be part of a traffic mitigation program tied to changes in traffic volumes.*

- **Transportation Engineering Plan (TEP):**
  The ENF incorrectly indicates that the proposed development will meet or exceed thresholds related to roadways. The developer will have to acquire many permits from Mass Highway and from the City of Newton. Boylston Street, a proposed site access point, is operating at most times at a very low service level. The City of Newton will require a TEP as part of the permit/approval process. *The EIR should include a TEP.*