



August 7, 2008

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

RE: Comments on Draft Environmental Impact Report
Assembly Square, Somerville, MA
EOEA # 13989

Dear Secretary Bowles:

WalkBoston has reviewed the Draft Environmental Impact Statement for Assembly Square in Somerville, MA, a very large project which will have significant impacts on future pedestrian activity in and near East Somerville and parts of Medford, Everett and Charlestown. On 50.2 acres, there will be 2100 residential units, 1.75 million gsf of office, 852,000 gsf of retail, restaurants, cinema and up to 340,000 gsf for Ikea and a 200 room hotel. Total development will be 5,125,000 gsf. The tallest buildings will be 250' tall; each development site is permitted to have structures that are at least 90' tall.

The pedestrian aspects of the proposal will play an extremely important role in the way in which this project relates to its surroundings. We are pleased that the project proponent has made substantial efforts to integrate pedestrian facilities into the project. In general, we think they form a promising basis for a more complete pedestrian network on the site – one that draws its neighbors together. The many positive improvements for pedestrians include:

- Design of the plan with “smart growth” principals that encourage use of a proposed MBTA station and pedestrian connections throughout the developed area.
- Planned expansion of the riverfront park and trail sites as a more attractive setting for pedestrians and for the development.
- Agreement to design and construct a pedestrian/bicycle underpass at the bridge over the Mystic River on Route 28.
- Construction of safety improvements for pedestrians to reach the site on routes under I-93 and across Route 28.
- Addition of exclusive pedestrian phases at signals at major street crossings including Assembly Square Drive.
- The construction of an off road path from Mystic Avenue (at the Lombardi Street and Assembly Square Drive intersection) will enable pedestrians and bicyclists to get to the waterfront and Draw 7 Park on a path away from traffic going into the development.
- Promotion of walking at a pedestrian/bicycle service center – which will be built on-site either as a stand-alone facility or be incorporated into a commuter information center.
- Institution of a transportation management association and a hired coordinator to provide information designed to reduce single-occupant vehicular travel.
- The proposed land exchange – 1.8 acres of parkland for 1.5 acres of DCR-owned backland – to promote pedestrian ways along the Mystic River.

Overall, the redevelopment of this important site will yield an environment that is much more accessible and attractive to pedestrians.

Our reading of the Draft EIR left us with some questions about the ways in which certain pedestrian needs will be met. We request that these questions and issues be addressed in the next round of MEPA analyses.

General comments

- This project will create an entirely new urban district, generating many pedestrians. As shown in the DEIR it seems like a diagram of blocks. We need to know more about the overall concept of the project and its context within the larger setting of Assembly Square.
- The development is proposed to be a transit-oriented development. Given TOD as the overarching concept, the transit station should be constructed very early in the development process to set a pattern of transit use from the beginning. The opportunity for adding a second headhouse at the southern (Ikea and cinema) end of the platform should also be preserved in the station design.
- As part of the transit orientation, access to the MBTA station should be more physically connected into the overall development. At the moment it appears to be located in the development's back yard. For example, a major public square facing the station and a street pattern emanating from the station could provide a much stronger transit orientation.
- Assembly Square Park, described as the project's signature public place, is further described as being anchored by the new MBTA station. However, as drawn, there is no visual connection between the MBTA station and the park. How will MBTA passengers alighting at this station know about the park and potential passengers in the park know about the station?
- Are the retail uses along the project's streets intended to draw people from surrounding communities? If so what are the characteristics that will attract them? Is it major retail? Specialty retail?
- Using the river as an orienting feature would seem to be another important element of creating a walkable place with a distinctive character. As currently diagrammed, the potential riverfront connections do not seem to be a strong element of the design – and a street lies between all of the buildings and the park.
- In future documents, we anticipate learning a great deal more about the pedestrian environment in this project. Although existing pedestrian activity at the site is minimal, future pedestrian use will be significant because of the large volumes projected for walking, bicycling and transit. We request that on-site pedestrian volume projections and distributions be provided in subsequent documents.

