



WalkBoston

November 14, 2006

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

Kristin Donovan
Boston Redevelopment Authority
Boston City Hall
Boston, MA 02201

RE: Comments on Expanded Environmental Notification Form and Project Notification Form for 585 Commercial Street in Boston.

EOEA # 13894

Dear Mr. Golledge and Ms. Donovan:

WalkBoston appreciates the opportunity to comment on the Expanded Environmental Notification Form and Project Notification Form for 585 Commercial Street in Boston. We are commenting because of concerns about pedestrian issues associated with this project.

This proposal is positive for pedestrians to the extent that it improves the harborfront and provides access directly through the building itself for access to the harbor walkways. It proposes enhancements and includes new areas dedicated as open space along the harbor front. It also proposes construction of two new portions of the HarborWalk: the route of the HarborWalk directly adjacent to the property, and a second area where the proponent has volunteered to construct a segment of the HarborWalk along the Puopolo Playground adjacent to the harbor.

Proposals for the building's uses and the land areas along the harbor front are very useful. However, on the landside portions of the project site, pedestrian access has not been well served. Our questions and suggestions deal principally with the Commercial Street side of the site, as follows:

- There is inconsistency among the traffic figures in the document, and these differences have an impact on the pedestrian experience.
- Street-side access to the building is dominated by a large vehicular drive and garage ramps - despite the assertion by the document that the vast majority of trips to and from the building will be by pedestrians.
- The building does not meet the street edge as an element of the urban and pedestrian streetscape: rather it is set back from the street and will present a passive, auto-dominated face to the street.

We request that the following issues be addressed by the proponent in subsequent filings:

MAKING OUR COMMUNITIES MORE WALKABLE

1. Vehicular Traffic and Pedestrian Access to the Site

- Vehicles are not the principal mode of access by inhabitants to this site. According to the document's modal split analysis, it is pedestrian or transit access that will be paramount. The proposal's modal split analysis projects daily vehicle trips to the site as only 13% of the total trips. Eighty-seven percent of the total trips are made by pedestrians: 427 walking trips from the building plus 183 for transit (also involving walking, of course), for a total of 610 total daily trips on foot.
- Table 5-4 is titled "Summary of Proposed Project-Generated Vehicular Trips" and shows total project vehicle trips at 297/day. Table 5-5 shows "Net New Project Trips" at 175 new vehicular trips. The ENF form indicates that the project will generate a total of 1,002 trips per day (with a net change of +630). Which of these figures are correct? They paint very different pictures of the project.
- The project includes a parking garage with 135 spaces that will serve only 62 units. Is the extra parking intended to serve commercial uses in the building? If so, how will the parking be managed and priced to discourage vehicle trips?

2. Access to the Site

- As a residential and commercial development in an urban setting, this building should receive its residents and visitors from the street, with pick-up and drop-off from the curb lane. Access to the building garage should be via a narrow two-lane driveway that provides access to ramps that are largely enclosed within the building. Many elements of the site design are more suggestive of a suburban car-dominated environment than of the North End/Waterfront of Boston.
 - The "grand entry drive" (as described in the document) to and from Commercial Street includes a 40-foot wide curb cut into the street. This break is very wide – as wide as a 4-lane street – and will pose dangers for pedestrians crossing it. The driveway devotes significantly more space to vehicle access than is appropriate for the site.
 - The entrance to the proposed structure is defined by the vehicle circle in front of it. For a building where the principal access will not be by vehicles, this gives excessive emphasis to cars.
 - Taxi use is promoted by direct vehicular service for riders that use the vehicle circle. However, taxis are a small proportion of all trips; they should pick up or drop off fares at the curb, removing one more reason for the extensive space devoted to vehicular access.
 - An awning could provide a covered walkway between the curb and the front door of the building (as is provided by many other residential, restaurant and hotel uses in the city).
- Will all service access (including deliveries, dumpsters and recycling) be provided within the garage?

