



WalkBoston

December 12, 2005

Secretary Stephen Pritchard
Executive Office of Environmental Affairs
Attn: William Gage, MEPA Analyst
100 Cambridge Street, Suite 900
Boston, MA 02114

Heather Campisano
Boston Redevelopment Authority
Room 910 City Hall
Boston, MA 02201

RE: Canal Place Project Notification Form and Environmental Notification Form
EOEA# 13674

Dear Secretary Pritchard and Ms. Campisano:

For 15 years, WalkBoston has been an advocate for Greater Boston's pedestrians, working for improved walking facilities, programs and safety. We are pleased to provide comments on the Canal Place Project Notification Form and Environmental Notification Form (we have written our comments to address both documents).

The proposed development of Parcel 1A in Boston's Bulfinch Triangle will add 388,100 square feet of mixed use, retail and residential space on the site. It is a site that is extremely important from a pedestrian point-of-view, as it is located atop the North Station Green Line and Orange Line Superstation. Access to and from the Superstation on the south side of Causeway Street is entirely encompassed within the site. In addition, the site abuts the direct flow of pedestrian traffic between the North Station Commuter Rail Station and the downtown financial and retail districts.

Total daily pedestrian trips generated by the proposed project are estimated to be significantly higher than the total daily vehicle trips: 2790 pedestrian trips will be generated (704 of which are estimated to be users of public transportation), compared with 860 total daily vehicle trips. The significance of this comparison is that pedestrian concerns and access to transit deserve extremely sensitive planning and design.

Development Context

The land use and urban design context of the proposed development should be discussed and included in the assessment of the development's effects on pedestrian activity. Some of the issues to be considered in future filings include the following:

- There has been considerable discussion of the location of a supermarket on one of the adjacent sites, but the ENF and PNF do not indicate where that may be. Pedestrian traffic - both pedestrian trips originating inside the proposed residential spaces in this project, and those coming from surrounding neighborhoods - will be significantly influenced by the location of a supermarket.
- Potential land use changes in the vicinity of the project are not discussed. The large development at the Causeway Street side of the North Station will be directly across the street from the building. Parcels 2A and 2B, also directly adjacent to the site, are mentioned on page 1.8.3, but are not shown until later (see Figure 3.1.1). These sites may have significant implications for pedestrian movements at ground level. Perhaps their locations and potential land uses could be described in an early portion of the report.
- Major generators of pedestrian traffic seem to be overlooked. Boston Garden has traditionally had a major impact on area streets and sidewalks, and it is right across Causeway Street from the proposal. Mass General Hospital has a major presence in the area, both in terms of job provision and for medical services. Access between local park and recreation facilities and the site may be advantageous for both prospective residents and the developer marketing the units.
- No mention is made of the Rose Kennedy Greenway until pp. 4-1 and 4-2, and then only in reference to crossing the Greenway on the way into the North End. The proposed development should give clear recognition of the likely route of the north-south pedestrian route(s) connecting to the Greenway, because one of the potential routes may follow Canal Street to North Station. Haverhill Street cannot perform this role as is not a through street and seems to be a loading and trash collection street. The remaining options are Beverly Street and/or Canal Street. Washington Street is too far away from Portal Park to be a corridor option.

Pedestrian Counts

As a first step, it is important to assure that existing and future pedestrian volumes are accurately portrayed. We have several comments on the pedestrian trips and patterns as described in the ENF and PNF:

- The flow of walkers down Canal Street between North Station and the financial district looks extremely low in both AM and PM peak periods: as shown on the Existing Conditions diagrams, there is only one person crossing New Chardon Street in the AM peak, with 5 crossing in the PM peak (see Figs 2-8 and 2-9). It is possible that this low number can be currently attributed to CA/T construction activity along New Chardon Street. However, the estimates are unchanged in the Future 2010 No-Build Conditions in Figs. 2-14 and 2-15 (which will come after all CA/T construction activity). Furthermore, there are only 28 AM peak pedestrian crossings of New Chardon Street in the Build Conditions with 58 in the PM peak (see Figs 2-22 and 2-23). Prior to CA/T construction the walk along Canal Street was a major and well-known access route between the commuter rail station and downtown. It seems

likely to return to that role after the CA/T is completed, when there will be a crosswalk at this location according to CA/T design documents.

