



WalkBoston

April 6, 2007

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

Mark McGowan
Boston Redevelopment Authority
Boston City Hall, 9th Floor
Boston, MA 02201

RE: Comments on NPC/SEIR/DPIR for Waterside Place, South Boston, MA
EOEA # 13367

Dear Msrs. Bowles and McGowan:

We have reviewed the NPC/SEIR/DPIR for Waterside Place in South Boston, a complicated air rights project that fills the most significant gap in the district's development. The project is especially important for pedestrians because it sets the stage for the pedestrian environment and transit access to Boston's single largest concentration of city visitors - the Boston Convention and Exhibition Center (BCEC). It will determine the quality of the walking environment between the BCEC and the MBTA Silver Line World Trade Center (WTC) Station. In addition, the site will house major developments of retail, hotel and residential uses whose success will be dependent on the success of the project in creating a pleasant pedestrian setting.

We are very pleased that the site is to be developed, and are comfortable with the mix and scale of uses that are proposed. We also understand that this is a difficult and complicated site for development. Thus, while we make a number of comments that focus on ways in which the project does not yet work well for pedestrians, we are also keen to see this enormous void in the urban fabric filled, and the environment of the Seaport District and the BCEC greatly enlivened.

Key Points

- Transit Oriented Development The proponent of Waterside Place describes it as a Transit Oriented Development (TOD), yet the design of the project vacillates between attention to transit and pedestrian needs and auto accommodation that overwhelms the pedestrian. WalkBoston hopes that future iterations of the design go much further toward transit and pedestrian orientation and believe that the project will better serve both the City and its occupants if this approach is undertaken.
- The Summer Street/WTC Avenue intersection is the 100% corner for the district's pedestrians – yet it has the worst projected level of service for pedestrians and is a very wide and unfriendly crossing. The below grade pedestrian tunnel is awkwardly located – and is not a gracious pedestrian environment for the many thousands of visitors to our city who will be walking to the BCEC. This intersection must be re-configured and re-conceived to be a welcoming gateway between the Silver Line and the BCEC.
- Streetscape Similar to our comment concerning TOD, the project seems caught undecided whether it is an interior or exterior oriented development. We very much hope that it will turn its attention outward, create a stunning streetscape and de-emphasize vehicles and vehicle access.

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- Pedestrian projections are needed at each intersection and along each sidewalk. As WalkBoston sometimes says – pedestrians need to be counted in order to count. While overall travel projections indicate that about three times as many people will come to the site on foot and by transit as in vehicles, this is not reflected in the details of circulation and attention to the interaction of vehicles and pedestrians.
- Parking Finally – we would ask that the proponent consider the number of parking spaces in the garage – is this much parking needed, or can the development truly depend on transit and be an urban shopping, residential and hotel center.

Our detailed comments below begin with several overarching issues and then discuss sidewalks along street frontages, intersections important to pedestrians near the site, and the interior walking paths established by the new facilities. We have focused on pedestrian ways through and around the proposed project, and how they function for walkers, and link to adjacent streets, crosswalks and particularly to the BCEC.

Pedestrian routes – generally

The proposal has a reasonable pedestrian scale within its difficult and constrained setting. Each side of the site is about 2 city blocks long - an easily walkable distance, if broken into segments by attractive shops and entrances along the way. A conceptual design of pedestrian access for both the exterior and interior of the proposal is diagrammed in Fig. 2-1, showing primary pedestrian access north-south across the site along WTC Ave and D Street and less important building access from Congress and Summer Streets. This diagram does not reflect pedestrian demand, which will likely be greater on Congress and Summer Streets and on WTC Avenue than on D Street.

Missing Pedestrian Information

Given the significant pedestrian activity that will occur in and around the site, we believe that projections of pedestrian volumes are needed to understand whether the proposed elements of the project’s pedestrian circulation system are responding to these projected needs. In particular, the interaction of vehicles and pedestrians at major intersections and driveways needs to be fleshed out in greater detail.