3. The Pedestrian Streetscape

- A 40' setback along the Commercial Street frontage of the building seems excessive from a pedestrian point of view. No other privately-owned nearby building has such a setback. Instead, Commercial Street and North Washington Street buildings are sited in downtown Boston's traditional pattern of direct frontage on the sidewalk line, with occasional indentations for building entrances.
- The 40' setback also means the internal and potentially interesting parts of the building are a significant distance from the sidewalk, rendering pedestrian views marginal. The "monumental view" of the harbor and Charlestown framed by the building entrance and the large window wall facing the water will be difficult for pedestrians to see unless they walk toward the ground floor through the vehicular access area, and look under the overhanging building. Because of an indentation at the entrance, the distance from the sidewalk to the main building entrance appears to be some 60 feet, with the window wall another 50 feet away.
- The text mentions that the project will provide "lovely, at-grade street activity" with a variety of uses. This is not clear from the site plans. For example, "café-type activities" are noted on page 3-4, but the building's interior layout does not suggest any functional relationship that would indicate that a café is planned – the restaurant faces the harbor, not the street, and tables are shown on the harbor side of the building but not the street side. Likewise, no benches are shown in the open area between the building and Commercial Street. The plan does not indicate any active uses that would be seen by a passing pedestrian.
- Pedestrians will be invited to walk from the street to the HarborWalk using the lobby as a covered passage. The proponent should commit to this access. Will the building provide public restrooms?

4. Open Space

- The open space around the building – particularly along Commercial Street – does not seem particularly usable. Of a total of 12,500 square feet of designated open space that surrounds the building, some 5500 square feet (45%) is devoted to auto access for the large turnaround at the main entrance and ramps to the parking garage (despite the estimate that only 13% of daily trips to or from the building will be arriving or leaving by car). The 427 walk and 183 transit trips generated by residents will have to find their way daily through this vehicle-dominated area.
- Ramps to the garage occupy a major portion of the open space along Commercial Street. The ramps will require retaining walls that are hazardous to pedestrians and may require fencing. The space the ramps occupy may be open to the sky, but it cannot qualify as usable open space. As noted above, access to the garage should be via ramps that go perpendicularly from the street into the garage so that this considerable amount of claimed open space does not disappear under pavement.
- The paved driveway will likely be used for pedestrian access to the building. The text mentions a "cobbled" circular drive (p3-4). Cobbles are a difficult walking surface. If the cobbled driveway in the open space is to act as part of the pedestrian access to the building, it will be very difficult for anyone with impaired walking abilities. People

in wheelchairs, the elderly, people pushing baby carriages, and anyone wearing high heels all will have difficulty with the paving stones.

- The open space on the left of the building's Commercial Street frontage is a residue left after the large proportion of the site's open space is taken for vehicular access. This area has, so far, no designated use. The proposed restaurant does not abut it; the "function" room, presumably for meetings, with windows onto this space, is small and will not be in use at all times.
- In summary, the proposed open space along Commercial Street seems basically either inaccessible or not useful. It is difficult to understand the visual benefits it may offer to pedestrians. Perhaps the proposed open space would be more useful to tenants, visitors and Harbor Walk users if it were transferred to the rear of the building along the harbor. This could take place if the building were moved closer to the street, a pattern of development that would be consistent with neighboring buildings.

5. Project Amenities

- The proposed fish pier is a significant project amenity, with possible touch and go ferry service attracting people to the HarborWalk. According to the EENF diagrams, it seems to have a boardwalk for pedestrian access. We hope this will be included.
- The construction of a new portion of the HarborWalk along the perimeter of Puopolo Park is a marvelous adjunct to this project. We are very happy to see this gesture from the proponent. We hope that the new walkway will be connected through the park back to Atlantic Avenue (assuming no access will be allowed across the harbor front at the adjacent Coast Guard Station.)
- Section 3.3.2 "Public Realm" mentions that the design creates "open and free seating areas for the general public." Does this indicate that the outdoor seating adjacent to the restaurant on the harbor side of the building will be available for general public use (as opposed to restaurant patrons)? This would be a nice pedestrian amenity.

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

Sincerely,

Wendy Landman
Executive Director

Robert Sloane
Senior Planner