



WalkBoston

February 6, 2008

Secretary Ian A. Bowles
Executive Office of Environmental Affairs
Attn: Deidre Buckley
100 Cambridge Street, Suite 900
Boston, MA 02114

John Palmieri
Boston Redevelopment Authority
Attn: Kristin Kara
Boston City Hall
Boston, MA 02201

RE: Comments on Draft Environmental Impact Report and Draft Project Impact Report for 585 Commercial Street in Boston.

EOEA # 13894

Dear Msrs. Bowles and Palmieri:

WalkBoston appreciates the opportunity to provide comments on the Draft Environmental Impact Report and Draft Project Impact Report for 585 Commercial Street in Boston. Many issues appear to be resolved but we remain concerned about specific pedestrian issues.

Nearly 80% of the daily trips to and from this site will be made solely on foot or by walking to nearby transit stations. With such a high pedestrian volume, the proponent and the City should assure that walking considerations are paramount in providing good access.

Issues that appear to be resolved

There are many positive aspects of this project for pedestrians. The proponent is enhancing and enlarging public space along water's edge with potential for visitors to pause and view the harbor. The proposed pier area will add interest and a destination for walkers. The outdoor area of the site is devoted primarily to embellishing the harbor and water views and pedestrian connections are provided between Commercial Street and the harbor. The public areas of the building are designed to accommodate pedestrians and visitors and provide a passageway between Commercial Street and the harbor.

The building site is flanked by public facilities – a skating rink to the east and two tennis courts to the west. The proponent is exploring ways to incorporate links to the tennis courts as a method of capitalizing on this context.

The current project design gives much better direct vehicular entrance into the parking garage from the street. The prior design captured the sidewalk and building entrance for autos on most of the side facing Commercial Street. It was not very pedestrian-friendly.

The new design will include individual driveways both into and out of the building. We suggest that the widths of both be as minimal as possible and that the curb radii be minimized as these drives leave or reenter Commercial Street. We also suggest that the sidewalk be level where the driveway crosses it. A warning for pedestrians using the sidewalk to cross these driveways should be provided.

Unresolved pedestrian issues: the route of the Freedom Trail

The proponent's site is one of the primary locations where the Freedom Trail meets and crosses the Harbor Walk. These two pedestrian routes will be connected by the passages on either side of the site or through the public area within the building. Directional signage for both the Freedom Trail and the Harbor Walk and for connections between the two routes should be provided because of the uniqueness of this site's location.

The current route of the Freedom Trail through the North End includes a segment along Commercial Street between Hull Street and N. Washington Street. This segment of the walkway can be best accommodated along the frontage of the proponent's site. The alternative for walkers is the other side of Commercial Street - now the less pleasant side because its frontage is primarily a parking garage. The openness of the proponent's site and the views of the harbor suggest a far more pleasant route for the Freedom Trail.

Crossing Commercial Street at Hull Street involves a currently unsignalized intersection. The alternative of crossing Commercial Street at N. Washington Street involves navigating a more complicated intersection. Commercial Street at the intersection is wider than at Hull Street. To improve the Freedom Trail route, improvements dedicated to the safety of pedestrians may be warranted at the intersection of Commercial and Hull Streets.

Unresolved pedestrian issues: auto access to the building entrance

The present design of the building includes a loop of street inside the entrance sidewalk area to provide a drop-off area close to the entrance. The drop-off area for vehicles would be distinguished by installing bollards to outline the route they must take. Walking would be permitted both within and outside of the space marked off by bollards. There is precious little space for pedestrians in this very small entrance area - a trapezoid about 50' on 3 sides and 40' on the 4th side. Inside the bollards there will be many conflicts with walkers as vehicles arrive and leave the loop, since many intruding vehicles can be as long as 20 feet.

WalkBoston is strongly against the use of sidewalk space by vehicles as proposed for this project, even if the space were much larger than it is here. Only 14% of the total daily trips to and from the building are projected to be vehicle-based, an imbalance of vehicular and pedestrian access to the building that does not warrant giving over valuable pedestrian sidewalk space to vehicular access of any kind.

WalkBoston has no disagreement with providing drop-off spaces. However, in this instance there is insufficient room to allow drop-off spaces in the area more appropriately devoted solely to pedestrians. If there are to be dedicated drop-off spaces for this building the best place for them is streetside on the curb lane. However, the curb lane here (on the north side of Commercial Street in front of the proposed building) is dedicated to right turns at the next intersection just west of the site, at N. Washington St. The potential overlap between drop-off spaces and this right-turn lane leads to several questions. (See below.)

Unresolved pedestrian issues: the intersection of Commercial and N. Washington Streets

The intersection of these streets appears to negatively impact walkers approaching or leaving the proponent's site. Virtually all transit users and most of the other pedestrians going to or from the site will be crossing streets at this intersection. The design of the

intersection includes very wide and numerous approach lanes and street cross sections that are dangerous for pedestrian crossings. Striping safe crosswalks and providing median islands are that would help make the intersection safer for walkers. WalkBoston strongly urges continued planning for upgrading this intersection to improve safety for pedestrians.

The northeast corner of the intersection closest to the proponent's property requires special attention. Here the right turns from Commercial Street westbound onto N. Washington Street northbound are provided for in a manner that does not seem appropriate to the location or to the volume of traffic the Commercial Street carries.

Redesign of the intersection and particularly this quadrant seems appropriate because:

- Relatively high volumes of traffic are projected at this intersection - primarily because of traffic volumes on N. Washington Street and Causeway Street (the continuation of Commercial Street.) In contrast to the other three legs of this intersection Commercial Street is a collector street. It serves primarily the North End and is not a major through street serving other parts of downtown Boston. Commercial Street was most recently a bypass route for vehicles avoiding Big Dig construction, a role which has now ended.
- The cross-section of Commercial Street varies and it operates as primarily one moving lane and a parking lane in each direction throughout much of this part of the North End. On the Commercial Street approach to the intersection with N. Washington Street the westbound roadway widens into a 3-lane westbound cross section with the curb lane devoted to the right turn. This right turn lane begins at the east edge of the proponent's property and affects the entire frontage of the site. Parking or stopping in this lane is prohibited. The right turn lane extends along the curb for a distance of about 200 feet between from the east edge of the proponent's site and the intersection of Commercial and N. Washington Streets. Even if a right turn lane is appropriate for this location, it is unclear if the length of the turning lane is related to the projected volume of right-turning traffic.
- The northeast quadrant of the intersection of Commercial and N. Washington Streets appears over-designed. The right turn lanes are physically two lanes wide but are striped to limit operations to one lane. In addition the geometry of the right turn curb radii can accommodate vehicles at a speed that does not appear warranted. None of the other quadrants of the intersection, some with higher turning volumes than here, are accorded such a dramatic geometric layout for turns. Projected traffic volumes do not seem to warrant a two-lane right turn movement at this location.

WalkBoston suggests that the intersection of Commercial and N. Washington Streets be thoroughly analyzed for pedestrian safety in conjunction with development of this site, as there is no doubt that more pedestrians than vehicles will be accessing this site on a daily basis. The designs for the street cross-section, the sidewalks, crosswalks, and the vehicular access to the site must accommodate pedestrian safety concerns. The right-turn lane on the north side of Commercial Street should be redesigned in a way that serves the interests of both vehicles and pedestrians. The exclusive right-turn lane should either be eliminated, restriped or redesigned to include a drop-off curbside location would improve the access to the site for pedestrians while maintaining an appropriate site for vehicle drop-offs.

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

Sincerely,

Wendy Landman
Executive Director

Robert Sloane
Senior Planner