



July 31, 2008

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

RE: Comments on Environmental Notification Form/Project Notification Form/Phase 1 Waiver Request, Seaport Square, Boston, MA
EOEA # 14255

Dear Secretary Bowles:

WalkBoston has reviewed the Environmental Notification Form/Project Notification Form for Seaport Square in Boston, MA. The project comprises 23 acres, divided into 20 city blocks, with 6.5 million sq ft in 19 buildings, 6 acres of open space (25% of the project area,) 2 schools (K-12 for 1800 students, and a pre-K – 1 privately-funded, public pilot school for 200 students), a library, 2500 units of housing, 1.4 million sq ft of office/research, 700 rooms in 3 hotels, a grocery store, possibly a skating rink and outdoor sculptures.

The proposal will have very significant impacts on future pedestrian activity in the seaport area of South Boston, and is projected to generate 32,650 daily walk trips and 42,251 daily transit trips that require a walk trip to or from the site. Combining walk and transit trips, the Project will generate 74,901 daily pedestrian trips. This averages approximately 110 pedestrian trips per minute during the morning and afternoon peak hours distributed over all the sidewalks and crosswalks provided in the Seaport Square area. By our calculation the project will result in almost two miles of new sidewalks along streets and around open spaces.

We are pleased that the project proponent has made so many substantial efforts to create an attractive, lively and integrated pedestrian environment. We are particularly pleased that the proponent will contribute \$5 million in infrastructure improvements for the Old Northern Avenue Bridge, where WalkBoston has long sought permanent improvements. In general, we think the proponent is open to constructing a vibrant pedestrian network on the site to help draw neighbors together.

Serving pedestrians in this project

With so many anticipated daily walking trips, the proponent will need to be cognizant of detailed pedestrian needs throughout the development. The pedestrian aspects of the site will play an extremely important role in the way it meshes with its surroundings and the ways pedestrian access might help alleviate traffic congestion. The proposal has provided for continuity of pedestrian routes throughout the project and routes have been designed to connect the components of the project to each other. In addition, it will be essential to provide pedestrian connections to the adjacent neighborhoods and nearby large

developments, and provide routes for walkers to all public facilities, including schools, libraries, and the convention center.

We request that the proponent use design standards for sidewalks that provide a minimum of 12' wide for busy sidewalks, and 8' in all other areas. These widths should be clear and continuous in all affected blocks. Street trees, lighting fixtures and other street furniture should not intrude on these minimum clear and continuous widths. Smooth, easily snow-shoveled sidewalk paving should be used (WalkBoston has established draft guidelines that may be of use to the proponent.)

We have couched most of our comments as questions to be addressed in the next phase of project planning and environmental review submissions. Our questions focus on:

- Sidewalk width
- Pedestrian safety at intersections
- Character of streets/sidewalks that is differentiated based on use and volumes

Two big picture concerns are not covered in this analysis, but are related to many pedestrian issues:

1. The project calls for a vast quantity of retail use at street level adjacent to the sidewalks where such use will add considerably to a lively and interesting walk. We are concerned that much of the retail space may not be occupied until the project reaches full build out, leaving vacant space and possibly rather empty sidewalks that are not interesting and perhaps not comfortable for pedestrians walking alone. Ultimately, it is hoped that the retail market will fill the space; in the meantime (perhaps over many years) pedestrians may not have either a lively or safe environment in which to walk. We request that the proponent will provide a plan to keep this ground floor space occupied and lively over the course of the project's build out.
2. The intersection of B Street and Congress Street is not a friendly pedestrian environment due to its many traffic movements onto and off the highway system. The addition of the Autumn Lane pedestrian way into this intersection seems intended to help change that character, but we are concerned whether this will be effective. We are worried about high traffic volumes and the need to address issues of overhead signage and lighting that creates a busy highway character where drivers do not expect to encounter pedestrians. We request that the proponent work closely with the City and the Turnpike Authority to develop a plan for this intersection that meets its multiple functions such that pedestrians are safe and comfortable.

Each of the proposed pedestrian corridors in this project have been classified somewhat differently, based on a street typology that is a general guide to function and potential design. It is not yet known what pedestrian traffic volumes and issues may arise. The differences between street types led to the following analysis.

