



July 6, 2009

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

John Palmieri, Director
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201
Attn: Rodney Sinclair, Sr. Project Manager

RE: Comments on the Harbor Garage Redevelopment Environmental Notification Form (ENF)
and Project Notification Form (PNF)
EOEA #14411

Dear Secretary Bowles and Director Palmieri:

WalkBoston appreciates the opportunity to provide comments on the Environmental Notification Form (ENF) and Project Notification Form (PNF) for the Harbor Garage Redevelopment (the Project). We understand from the ENF/PNF that the Project includes razing the Harbor Garage (the Garage) and building a 40-story office tower (Building A) and a 59-story residential and hotel tower (Building B) in its place, along with associated parking, an indoor glass promenade, and a sky-frame connecting the two buildings.

The scale of these buildings and their proposed height are major concerns, and it is our understanding that many groups will be commenting on those issues. Rather than focus our comments on those items, we have devoted substantial analysis to the pedestrian issues associated with this site at the heart of Boston, at the point where the Greenway and the Harborwalk are only one short block apart. Consideration of the walkways surrounding the site are essential to our analysis, as is the surrounding pedestrian network – the pedestrian access to and from the Greenway, adjacent streets and sidewalks, as well as public transportation and the significant nearby institutional uses. Equally important are the access ways proposed to lead into and through the site.

The reuse of this very significant site offers many opportunities for exciting pedestrian benefits. It can become a tremendous asset to the Wharf District, the Financial District and the North End / Waterfront, if it replaces a dilapidated parking garage with a mixed-use pedestrian friendly development. Given the site's unique location, the Project should stand as a model of walkable design at a key location between the Greenway and Boston Harbor.

WalkBoston believes that specific improvements could help the project make better use of the site's intrinsic amenities, resulting in a walkable design that activates the site and its linkages to the Greenway and the harbor. We believe that each of the site's four sides offer different opportunities.

1. The Greenway

WalkBoston is pleased to note that the hotel vehicular drop-off / pick-up area is appropriately located on East India Row and not along the Greenway frontage of the site. This is a good solution to a problem that is not always recognized for the issues it brings for walkers.

We would urge that the Proponent consider providing the primary pedestrian entrances on Atlantic Avenue – perhaps at the corners of the block. It should be noted that many more trips will be made by pedestrians arriving on foot or from transit than will be made via vehicles. As currently proposed, the primary entrance for Building A is on Milk Street and the main entrance for Building B is proposed on East India Row – away from the Greenway. Locating primary building entrances for pedestrians at the corners of the building site will help activate and create street life on the Greenway and ensure that the Project does not turn its back on the City's newly-minted park resource.

Paralleling the Greenway, the plans calls for wide sidewalks and no parking or pull-off zones. We trust that the proponent is working closely on this design with the City of Boston and the IAG. We have found that pedestrians frequently do not feel safe walking along avenues that carry fast-moving traffic, even if sidewalks are spacious. In many cases, a protective line of parked vehicles is preferable to shield walkers from the noise and proximity of heavy traffic. We urge that the City consider allowing parking along this frontage.

2. East India Row

East India Row is a lightly used roadway approximately 30 feet wide with 4 inset parallel parking spaces on the south side of the roadway. Given the available road width and the relatively light projected use of this street, the hotel vehicle drop-off / pick-up area is appropriate at this location. Along with the proposed parking garage ramp on this street, East India Row will become primarily automobile-oriented. Incorporating the area used by the 4 existing parking spaces into a pedestrian-friendly curbside hotel drop-off / pick-up is a good idea.

Pedestrian protections here are important. Most, if not all of the pedestrians on this street will be accessing the proposed hotel. Many will be passing by on the Harborwalk at the waterfront. People moving directly between vehicles and the hotel entrance should be safely accommodated. Weather protection for this arrival and departure location, such as an overhang of the building, would be appropriate.

Accommodating the garage entrance on East India Row is a good idea. The current design shows a physical separation between pedestrian facilities and the vehicular path. We urge that the garage entrance be narrowed to one lane in and one lane out. We also urge consideration of combining the vehicular access to parking with the loading and service ramp which seems poorly located on Milk Street in close proximity and in conflict with major pedestrian flows to the Aquarium and Imax Theater.

3. Milk Street

This side of the site has surprising assets: across both Milk Street and Atlantic Avenue are newly developed parks. At the harbor end of Milk Street is the expansive entrance plaza of Central Wharf and its active and interesting connections to Long Wharf. The main entrances to both the Aquarium and IMAX are at the foot of Milk Street, bringing a heavy stream of

pedestrian traffic. The presence of these pedestrian spaces suggests the need for major pedestrian connections between them, in a promenade along Milk Street between the Greenway and Central Wharf. This frontage can become a major front door to the site. Facing the promenade, Milk Street along this site could become a premier commercial space on the harbor side of the Greenway, and should offer many retail opportunities for the proponents.

In the present design, there is one unfortunately major intrusion into the pedestrian spine along Milk Street: the loading/service ramp for the building is proposed to connect to Milk Street where it intersects the Harborwalk. The proposed location of the loading/service ramp will be both unsightly and potentially dangerous, as it is located in the midst of one of the heaviest used sections of Harborwalk, a section often used by tourists visiting the New England Aquarium. WalkBoston urges the proponent to move the loading/service ramp for the new buildings to a different location – perhaps East India Row. Considering the potentially heavy pedestrian use, truck movements of any kind in this location should be prohibited.