We assume from the land use pattern that the highest levels of pedestrian demand are along WTC Avenue between Congress Street and Summer Street, because it provides major access between BCEC, the Seaport World Trade Center exhibition hall, the MBTA station and the hotels and offices in the Northern Avenue corridor - but projections are crucial to understand what the demand will be. Another important route may be Congress Street between D Street and Seaport Lane, where major access between the John Hancock offices, the Marriott Hotel, the Park Lane apartments, and the site may occur. This route may be significantly more attractive for pedestrians than D Street because it will be more pleasant and connect with the site’s weather-protected interior route to the BCEC.

Sidewalks surround the site on all boundary streets. According to drawings (such as Fig. 2-13) the widths of these sidewalks vary considerably. Our estimate is that sidewalk widths on Congress and D Streets are 15-20’. By contrast, the approximately 20-25’ sidewalks for WTC Avenue and Summer Street on Fig. 2-1 would suggest that these streets will accommodate greater pedestrian volumes than the sidewalks along Congress and D Streets. Are these widths based on the projected pedestrian traffic for the perimeter streets?

WTC Avenue

WTC Avenue has major symbolic importance for the entire South Boston Seaport and Waterfront. It is the spine that connects two convention centers, office buildings, hotels, and the transit station. The planned grocery store will have its street frontage on WTC Avenue, and every effort should be made to ensure that shoppers are encouraged to access the store on foot - a characteristic of several of Boston's newer in-town grocery stores. As a dead-end street with vehicle access only at Summer Street, and a cul-de-sac turnaround at the World Trade Center exhibition center, the street is particularly well suited for safe pedestrian activities. As the focus of walking for convention-goers, tourists and shoppers, WTC Avenue should be treated as an urban street with very high pedestrian quality.

Vehicle drop-off space Plans and illustrations of the Waterside Place façade adjacent to the MBTA WTC Station show an attractive sidewalk space, commodious for arriving transit riders and inviting for customers to enter the retail building (Figure 2-1 and sketches Figures 2-2 and 2-3). However, Figure 2-13 seems to suggest that a portion of the sidewalk would be used for a vehicular drop-off zone. The possibility of drop-off vehicles looping back toward Summer Street is also suggested by the elimination of the median strip in WTC Avenue at this location on the plan. We strongly urge the elimination of vehicular drop-off inside the sidewalk line along WTC Avenue because it would detract from the intended use by pedestrians. Since WTC Avenue is not a busy street, passenger drop-off/pick-ups should take place at the curb. Return vehicular movements to Summer Street should use the loop at the cul-de-sac at the end of the street.

Sidewalk widths According to Appendix C, the Commonwealth Flats Mitigation Status Report, Table 1, Status of Transportation and Streetscape Mitigation Elements: Mitigation Element 11 - Viaduct Street Sidewalks, Massport contributed funding and design to widen the sidewalks along WTC Avenue from 9 to 11 feet; work was completed in 2002. The project description does not include proposed sidewalk widths to accommodate increased foot traffic engendered by development of this site. Depending on forecasts of pedestrian activity, a minimum of 20-25 feet may be needed for the sidewalk along the eastern side of WTC Avenue.

On the west side of WTC Avenue, the sidewalk will provide access to the visitor center, a passive park across from the BCEC, and a potential future building nearer Congress Street on Parcel A-2, and will only indirectly connect the transit station, mall, BCEC and World Trade Center. The west sidewalk does not seem to warrant a sidewalk as wide as the east, and further analysis of pedestrian volumes associated with the park and visitor center are needed to determine an appropriate width.

Sidewalk Weather Protection A covered WTC Avenue walkway for Waterside Place was set out in Appendix C, the Commonwealth Flats Mitigation Status Report, Table 1, Status of Transportation and Streetscape Mitigation Elements, Mitigation Element 18 – “Design and install a cover for the sidewalk on the east side of the viaduct (WTC Avenue) adjacent to Parcels C-1 and D-2.... will be designed and installed to improve the pedestrian environment along the Viaduct in a variety of weather conditions and seasons,” with “façade elements along WTC Avenue to provide pedestrians with a weather-protected path from Summer Street to near Congress Street.”

