



July 6, 2010

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

Jay Rourke  
Senior Project Manager  
Boston Redevelopment Authority  
One City Hall Square  
Boston, Ma 02201

Re: 157 Berkeley Street, Environmental Notification Form EEA #14597, and City of Boston Expanded Project Notification Form

Dear Secretary Bowles and Mr. Rourke:

WalkBoston welcomes the opportunity to comment on the documents prepared for proposed development of 157 Berkeley Street - the MEPA Environmental Notification Form EEA #14597, and City of Boston Expanded Project Notification Form

This proposal would expand the home offices of the Liberty Mutual Group. It consists of two elements – a two-story conference center and a 22-story office building – separated by Stuart Street. Parking for 205 vehicles will be provided by the new buildings, of which about 140 are net new spaces. A pedestrian bridge is proposed to connect the two new buildings at the second floor level.

While we are supportive of the project and very glad that Liberty Mutual will expand its operations in Boston, there are many pedestrian issues associated with this proposal because it is located in a concentrated employment area of the Back Bay and because it will ultimately house some 3,200 Liberty Mutual employees on-site, 600 to be added when the new building is complete. Only 13 percent of the current employees drive to work. 70 percent arrive by walking from public transit, and another 17 percent by walking between home and work or by vanpool or carpool. Aside from drivers, vanpools and carpools, all of the employees will approach the Liberty Mutual buildings on foot. Therefore, the sidewalks surrounding the buildings are extremely important access routes for the vast majority of existing and future Liberty Mutual employees as well as many other walkers. This condition leads to the following three major comments on the pedestrian environment:

1. We do not believe a pedestrian bridge is necessary or desirable in this location.
2. We think that sidewalk widths around the perimeter of the project should be wider to accommodate anticipated pedestrian volumes and we urge the proponent and the City to work together to improve pedestrian access and safety.

3. We also urge the proponent to work with the City to improve the intersection of Columbus, Stuart and Arlington Streets.

### **The Pedestrian Bridge**

While we understand Liberty Mutual's desire to create an indoor connection between its two buildings, we are not comfortable with the introduction of a 2<sup>nd</sup> story pedestrian bridge over Stuart Street in the Back Bay. The project will be a success if it creates an active, safe street life, and the best way to do that, we believe, is for employees to continue to cross at street level. The pedestrian environment would be reduced in quality by adding a low-level elevated crossing only 18 feet above the sidewalk that interferes with the surroundings, adds shadows, alters the appearance of the streetscape and constricts views in an unorthodox, non-Bostonian way. Alternatives to the low-level pedestrian bridge must be thoroughly explored, and we urge Liberty Mutual to work closely with the City of Boston to address traffic issues on Stuart Street to develop a satisfactory street-level crossing option. If a weather-protected route between the buildings is a mandatory requirement for the proponent, a tunnel under Stuart Street would solve the problem.

### **Sidewalks**

The pedestrian environment at sidewalk level should be improved and made safer. A first step is wider sidewalks on the Berkeley and Columbus Street frontages of the two sites, with a clear width (that includes no street furniture or trees) for walkers that meets the standards of the 2006 MassHighway [Project Development and Design Guide](#) for heavily pedestrianized urban commercial districts (such as the project area). In the Guide the recommended minimum clear sidewalk width is 8 feet and the preferable clear width is 12-15 feet.

The Berkeley Street frontage provides the major entrance to the new 22-story building, the existing Salada Tea Building and the 1937 Liberty Mutual headquarters building at 175 Berkeley Street. On-street parking is provided on this frontage for about 12 cars in front of the 1937 building and 10 cars where the proposed 22-story building will be located. The current sidewalk appears to be about 10 feet wide, but trees and other street furniture reduce its usable clear width. Contrast this with the sidewalk on the opposite side of Berkeley Street, where the clear width in front of John Hancock Hall is over 20 feet.

WalkBoston requests the proponent and the City of Boston to study ways of providing a wider sidewalk along the two blocks of Berkeley from Columbus Avenue to St. James Street to enhance the major entrances to the new and existing Liberty Mutual buildings. One option is to eliminate parking in front of the proposed building and the 1937 building.

A second option is to remove a travel lane from Berkeley in these two blocks, which would be possible because traffic here is not heavy enough to justify three travel lanes and Berkeley narrows to two lanes north of St. James continuing thus to Storrow Drive. In both options the space would be added to the sidewalk.

