



January 8, 2013

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

RE: Comments on Casey Overpass Project, Route 203 Reconstruction ENF
MEPA 14978

Dear Secretary Sullivan:

WalkBoston has been a member of the Casey Working Advisory Group (WAG), and now the Design Advisory Group (DAG) since MassDOT's planning process began. We have learned a lot about the project and have spoken out on behalf of Jamaica Plain pedestrians and users of transit at the Forest Hills station. We have analyzed the information provided in the ENF and during the planning and design process and write to express our strong support for an at-grade solution for the Casey overpass corridor.

Goals for the Casey Corridor

WalkBoston has worked with WAG and DAG members throughout MassDOT's process and we share many goals for the project:

- Improve safety for pedestrians, drivers and bicycle riders.
- Improve safety for vehicles passing through, as well as those with local destinations.
- Improve access between the Forest Hills T station and nearby neighborhoods.
- Reconnect the parts of the Emerald Necklace that are now separated by the viaduct.
- Provide links to the Forest Hills Cemetery and the Southwest Corridor Park.
- Change Forest Hills into a retail/transportation/recreation destination.
- Ensure that there are no significant traffic impacts on adjacent neighborhoods.

Planning issues

Many potential alternatives have been examined to meet these goals. Of the alternatives WalkBoston believes that removal of the viaduct is the most suitable option and is clearly in the best interests of the city and Jamaica Plain. Our belief is based on a wide variety of considerations including those summarized below.

Serving through traffic

The transportation analysis carried out by MassDOT's consultants shows that overall local and regional traffic operations will work equally well whether Forest Hills has an at-grade roadway or a new bridge. Boston streets that are comparable to the at-grade proposal and carry similar volumes include Congress Street near Government Center, Massachusetts Avenue in the South End, Boylston Street at the Fenway, Tremont Street in Roxbury and Dorchester Avenue in South Boston. An at-grade roadway in the Casey corridor is well within the scale of other urban roadways in Boston, and while they are not in every case ideal pedestrian environments, they are nonetheless reasonably scaled for all travelers.

Balancing needs of corridor users

The Casey Overpass was designed to provide an unimpeded route for vehicles between

the Arborway and Morton Street. Although it is important to serve this traffic movement, it should not be the overriding goal of the reconstruction in this area. Balancing the needs of drivers, walkers and cyclists is a more important goal, and the alternative of removing the Overpass presents a rare opportunity to do this while simultaneously reconnecting and revitalizing the Forest Hills neighborhood of Jamaica Plain. In addition, construction of an at-grade option would take less time, would be less disruptive to the neighborhoods, and would be less costly to maintain in the future.

“Complete streets” planning

The City of Boston and the Commonwealth of Massachusetts have made recent strong policy and design commitments to designing streets and roadways so that pedestrians, bicyclists, transit users and vehicles are all well accommodated. The “Complete Streets” approach is predicated on design that respects the scale, land use mix, history and landscape setting of roads while accommodating all kinds of traffic. A busy urban roadway should not overwhelm other transportation modes or the Forest Hills setting with a new highway structure that is out of scale and function with its setting and the volume of people and vehicles that need to be served.

A comfortable pedestrian environment

Pedestrians feel intimidated by vehicular traffic that might be unexpected and in volumes that make crossing the street difficult. However, a busy at-grade street can be designed as a safe, comfortable and handsome thoroughfare for all modes of transportation. Pedestrians are much better served with an at-grade design, for few walkers are comfortable walking the isolated sidewalks on the existing viaduct, and walking under or next to a viaduct signals that this is a highway environment not a city street.

The overhead viaduct and pedestrians

Bridges and elevated roadways are not good neighbors for pedestrians. Spaces beneath overpasses are uninviting; piers present barriers to local movement and people do not want to walk next to overpasses. Views along and across the corridor are obstructed in many locations and deep shadows are cast. Ramps would continue to cause confusing intersections and pedestrian crossings. Pedestrians attempting to walk over the viaduct will be intimidated, as drivers will be “cued” that they are in a highway environment.

Improvements to transit

The project sits an important spot for transit users, as Forest Hills Station is one of the busiest on the MBTA system. Safer and more convenient connections to the Forest Hills Station are essential – especially for pedestrians from the surrounding residential areas. The planned improvements to bus operations will make them more efficient with bus-priority signalization and a dedicated bus turning lane.

