



April 7, 2006

Secretary Stephen R. Pritchard
Executive Office of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02115
ATT: MEPA Office

RE: EOE #9131
South Station Air Rights Development by Hines
Atlantic Avenue
Boston, MA

Dear Secretary Pritchard,

Adaptive Environments writes regarding the South Station Air Rights Development proposal by Hines and its excellent architectural team. Though we have not commented formally on past filings by the proponent, we have eagerly followed its progress. We hope that the project will be as responsive as possible to the needs of the thousands of commuters and adjacent stakeholders as well as to the tenants.

Adaptive Environments (AE) is a 28 year-old international non-profit organization, based in Boston, committed to advancing the role of design in expanding opportunity and enhancing experience for people of all ages and abilities. AE's work balances expertise in legally required accessibility with promotion of best practices in human-centered or universal design. AE has been the lead organization in the international universal design movement, having hosted four international conferences (New York -1998, Providence -2000, Yokohama – 2002, Rio de Janeiro – 2004) as well as international student design competitions, smaller regional meetings and publication of web and print materials. We are currently working with the UN and the Ad Hoc Committee on the Human Rights of Persons with Disabilities on the role of design in human rights.

With our extensive international network of individual and organizational collaborators, AE has an unusually rich and flexible expertise and a capacity well beyond its core staff of nineteen designers, educators and humanists. AE knows the state-of-the-art of universal design in the spectrum of design disciplines from urban design, landscape and architecture to interior design, industrial design, media and information design and can call upon the ideal match of expertise and use it efficiently. We have a formal collaborative relationship with the International Association for Universal Design in Japan, with the Design-for-All Foundation in the

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European Union, UN DESA and the International Federation on Ageing. Our international network includes colleagues on every continent.

All of our work is governed by our core convictions:

- Design is powerful and profoundly influences our daily lives and our sense of confidence, comfort, and control.
- Design is a tool of social equity and matters more than ever in a world more diverse in age and ability than at any other time in history.
- Variation in human ability is ordinary, not special, and affects most of us for some part of our lives.

In short, we believe that compliance with requirements for accessible design are valuable but far short of an appropriate response to the twenty-first century reality of diversity in ability and age. Universal design is the only choice for socially sustainable development.

These general demographic realities are particularly important for Boston. In 2003, Boston had over 100,000 residents who were 55 or over. That figure is expected to grow by 46% by 2023¹. 35.9% of the Massachusetts' population is already 45 or older. More than 20% of Boston residents reported some level of disability in the 2000 census. These demographics highlight the importance of designing both public space and residential units that anticipate and seamlessly accommodate these new realities.

Adaptive Environments made a commitment in 1998 to review all large project proposals for the South Boston Waterfront. That commitment was made in order to assess each development proposal for the caliber of attention to inclusive and welcoming designs that would work for everyone. Our attention and advocacy was also based on the belief that the \$20B investment of public funds for infrastructure improvements in and around the Waterfront makes a stunning case for public benefit.

We want to be clear that we *assume* compliance with state code and federal accessibility laws. But we think that any new development should do more than the minimum. Compliance alone would not make for places that are usable and welcoming for everyone. Curb cuts, level entrances, and a 36" minimum path of travel are legal obligations. Attention to wayfinding, to maximizing access to daylight, thoughtful acoustics, wide pedestrian crossings that feature flush curbs, and healthy indoor air quality are examples of enhancing the human experience of place through design. We are attaching our UD guidelines to this letter; these are used in each of Boston's Municipal Harbor Plans.

In terms of the specific FEIR filing, we want to first thank the proponent and all of the City and State agencies that have, behind closed doors, contributed so much time and effort over these past three years to improve substantially the proposed development. Clearly, the project is better for these efforts. The question now at hand is whether this FEIR filing has adequately responded to all of the concerns raised in previous filings and currently by the public and many of our collaborating non-profit organizations.