It is essential to provide a covered sidewalk along this façade. It is the most direct connection for many walkers between the BCEC, the site and the MBTA Station, and will provide the only access when the building is closed. Fulfilling the commitment to a covered walkway along WTC Avenue is blurred in the current presentation because it is unclear from drawings and plans if the cover is continuous along this frontage. As cited in Appendix H, Proposed Section 61 Findings, p. 14 and in Table 7-2: Mitigation, the project will reduce the scale of the WTC Avenue building façade, provide more welcoming storefronts and entrances, and place “awnings above some storefronts to promote comfortable passage between the BCEC and the WTC MBTA station during all seasons.” Most awnings are made of impermanent materials and may be removed during cold and snowy months. Given the extensive background of planning and commitment for this element, a commitment to install awnings, repeated in several places in this document, is inadequate to guarantee a continuous covered walkway along WTC Avenue.

Interior walkway from Summer Street to Congress Street An interior walkway through the development (separate from the exterior, covered walkway along WTC Avenue,) was set out in Appendix C, the Commonwealth Flats Mitigation Status Report, Table 1, Status of Transportation and Streetscape Mitigation Elements: Mitigation Element 18, which calls for “...an interior, climate-controlled pedestrian path to be provided from Summer Street to Congress Street as an alternative” [to the WTC Avenue exterior walkway.] To be a useful alternative to the exterior walkway, the interior path must connect directly to the same sites as the exterior walkway - the MBTA WTC Station, Congress Street, and the elevator/stairs/escalators leading to the underground pedestrian crossing of Summer Street at WTC Avenue.

The Congress Street end of the interior walkway overlooks Seaport Lane, with a direct view down the street to the open water of the Harbor. We hope that the interior walkway will be aligned so that the backdrop of the harbor will be an important visual orientation element for pedestrians inside the building. From the BCEC, the interior connection to Congress Street is more direct than the exterior connection, which requires using the stairways of the MBTA Station as a connection between the two levels: WTC Avenue on the viaduct and Congress Street down below.

Inside the building, the pedestrian spine is spacious: its central walkway is as wide as the WTC sidewalk. However, because this is an interior corridor with retail on only one side and a dead garage along the other side, this layout may not be very lively for walkers.

Vehicle access to the garage WTC Avenue carries low vehicle volumes and high pedestrian volume. In the Commonwealth Flats Development Area DEIR (Fig. 3-1) vehicular access from WTC Avenue into the Air Rights Garage is diagrammed to be through Parcel C-1, directly across from Parcel A-2 and close to the MBTA station. As shown on Fig. 2-13, the entry/exit for vehicles into the garage is now through Parcel D-2 on WTC Avenue very near the intersection with Summer Street. This entry/exit is only about 100 feet from the intersection. This unsignalized driveway will interfere with pedestrian movement along WTC Avenue, providing a point of potential conflict between walkers and vehicles. Since WTC Avenue is the principal pedestrian path through the district, the location of this garage entry/exit is unfortunate.

Queuing of vehicles entering or leaving the garage may affect the short portion of WTC Avenue and decrease its attractiveness as a major pedestrian route. Vehicular flows to and from the garage will complicate the intersection of WTC Avenue and Summer Street (already

a difficult intersection for pedestrians) and increasing traffic flow on the north leg of the intersection. Queues will potentially overlap around corner into both directions of Summer Street.

The proponent should consider alternatives that do not interrupt the WTC Avenue sidewalk with a garage exit and entrance.