Potential land use changes

Forest Hills was once the terminus of an elevated transit line and traffic was difficult in an around the station. The existing bridge was built high above the “el” to avoid snarled traffic on the surface, and was a very long structure as it climbed above the tracks and connected to ramps on either end. The overpass truncated the path of the Emerald Necklace (except for cars). It divided Jamaica Plain and Forest Hills and virtually precluded easy pedestrian connections through the area and under the viaduct. Development options around the transit station have also been discouraged by the noise, disruption and

inconvenience caused by the viaduct. When compared to any plausible bridge alternative, the at-grade option will greatly enhance the conditions and prospects for high quality mixed-use development around Forest Hills Station permitting a greater share of the area's future residents and employees to live and work near a major transportation hub.

Impacts on adjacent neighborhoods

WalkBoston believes that the final design and construction of the proposed Casey Arborway must not result in drivers using residential streets in the surrounding neighborhoods as cut-through commuter routes. MassDOT and the Boston Transportation Department have vowed to work with local residents to implement proven traffic control techniques to prevent this from happening.

Precedents for viaduct removal

All across the country, transportation officials are removing overpasses to create more vibrant, pedestrian-focused neighborhoods. Our own Big Dig is only one of many such efforts. New York, San Francisco and Seattle have also demolished overhead highways. Traffic has been diverted or discouraged as viaducts have been removed, allowing many opportunities for neighborhood improvements to arise as such projects proceed.

Public process

WalkBoston believes that the advisory group process was fair, thorough, and inclusive; that the consultants presented a suitable variety of schematic alternatives; and that goals of improving and balancing livability and mobility were discussed at length with the advisory group. We thank MassDOT setting up a process that allowed the community to closely examine the details of this very important project.

Upcoming design details

The continuing process of planning this project will be watched closely for many issues, ranging from crosswalk design to the details of the Washington Street slip lane. Here are some issues that WalkBoston believes are important:

Crosswalk design

The detailing of crosswalks is important for pedestrian safety. WalkBoston urges that several guidelines be followed:

- Crosswalk distances should be as short as possible.
- Medians should be wide enough to provide pedestrians with a place to safely wait if they cannot cross all the way during one signal cycle, but not so wide that they significantly increase the crossing distance.
- Roadway lane widths should be adequate for safe traffic operations and narrow enough to improve pedestrian safety and deter speeding in off-peak hours.
- Tight curb radii at intersection corners should be used to help slow traffic speeds and provide greater pedestrian safety and shorten crossing distances.
- Signal timing should allow sufficient time for pedestrians to safely cross streets.

Sidewalk widths should provide space for significant pedestrian volumes where needed. In those locations, a minimum of 10 - 12 feet of width will allow two people walking side by side to pass two others walking side by side.

Pedestrian and bicycle conflicts

The current design contains pedestrian and bicycle issues that WalkBoston would like to see clarified. The separated locations of pedestrian and bicycle bike facilities have not yet been determined in detail. Routes for sidewalks and bike paths overlap and do not retain appropriate spatial relationships to each other and in relation to roadways. The lack of a comprehensible relationship is confusing and will lead to conflicts between user groups as these paths cross frequently. For example, in some locations sidewalks are adjacent to the roadway edge and in other places the bike path is adjacent to the roadway edge. The flow of bicycles and pedestrians in the large plaza area also needs further resolution.

Shea left turns

At the Shea intersection, the double-left turn lanes for Circuit Drive traffic increase the crossing distance for pedestrians and - because they may be unexpected by drivers - will diminish pedestrian safety.

Links to the Southwest Corridor Park

The paths leading to the Southwest Corridor Park on the downtown side of the connection between South St. and Washington St. intersections may be missing an important pedestrian desire-line connection to the Southwest Corridor Park. If the proposed connection is to serve as a multi-use path rather than only a bike path, this should be clarified in the design.

The Washington St. slip lane

The slip lane for EB traffic turning right onto Washington St SB can be made safer for pedestrians and bikes by making a raised crosswalk. (Perhaps that is what is intended by showing the crosswalk in yellow.) This treatment would make the slip lane acceptable to WalkBoston, and there are precedents for this adjacent to similar parkways

Thank you for the opportunity to provide comments on this important project. We are pleased with the current decision on the removal of the viaduct and the construction of an at-grade roadway in this corridor. Building a project that works for traffic and also provides a comfortable, safe and inviting environment for pedestrians is a once-in-a lifetime opportunity that will serve all users of the corridor and help to ensure the long-term vitality of the Forest Hills residential and commercial areas.

Please feel free to contact WalkBoston with questions you may have.

Sincerely,



Wendy Landman
Executive Director