A Pedestrian Network Based on Street Distinctions

Except for paths adjacent to the Mystic River, most of the sidewalks in this project are parts of street rights-of-way. From both a pedestrian and a motorist point-of-view, the system is clearly laid out – a classical rectangular grid where all sites can easily be found.

However, in a grid street layout, not all streets can or should be designed for the same purposes. Many developments include streets designated for different uses resulting in varied traffic movements and resulting in varied cross-section dimensions. An example would be four street categories with differing dimensions: arteries, connecting streets, local streets

and pedestrian ways. Although no deliberate categorization of streets has been outlined for the Assembly Square project, a decision on categories may be fairly easy to make.

The principal access way to and from nearby highways through the development site is Assembly Square Drive - the artery that is the spine of the circulation system of the area. Since vehicular access to individual sites appears to take place off the Drive, getting to most of the proposed development and to existing parking lots will require using the Drive and then the streets that intersect it (B, C, and D Streets, E/Foley Street and Ikea Way) or parking lot driveways. This primary function makes the Drive not only the major artery of this development, but in effect the main street of the entire area. Other streets will have very different functions; each requires some thought.

The Pedestrian Network: Assembly Square Drive

The role for the Drive is to serve motorists and, probably to a lesser extent, pedestrians. Whether the Drive becomes a principal pedestrian street as well depends on many decisions:

- Is the Drive designed to attract pedestrians? What are the proposed widths of sidewalks on either side of the Drive? Are sidewalks wider on one side than on the other? Will there be uses along the street that are attractive to pedestrians and will there be extensive landscaping?
- Are retail frontages intended to attract primarily motorists? Can they also be designed to serve pedestrians walking along the Drive? Can activities such as outdoor cafes be accommodated along the Drive frontage?
- Will a pedestrian route along the Drive be safe? Will there be on-street parking along the Drive, to make pedestrians feel safer?
- Will there be traffic signals at intersections of Assembly Square Drive with B, C, and D Streets, E/Foley Street and Ikea Way? Will there be pedestrian countdown signals?
- Are there any access points into underground garages along the Drive?
- In the longer term, can the Drive become a focus for new construction in the parking lots at the Assembly Square Marketplace? At one point the proposed Main Street Development called for intensive development on both sides of the Drive. Is this still a possibility? Will a street wall of buildings be constructed on both sides of the Drive? With additional development, will the Drive be able to handle the increases in traffic?
- Assembly Square Drive is very close to the river at the north end of the project. Is it possible to move it further from the riverfront? Can its presence be diminished in some way?
- Only two portions of the site are west of Assembly Square Drive – Office Building M and restaurant building N. Will these sites be developed in conjunction with adjacent property owners?

The Pedestrian Network: Connector Streets and Local Streets

The development's other streets have different functions to perform. For example, Ikea Way/ New Road serves as a major connector street between Mystic Avenue and Assembly Square Drive. Foley Street/E Street is a connector performing the same functions and connections. The other streets (Main, B, C, D and G Streets) may by default become local streets, market streets, or perhaps pedestrian ways, because of the way they serve development parcels and for the relatively low auto or relatively high pedestrian traffic volumes they may attract.

Minimum sidewalk standards should be met on all these streets: minimum clear widths of all sidewalks should be no less than 8' clear width. A 12' minimum clear width should be provided on streets with projected heavy pedestrian traffic. Because all of these streets may have loading, service and parking access functions connected to them by curb cuts, special study may be warranted to assure pedestrian safety where sidewalks cross curb cuts.

Differing designs to accommodate differing street functions lead to these questions:

- A total of 9,174 parking spaces and 52 loading spaces are projected for surface, on-street and structured locations. Which streets are designed to accommodate the major service functions for the development, including parking access ramps and service loading locations? Are C, D and E Streets the major parking and service access streets?
- Will street widths differ among connector and local streets? Will sidewalks differ in dimensions and embellishments?
- What protections are offered to pedestrians where local streets cross?
- Where are the access ramps to parking under the developments? What treatment is provided where sidewalks cross loading zones or parking access points?
- How are intersections to be designed? Is there a standard crossing design that maximizes pedestrian safety? Will intersections include neckdowns (as shown on basic maps of the project) for safer pedestrian crossing?
- Will all connector streets continue across Assembly Square Drive into the Marketplace parking lot? If these extended streets form complete 4-way intersections, are they likely to warrant traffic signals?
- Countdown signals for pedestrians are appropriate where significant volumes are projected. What are the likely locations for countdown signals in this development?

