



walkBoston

April 25, 2008

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

John Palmieri
Boston Redevelopment Auth.
Boston City Hall
Boston, MA 02201
Attn: Jay Rourke

RE: Comments on Project Notification Form (PNF) and Environmental Notification Form (ENF) for the Bulfinch Triangle Project in Boston.
MEPA # 14194

Dear Msrs. Bowles and Palmieri:

WalkBoston appreciates the opportunity to provide comments on the ENF and PNF for the Bulfinch Triangle Project in Boston. As the state's leading advocacy group for pedestrians, we are highlighting issues and raising questions of importance to pedestrians – for both the developers and the City of Boston – that we hope will be answered very soon.

This project will occupy a very important location along the Rose Kennedy Greenway and will help create a complete urban fabric for the Bulfinch Triangle. The mix of uses and the inclusion of a grocery store are welcome additions to the City. Nearly 60% of the site's daily trips will be solely on foot or by walking to nearby transit stations, and excellent pedestrian access is a basic requirement for the project's success.

The four street frontages of the site present unique issues for pedestrian circulation, and many of the pedestrian issues arise because of pre-existing planning and construction conditions. To the extent possible, sidewalks should be assessed in light of the design parameters in the STAF commitments for the Rose Fitzgerald Kennedy Greenway.

The Beverly Street/North Washington Street frontage of the site

Beverly Street/N. Washington Street form a continuation of the north-south Rose Fitzgerald Kennedy Greenway, and sidewalks along this frontage of the site - at 13' wide – are somewhat narrower than others along the Greenway.

- From the preliminary plans it appears that street trees, signs and related street furniture will reduce the effective width of the sidewalk to about 5' - this is not adequate. We are concerned that this important sidewalk will not be a comfortable location for walkers.
- On-street parking is not allowed along this street, and a managed parking lane has been suggested for off-peak hours. We are supportive of managed lanes for drop-off and pick-up of passengers. In this instance, the lane might also be used for trucks approaching the site.
- The new sidewalks will include driveways for truck service - these driveways should:
 - Incorporate level sidewalks

- Be as narrow as possible, with tight curb radii to reduce their width and slow vehicles
- Provide a warning signal for pedestrians when trucks will exit

North Washington and New Chardon Street crosswalk

The design of this crosswalk should be reviewed and improved if possible. Under the current plans, walkers are required to cross half of N. Washington Street, turn and walk on the median island for 50 feet, then cross the remainder of the street. Walking on a median island that has no protection for pedestrians in a sea of vehicular traffic does not appear to be safe or pleasant. WalkBoston asks that the City and the proponent consider if it might be possible for crosswalks to be laid out across the street in a straight line.

The Canal Street frontage of the site

Sidewalks on the Canal Street are planned to be unchanged, but the existing north-south flow of pedestrians is relatively high. Can Canal Street's eastside sidewalk be widened to better accommodate the flow?

The New Chardon Street frontage of the site

The frontage on New Chardon Street is very short, and a park is planned at the corner of Canal Street. The pull-off lanes that have been suggested would be wholly inappropriate for this short block and would detract from the sidewalk.

Causeway Street impacts

Under build conditions pedestrians at the intersection of Causeway/Canal Streets have an estimated 2012 pedestrian level of service of "F" in both am and pm peak hours. Levels of service for vehicles are projected to be much higher, and thus signals have not been proposed. Pedestrian-activated signals should be considered for this crossing or signage that would direct pedestrians to a safer crossing.

Valenti Way

Valenti Way presents very difficult pedestrian issues for this site. It will be the principal pedestrian access route between the supermarket, the nearby North End/West End neighborhoods and the MBTA Green Line/Orange Line Superstation at corner of Haverhill Street/Valenti Way. The main doors to the supermarket and the transit station face Valenti Way. In addition to pedestrian activity, Valenti Way is the major access route to the truck loading area, this site's parking garage, the parking garage at the Avenir site, and vehicles servicing development along Haverhill St. For pedestrians, this concentration of vehicles on Valenti Way is a safety issue, given what appear to be the narrowest sidewalks in the area.

Valenti Way (roughly 24' of roadway pavement) is a one-way street westbound from Beverly St. to Canal St. with one lane for moving traffic and potentially one lane of parking on the north side of the street. As a result of the project described in this development proposal, the 3-way intersection of Valenti Way/Haverhill St. (Haverhill St. one-way northbound, Valenti Way one-way westbound) will become a 4-way crossing of traffic because a service entrance for truck access will connect into it. As described in the ENF/PNF, this is the primary entrance for all trucks up to WB-35, which will be required to enter and exit the loading bays of the building through this intersection from 7:00 am to 1:00 pm. Truck access after peak hours is permitted via a driveway from N. Washington Street.