Pedestrian Corridors: Seaport Boulevard

The proponents envision Seaport Boulevard as a major east-west promenade through the Seaport Square development. The boulevard is considered a retail promenade, with pedestrians, bicycle, vehicular, and truck circulation and a 20' wide planted median. It has

two traffic lanes in both directions plus left-turn lanes. Service vehicles will be directed to below-grade service areas, with principal access from streets other than Seaport Boulevard. It appears that no vehicle access points are located directly on the boulevard.

- A sidewalk with a double-row of trees is planned for the sunny, north side of Seaport Boulevard, with a total width of 28' with the rows of trees occupying perhaps 16' of that width, leaving a 12' wide continuous strip of sidewalk. Is this adequate for the proposed retail and office facilities fronting the Boulevard?
- The shady south sidewalk on the Boulevard has a single row of trees and appears to be a total of 14' wide, with space reserved for a tree/light/street furniture strip of what appears to be 8', and a sidewalk width of 6' (from Figure 2.3-28). WalkBoston recommends a minimum of 8' and preferably 12' for the continuously clear walking surface on all major streets such as the boulevard, particularly if the abutting uses are predominantly retail and office uses.
- The "Children's District" proposed to extend along south side of the boulevard is an interesting idea. Will this sidewalk reflect that concept with changes in width?

Pedestrian Corridors: Congress and Summer Streets

The connector street pattern (Congress Street, Summer Street) calls for a layout similar to the boulevard, but has no bicycle lanes. Pedestrians are accommodated on 18' or 19' sidewalks, which, with 8' of width for the trees and lights, leaves a 10' width of continuous sidewalk - adequate depending on the future uses which might attract pedestrians.

The future of Congress Street as a pedestrian facility is unclear from this plan. It is projected to carry fairly heavy traffic and is does not appear to be a focus of retail activity. In addition, Congress Street will pass under the new Harbor Street Bridge. Congress Street is also a direct route between this project, the World Trade Center subway station on the Silver Line, and the proposed Waterside Place shopping mall. The walking route requires an at-grade intersection with B Street, which appears to have high traffic volumes because of its location at the entrance and exit ramps to the westbound interstate highway.

- What can be done to make Congress Street into a relatively desirable location for walking? How can Congress Street under the Harbor Street overpass become a pleasant place for walking?
- Will the B Street/Congress Street intersection be an attractive and safe place for pedestrians?
- Will there be a stairway or other connection between Congress Street and Harbor Street? How can it be designed to make it attractive to pedestrians?
- Is there a pedestrian link between the off-site Congress Street hotel and the Harbor Street elevation at Summer Street? Is such a link feasible working with the hotel proponent?

Pedestrian Corridors: Northern Avenue

Northern Avenue is envisioned to be a local street – not a major vehicular thoroughfare. The street could become a very interesting, relatively quiet and rewarding pedestrian corridor. On one end of the corridor is the Fort Point Channel with the landmark pedestrian-only Northern Avenue Bridge and the dramatic downtown skyline. At the other end is the monumental frontage of Commonwealth Pier, with dozens of flags and with shuttle boats arriving during warm seasons. In between is the Moakley Federal Courthouse, connections with the Boston Harborwalk, the open space of Fan Pier's Public Green with views of Boston Harbor and the

open space of Seaport Square on the other side of the street. It is convenient to a cluster of hotels and the ICA is one block from the corridor.

Northern Avenue is planned to have two traffic lanes – one in each direction - with parking on both sides of the street. (See Fig. 2.3-27) Sidewalk widths are planned to be 20' wide on one side and 16' wide on the other.

- The proponents of the Fan Pier project envision Northern Avenue as a major east-west promenade through their development from Old Sleeper Street to East Service Road; will this be reflected in Seaport Square development?
- How will Seaport Square's plan for Northern Avenue relate to the Pier 4 proposals?
- The old Northern Avenue Bridge, now a pedestrian facility, has been mentioned as a vehicular route for emergency evacuations. WalkBoston is opposed to having a pedestrian facility assume vehicular demands, and we hope that the question of opening the bridge to vehicles can be laid to rest during the consideration of this project.