The Pedestrian Network: Connecting to Adjacent Areas

Much of the site boundary is defined by the Orange Line/Commuter Rail Line, the Mystic River and Assembly Square Drive, with only a small triangle of land at the intersection of Foley Street lying beyond the Drive. Figure 2.4 "Pedestrian and Bicycle Circulation Plan" shows the proposed network of pedestrian and bicycle facilities. Links to areas outside the development's 50 acres occur in several ways.

- A link to Draw 7 Park is provided where C and G Streets intersect. How will the special pedestrian/bicycle path along G Street affect this link?
- A link to Draw 7 Park via a bridge within the proposed MBTA Orange Line station should be included in the project.
- Will the transit station be completed before the development begins?
- Connections are proposed to the sidewalks already in place along the existing portions of both New Road/Ikea Way and Foley Street/E Street. Are these viewed as the major intersections in the development? How will pedestrians be protected at these locations? Does C Street also have a major intersection with the Drive?
- Sidewalks in the vicinity of the New Road/Ikea Drive intersection are sketchy. A crosswalk is proposed across New Road/Ikea Drive link into Ikea, presumably to reach Ikea's main doors facing Assembly Square Drive. As part of the Ikea Drive pedestrian network, an interior walkway on the ground floor of the Ikea structure has been proposed as part of that project between the main doors and G Street. What are the proposed connections between Ikea Drive and F Street, G Street and the proposed MBTA station?

- Crosswalks are proposed along Assembly Square Drive at intersections with New Road/Ikea Way, Foley Street/E Street, D Street, C Street and B Street. Will new sidewalks lining up with these streets be provided in the Marketplace parking lot (as shown on Figure 1.1)?
- From a pedestrian point-of-view, connections into the major shopping areas near the site are essential for residents who will be living on the site. How will sidewalks inside the parking lot be built to facilitate connections between retail establishments, the Drive and this development?
- A considerable effort has been expended on improvements to neighborhoods beyond I-93 and Route 28. These include the intersections of Assembly Square Drive with the Fellsway (Route 28) and Lombardi Street, along with the underpass connection to Kensington Avenue. What pedestrian traffic volumes are anticipated at these locations? Will pedestrian countdown signals be added at these important intersections to improve pedestrian safety? Will the developer ensure that the pedestrian/bike improvements in the development flow consistently into the proposed redesign of East Broadway and Lombardi Street?

The Pedestrian Network: Main Street (aka F Street)

At first glance, it is difficult to discern how F Street will function as a Main Street for the area. It won't have the vehicular traffic that is focused on the Drive, and where pedestrian traffic may also concentrate. It doesn't connect directly to the proposed MBTA station. It may not connect directly to a main entrance of Ikea. It won't have the pedestrian/bicycle path that is designated for G Street. On the positive side, it shares the view of the Mystic River with two parallel streets (the Drive and G Street). It has a park, called Assembly Square, at one of its intersections. It's relatively quiet.

- How can F Street be made into a primary pedestrian avenue? Can it be designed to attract pedestrians? What are the proposed widths of sidewalks on either side of the street? Will there be street trees, benches or other facilities that attract pedestrian traffic?
- Is it possible that F Street will be the principal access route to the parking garages? Would this transform the cross streets into east-west pedestrian corridors, connecting the development more closely with the Assembly Square Marketplace?
- Are F Street retail frontages likely to attract motorists? Can activities such as outdoor cafes to be accommodated along the frontage?
- Are there projections of pedestrian traffic for F Street? Is F Street likely to be safer than other streets for walkers?
- The proposed street market may be a lively attraction and its abutting streets may need special treatment to encourage local use. Can Main Street here be temporarily closed for market days? Will this be a regularly scheduled farmers' market?
- Are there special design elements that could help mark this street and make it significant and interesting for pedestrians? Fountains, statuary, flagpoles, and interesting landscaping are possibilities; where would such things be located along the street?