Visitor Center A triangular park and visitor center are planned for Parcel D-1, directly across Summer Street from the BCEC and abutting WTC Avenue. The park will face Summer Street at the intersection with WTC Avenue and provide enhanced views from the terrace in front of the BCEC. The visitor center will be constructed on the air rights north of the park and above the underlying street network. The visitor center will create a frame for WTC Avenue, greatly enhancing its environment for pedestrians by closing off highway views and adding an interesting use for the street. The park and visitor center will provide infill between the new buildings surrounding the site, and begin to complete WTC Avenue as a street with buildings on both sides.

This is a prime site, highly visible from both the BCEC and Waterside Place and readily accessible to the pedestrian axis along WTC Avenue. Good at-grade pedestrian access from the BCEC should be insured to make the visitor center truly accessible for convention goers. In order to further enliven WTC Avenue, perhaps the visitor center building could also house other uses in the proposed air rights structure, through sharing of street-level space or addition of upper stories. The dramatic views of BCEC from this building could make the site desirable for more than a single user.

Summer Street

The 100% corner of the project for pedestrians is the intersection of Summer Street and WTC Avenue. This is where we expect that the highest pedestrian volumes to occur - and it is a location that will be used by many visitors to Boston who travel to the BCEC via the MBTA. This intersection should be significantly improved for pedestrians, and a good surface crossing is needed no matter whether there is a below grade pedestrian tunnel. The tunnel is awkward to access from the Waterside Place site, and WalkBoston does not believe that it will be heavily used. Unfortunately, based on the information in the report, this street crossing will be difficult for pedestrians to negotiate. The intersection's crosswalks have the district's worst projected future pedestrian levels of service for both AM and PM Peak Hours, levels of service for pedestrians were ranked "E" or "F" for all four crosswalks on the sides of this intersection. (See Appendix D, last page, the pedestrian LOS on this page does not match the analysis presented on page 3-61 of the SEIR. Please explain this inconsistency.)

The Summer Street frontage of the site has two significant pedestrian entrances – the hotel entrance at the corner of D/Summer Streets and a lobby entrance providing access to upstairs retail, several large retail spaces on the same level, and the below grade access to the BCEC via a tunnel beneath Summer Street. The pedestrian access into the mall is midway between WTC Avenue and D Street. A more modest mall entrance is situated closer to Summer Street near where the elevator and stairway come up from the pedestrian tunnel under Summer Street, according to Fig. 2-12. It is not clear why the major mall entrance on this side of the building is not located at the of Summer Street/WTC Avenue intersection with a closer relationship to the BCEC. The intersection is a logical decision point where pedestrians can decide whether to walk along the exterior or through the interior of the

building, and the principal entrance should capture the potential market of the BCEC and provide an inviting retail presence on Summer Street.

Fig. 2-12 shows street level parking extending the full length of the block. A drop-off location for the hotel is shown on Fig. 2-13, which eliminates the parallel parking. On balance, parking along the sidewalk makes the street more comfortable for pedestrians by distancing walkers from the moving traffic lanes.

Summer Street Underpass A pedestrian underpass has been planned since the earliest designs for the area. The construction is required by the CFDA FEIR to connect Parcel D2 (the corner of the site at the intersection of Summer Street and WTC Avenue) directly to the BCEC. According to Appendix C, the Commonwealth Flats Mitigation Status Report, Table 1, Status of Transportation and Streetscape Mitigation Elements, Mitigation Element 19, the underpass is to be funded by Massport and built as part of the CA/T project. The site proponent will fulfill a mitigation requirement by providing internal finishes to the tunnel.

Details of the connections at both ends of the underpass are tantalizingly hinted at but not explained. The connection on the BCEC side is on the same level as the principal entrance to the convention center. (See Fig. 3-1) Underpass access is on a street corner adjacent to the Westin Hotel, directly across the access road (a continuation of WTC Avenue) leading to the south side of the BCEC. The crossing is part of the signalized intersection at WTC Avenue and Summer Street. It is unclear if an elevator or escalator is part of the access between grade of the BCEC entrance level and the underpass. On the Waterside Place side of Summer Street, the underpass connects to a corner of the proposed building, with an elevator, (escalator?) and stairs between the underpass and street level. (See Fig. 2-12) This location is inconveniently connected to both the exterior sidewalks along WTC Avenue and the pedestrian way through the interior to Congress Street and the MTA WTC Station. If pedestrians are to be enticed to use the Summer Street underpass, good facility design is essential.