¹ Boston Partnership for Older Adults, June 2003

These reasonable concerns and requests have included:

- Maintaining pedestrian conditions and connectivity throughout and around the South Station area and to Fort Point Channel;
- Enhancing the pedestrian experience with wider sidewalks, stable trip-free surfaces and appropriate pedestrian scaled amenities;
- Improved connectivity from the subway concourse to train and bus levels including improved elevator access;
- Ensuring that South Station's main waiting area is improved and becomes the "Great Hall";
- Providing appropriate mitigation for wind, shadow and massing;
- Actively addressing Chapter 91 obligations including watersheet activation in exchange for legislative dispensation of a formal Chapter 91 review and license;
- Reducing parking ratios and improved TDM measures;
- Consolidating truck loading areas off of Atlantic Avenue;
- Building types, height, and fenestration that respond to the site's signature location and respect the character of the Leather District;
- Sustainable building design including "green" roofs;
- Housing; providing both rental and condo opportunities;
- Affordability – Ensuring the residential component(s) are diverse on site. We also endorse the formula of using having Boston median income instead of using regional median income as a means of determining eligibility.
- Significantly more detailed construction management plans

The proponents clearly feel they have addressed all of these matters adequately and want to move forward in the permitting process. To that end, they are seeking Boston Redevelopment Authority Board approval in May or June. On the face of it, this seems reasonable. However, we concur with the emerging thinking that there must be a formal mechanism, possibly in the form of an IAG or CAC, for ongoing discussion and consultation with relevant stakeholders. Such a mechanism should include representatives of such stakeholders as the Leather District, Chinatown, Move Mass, the Conservation Law Foundation, WalkBoston, Livable Streets Alliance, the Massachusetts Horticultural Society, Rose Kennedy Greenway Conservancy, people with disabilities, and waterfront advocates, in a manner that ensures further project refinement beyond what is currently described in the FEIR before MEPA.

To their credit, the Proponent has indicated a willingness to meet with various stakeholders individually, most notably, WalkBoston. With that said, to date, the public's first major substantial discussion of the current filing, specifically the project's urban design and transportation components, was a Move Mass meeting two weeks ago. We are not aware of other City or MEPA sponsored meetings. The Boston Society of Architects will host the Proponent in May for further discussion of the impact on the public realm. The Boston Civic Design Commission still has design committee review sessions scheduled. In light of these points and given the limited amount of public comments provided to MEPA thus far, MEPA needs to encourage further public discussion of some of the finer points of the project.

Before addressing specific items needing attention in the certificate, we want to broach the important subject of how South Station is a great space and how it can be greatly improved.

The existing main concourse is a large, often sunlit space, capable of holding huge numbers of commuters. The restoration begun by Governor Dukakis reinvigorated the station by not only restoring stonework but also adding significant retail and food court space. The result, now managed by Equity Office, is a wonderful meeting space day or night and accommodating to all. Festivals, exhibits and concerts are common. In past filings the development would have punctured this space with massive columns but would have also significantly improved the ceiling and electric lighting of the space. In the most recent filing, the tower has been redesigned and the support columns condensed and largely relocated to the exterior of the glass curtain wall/sliding doors.

The proponent has also repeatedly said that they want to minimize the impact on the main concourse and as a result of that, do not want to alter or replace the existing ceiling and HVAC. Likewise, they do not envision relocating the current glass current wall and sliding doors to the ends of the tracks. We believe that as part of building this important development, the natural light lost to the tower, bus station and parking garage, needs to be replaced and expanded. As part of that, we believe a new roof, capable of letting ambient light in, should be constructed over the existing leaking and unattractive roof and ceiling of the main concourse. Further, we believe that fully enclosing the exterior concourse and relocating the sliding doors to the track ends should be fully explored and implemented. Such a move would not only expand the main concourse but also provide a full indoor environment as people head to either the tower's sky lobby or the much enlarged bus station. If such work is done, South Station will once again be a "Great Space" in keeping with many other famous train terminals.

