



November 8, 2013

Secretary Richard K. Sullivan, Jr.
Executive Office of Energy and Environmental Affairs (EEA)
Attn: Alex Strysky
100 Cambridge Street, Suite 900
Boston MA 02114

Commissioner Thomas Tinlin
Boston Transportation Department
One City Hall Plaza
Boston, MA 02201

RE: Comments on the DEIR for The Boston Garden, MEPA #15052

Dear Secretary Sullivan and Commissioner Tinlin:

WalkBoston has reviewed the DEIR for the Boston Garden project. The proposal will improve the second largest pedestrian, transit and commuter rail interchange locations in the city. From WalkBoston's perspective, one of project's key challenges is handling the many daily pedestrian trips generated by subway and commuter rail riders, on-site workers and residents, and the large crowds generated by the TD Garden Arena.

The design of the 2.8 acre site includes a large office building, a hotel and a substantial residential building, comprising 1,870,000 square feet of new structure. The basement and first two levels of the building are predominantly retail. A lower level garage expands the existing below-grade parking facility by 800 spaces, for a total of 2075 in the complex.

The magnitude and importance of pedestrian access has prompted a number of comments and questions about the ways in which the proposed plan meets the needs of walkers both to and within the site. It is very important to distinguish between the site design, which is under the control of the developer, and the design of Causeway Street, which is under the control of the City. We believe that these two components must be designed to work well together, and our comments address both areas because it is not possible to separate them from a pedestrian perspective. For that reason we have addressed our comment letter to both MEPA and the City of Boston Transportation Department.

CONFUSION ABOUT PEDESTRIAN CROSSINGS OF CAUSEWAY STREET

The DEIR includes a design for Causeway Street that has been superseded because of the City's receipt of a federal TIGER grant that will pay for the reconstruction of the street. As described to WalkBoston by several City staff members, the designs shown in the document are currently being modified by the City to incorporate cycle tracks instead of bicycle lanes and to possibly alter original alignments of lanes on the street. New designs will change the approved 25% design drawings for all pedestrian crossings on Causeway Street, and for vehicular accommodations on the street as well. The details of the proposed changes have not yet been shared, and WalkBoston will actively participate in review of the new design once it is

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presented. Rather than provide comments on the current design we have focused this letter on suggestions about elements we would like to see in the new design.

MAJOR PEDESTRIAN ISSUES

1. Projected pedestrian volumes into and out of the site exceed vehicular volumes.

The number of people who currently enter the rail and arena adjacent to the site is impressive. Per the MBTA Blue Book, there are 26,763 weekday commuter rail boardings at North Station, and 16,702 weekday entries into the Green and Orange Lines. In addition many more people use the transit lines, streets and sidewalks when an event is scheduled in the 19,000 seat TD Garden. North Station is the 2nd busiest transit station in the MBTA system (exceeded only by South Station). Causeway Street carried 14,800 vehicles per day in 2009, according to MassDOT.

2. Pedestrian crossings of Causeway Street are one of the most important issues to be explored.

a. Canal Street is the major pedestrian approach to the site.

Reflecting the significant anticipated growth in transit and pedestrian trips, a new pedestrian entrance to both the rail station concourse and the TD Garden is planned for the location where pedestrians will cross Causeway Street from Canal Street. Historically Canal Street served as the pedestrian route to North Station from the Downtown financial and retail districts, and in the planned design it will regain that prominence (Fig. 1-14.)

Walking along Canal Street is fostered by wide sidewalks and by the street's slow speed, narrow travel lanes, corner bulb-outs and traffic signal designs. Pedestrians are encouraged to follow a walking route along Congress Street from the financial district and up Canal Street to North Station.

Retail property uses along the frontage of Canal Street have also changed over time and it now includes many uses catering to people attending sports events including bars and restaurants with large outdoor seating areas.

