



WalkBoston

January 12, 2006

Victoria Bonarrigo
Department of Conservation and Recreation
Commonwealth of Massachusetts
251 Causeway Street
Boston, MA 02114

Dear Ms. Bonarrigo:

WalkBoston welcomes the opportunity to review the changes made to the draft of the DCR Guidelines on Historic Parkways. The Guidelines are a codification of tools to use in reconstruction and rehabilitation projects on the network of parkways in the region. Indeed, it appears that some of the Guidelines have already had a significant effect on the recent redesign process - in which we happily participated - of Woodland Road and Pond Street, both parkways within the Middlesex Fells Reservation.

Many of our comments on the initial draft were addressed in this redraft. In general we support the new additions and redrafts of tools in this report. New data will be essential for effective planning, including basic information on the extent of the network of paths, their levels of use by pedestrians and non-motorized wheeled conveyances, and levels of walkers' satisfaction with existing facilities.

We offer the following comments.

Framework

- Coordination with state and national design standards is exemplary. The reference to the Massachusetts Highway Department's 2006 document, "Project Development & Design Guide," shows commitment to coordinating with standardized approaches to be taken for pedestrian improvements in the state.
- Coordination with the Rules and Regulations of the Massachusetts Architectural Access Board and the Americans With Disabilities Act (ADA) requirements provide ways of thinking about providing for a wide range of users, including people with disabilities.

Data

- We are pleased that data on pedestrian, bicycle, and other non-motorized vehicle volumes will be included to give an essential basis for careful analysis of proposals for improvement. Safety evaluations will also provide a useful analytic tool for strategies to improve pedestrian conditions.
- As we stated in our prior comments, the total miles of paths, walkways and trails within parkways are not summarized. These are assets that DCR should document and keep track of the changes as made.
- The Guidelines state that new pedestrian facilities will be designed in concert with measured pedestrian volumes and projections of walking needs. We support the approach of analyzing walking, cycling, rollerblading, and skateboarding needs as separate concerns, pointing toward separate facilities where needed and where space is available, and in areas of high demand where shared path use is causing unsafe conditions for pedestrians, cyclists and other users.

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- Data alone may be insufficient as the sole basis for furthering these guidelines for improvement. Basic research may also be needed, for example, to determine the ways pedestrians might be better served if not in competition for space with wheeled vehicles, rollerblades or skateboards.

Administration and maintenance

- The proposed Guidelines permit exemptions to be granted by the Commissioner with an explanation of the reasons for not following the Guidelines. This exception seems to be poor public policy, as it grants total discretion to one public official. This could strip parkways from the protection of the new Guidelines. If an exception is being considered, it should not be left to the sole discretion of the Commissioner but should allow for involvement of the Stewardship Council and for public review.
- Routine maintenance of sidewalks and pathways includes keeping them clear of snow and litter. Replacement of sidewalks and pathways that have deteriorated due to cracking and frost heaving, settling of improperly compacted subgrade, and localized storm deposition should occur on a systematic schedule.
- The Guidelines include the possibility of pedestrian-actuated crossing signals if warranted by counts of actual crossings or estimates of potential pedestrian crossings. These signals should be calibrated to maximize the time allowed for pedestrians to cross streets. Where there are signals, there should be consideration of pedestrian crossings during green time in either direction (concurrent signals).

Design choices

- This draft of the Guidelines states that, during upgrading of historic parkways, the preferred treatment of sidewalks is for total rehabilitation, rather than for preservation of the existing facility. This emphasis recognizes the challenge of staying up to date and spreads the knowledge that pedestrian facilities should be improved to contemporary standards - not just rebuilt as designed 100 years ago.
- One of the goals for sidewalks and pathways is to safely accommodate pedestrians, bicyclists and in line skaters on an equal level with vehicles in parkway design and management. The acknowledgement that pedestrians require adequate physical space to maneuver comfortably is welcome.
- In-line skaters and skateboards have been added as potential non-motorized users of pedestrian facilities. The Guidelines note that they are more compatible with bicyclists than with pedestrians, because of their speed and preference for pavement.
- WalkBoston is particularly concerned about good design for pedestrian crossings of roadways at both controlled and unsignalized intersections. Traffic calming should be added to the list of potential improvements to parkway facilities and intersections to improve pedestrian safety. Traffic islands, lane narrowings and bulbouts for pedestrians at intersections are potential techniques to use on Historic Parkways.
- The Guidelines contain the hopeful suggestion that new materials such as aggregates can be found to provide a walking/running surface for pedestrian traffic. However, a new surface may preclude some access for disabled people attempting to use the paths, and should be very carefully reviewed to address this concern.

- The Guidelines allow placement of new and separate pedestrian trails well back from the travel way in locations such as Border Roads. This approach is essential to maintain the appearance of the parkway which providing essential pedestrian services, but should be balanced with the safety requirements for pedestrian use of trails for commuting use during hours when it is dark.
- Where the parkway corridor width permits, the Guidelines allow two separate off-roadway trails: a paved trail for two-way bicycle and in line skater traffic and an unpaved trail at least five feet wide for pedestrians and runners. This kind of thinking is laudable, and should be applied immediately to parkway project planning.

Thank you for the opportunity to comment on this document. Please feel free to contact us for clarification or additional comments.

Sincerely

Wendy Landman
Executive Director

Robert Sloane
Senior Planner