Specific to the Certificate to be issued by the Secretary, we ask that the following be explicitly required:

South Station

- For the Station itself, the proponent should fund the installation of an elevator directly adjacent to the existing stairs & escalators that connect the main station concourse to the subway concourse. Currently, passengers with luggage, baby strollers or people with disabilities take a long winding corridor to reach the elevator. The elevator should be of substantial size and be designed and located in such a manner that it allows transparency and is easily recognizable from a distance.
- The proponent should work with the MBTA and Equity Office to widen the existing pinch point of a 7' opening (formerly a sliding door) at the base of said stairs/escalators. Each morning and evening, there are substantial lines of riders trying to pass in each direction as they squeeze from 15'-20' walkways into the narrow opening.
- For the station and its connection to Atlantic Avenue/Track 1, the existing stair and ramp structure should be completely replaced with a sloped walkway that eases the lives of those toting luggage or rolling briefcases each day.

- That any new temporary or permanent doorways into or out of the train or bus stations be motion-activated doors, preferably using sliding doors. Hinged doors impede flow of pedestrians and difficult to utilize with luggage or for people with disabilities.
- Elevators connecting from the train tracks up to the new bus terminal and tower lobby should be highly transparent and located in immediate proximity to stairs and escalators.

Atlantic Avenue

- For Atlantic Avenue in its entirety, the existing rough brick surface, which is a tripping hazard, should be replaced with granite, wire cut pavers, or high quality concrete and the development should become responsible for sidewalk maintenance. Further, the existing street trees should be retained wherever possible, in part, because most are located in the only areas without subsurface utilities that would otherwise prohibit or impede growth. Where trees cannot be retained, the proponent should consider offsetting such losses by providing green roofs and roof gardens where possible. Additionally, ample seating options should be retained along Atlantic Avenue.
- For all traffic and pedestrian signals that the project upgrades, the signals should be made accessible for people with vision impairments; walk times should be based on 3 feet per second.
- For the proposed pedestrian access study, the study should be done in close consultation with pedestrian and bicycle advocates including WalkBoston, Livable Streets Alliance, and Adaptive Environments with a focus on conditions in the Leather District and Chinatown.
- Provide bicycle racks at multiple locations along Atlantic Avenue.
- For Atlantic Avenue at the Hotel, curb side loading via the existing parking lane should be the starting point for the design of the hotel drop-off; the effective width of the sidewalk should be maximized. If any driveways are retained, all curb returns should be 2 feet or less, driveway aprons should be designed such that pedestrians do not encounter any grade changes as they walk along the sidewalk and cross slopes should be kept below 2%. The current proposals of 12' or even 17' of sidewalk are unacceptable and the cut in of a drop-off hark back to 500 Atlantic Avenue's design; a design that MEPA recently ordered changed and about which it issued a well-reasoned decision. Further, we can think of countless higher end hotels with curb-side drop-off in this region as well as in NYC, Washington DC, Chicago and San Francisco.

- For Atlantic Avenue at the corner of Kneeland Street, the design should be completely revised to maintain the sidewalk by way of two options: Move the loading dock upward to the parking deck level. Or, if that is not feasible, reorient the loading dock so that trucks would use the existing service road and the loading docks face south towards said road. The current layout is unacceptable. It is imperative that everyone involved also understand that as the parcels south of Kneeland are developed, they will create much more north-south pedestrian circulation at Atlantic & Kneeland. (What is now an edge of a district will become its center.) Further, the sidewalk on the opposite side of Atlantic Avenue is not an actual sidewalk, it is a loading dock and parking area complete with signs that indicate the sidewalk ends and pedestrians must cross to the bus terminal side of Atlantic Avenue. In short, this eastern sidewalk is the only pedestrian route and should not be sacrificed to roadway for infrequent daily truck movements.
- Finally, the proponent should eliminate parking garage entrances and exits along Atlantic Avenue. Ideally, all autos should utilize the existing parking and bus ramp structures that provide direct connectivity to I-90 & I-93 and Kneeland/Lincoln/South Streets. Failing their complete elimination, the entrances/exits should be a single narrow opening and curb cut. Currently, the Atlantic Avenue sidewalk along South Station has no curb cuts from Dewey Square to Kneeland/Service Road. The garage entrance/exits, hotel drop-off, and loading dock add at least four curb cuts – some of extraordinary length.

