

115 Winthrop Square Supplemental Information



Submitted to:
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May 4, 2018

115 WINTHROP SQUARE

Boston, MA

Supplemental Information

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MPWinthropSquare.com

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Boston Planning & Development Agency

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Commercial Construction Consulting, Inc.

Feldman Surveyors, Inc.

Suffolk Construction Company, Inc.

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Supplemental Information

SUPPLEMENTAL INFORMATION

1.0 Introduction

The 115 Winthrop Square project (the Project) (see Figure 1-1 115 Winthrop Square Project) is the proposed redevelopment by MCAF Winthrop LLC (the Proponent) of a publicly-owned approximately 47,874 square-foot (sf) parcel of land into a vibrant mixed-use Project with approximately 1.6 million square feet of gross floor area as measured by the Boston Zoning Code.

A Project Notification Form (PNF) was submitted to the Boston Redevelopment Authority doing business as the Boston Planning & Development Agency (BPDA) on November 8, 2016. A Scoping Determination was issued on April 11, 2017. An Environmental Notification Form (ENF) was submitted to the Massachusetts Environmental Policy Act (MEPA) Office on November 15, 2016. The Certificate of the Secretary of Energy and Environmental Affairs (EEA) on the ENF was issued January 6, 2017. A combined Draft Environmental Impact Report/Project Impact Report (EIR/PIR) was submitted to the MEPA Office as well as to the BPDA to advance review of the Project in accordance with the MEPA Certificate and the Scoping Determination under Article 80B, Large Project Review, of the Boston Zoning Code on January 2, 2018. The Certificate of the Secretary of the EEA on the Draft EIR was issued on February 16, 2018. The Final Environmental Impact Report was submitted to the MEPA Office on March 15, 2018 in accordance with the MEPA Certificate on the Draft EIR and a Certificate was issued on April 27, 2018. This Supplemental Information has been prepared in accordance with the Request for Supplemental Information issued by the BPDA on March 30, 2018.

1.1 *Public Review Process*

Since the filing of the ENF and PNF, Draft EIR/PIR and the Final EIR, the Proponent and the design team have met with elected officials, the City of Boston, abutters, neighborhood groups, individuals and other interested parties to review the Project, its impacts and potential mitigation measures. The Proponent continues to be committed to a comprehensive and effective community outreach and will continue to engage the community to ensure public input on the Project. Since the publication of the Draft PIR on January 2, 2018, the Proponent has conducted 27 meetings with individuals, the community and city officials including two public hearings.

1.2 Project Site and Description

1.2.1 Project Site

Located at 115 Winthrop Square, also known as 115 Federal Street and 240 Devonshire Street in Downtown Boston, the site is bounded by 75-101 Federal Street to the north, 100 Summer Street to the south, Devonshire Street and Winthrop Square to the west, and Federal Street to the east (the Project site) (see Figure 1-2 Aerial Context Plan). The Project site, until recently, was the location of a decaying 1,125-vehicle parking garage that was closed in 2013 due to safety concerns and which has been, for generations, an impediment to a cohesive public realm in the area; the structure has recently been demolished.

1.2.2 Project Description

The Project is comprised of a thoughtfully assembled mixed-use building with complex and diverse functions that engages the public realm and has the power to drive significant pedestrian activity on the street through all the days of the week and through the evenings. This diversity of uses has the added benefit that the infrastructure and transportation requirements of the Project's different uses peak at different times, resulting in a significantly lower use of the area's overall infrastructure capacity than what a single-use project of the same size would have. The central public feature of the Project is the Great Hall (see Figure 1-7 Great Hall). Located at grade, the approximately 12,000 square foot grand space passes entirely through the site connecting Winthrop Square and points west, to the Financial District and points east. The mission of the Great Hall is to be a space for the public, and to provide the operational structure and architectural scaffolding to accommodate and implement a variety of programmed educational, civic, performance and cultural experiences available for the public as they may change throughout the day, with the seasons, and as they are reimagined over time. The Project also includes numerous public realm improvements including the re-creation and expansion of the landscaped and pedestrian areas of Winthrop Square, new and often wider sidewalks and improvements to the Tontine Crescent on Franklin Street between Arch Street and Hawley Street, street lighting, traffic improvements and signalization upgrades among others.

The Project includes a mix of complementary uses including residential, commercial office, civic space and retail/food and beverage uses as well as parking to support the Project. The residential, commercial office, and the Great Hall drive the economics of the Project, and the direct and indirect benefits that result. With a substantial number of proposed residential units, the Project will expand the emerging critical mass of residents in the dynamic Downtown Crossing neighborhood. The commercial office space will set new standards for workplace efficiency, adaptability, environmental sustainability, and wellness and the Great Hall will provide a venue for civic space to be utilized by all Bostonians.

The Project will be a mixed-use tower with residential units on approximately 26 floors. The residential portion of the tower steps back on the western and portions of the northern and southern building edges at approximately floor 25.

The lowest four floors occupy most of the 47,874 square foot site and contain amenity space, conference space, food and beverage/retail space and the Great Hall. The Great Hall includes a civic assembly space for approximately 350 people.

The Project will have the commercial lobby and the residential walk-in lobby as well as the loading area and access to the garage on the ground floor. Below grade uses include: vehicle pick up, drop off, parking and circulation, storage, building management and other programs, as well as mechanical and other uses accessory to the above grade uses.

Design and programming of the Project continue to evolve through market analyses and design review with the City of Boston, BPDA, and the public. The Project is expected to include approximately 1.556 million square feet of gross floor area, as defined in Article 2A of the Boston Zoning Code.