Pedestrian Corridors: Harbor Street

Harbor Street is the principal north-south street to be constructed by the proponent. It will become a Hill-to-Harbor Walk, extending from Summer Street to Seaport Boulevard. Our analysis examined three distinct sections of Harbor Street:

1. A route from Summer Street through the Seaport Hill area with its park and residential uses down the hill to Autumn Street.
 - Will Harbor Street (which connects to both East Service Road and Boston Wharf Road) attract traffic because it provides a new two-way connection between Summer Street and the Boulevard? Is it possible it will become an alternative to D Street, the only other area street that serves this movement? What kinds of traffic volumes are projected for this movement between Summer and Seaport?
 - Will traffic signals or special protections be implemented at locations where the pedestrian path through the Square and down the hill crosses Harbor Street's vehicular lanes?
 - What provision has been made to assure pedestrian protection at the new Harbor Street/Summer Street intersection?
 - Can this section of Harbor Street be designed in a way similar to Seaport Boulevard or Autumn Way between East Service Road and Boston Wharf Road - where one side of the street has a wider sidewalk than the other – to ensure a concentration of pedestrian traffic on a relatively safe alignment?
2. A pedestrian way serving the proposed Entertainment District between Autumn Street and Seaport Boulevard. A sample cross-section of a pedestrian way is shown in Figure 2.3-33, indicating a typical width of 70', with trees and street furniture in the center of the street. This seems ample for the intended uses.
3. Across Seaport Boulevard, the street serves 1 block of office structures up to the harbor and the ICA. It is proposed to have two 12' sidewalks containing street furniture, lighting and trees.
 - Will sidewalk widths be sufficient to serve pedestrians along this part of the route? Is it possible that the clear and continuous sidewalk width will be 6' or less?

Pedestrian Corridors: Boston Wharf Road, East Service Road and B Street

Bracketing Harbor Street and parallel to it, Boston Wharf Road, East Service Road and B

Street provide major connections to the nearby interstate highways.

Boston Wharf Road connects between Seaport Boulevard and the expressways, providing eastbound access to the Williams Tunnel. The street is two-way for its entire length through this area, with two lanes of moving traffic and one for parking. Sidewalks are proposed to be 12' wide, and include space for trees, signage and lighting. The street may ultimately need to be one-way southbound, depending on traffic volumes.

East Service Road is a two-lane road with parking with direct ramps from the eastbound highways. It will operate one-way northbound. The east sidewalk is seven feet wide, and that on the west side is 11 feet wide. Short pedestrian connections are proposed to connect Seaport Hill Park and Harbor Street to both E. Service Road and Boston Wharf Road.

B Street, also two-way, serves major access to and from the highways westbound. B Street has two lanes in each direction, left-turn lanes and a median, and 12' wide sidewalks containing signage, lights and trees.

- Does projected vehicular traffic differ significantly on Boston Wharf Road, East Service Road and B Street?
- What do differences in anticipated traffic volume mean for pedestrians using abutting sidewalks? Are they affected differently on the three roads?
- Is Boston Wharf Road (as compared with East Service Road) anticipated to be a low-volume route, despite its connection to the expressways? At what point would it be likely to become a one-way street?
- Why is there no direct connection via Boston Wharf Road between Seaport Boulevard and Northern Avenue to serve Fan Pier and Courthouse traffic? Will that traffic be diverted to Sleeper, Fan Pier Boulevard, Pier Street and East Service Road? Will traffic diverted to these streets require traffic signals at each intersection?
- Will proposed sidewalk widths be sufficient to serve pedestrians with a clear and continuous sidewalk width of 6' or less along Boston Wharf Road, East Service Road, and B Street?

Pedestrian Corridors: Autumn Lane

Autumn Lane between Boston Wharf Road and East Service Road marks a division between the vehicular portion of Harbor Street and the pedestrian way through the entertainment district. As an east-west road, Autumn Lane is planned to have sidewalks of 20' width on the north side and 12' on the south side. Both sidewalks include street furniture, and only the north side has trees.

In contrast with this section, a wide linear pedestrian area is planned for a continuation of Autumn Lane in the block between East Service Road and B Street.

- Is this pedestrian way a continuation of the Entertainment Zone? Is it intended to direct foot traffic through the Congress Street/B Street intersection?
- Will there be a convergence of foot traffic routes in this block? Where will the foot traffic be coming from – the Silver Line World Trade Center Station? The Congress Street hotel on the opposite side of Congress Street?
- Are there specific pedestrian connections (bridges, other walking routes) that are possible to connect this project with the Congress Street Hotel, either through Autumn

Lane or Harbor Street? (A faint bridge, with shadow, between this hotel and Seaport Hill shows on one of the projected development illustrations early in the document.)