Wind and Shadow

- The Proponent should work to further minimize wind and shadow impacts with specific attention to Dewey Square, the Mass Horticultural parcels and Fort Point Channel/Boston Tea Party Ship/Children’s Museum. The latter three are of importance because a full Chapter 91 review will not occur yet these locations will experience impacts and also depend heavily on visitation during shoulder seasons and late afternoons/early evenings (for example: concerts/performances on Children’s Wharf).
- Join Friends of Fort Point Channel and become involved in activating Boston’s “Next Great Destination.”

Transportation and Parking

- Similar to recent TOD projects including the Bulfinch Triangle Air Rights projects, the parking ratios (including residential) can go lower. The ratios should be dropped further and the total number of spaces dropped. The Proponent and City have made efforts but more can be done;
- The proponent should set aside several spaces for car sharing services and also reach out to van pools to provide spaces.
- Provide secure bicycle parking and shower facilities in each building.

- Provide free T passes for at least one year to all residents.
- Price parking at Financial District/Downtown rates (typically \$30+ per day).
- Create and support a vibrant TDM and social marketing program to encourage walking, biking and transit usage.
- Make a significant contribution towards water transit in lieu of full Ch. 91 responsibilities.

Affordability

Adaptive Environments has maintained a steady involvement with housing issues, often working in concert with CHAPPA and MA Smart Growth on various initiatives. AE has many young staff, all of whom are keenly aware of the challenges facing them, as young professionals, in finding both affordable rental and ownership opportunities within Boston. While we recognize that Hines is making significant contributions to the public including the huge enlargement of the bus terminal, affordability beyond the minimum City requirement should be a basic tenet of such a large and centrally located development. There are four ways to achieve this:

1. Use the Boston Median Income rather than Metro Boston Median Income rate;
2. Instead of only matching the Mayor's goals, seek 20% or more, of the units to be affordable;
3. Take cues from S.F., NYC and other cities where developers are able to build fewer structured parking spaces and instead build more units – the net effect is two fold: units are cheaper overall and auto trips are reduced.
4. Add additional housing in Phase II and Phase III with the attendant changes in massing that will make that feasible and the additions as appealing as possible.

Sustainability

The proponent has several LEED certified buildings in its portfolio and has indicated a desire to seek a Silver rating for the office component of the project. We applaud this but would prefer the proponent seek a Silver rating for the hotel and residential components of the project as well. Accordingly, the developer should address, as the design develops, the following:

1. Developing an indoor air quality management plan
2. Maximizing the use of natural lighting
3. Installing daylighting controls (office areas only)
4. Including building purge cycle controls
5. Developing a heat recovery system for pre-treatment of outdoor air
6. Developing a permanent air monitoring system, including demand controlled ventilation
7. Including operable windows where they will enhance and not compromise air quality
8. Consider a sustainable roof design

Though we have noted a range of issues and made many recommendations for improving the project, Adaptive Environments encourages the Commonwealth to work with South Station Air Rights Project to address the issues and move the project along in the permitting process. Finally, we want to reiterate our desire to meet with the Hines team and work through some of the more challenging elements of this exciting project.

Thank you for the opportunity to comment.

Sincerely,

Christopher Hart
Project Coordinator

Valerie Fletcher
Executive Director

Attachment: Municipal Harbor Plan Sample Section 6.5. Universal Accessibility

cc: David Perry, Hines
Mark Boyle, MBTA
Barbara Boylan, MBTA
Kairos Shen, Boston Redevelopment Authority
David Carlson, Boston Redevelopment Authority
Jim Gribaudo, Boston Redevelopment Authority
Richard McGuinness, Boston Redevelopment Authority
Stephen Spinetto, Boston Commissioner on Disabilities
Wendy Landman, WalkBoston
Jeff Rosenblum, Livable Streets Alliance
Rob Tuchman, Mayor's Greenway Task Force
Anne Fanton, Environmental Oversight Committee
Bob O'Brien, Downtown North Association
Dan Wilson, MoveMass
Peter Shelly, Conservation Law Foundation
Vivien Li, Boston Harbor Association
Bruce Berman, Save the Harbor Save the Bay
Neil Gordon, Boston Children's Museum
Kirk Joslin, Easter Seals
Bill Henning, Boston Center for Independent Living
Meg Robertson, Mass Commission for the Blind