The Pedestrian Network: B Street

B Street is a relatively minor street in this scheme. It will be notable for its park like feeling, its close relationship to open space, its views of the river, its gazebo for band concerts, and its visibility from Route 28 and the Assembly Square Drive entrance into the area.

- Why does B Street need to provide for vehicles? Could it become a pedestrian way, where buildings edge the park? What is the need for a vehicular street between the proposed B Street frontage buildings and the park?

- With or without a street dividing parkland from building frontages, are there potential methods of private sponsorship/maintenance for all or part of the Mystic River parks?
- Proposed park designs can affect the uses of B Street. Will there be separate pedestrian and bicycle trails through the park? Bicycle trails may attract fast-moving riders; pedestrian trails may invite strollers and shoppers.
- If B Street cannot be limited to pedestrian use, perhaps it may suggest other concepts:
 1. Can it be designed as a narrow street separating public parkland from private structures, with no parking and no turning lanes to reduce feeling of separation?
 2. Can it become the marketplace street to capitalize on the relationship to the river, Route 28, and Assembly Square Drive, and to parking and eventual new buildings at the Assembly Square Marketplace? Could marketplace activities, fairs, tent locations and events spill into the park?

The Pedestrian Network: C Street, D Street and E Street

Both C Street and D Street seem to have relatively minor roles in this development, although C Street would be likely to carry more traffic as a through route bisecting the proposed development. E Street seems designed as a wider thoroughfare with perhaps more traffic than the other two streets. Questions about them include:

- What are the widths of the streets and their sidewalks?
- What garage or service access points do these three streets serve?
- Will C or D Streets carry major traffic volumes? How will the volumes they carry differ from E Street volumes?
- If low traffic volumes are projected, could the block of D Street between Assembly Square Drive and Main Street/F Street become a pedestrian way? Alternatively, could D Street be significantly wider near Assembly Square Drive to accommodate additional pedestrian or restaurant activities or perhaps another public park?

The Pedestrian Network: G Street

G Street is of interest to pedestrian advocates because of its location as the principal access to the proposed MBTA station on the Orange Line and because major pedestrian and bicycle routes extend along it between C Street and Ikea Way and further south.

- The present design for G Street appears to treat pedestrian and bicycle routes as adjuncts of the vehicular traffic. Is it intended that pedestrians will be on ordinary sidewalks, and bicycles will be on bike lanes?
- A landscaped pedestrian walkway along G Street could provide a buffer between development sites and the generally noisy rail lines. Will this buffer be provided?

The Pedestrian Network: New Road/Ikea Way

This street appears to be destined for major vehicular service access to Ikea.

- How does the heavy Ikea traffic affect pedestrian activity along this street?
- What is the purpose of the very wide intersection between this street and Assembly Square Drive? Why is there such a large free right turn in the intersection? How will pedestrians be treated in the intersection?
- What is the proposed South Gate entrance on New Road and Assembly Square Drive? Does it include bus shelters and traveler information? Will it include related facilities such as restaurants?

- Is this corner likely to become the major bus node for the entire project until the advent of the proposed MBTA station on the Orange Line? Are there bus stations elsewhere?

Infrastructure Supporting Pedestrian Functions

The proponent suggests that distinctive public spaces and circulation paths as well as pedestrian gathering places and plazas may be paved with brick, granite or concrete pavers to create a visually distinctive space (2-17, 2-18). While brick or stone pavers are picturesque, they are undesirable from a pedestrian viewpoint: these surfaces can quickly become uneven, making for treacherous walking, and surfaces that are difficult to clear of snow during the winter months.

Thank you for the opportunity to comment on this document. Please feel free to contact us if you have further questions.

Sincerely,

Wendy Landman
Executive Director

Robert Sloane
Senior Planner