

October 9, 2013

John Fitzgerald
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007

Delivery by Adobe PDF via email to: John.Fitzgerald.bra@cityofBoston.gov

Subject: The Boston Garden / 80 Causeway Street

Dear Mr. Fitzgerald:

LivableStreets Alliance is pleased to submit these comments on the Expanded Project Notification Form (EPNF) dated September 6, 2013 for the above referenced project.

We agree that this Project has the potential to serve as a gateway to Boston for those accessing the City by car from Interstate 93 or local roadways, or by public transportation and Amtrak at North Station, or by traveling by bicycle or foot. With the combination of appropriate livability and sustainability commitments along with proper architectural and engineering designs, the Project's tenants, residents and visitors may greatly benefit from its adjacency to North Station, with easy access throughout Boston via the MBTA Green and Orange Lines, to the greater metropolitan area via the Commuter Rail lines, and to New Hampshire and Maine on Amtrak, and to various cities and towns located north of the Charles River via new off-road bicycle trails and new on-road bicycle tracks.

The Proponent is proposing a development on the Project site that includes approximately 1,870,000 square feet (sf) of mixed uses, a project that is larger in scale than either of Boston's two largest towers: the Prudential Tower completed in 1964 or the Hancock Tower which opened in 1976. While large-scale transit-oriented development can be a positive contribution to the area's livability, the huge increase in car traffic and other trips precipitated by the development could easily swamp the area. The ENF estimates the Project will result in 7,034 new automobile trips (two-way, 24-hour volume) on an average weekday, with 6,970 transit trips and 19,352 pedestrian/bicycle trips.

The enormity of these trip estimates will be challenging to fit within the City's mode-split goals as well as properly manage in terms of scale. Although the EPNF provides much information relative to motorized vehicle impacts and planned mitigations, it incorporates relatively scant details on transit trips, or bicycle trips, or pedestrian trips. We believe the Proponent should be required to expand its planning for and mitigation investments in trips by such alternative mode trips.

Boston has made major commitments to becoming more bicycle and pedestrian friendly -- both to improve livability and sustainability -- there are number of ways that investments of sufficient magnitude made by the Proponent could significantly contribute to that priority process. These include:

1. Major covered, conditioned, and secured bicycle-parking facility. Upon completion of this Project and others now underway nearby, the North Station area might otherwise drastically be underserved with bicycle parking for people using North Station/TD Garden. Please require the Proponent to provide covered and secure bicycle parking for use by the general public for approximately five hundred (500) bikes at the ground floor with direct and quick access to the public way between the Garden and the Tip O'Neill building on the west or on the east side between the Garden and the Zakim Bridge. Currently, private bicycle use at North Station/TD Garden is low due to very limited bicycle parking, all of which is outside, non-secure spaces. Bicycle parking is needed for commuters, tourists, and other North Station users and well as those attending games or other events

at the Garden. While the developer proposes to help link the project site with the Paul Dudley White Bike Path, linkage without additional parking is not an appropriate solution. The EPNF refers to new covered secure bike racks and lockers to be provided by the Proponent, but does not specify how many will be provided.

2. Improved Transit Connections. The main entrance, Champions Row, needs to be re-envisioned as a Transit connector as much as an entrance to the TD Garden, the entrance to North Station should be on axis with Champions Row and stairs, escalators and elevators moved off axis to accommodate and prioritize pedestrian flow to and from North Station's commuter rail and Amtrak terminal. Champions Row will become the primary route for Commuters and Visitors to both enter and leave our city. They should not be treated as second class citizens by having to walk behind inviting stairs and escalators to find their way to the North Station entrance. Remember, many event goers will arrive and leave via commuter rail. Direct indoor access is also needed from Champions Row to the MBTA Green and Orange Line station at the South East corner of the development, this could happen at a below grade level. The Green and Orange Line station should also be directly connected to North Station, this could also happen via a below grade passageway.
3. The proponent should be required to perform a detailed pedestrian flow study with emphasis on both commuter patterns as well as event patterns. Specific areas of concern are: connections to North Station from both Green and Orange Line head houses, connections from TD Garden to North Station and the Green and Orange Line head houses, connections from Canal and Friend Streets to both TD Garden and North Station, and connections within Champions Row.
4. Major New Hubway Station. The proponent should be required to provide covered space for a major Hubway bicycle Station to operate in support of the North Station/TD Garden area. This new Hubway Station should be a very large station of approximately 100 bicycles, and the Proponent should also provide it with driveway access and temporary parking to support large restocking vans out of (without interference with) other uses of the public way.
5. Dedicated Cycle tracks and sidewalks to service the new onsite 500-space bicycle parking garage and 100-space Hubway Station. Please require the Proponent to design, build, and maintain on-site cycle tracks and sidewalks that can operate without interference with or from other public access to North Station or the Garden.
6. Connect Historic Boston Green Link Trail. The Proponent should be required to build the portion of the Connect Historic Boston Green Link Trail that is in front of their site. The City of Boston and the National Park Service need to make sure that the design of the development enhances the Green Link Trail. The developer does not appear to mention the Connect Historic Boston Green Link Trail in the EPNF documents. The developer also appears to reference what appears to be an outdated design for the upcoming reconstruction of Causeway Street by others, and the Proponent should be asked to revise its plans such that they support the current design for the rebuilt Causeway Street.
7. Car Share Spaces and Electric Charging Stations within the new underground parking garage. The EPNF currently proposes to provide four (4) spaces within the 800-space garage for car share. This is far too low for a Transit Oriented Development. We suggest something like 5% of the garage's total size or some forty (40) or more spaces be set aside for car-share spaces and additional spaces for rental cars. Electric charging stations should be required to be provided for 5% of car-share, rental, and normal parking spaces.
8. Nearby adjacent multi-use paths: please require the project proponents to advocate for and support the South Bank bridge and the bike/ped crossing of the Charles River alongside the new MBTA commuter rail drawbridge. This should include local connections to these bridge and possibly include design assistance and possibly helping fund construction.

The bicycle and pedestrian enhancements requested herein will go along way to help support the enormous development contemplated by the Proponent. These measures should help reduce car use and ease congestion, and help meet City and State-sponsored sustainability goals. It will also lead to a more walk-able, bike-able and more livable neighborhood.

Mr. Fitzgerald re: The Boston Garden
October 9, 2013

Page 3 of 3

Thank you for considering our input as this project develops. If you have any questions on the above comments and suggestions, please contact Mark Tedrow, Advocacy Committee Member, LivableStreets Alliance, who may be reached at 857.719.7143 and mctedrow@verizon.net.

For LivableStreets Alliance

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