



June 11, 2013

Secretary Richard K. Sullivan, Jr.
Executive Office of Energy and Environmental Affairs (EEA)
Attn: Deirdre Buckley
100 Cambridge Street, Suite 900
Boston MA 02114

RE: Comments on the ENF for The Boston Garden project, MEPA #15052

Dear Mr. Sullivan:

WalkBoston has reviewed the ENF for The Boston Garden project. We understand that the building project will be constructed on 2.8 acres of land fronting on Causeway Street and include:

Four retail levels from basement to fourth floor	300,000 square feet
Office building	600,000 sq. ft.
Residential building	500 residential units
Hotel	200 rooms
Parking	2075 spaces below grade

WalkBoston is supportive of this development and considers it a critical location that requires close examination of pedestrian circulation, as it encompasses major pedestrian movements between regionally important city and suburban transit facilities and a major sports facility. In addition to pedestrians already using the site, the proposal will need to accommodate the movements of the new workers, guests and residents brought into the new buildings on the site as the project components are completed.

Our comments focus on pedestrian volumes to the site, circulation inside the grouping of new buildings and along the perimeter of the site, and the potential for improvements to the Charles River walkway behind North Station.

Pedestrian volumes to and from the site

Many residents of the region already pass through this site daily and for special events. The site is the location of commuter rail connections to the northern half of the metropolitan area, two major subway stations and the TD Boston Garden, home of the Bruins and Celtics professional sports teams. These pedestrian volumes need detailing and evaluation. Our review of the data led us to the following numbers:

The MBTA Blue Book 2010 passenger numbers are:

- Morning commuter rail passengers - 26,709 boardings from stations north of Boston
- Afternoon commuter rail passengers - 26,709 boardings to stations north of Boston
- Subway users entering the combined Orange and Green Line subway station (6th busiest in the MBTA subway system) - 16,769 entering patrons
- Subway users exiting the station - approx. 16,769 exiting patrons

In the morning, the combined total for arrivals by commuter rail coupled with patrons exiting the Green and Orange line subway station is thus a number that is around 43,000

pedestrians using the stations for transportation access or interconnections in and around the site. A similar number may exist for the afternoon use of the site.

These numbers have not been updated and are of course prior to the construction of office, hotel or residence buildings that will bring additional people to the site. In addition, the existence of the 19,600-seat TD Garden arena above the commuter rail station can create circulation difficulties when people attending events overlap with people leaving the city after work. With over 200 events each year at the TD Garden and limited on-site parking for event attendees, there are many opportunities for overlapping movements of large numbers of people moving into and through the site. It may be possible to have over 60,000 people on the site in the afternoon hours prior to a major event.

As preparatory steps for addressing environmental concerns surrounding this project, it will be important to closely examine the volumes of pedestrian traffic that move to and from the site each working day, and on days with special events in the TD Garden. Flows of pedestrian traffic that are deserving of special attention include movements between:

- the Green and Orange Line subway stations and the Commuter Rail Station
- the Commuter Rail Station and TD Boston Garden
- the Green and Orange Line subway stations and TD Boston Garden
- Canal St. (used by downtown workers on foot) and the Commuter Rail Station
- Canal St. and TD Boston Garden
- Canal St. and the Green and Orange Line subway stations

These pedestrian movements deserve to be counted and evaluated for trends that indicate potential future use of transportation facilities at this site.

Pedestrians going to or from the new on-site buildings will also be moving between:

- the commuter rail station and the new buildings on site
- the subway stations and the new buildings on site
- Canal St. and the new buildings on site

These potential movements should be projected and evaluated in conjunction with the pedestrian traffic already using the site.

Pedestrian circulation through the buildings on the site

Pedestrians currently move into and out of the TD Garden building by using the east and west entrances on Legends Way and on the O'Neill Building pedestrian way. Plans show the intention of moving much of the pedestrian access between the subway stations and the TD Garden/North Station building below ground level. This will provide protection from weather conditions for walkers and is conceptually a major improvement for all.

The brief current outline of the plan calls for a passageway built under the large office tower to handle all pedestrian movements and connections on the site, located on the first basement level and connecting (in an undefined manner) between the subway stations and the proposed major pedestrian passage, to be called Champions Row. Escalators and elevators will be needed to make the connection fully ADA accessible and to speed the large volumes of pedestrians to their destinations.

It is entirely possible that this connection can be designed to handle the 43,000 users of transportation facilities on-site very well. However, it is equally possible that the volume of pedestrian traffic will be such as to thwart the good intentions of the proponent of this project. There are several possibilities for additional capacity to handle pedestrians in this important location under the office tower:

1. Addition of an escalator- and elevator-served access point leading into the present east entrance to the TD Garden/commuter rail station building (very much like the existing head house, but with a direct, covered connection into the building.)
2. A passageway between the subway station and the TD Garden/commuter rail station building that connects in several potential ways (all underground):
 - As a diagonal passageway between the MBTA undercrossing of Causeway Street and the proposed main stem of the project - Champion's Row. This passageway should be sufficiently wide to handle the considerable traffic using it twice a day.
 - A passageway under the office tower could support small commercial/retail establishments that can quickly serve people passing through to make their commutes or to attend a large event.
 - A passageway could envisioned as a large food court or produce market serving all pedestrians passing through as well as those who will be working in or nearby after the new structures are built.
 - All proposed principal passageways, including Champions Row, should be unobstructed by escalators or elevators that may impede pedestrian movements.