Pedestrian Corridors: Farnsworth Street

A pedestrian way is planned for Farnsworth Street in the block between Seaport Boulevard and Northern Avenue. The passageway should be a useful pedestrian connection between the Silver Line transit station and the Courthouse. It should also be an attractive location for retail uses that complement adjacent office uses.

- Is this pedestrian way similar in cross-section to the Harbor Street Entertainment District walk? Will it contain similar retail facilities?
- How will the Farnsworth pedestrian way design be coordinated with its extension, Courthouse Way, through the Fan Pier project? Is it intended to be an access way to the harborfront park?
- Will the headhouse for the MBTA Silver Line service be retained in this location?

Pedestrian Corridors to Public Facilities

The proponent deserves praise for including a library, schools and a performing arts center in the project. Their locations and access points will directly affect pedestrian activity, including that of school children.

Boston Public Library. It is useful to think of the library as a resource for the entire residential area of the Fort Point Channel District, Fan Pier and Seaport Square. Only one public library can realistically be constructed here, and it ought to be centrally located. In addition, the library should probably be close to the proposed schools. The presently proposed Northern Avenue location requires a walk between schools, residences and the library through the Seaport Square entertainment district. From a pedestrian point of view, the library might be better located nearer the heart of the residential areas.

- Can an alternative site for the library be analyzed - perhaps near the intersection of Boston Wharf Road and Autumn Street?
- What are the criteria used to examine easy walking distances from all residential areas in the S. Boston waterfront to the library?
- Can the library be designed for easy access by students in proposed schools in Seaport Square at Summer Street?

Seaport Hill Playground. The proposed playground at Seaport Hill is a very worthwhile addition to the residential areas. It is close to the proposed schools near Summer Street and thus useful for associated outdoor recreation. It is within a close walking distance of the residential areas south of Seaport Boulevard.

- As the playground is expected to become a public facility, what pedestrian routes will residents from outside Seaport Square use for access? These street crossings should safely accommodate children.

Schools and Performing Arts Center. The proposed schools and the performing arts center are located at the Summer Street end of Harbor Street.

- Are there specific pedestrian improvements that are necessary to serve the schools and the arts center? In particular, street crossings should safely accommodate children.
- How are these facilities related to open space and the public library?

New Seaport Square. Most of the project's principal streets – Seaport Boulevard, Harbor Street, Northern Avenue and Boston Wharf Road – connect directly to the new open space adjacent to the harbor provided by this project and by the Fan Pier project. The green areas are also the focus of the entertainment district and several hotels planned for this project as well as adjacent projects.

- How will pedestrian safety be assured at street crossings connecting to the park?
- Why is the square surrounded by streets? Is there a possibility for buildings and sidewalks to directly abut the square without intervening streets?

Boston Convention & Exhibition Center (BCEC). The new convention center is nearby, and will be served by many of the facilities, particularly hotels and related tourist attractions that may be planned within the project.

- A major new pedestrian crossing on Summer Street at the end of the proposed Harbor Street should be considered.
- Will the new cultural facilities and schools at this location affect the design of a street crossing?

Potential vehicular/pedestrian conflict areas

Notable efforts have been made to group the large underground parking/loading facilities required to serve the project. This will have the effect of reducing the number of access points into the parking garages and truck loading spaces, while increasing the volume of traffic at those access points. Very careful design of the areas where access ramps are located will be needed to insure pedestrian safety and convenience.

On Seaport Boulevard there are several potential conflict areas. The intersections with B Street and East Service Road seem likely to carry significant traffic volumes, making these intersections potential issues for pedestrian crossings.

- Will this traffic in effect drive the intensity of land uses at these intersections by creating a high value market (100% corners?), causing additional pedestrian crossing demand at the intersections?

The intersections where Boston Wharf Road and Harbor Street meet Seaport Boulevard appear destined to be somewhat less complex, with simplified intersections.

- Will this intersection also become a prized location within the entertainment zone? Will it have less vehicular traffic and be somewhat easier for pedestrians to use?

Pedestrian/Subway Connections

The proponent calls for retaining the existing subway access at the corner of Thompson Place on the south side of Seaport Boulevard. (See Fig. 2.3-17) However, the same illustration shows a new subway station on the north side of Seaport Boulevard at the corner of Boston Wharf Road in a corner of the proposed green space of Seaport Square.

- Will the existing headhouse of the Silver Line on the north side of the boulevard near Farnsworth Street be retained?