- Pedestrian counts must be accurate. Fig. 2-9 shows a total of 1338 existing PM peak pedestrian crossings on the west side of the intersection of Friend Street and Valenti Way. This does not seem comparable to Fig. 2-8, which shows 160 (roughly nine times fewer) existing AM peak pedestrian crossings at the same crossing. For the Future No-Build Conditions, the crossings are 1406 in the PM peak, with 168 in the AM peak. However, future PM peak period Build Conditions pedestrian crossings, Fig. 2-23, total 1439 crossings at Friend Street and Valenti Way, while the future AM peak pedestrian crossings total 320 at this crossing.
- Jaywalking counts all seem to be based on measurements of crossings at intersections where there are no painted crosswalks, but where there are clearly demands for a pedestrian crossing. Jaywalking is usually considered to take place on a more careless basis, largely in as mid-block crossings, and thus these "jaywalking " counts seem odd. There are no reported counts or observations of mid-block jaywalking.

We request that the proponent re-examine the pedestrian counts and projections in the project area, and specifically provide a picture of future conditions that reflect the street pattern and crosswalk pattern that will exist at the build year.

Transit Access

Transit access is vitally important, as the development of the site will determine the points of access into the Green/Orange Superstation. Many of the transit access points into the superstation below the site are located on Haverhill Street (see "Canal & Haverhill Elevations" following p 1-9). This heavy transit use does not seem well matched with Haverhill Street's other use as the location of trash storage/removal and truck deliveries. This mix of uses may bring about conflicts where pedestrians must compete with vehicles loading or unloading very near the major access points into and out of the superstation. Of particular concern is the main pedestrian exit from the superstation which is immediately adjacent to the only two truck bays for the building. Additional allocation of non-conflicting entry space on both Causeway Street and Valenti Way may need to be considered.

Other Design Issues

Other pedestrian-related issues that should be given clear consideration in future filings for the project include the following:

- Canal Street is two-way in front of the site, but one-way below Valenti Way. This may reflect an emphasis on traffic calming on Canal Street. A slower moving street may have a different traffic purpose than the street now has - one that is much safer for pedestrians. However, this does not seem to be the implication of Canal Street as the "principal street of the district" (page 4-2). If it is the principal street

in this area, should it include parking access into the proposed Canal Place building?

- The project's principal points of access are located along Causeway and Canal Streets, with only supplementary access on Valenti Way. There is little building access on Haverhill Street. However, Haverhill Street will be a major pedestrian route because of its transit functions and therefore deserves consideration as to its ground level design and access into the building.
- Crosswalk locations seem clear. Aside from clearly designating the crosswalks with paint, are there other pedestrian protections that might be installed?
- Sidewalk widths are not clear. The ground floor plan following page 1-9 and especially Figure 2-16 show sidewalks that are wider on the west side of Canal Street than the east side of the street. They also show wide sidewalks on Haverhill Street. Do these designs match pedestrian volume projections? Are they to accommodate outdoor tables for Canal Street restaurants? How will wide sidewalks on Haverhill Street be used? Are they for loading and unloading for retail establishments and for restaurants? Is it a major pedestrian route?
- What can be expected for other design features that affect pedestrians, such as street furniture? Trees? Pavement types? These seem to be mentioned only on page 4-2, with plantings mentioned on page 1-14. What about curb cuts? Bulb-outs? Restaurant seating outdoors - mentioned in the report on pages 1-8, 1-15
- Air quality analysis - the highest one-hour and 8-hour concentration of CO impacts predicted in the area of the project for the future build conditions plus background occur at the intersection of Causeway and Haverhill Streets. Unfortunately, this is also the location of many of the highest pedestrian volumes that have been monitored and projected.

Canal Place has the potential to be exemplary for its consideration of pedestrian issues of many varieties. We hope that the project's proponents will take advantage of these potential benefits to the maximum degree.

Thank you for the opportunity to comment on this project. We look forward to working with the proponent and the consultants on the project in the future.

Sincerely yours,

A handwritten signature in black ink that reads "Wendy Landman". The signature is written in a cursive, flowing style.

Wendy Landman
Executive Director