There may be a desire to connect other buildings or uses planned for the site into this major pedestrian facility under the tower of the office building. If so, a major connection across Champions Row leading into the underground pedestrian facility would be needed to provide access for all of these pedestrian connections and services while also providing access for the four levels of retail attractions that are anticipated for the site.

Based solely on its need to serve so many access points for pedestrians on the site, Champions Row could conceivably become a much more significant and grander element of the site. Champions Row has been located to be on a direct axis between Canal Street and the entrance to the commuter rail station/TD Garden building. Like the major axis of an enclosed shopping center, it also provides direct access to the surrounding transportation facilities and the TD Garden. Alternatively, it could become a part of an imposing railroad station with retail facilities surrounding it and even below it (like South Station, perhaps, grand but laid out as a small Grand Central Station). In either event, the space could become a local landmark and meeting place for residents, commuters and event attendees.

Pedestrian access on the perimeter of the site

Because the new facilities back up to the TD Garden, three sides remain to be served by sidewalks – along Causeway Street, Legends Way and the O'Neill Building pedestrian way.

1. Causeway Street

Wide sidewalks are planned in keeping with the city's Crossroads Project plans for Causeway Street. Street furniture and trees will be added in keeping with this plan. On the

site, the façades of the new buildings will be lined up with the O'Neill Building to present a uniform appearance along the streets. A number of small and large retail facilities will have access to and from the sidewalks, and access to the three large buildings planned for the site will also be focused on the Causeway Street sidewalk. The sidewalk will not be interrupted by access ramps into the on-site garage, as these ramps are being located at the edge of the site adjacent to the Central Artery, and will supplement the existing ramps that are located at the rear of the TD Garden Building.

However, the diagrams show a loading platform near the proposed hotel building that will interfere with pedestrian traffic on the sidewalk significantly. This loading platform is a potential hazard for pedestrians on the Causeway Street sidewalk, particularly if service trucks back into the site from the street.

To be fully supportive and attractive to pedestrians, the new buildings could be designed to attract and provide interest for passers-by, using strategies such as:

- Maximize the number of retail outlets facing the sidewalk by using narrow frontages for business facilities
- Introduce sidewalk cafes, restaurants or bars
- Provide canopies along the building frontage to protect walkers
- Avoid intimidating pedestrians by the overwhelming scale of proposed buildings. The proposed façade for the Causeway side of the site is about three blocks long, and has been broadly designed to be a uniform building of four stories topped by towers. The four-story building could be intimidating for pedestrians – it is a very large and long building. Its façade could be articulated to show connections with the streets of the area, as is currently diagrammed for the three large towers planned for the site that line up precisely with Canal Street and Friend Street. The four floors of the building complex that are designed for retail could also reflect these breaks while retaining the alignment with the O'Neill Building, either physically or by using varied building materials.

2. The pedestrian passageway at the O'Neill Bldg.

This walkway should be treated qualitatively as handsomely as the Causeway Street frontage. It has become a major entrance for pedestrians and will continue to provide major access to the commuter rail station and the TD Garden. It could also become more interesting for walkers, if cafes or other retail establishments were added. It has the advantage of the statue of Bobby Orr which is a dramatic addition of great interest to pedestrians using the site. A canopy for the length of the walkway would be of great service to the pedestrians using the walkway for access to the TD Garden/commuter rail building.

3. Legends Way

This street will be of limited use for pedestrians, except to provide access to the east entrance into the TD Garden/commuter rail station building. Access for users of MBTA's The Ride will be retained. Opportunities for retail uses appear very limited, but should be considered. This is another location where a canopy could be of considerable use to passengers waiting for The Ride.

4. The Riverfront walkway along the Charles

At the rear of the commuter rail station, the tracks serving the terminal narrow down to enter two bascule bridges across the Charles River. At this location, Central Artery plans included a bridge on the North Bank crossing over the tracks, a bridge on the South Bank also over the tracks, and a bridge that would be cantilevered or attached to a bascule bridge. The North Bank Bridge is now completed and in operation. The bascule bridge walkway is in design. The South Bank Bridge remains to be designed and constructed.

As a positive improvement to the environment of this project and as mitigation for some of the anticipated impacts of its construction, the proponent and the MBTA have begun discussions of constructing the South Bank Bridge. This positive development is very exciting, as it would complete the major interconnection of Charles River walkways on both banks, along with connections into the downtown Boston Harborwalk and the Charlestown Navy Yard.

Construction of the South Bank Bridge will involve examination of the potential building methods within a narrowly defined space on both sides of the tracks. On the east side of the tracks a sidewalk follows the boundary of the MBTA trackage at the river's edge to a dead end at the bascule bridge. This sidewalk may become an approach ramp for the South Bank Bridge. However, there are difficulties in constructing the bridge on the west side of the tracks that are likely to require significant work in examining possibilities. The rewards of designing and constructing this bridge will have regional impact because of its connection to metropolitan-scale pedestrian facilities.

We appreciate your consideration of our comments and look forward to your responses to them. Please feel free to contact WalkBoston with questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Sloane". The signature is fluid and cursive, with the first name "Robert" and last name "Sloane" clearly distinguishable.

Robert Sloane
Senior Project Manager