### **Complete Streets**

WalkBoston congratulates the proponent for moving its cafeteria to the Columbus frontage to enliven that block. Here, an opportunity exists for considerable improvement of the extremely narrow sidewalk. Columbus now has two travel lanes westbound in the Arlington to Berkeley block. Traffic here and in the next two blocks is very light. We request that the roadway be narrowed by one travel lane and the space converted into a wider sidewalk, plus a bike lane to continue that recently striped above Dartmouth Street. The existing cobble median should be

retained to allow for passing double-parked vehicles. This configuration has worked well above Dartmouth Street for 25 years. The proponent's plan proposes about an extra foot for the sidewalk by removing the cobble median; this solution does not address the potential walking traffic.

Stuart Street should be redesigned to make mid-block crossings legitimate and safe for pedestrian movement, with a striped crosswalk flanked by curb extensions at both sides of the street, and "Pedestrian Crossing" warning signs to alert motorists to the presence of pedestrians – as has been done fairly recently for the Dartmouth Street crossing from the Back Bay T Station. This mid-block crossing could be achieved by removing a few parking spaces and would make pedestrians much more visible to drivers.

At all intersections, curb extensions should be added for pedestrian safety and visibility. All intersection crossings should be designed with signal timing that gives maximum time for pedestrians to cross the street. Clear pavement markings should be added or enlarged for additional safety for pedestrians.

### **Intersection of Columbus, Stuart and Arlington Streets**

We understand that the developer will undertake a study of this intersection and we applaud that idea. This intersection is critical to the movement of traffic along Stuart Street between the two parcels of the project. Its crossings serve pedestrians poorly, slowly and unsafely. And its signal timing seems inadequate for Stuart Street traffic. We suggest the study consider the intersection layout from about 50 feet west to 50 feet east, with the goals of reducing its vast asphalt sea, designing direct pedestrian crossings, and readjusting signal timing to better serve both vehicles and pedestrians. Some improvements that might be made are described below.

- Signals re-timed to ensure maximum crossing time for pedestrians. Our understanding is that adjusting the signal timing at the box involves considerable expense for the city. Perhaps the proponent could help.
- In the early 1970s, the City's future plan was to close Columbus Avenue westbound at the Arlington intersection adjacent to the Park Plaza Hotel, retaining the loading and storage functions for the hotel within current street right-of-way. Through traffic from Charles Street was to continue down St. James to Copley Square or turn left on Arlington and right to travel out Columbus. This plan would remove some traffic from the intersection, permit construction of more sidewalk space to help pedestrians find their way through the intersection and has potential for safer pedestrian crossings and greater convenience for Liberty Mutual employees and all other pedestrians as well as for the hotel. We suggest that it be reconsidered.
- Extension of pedestrian 'safe areas' into the intersection would be very desirable. Additional refuge areas for pedestrians would add to safety. (Currently there are street markings that suggest the opposite is planned – that the nose of the island at the crosswalk will be cut back.) Curb extensions should be used where possible to narrow street crossings. The drop-off area in front of the former Renaissance School should be removed and replaced with a sidewalk.
- An additional issue that should be reviewed at this intersection is the pedestrian safety impacts that result from delivery trucks and loading dock operations. Pedestrians are sometimes forced to walk into the street into oncoming traffic because delivery trucks block the sidewalk. Better design and management should be undertaken to eliminate this problem.

We offer these specific suggestions because, while the ENF and PNF documents discuss such amenities as trees, planters and outdoor seating, they do not provide specific proposals for good sidewalks and crosswalks for walking – widths, curb extensions, crosswalks, intersections. This project provides a rare chance to transform two whole blocks to embody the goals of the City’s current Complete Streets planning. We hope the proponent and the City will cooperate in a systematic study of such possibilities here and create a splendid legacy for Liberty Mutual in Boston.

Our meeting with Liberty Mutual’s thoughtful, competent staff and consultants leads WalkBoston to believe that the knowledge to consider broader streetscape design possibilities exists, needing of course, the participation of the City of Boston.

Thank you for the opportunity to comment on this important project. Please feel free to direct questions to me or to Bob Sloane at 617-367-9255 or [wlandman@walkboston.org](mailto:wlandman@walkboston.org)

Sincerely,

A handwritten signature in black ink that reads "Wendy Landman". The signature is written in a cursive, flowing style.

Wendy Landman  
Executive Director

Cc Sean Murphy, Liberty Mutual Group  
Yanni Tsipis, Colliers, Meredith & Grew  
Dave Hewitt, Epsilon Associates