The private and public expenditures on Canal Street have emphasized it as the primary walking route, thus leaving Friend, Portland and Haverhill Streets much less used by walkers.

b. The design of the Canal Street entrance emphasizes its importance

"Champions Way," is the grand entrance into the project from Causeway Street – directly aligned with Canal Street. It is approximately 50' x 200' (10,000 square feet), sized to handle large numbers of people accessing the site and lined with retail facilities to attract walkers. (Nothing of this nature is proposed for either the Friend Street or Haverhill Street approaches.)

About half of Champions Way will be open to the sky, and at the far end, near the rail concourse, is a 'mixing bowl,' where the entrance is divided into three parts leading to the Commuter Rail Station, the second-floor TD Garden and the below grade North Station subway station.

Interestingly, the proposed Champions Way has roughly the same dimensions as the Channel Gardens/Promenade leading into New York's Rockefeller Center. The New York example spreads out into wide sidewalks at either end of the Promenade; here, that would be somewhat comparable to the wide sidewalk along Causeway Street and the expanse of the rail station concourse at the opposite end of the entrance court.

Other local comparisons are also apt. The Canal Street entrance is about one-half the length and roughly the same width as Yawkey Way, used as a pedestrian street for access

to the 40,000-seat Fenway Park. South Station's main entrance has roughly 6,500 square feet divided into two walkways and a row of escalators and small shops. The South Station vestibule also connects with relatively large open areas on both ends, a triangle of sidewalk in front of the station is about 9,300 square feet and a plaza for pedestrians on the opposite side of the street is an additional 17,500 square feet.

c. The new entrance to the site is more than a replacement of existing site entrances.

Walkers currently enter the TD Garden and rail station concourse via east doors facing the sidewalk along Legends Way and west doors facing the O'Neill Building path. This layout is reflected in current pedestrian access patterns with existing peak hour pedestrian traffic heaviest where Friend Street crosses Causeway Street, as commuters walk toward the western doors.

The same pattern does not exist at the intersection of Haverhill and Causeway Streets, perhaps because walkers heading to the east entrance use the MBTA's underground passage beneath Haverhill Street.

Once the proposed new development is in place, the importance of the east and west entrances will diminish significantly and the new entrance at Canal Street will be the focus.

3. Projections of pedestrian activity on parallel streets do not seem to reflect the current design.

Causeway Street intersects with four streets in front of the project site – Portland, Friend, Canal and Haverhill, and the distance between the streets is quite narrow. The intersections of Portland, Friend and Canal are three-way, and Haverhill St. is a four-way intersection. All have at least one crosswalk, and there are signals at Haverhill and Portland Streets.

A brief analysis of each street is useful to explore their role in the pedestrian network leading to North Station. As noted above, Canal Street is the primary pedestrian route and the other streets have narrower sidewalks, fewer retail outlets catering to Garden event patrons, and more parking lots that reduce the quality of the pedestrian experience.

- Portland Street, slightly west of the project site, serves relatively few pedestrians. Most walkers on this street may be heading toward the O'Neill Federal Building at the corner of Causeway and Merrimac Streets, and some may be heading toward the west entrance to the TD Garden and the rail station concourse, although the walking route is not direct.
- Friend Street provided a more direct route to the west entrance of the TD Garden/Rail Station, but it crosses Causeway Street at a location that does not align with the O'Neill Building pathway, and the existing diagonal path across the project site will disappear with the new development.
- Haverhill Street provides access to the Orange Line/Green Line station, and both sides of this 2-block street have been recently developed with large apartment buildings. However, many loading zones for the new buildings and vehicular entrances make the street less pedestrian-friendly than Canal Street.

4. Pedestrian volume projections may need re-examination.

Existing and projected pedestrian volumes for the four street crossings are provided in the document. Existing pedestrian volumes are highest in the weekday AM peak hour at Portland Street which would seem to stem from Commuter Rail passengers walking from North Station, exiting via the west door and walking toward downtown.