A detailed study of the traffic patterns and potential narrowing of both Milk Street and Central Street may be warranted. Such a traffic study should include a proposed reconfiguration that simplifies the traffic flow adjacent to the site on Milk Street, Central Street and Old Atlantic Avenue. Milk Street should be made one-way to the east, as the westward section of the traveled way duplicates the right turn only service on Central Street, a mere 50 feet away. Any study of Milk Street and Central Street should include provisions for wider sidewalks, and the potential enlargement of the newly built pocket park created by the Frog Pond Foundation between these two streets.

4. Waterfront

This frontage of the site is confusingly called East India Row. It is distinguished by its stellar location directly on the harbor, with magnificent views of maritime activities. The proponent calls for no changes here, except for an intersection of the harborwalk with a new mid-block covered walkway. Preservation of the walkway is essential in all alternative proposals for the site. Protection from the intrusion of vehicles into the walkway is basic to its preservation as a pleasant and safe walking area.

Pedestrian access to and from public transportation will be, to a large extent, focused on Old Atlantic Avenue along the Waterfront. The high level of water-related activities, along with crowds walking in the area, may make this route from the Blue Line station to the site very interesting to walkers. Comparable and equally interesting sights may occur along the Greenway, between the public transportation kiosk and the entrance to the site.

5. The mid-block walkway

In the center of the site is a proposed east-west walkway, covered with glass and situated between the two tall towers proposed for the site. It is not clear what the function of the walkway is intended to be. It separates the two main towers, but does not seem to depend on them or lead to them, because the principal access to both towers appears to be, respectively, Milk Street for offices, and East India Row for the hotel. The walkway could draw retail establishments inside the site, yet the site plan seems to provide for a considerably larger number of retail functions at the perimeter of the site. The walkway connects with the Harborwalk felicitously, but its connection at the Greenway end will be located at a place where no pedestrian crossing of Atlantic Avenue exists. Pedestrians will be required to go to

either Milk Street or East India Row to cross the street protected by traffic signals and crosswalks.

WalkBoston urges consideration of eliminating the mid-block passage, replacing it with major emphasis on a passage located on the Milk Street frontage of the site, where pedestrians will always be more plentiful, due to the intense interest in the public uses on Central and Long Wharfs. If the Milk Street retail frontage becomes the principal concentration of shopping on the site, a physical covering that gives protection from the weather would be desirable.

6. Parking

The Project contains a great deal of parking. The 1,200 – 1,400 parking spaces proposed, along with the estimated 1,620 net new daily auto trips generated as a result of the Project, do not seem appropriate for a site that is located adjacent to a Blue Line subway station and a major water transit terminal, a short distance to two other subway lines, and walking distance to both North Station and South Station. Parking ratios should be reduced for a project with such transit amenities. Parking spaces dedicated for office space should be eliminated from the Project. New parking, other than the in-kind replacement spaces for Harbor Towers, should be for general use and be shared on a first-come, first-served, short-term basis. Such “flex” parking was included in the Scoping Determination for the Government Center Garage Redevelopment Project, and this parking treatment should be expanded upon in this Project.

7. Walking inside the garage

A large number of daily pedestrian trips will take place inside the new parking garage. The thousands of pedestrian trips that will be generated are not currently considered by the ENF/PNF, or within the Project’s proposed pedestrian amenities. Given the propensity for pedestrian - auto conflicts in the loosely-structured driving situations that parking garages provide, and the large number of foot trips that drivers will make while accessing their cars, it is paramount for pedestrian safety that a footpath or way-finding system be established inside the parking garage, with designated walkways and signage and directional markings to make the garage more pedestrian friendly.

8. Garage curb cuts

The existing garage access drives are excessive, ranging between 45 feet wide (East India Row) and 60 feet wide (Milk Street), with as many as 5 lanes of traffic across the sidewalk at a single point. All new garage curb cuts should be minimized to one lane in and one lane out to be compatible with pedestrian walkways. Appropriate vehicle exiting warning signs must be provided for pedestrian safety.

9. Pedestrian signalization

The existing pedestrian walk signals at the intersections of Atlantic Avenue at both Milk Street and East India Row will need to be adjusted. The Project will dramatically increase pedestrian trips to the site, especially across Atlantic Avenue. The Proponent should be encouraged to work with the Boston Transportation Department (BTD) to increase the time devoted to pedestrian crossings at these locations. Any signalization study undertaken with BTD should include automatic pedestrian signalization, and the elimination of the push button walk signals.

10. Wind and shadow issues

The proposed height of the buildings on this site suggest that wind patterns may become major difficulties for pedestrians walking in its vicinity, as is frequently the case on sidewalks where very tall buildings are constructed. Shadows of tall buildings may also affect pedestrians on the Greenway, the Harborwalk and Central and Long Wharfs.

Thank you for the opportunity to comment on the ENF/PNF for the Harbor Garage Redevelopment. The Project's final design must fully consider pedestrians to create a walkable design that will both help activate the Greenway and link the Greenway to the harbor. We hope our comments on the ENF/PNF are incorporated into any requirements and conditions for the next phase of design and permitting documents.

Please contact us for any clarification or additional comments that you may need.

Sincerely,

Wendy Landman
Executive Director

Robert Sloane
Senior Planner

cc: Mayor Thomas M. Menino
State Senator Anthony Petrucci
State Representative Aaron Michlewitz
Councilor Salvatore LaMattina
Council President Michael Ross
At-Large Councilors John R. Connolly, Michael Flaherty, Stephen J. Murphy and Sam Yoon
Jeffrey B. Mullan, Executive Director, Massachusetts Turnpike Authority
Laurie Bert, Commissioner, Department of Environmental Protection
Karl Haglund, Department of Conservation and Recreation
James W. Hunt, Chief, Boston Environmental & Energy Services
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