Request for a Phase I Waiver

The proponent has requested a Phase I Waiver to allow plans for Blocks A, H and J to proceed.

Plans for Blocks H and J. The plans for Blocks H and J seem sensible and proceeding with them with new structures and a relocation of Our Lady of Good Voyage Chapel appears to be a good idea. The sidewalks in front of both of these structures should be of sufficient width to encourage walking between the MBTA Courthouse Station and the Children's Museum and promote uses that capitalize on the nearby museum. Signage for pedestrians using this access route from transit to the museum would be appropriate on street level and in the transit station.

Plans for Block A. The building design for Block A is predicated on the retention of the Barking Crab restaurant occupying a parcel that the developer does not own at the water's edge. Building A is located on a site separated from the restaurant by Old Sleeper Street, which is now used for parking and restaurant-related uses. Assuming the parcel's Chapter 91 obligations are met and the concerns noted below are addressed, we believe a Phase I Waiver is reasonable. There are several issues for Block A:

- Harborwalk – the route for the Harborwalk at Block A will fill a missing link between the existing portions of the Harborwalk in front of the Children's Museum Park and the Moakley Courthouse. The Harborwalk is to be directed into two right angle turns after it passes under the Moakley Bridge and up a ramp or stairs to the plaza to be constructed in the bed of Old Sleeper Street. It will then pass between the Barking Crab and Building A to Northern Avenue, which it will cross at grade. This should not be an insurmountable design issue, but current plans do not show the stairs/ramp configuration in sufficient detail for careful analysis. (See ramp elevations from Harborwalk up Old Sleeper Street in Figs. 2.7-3, 2.7-4 and 2.7-5 which appear to be in conflict). This steep grade is a challenge for a wheelchair-friendly ramp.
- Old Sleeper Street plaza – the plan for the plaza includes a wide walkway with space for outdoor tables at Building A facing the Barking Crab. It also will serve as the route for manual garbage removal from the Barking Crab to a storage/pick-up facility within Building A on its New Sleeper Street frontage. Dragging garbage across the Harborwalk will not be an attractive feature for walkers. Care should be taken to plan for moving garbage that leaves no traces or odors on the plaza/Harborwalk itself. Garbage storage should be well removed from the plaza/Harborwalk side of Building A.
- Relationship to the Barking Crab - the existence of the Barking Crab restaurant poses major challenges for the development. Building A is planned to be a luxury apartment/retail facility facing the Old Sleeper Street plaza and it is probable that this charming but decrepit building may lead to marketing difficulties for Building A. Moreover, retaining the Barking Crab results in a redirection of the Harborwalk. For the full length of the Fort Point Channel, the Harborwalk is directly adjacent to the harbor. This will be the first and only segment of the entire channel front where the Harborwalk will not be directly adjacent to the water.
- Servicing the Barking Crab – vehicular deliveries and service access for the Barking Crab should not be allowed on the pedestrian-only Old Sleeper Street plaza. All vehicles servicing the restaurant should be required to remain on Northern Avenue and away from the pedestrian crossings associated with the Harborwalk. Removable bollards have been suggested to allow for emergency vehicles, but these should not be used by service vehicles.
- Northern Avenue crossing – the Harborwalk crosses Northern Avenue in a location that may, curiously, result in being somewhat dangerous. The City has proposed opening one of the lanes of the Northern Avenue Bridge to vehicular traffic. This traffic will cross the

Harborwalk at an awkward location and potentially on an awkward alignment caused by property lines abutting the street. If this use of the Northern Avenue Bridge is to be accommodated, it should be for emergency use only. To do otherwise would compromise public safety and put pedestrians in particular at great risk. One method of accommodating both emergency vehicles and pedestrians at this location might be the construction of a raised intersection – a solution that has been successful in many cities around the country.

- Northern Avenue frontage - the Northern Avenue side of the building is designed to accommodate motor vehicles with a consolidated entrance and exit ramp to the underground parking. In addition, it will have a turnaround loop for loading and unloading at the door to the residential facilities. This loop impinges on the plaza in Old Sleeper Street, because it requires vehicles using the turnaround loop to pass through what should be a pedestrian-only area. The building has an overhanging upper floor for weather protection and, overall, extends very close to Northern Avenue

Thank you for the opportunity to comment on this proposal. Please feel free to contact us if there are questions.

Sincerely,

Wendy Landman
Executive Director

Robert Sloane
Senior Planner