In future projections for the 2017 Phase I development, all pedestrian movements grow, but the largest growth is projected for Friend and Haverhill Sts. which lead only to the east and west entrances to the building. Canal Street traffic grows somewhat, but Haverhill Street projections for the AM peak hour grow to be **10 times larger** than the existing pedestrian

movement at that intersection. It is unclear if these volumes reflect a route using Haverhill Street's underpass beneath Causeway St. and the sidewalk along Legends' Way leading to the east doors of the rail station and the TD Garden. It seems unlikely that such high volumes could cross Causeway St. safely at grade.

For the 2028 full-build, pedestrian volumes grow again, but the pattern is difficult to understand: pedestrian numbers increase substantially at both Friend and Haverhill Sts., but change very little for Canal Street, despite the design's clear emphasis on the new entrance focused on the traditional walking path from Downtown to North Station.

By contrast, vehicular traffic through the four intersections changes very little from existing levels, declines slightly for the 2017 Phase I, and rises again for the 2028 full-build.

We are puzzled by the projections and request that the proponent describe the volumes and their projected locations in detail.

5. The traffic signal program for Causeway Street needs re-examination.

If this development is to focus its principal entrance on Canal Street, and pedestrian traffic at that location is to increase, the intersection of Causeway and Canal Streets must be signalized for pedestrian safety. The DEIR deliberately fosters jaywalking at both Canal and Friend Streets: a logic of unsignalized intersections is stated in the report: "The unsignalized crossings of Causeway Street at both Friend Street and Canal Street operate at a pedestrian LOS F during the peak hours independent of the full build-out of the Project. Again, under actual operating conditions, pedestrians cross these locations in a platoon when a gap in traffic is afforded in at least one direction on Causeway Street thereby resulting in less pedestrian delay than predicted by the analysis model."(DEIR page ES-7; pages 3-2 & 3-4; table ES-4)

PROPOSED SOLUTIONS

WalkBoston is excited about the pedestrian service this project will provide. To make the project more appealing and safe for walkers, we suggest the following steps that would more clearly recognize the important role of pedestrians in accessing this site:

THE CAUSEWAY STREET FRONTAGE OF THE SITE

1. Propose a hierarchy of pedestrian crossings on Causeway Street. Canal Street will be the most important pedestrian crossing of Causeway Street (on ground level) based on this design. Haverhill Street is the most important pedestrian crossing of Causeway Street (that passes underground) based on this design. Friend and Portland Sts. will be relatively low-volume pedestrian crossings.
2. Think of Canal and Haverhill Sts. (and possibly Friend St. as one intersection to aid in finding pedestrian solutions. The block front distance between Haverhill Street and Canal Street is manageably short (about 120 feet). Friend St. is a bit further away from Canal St.
3. Signalize Canal/Haverhill Street at Causeway Street as a single coordinated traffic intersection. Portland St. could also readily be signalized. Friend St. does not necessarily need a traffic signal, if alternative pedestrian crossing locations can be encouraged and if sidewalk and street crossing designs discourage pedestrians from crossing at this location.
4. Build a level pedestrian crossing table for this intersection to slow traffic from both directions. The table should extend a total of at least 200' from the MBTA headhouse area at Haverhill and Causeway Sts. to the west side of the intersection of Canal and Causeway Sts.
5. Try to attach Friend Street to this raised crossing, recognizing there will be some difficulties. Canal, Friend and Haverhill Sts. constitute the majority of pedestrian crossings

on Causeway St. and thus may be considered as a single unified crossing location. Friend Street might be included in the raised table, but issues arise. First, extending the platform to Friend Street doubles its length, potentially leading to the use of the street for storage of vehicles at signals that may interfere with large-volume pedestrian crossings. Second, an additional signal at Friend St. so close to the Canal/Haverhill signals complicates the vehicular signal patterns for the whole street. Third, much of the proposed truck service traffic into the site is located at a door between Friend and Canal Streets, perhaps causing conflicts with surface gradients of the proposed raised platform and adding turning movements into a pedestrian facility. Entrances and exits into this truck service area should take place only from westbound Causeway Street – thus, no left turns for eastbound access.

