

February 7, 2014

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

RE: Comments on the Government Center Garage Redevelopment Environmental Notification Form (ENF)

EOEA #15134

Dear Secretary Sullivan,

WalkBoston appreciates the opportunity to provide comments on the Environmental Notification Form (ENF) for the Government Center Garage Redevelopment.

The proposal calls for partial demolition of the underutilized Government Center Garage as an early action, with subsequent demolition and redevelopment to take place over a number of years. Initial demolition will result in opening Congress Street to daylight and allowing redevelopment of the East Parcel, including a new public plaza and pedestrian connection between the Bullfinch Triangle and Greenway. The east parcel is a critical pedestrian link between Downtown Boston and North Station/Bulfinch Triangle, as well as a link to the Rose Kennedy Greenway. The total development will include 812 new housing units, 196 new hotel rooms, over one million gross square feet of office, and 82,500 gross square feet of retail. The garage will continue to provide sufficient parking for the new on-site uses, commercial parking for transient users as well as overnight resident parking.

We offer the following comments:

1. We believe the proposed development will improve the area for pedestrians compared to existing conditions. The existing garage is a large, foreboding structure from the pedestrian viewpoint. While the potential removal of the garage and the reopening of Congress Street to the sky is appealing in its own right, the proposed development offers additional benefits. As the project is refined during subsequent reviews, MEPA and the BRA must ensure that these benefits are not lost during revisions or project changes. We trust that any project approval will condition the following proposed improvements to ensure they are included in the final design:
 - The removal of overhead parking decks and associated office space, returning sunlight to Congress Street.
 - The proposed pedestrian-only extension of Canal Street through the newly-configured east parcel that greatly benefits heavy rush-hour foot traffic to/ from North Station.
 - The narrowing and redesign of Sudbury Street, including elimination and replacement of angled Police Department parking from the right-of-way.
 - The extension of Bowker Street to make it a through street, eliminating the stairs between Sudbury Street and the existing dead end of Bowker Street.
 - The project could potentially provide very substantial benefits that would have a lasting effect on the built environment of the immediate neighborhood and the entire downtown core of Boston. Careful attention must be paid to the pedestrian experience in and around the site to take advantage of its tremendous pedestrian and transit access. The project is positioned to

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capitalize on these features and it is incumbent upon MEPA, the BRA and the City of Boston to ensure that the final design fully accounts for these opportunities.

2. Curb cuts for the garage – All curb cuts provided for the new garage should be kept to a minimum width, should enter the street at a right angle, and should be at sidewalk grade (no curb cut for pedestrians). Appropriate vehicle exiting warning signs must be provided for pedestrian safety. The existing garage access drives are too wide and pedestrians on the sidewalk are often threatened by automobiles traveling at high speeds into and out of the garage's overly wide parking access ramps.
3. MBTA on-site improvements – The project should not interfere with normal MBTA bus operations, and allowance must be made for continued bus and subway service connections on-site. The proponent and the MBTA should commit to additional design work to improve the walking environment in this area to accommodate the large number of pedestrians using transit, along with the additional pedestrian volumes that will be generated by this very large project.
4. Hawkins and Bowker Streets – Bowker Street should become a through street with a changed gradient that allows an ADA compliant sidewalk. If Hawkins Street cannot also be made a through street, the stairs that connect its dead-end at Sudbury Street should be re-graded into an ADA compliant sidewalk.
5. North End Access – While the project claims to reconnect long divided Boston neighborhoods, it fails to offer the North End the same pedestrian benefits it does for the West End, Government Center and Bullfinch Triangle. In fact the project design seems to turn its back on the North End. A North End pedestrian connection should be explored in greater detail. The connection should work to interconnect the north-south walkway through the east parcel, North End residents, the two Green and Orange Line MBTA subway stations, and the Greenway.
6. Walk Signals – The existing pedestrian walk signals at the intersection of New Chardon Street and Canal Street will need to be adjusted. The pedestrian service from Canal Street through the newly configured east parcel will siphon existing North Station foot traffic away from adjacent streets. As a result, this pedestrian walk signal and the narrow mid-crossing island may be overwhelmed by the additional foot traffic on Canal Street. All walk signals on New Chardon, Friend, Sudbury and Merrimac Streets should be adjusted to handle the additional pedestrian traffic that the project will create.
7. Narrowing Sudbury and New Chardon Streets – A detailed study of the potential for narrowing both Sudbury and New Chardon Streets is essential. Such a study should include provisions for wider sidewalks, coordinate with improvements being planned for neighboring streets as part of the Crossroads Initiative and potential bike lanes. Further pedestrian crossing improvements should be explored including the elimination (or infill) of the truck turning lanes at the corner of Merrimac Street and New Chardon Street, and at the corner of New Chardon Street and Congress Street.
8. Other pedestrian ways – The document does not address whether the proponent will maintain or improve pedestrian connections that skirt the northwestern edge of the site, from New Chardon Street, up the Brattle Way pedestrian mall and ultimately out towards Cambridge Street. This pedestrian mall/walkway and associated small park area is well used during the day and it should be considered with the project's design. The short length of Brattle Way could be an excellent candidate for expanded pedestrian use.

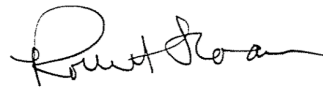
Thank you for the opportunity to comment on the ENF for the Government Center Garage Redevelopment. We believe this site provides an opportunity to develop a transit-oriented, mixed-use project that could showcase pedestrian friendly sidewalks and streets. We hope our comments on the ENF/PNF are incorporated into your requirements for the next phase of design and permitting documents.

Please contact us for any clarification or additional comments that would be useful.

Sincerely,

A handwritten signature in black ink that reads "Wendy Landman". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Wendy Landman
Executive Director

A handwritten signature in black ink that reads "Robert Sloane". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Robert Sloane
Senior Planner