Congress Street

The Congress Street frontage of the site is the principal pedestrian route between Waterside Place and the BCEC and the nearby pedestrian generating uses of office, hotel and residential blocks east of Seaport Lane and D Street. At the Congress Street/Seaport Lane intersection, a major pedestrian entrance into the site provides escalators and elevators to connect between street level and the upper level of the retail development where the principal interior pedestrian access route across the site is located. Given the level changes between Congress Street and the BCEC it is likely that pedestrians will enter the site via the escalators and then choose whether to cut over to WTC Avenue or stay indoors to reach Summer Street.

The sidewalk along Congress Street is abutted by a variety of retail and residential frontage, with some variation in building setbacks for added interest. WalkBoston hopes that the street level façade will be given substantial design attention to add variety and scale for the pedestrian. The sketches provided in the SEIR are suggestive but do not provide a strong sense of identity (this is true of all the sketches, not only those for Congress Street).

At Seaport Lane/Congress Street, major entrances and exits to the garage are provided, essentially creating a four lane unsignalized intersection to be crossed by pedestrians on the Congress Street sidewalks. This is a substantial barrier for pedestrians - and WalkBoston has

safety concerns with a two-lane entrance and two-lane exit from a garage. This is an unusual condition to encounter on a sidewalk, not really a street and much broader than a typical garage entry. It is worth noting that Seaport Lane is a strong visual corridor between the site and the harbor and may thus draw foot traffic from site visitors drawn to the waterfront.

It is unclear from the document if covered walkways were considered as part of the pedestrian designs for Congress Street (Fig. 2-11 hints at covered walkways). Especially between D Street and the Mall entrance, covered walkways would be attractive to walkers coming from nearby hotels, businesses and residences.

The analysis of wind on Congress Street indicates several uncomfortable locations for pedestrians where conditions may exceed the BRA's acceptability criteria. It is not clear from the document whether specific mitigation measures will be taken to protect pedestrians from wind.

D Street

Although the document portrays D Street as a major pedestrian access route and a good walking environment (see Fig. 2-1), this assertion is not supported by the descriptions. There are no visible or accessible retail uses planned for D Street. The residential tower connects to Congress Street and the hotel tower to Summer Street – neither relate to D Street. There is no significant pedestrian access into the project from D Street, but there are three major vehicular intersections along D Street - one for Silver Line buses, one that is a principal entry and exit to the site's large parking garage, and a third that is a ramp connection to the Haul Road directly below the site.

These three connections pose some unanalyzed difficulties and hazards for pedestrians walking along D Street. The combination of so many vehicular access ways, the heavy through traffic on D Street and the lack of retail or other uses with street frontage suggest that this may be a rather unpleasant route for pedestrians. The mitigation for pedestrians using the street is focused primarily on lighting to “unify streetscape design” and perhaps awnings (banners originally proposed have been abandoned).

For walkers who choose to use D Street, the other side of the street (the east/John Hancock side) is more pedestrian-friendly. The east side of the street has only one vehicular access point (for the Silver Line) that interrupts the sidewalk. It also is landscaped for some 40% of the route, including the landscaped frontage of the John Hancock Building and Portal Park, a green space hovering over I-90.

Despite the impediments for pedestrians, D Street remains an option for walking between Congress and Summer Streets, connecting the Marriott Renaissance Hotel, John Hancock Headquarters, BOA Pavilion, and waterfront offices and restaurants to the BCEC.

Thank you for the opportunity to comment on this NPC/SEIR/DPIR. Please feel free to contact us for clarification or additional comments.

Sincerely

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Executive Director

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