These access patterns are partly the result of the Central Artery/Greenway design, which resulted in a complete reconstruction of area streets. Because of area development, there are now far too many traffic operations and pedestrian movements on Valenti Way, many more than can be accommodated by the design as it now exists. We think this leads to the need for the proponent, working with the City of Boston, to respond to the questions below.

Truck access via Valenti Way

The easternmost block of Valenti Way - between Beverly and Haverhill Streets is a major focus of pedestrian movement because it contains the entrance to the grocery store and provides a connection to the transit station. Trucks should be minimized in this block of Valenti Way. However, it appears to carry the greatest truck volume into the site, serve all vehicles going to the site's parking garage, provide the major route to parking at the Avenir site, and provide the principal access to service entrances for other developments along Haverhill Street. Do we understand this correctly?

- Will all truck deliveries – office, grocery store and retail - pass through the block of Valenti Way between Beverly and Haverhill Streets?
- Are estimates still in the stated range of 26 to 32 trucks per day, primarily from 7:00 am to 1:00 pm?
- What are the truck traffic estimates from nearby sites with service access via Haverhill Street?
- Will there be turning radius difficulties for trucks (which may range up to the WB-50 sizes) in this block, turning into the site's loading dock area?
- Can these turns be made without narrowing the sidewalks?

We believe that as many trucks as possible should be removed from this block of Valenti Way. This raises questions about alternative truck movements to and from the site:

- Is it possible to have all trucks enter the site from N. Washington Street?
- Can radio dispatching of trucks minimize queuing on Washington Street?
- Can truck entry to the site via the intersection of Haverhill Street/Valenti Way be prohibited?
- Can both blocks of Valenti Way between Beverly and Canal Streets be made one-way eastbound?
- Can truck access to Haverhill Street be transferred to arrive via northbound Canal Street?

Pedestrian safety on Valenti Way

Accommodating pedestrians by minimizing traffic on the block of Valenti Way between Beverly and Haverhill Streets should be a design and operations priority.

- Can this block be closed to all traffic except emergency vehicles?
- If not, can Valenti Way have wider sidewalks on both sides of the street to serve pedestrians using the grocery store and the transit station at Haverhill Street/Valenti Way?
- Can the sidewalk and pavement be on the same level - as in Winter Street at Downtown Crossing?
- Can trucks leaving the site and turning onto Valenti Way be prohibited? (The street and sidewalks do not appear wide enough for pedestrian safety.)

- Can truck drivers leaving the building be made aware of pedestrians on Valenti Way and on N. Washington Street? With the building completely enveloping the truck access ways, can signs and sound devices warn pedestrians of trucks about to cross the sidewalk?

Much of the truck traffic to Haverhill Street could potentially be moved to Canal Street and the block of Valenti Way between Haverhill and Canal Streets. This block will also carry all vehicles accessing both the parking garage at this site and at the Avenir site.

- If Valenti Way were to become one-way eastbound between Canal and Haverhill Streets, does this adequately serve parking garage traffic?
- Can Canal Street (one-way northbound here) carry the parking garage traffic turning onto Valenti Way?
- Will parking be permitted along Valenti Way in this block? If so, where will it be located? If not, can the existing parking lane be used to widen sidewalks?
- At least one existing very narrow sidewalk in this block of Valenti Way is roughly 9' wide. Effective sidewalk widths are narrowed by light poles and traffic signs located adjacent to the roadway. What are the proposed future widths of the sidewalks on both sides of the street in this block of Valenti Way?

Changing traffic patterns on the two blocks of Valenti Way would have additional impacts on intersections and crosswalks. Two crosswalks across Valenti Way are planned - at Beverly St. and at Canal St.

- The crosswalk located at the intersection of Beverly St. and Valenti Way is estimated to have a peak period build condition rating of "D" in 2012. How does this affect pedestrian movement to the grocery store, the transit station or other parts of Valenti Way?
- Is a traffic signal needed at the intersection of Canal St. and Valenti Way?
- How will pedestrians be protected at the intersection of Valenti Way and Haverhill Street? Could a crosswalk be provided there for connections to the MBTA Green Line/Orange Line Superstation? Is a traffic signal also needed?

We realize that some of the challenges posed by this project are the result of planning and design decisions that are beyond the control of the proponent. We ask that the City of Boston work closely with the proponent, with nearby residents and businesses, and with the advocacy community to develop a plan that serves all street users - pedestrians, bicyclists, cars and trucks.

Thank you for the opportunity to comment on this Environmental Notification Form and Project Notification Form. We look forward to working with the proponent, the City, and the neighborhood to achieve a wonderful new development.

Sincerely,

Wendy Landman
Executive Director

Robert Sloane
Senior Planner