6. Permit no left turns to or from Causeway Street. Both Causeway Street westbound and Haverhill Street northbound can become vehicular entrances into the site's parking garage, but exiting traffic from this ramp should only be permitted to turn left to find its way to the Central Artery or Keaney Square. Traffic exiting here and wanting to turn right should be encouraged to use the existing exit ramps at the rear of the building, where Nashua Street provides direct access to Storrow Drive, Route 28, and the entrances to the Central Artery bridge and tunnels.
7. Design the cycle track proposed for Causeway St. to minimize impacts on pedestrians. The alignment of cycle tracks should not interfere with pedestrian movement. Cycle tracks could be located in space where landscaping is proposed. Cycle tracks should be located together so that pedestrians know where to expect bicycles. Pedestrians should be informed of the existence of the cycle tracks through a combination of eye-level signs and painted warnings on the pavement. Bicycle signals and signs in both directions should be installed to warn of pedestrian crossings. Bicycles waiting for signals and thus stored on the raised pedestrian platform should be minimized. Curbing along the cycle track should disappear at the raised pedestrian platform at Canal/Haverhill Sts. to avoid mishaps and to comply with ADA regulations.
8. Design lanes for movement on Causeway St. carefully. Preliminary designs indicate four 10.5' vehicular lanes, a 5' cycle track in each direction (possibly combined), a median strip of 6' located between the two cycle tracks, and restrictions on existing turning movements at both Canal and Friend Streets.

WITHIN THE SITE

1. Reflect by design the number of pedestrian movements anticipated in Champions Way.

Where Champions Way meets the entrances to the TD Garden and the rail station concourse, pedestrians will be passing through between:

- The Green and Orange Line subway stations and the Commuter Rail Station
- The Commuter Rail Station and TD Boston Garden
- The Green and Orange Line subway stations and TD Boston Garden
- Canal St. and the Commuter Rail Station
- Canal St. and TD Boston Garden

We are concerned about the dimensions of this complex entrance and especially the 'mixing bowl' near the entrance to the TD Garden and suggest a detailed analysis to explain its ability to fully, conveniently and safely handle the many pedestrian demands to be placed on it.

2. Reconsider the dimensions of the MBTA underground passageway between the 'mixing bowl' and the subway station to maximize pedestrian convenience, safety and service. It

has a 90-degree turn at one location, along with an inconsistent width progressing through the site. Additional width may be essential at the 90-degree turn. The queue of pedestrians at the bottom of the escalators should have adequate space for waiting.

3. Add a stairway inside the 'mixing bowl' to avoid overcrowding of the escalator and elevators. A stairway would also offer an opportunity for people to exercise during their on-site walk from the subway to the Garden or the commuter rail concourse.
4. Provide generous space for pedestrian circulation in and around the first floor at Champions Way. The DEIR design has two escalators, two stairways (leading upward only) and two elevators (leading downward only.) Space is provided on both sides for people walking through between Canal Street and the rail station concourse. It is important that these facilities and spaces are matched closely to anticipated pedestrian traffic. It may also be important to look forward to future pedestrian traffic to be certain that the spaces and facilities are able to handle projected demand. For example, escalator redundancy may be a consideration to assure that pedestrian traffic moves without impediments.

BEHIND THE SITE

1. Commit to financial aid for the construction of the Charles River Southbank pedestrian/bicycle bridge over the MBTA tracks. This proposal has been on the agenda for a considerable time. It has been proposed to complete the various pedestrian/bicycle projects along the Charles River in the vicinity of North Station. It will benefit all of the users on the South Bank of the river, and will aid non-motorized traffic to reach the site of this project.

WAYFINDING

1. Signs and other indications of routings for pedestrians should be provided to aid walkers and to direct pedestrian traffic to certain entry points.

We appreciate your consideration of our comments and look forward to your responses to them. Please feel free to contact WalkBoston with questions you may have.

Sincerely,



Robert Sloane
Senior Project Manager



Wendy Landman
Executive Director