The Project has a building height of approximately 664 feet as defined by zoning.¹ Figure 1-3 is a Context Plan and Figure 1-4 is the Proposed Site Plan. Figure 1-5 includes a Program Axonometric and Figure 1-6 is a Section. Figure 1-7 is a rendering of the Great Hall and Figure 1-8 is a Site Plan indicating vehicle access.

The Project includes up to five levels below grade for residential vehicle drop-off and pick-up, valet-assisted commercial/office parking, pet daycare/play areas, management and employee areas, mechanical, storage and support for the Great Hall, as well as other accessory uses for the Project.

1.3 *Updates since Draft PIR Filing*

Since the submission of the Draft PIR, the FAA has finalized its public review period and issued a Determination of No Hazard to the Project at the height of 702' AMSL (above mean sea level) to 720' AMSL.

The Proponent has continued to conduct several meetings with the community, neighbors and the City officials as well as numerous meetings with the Boston Civic Design Commission where public comments were voiced and welcomed. As a result of these meetings, the Project massing and façade design have evolved, and at a hearing

¹ The Project design includes a 25-foot-tall mechanical penthouse, and the height to the top of the mechanical space is 691 feet from average grade.

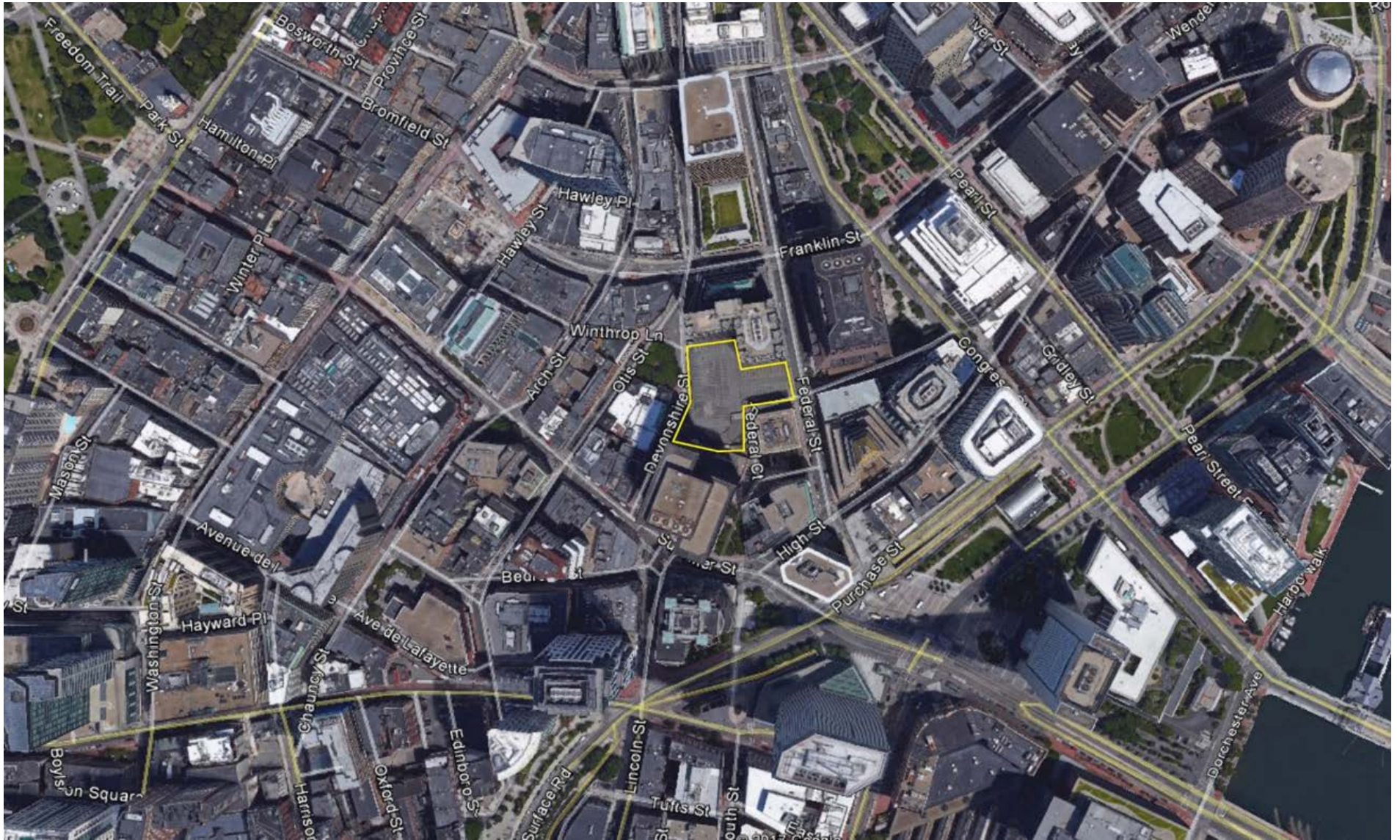
of the Boston Civic Design Commission on May 1, 2018 the Commission approved the Project's design. More details are provided in Section 4.0 Urban Design and in Figures 4-1 through 4-8.

In addition, since the submission of the Draft PIR, the Proponent, on January 10, 2018, submitted a response to the BPDA Request for Proposals in collaboration with the Asian Community Development Corporation (ACDC), Tufts Shared Services and Corcoran Jennison to build its Inclusionary Development Policy (IDP) units on the BPDA owned Parcel P-12, located in the Chinatown Community. The P-12 proposal, if selected, would allow for satisfaction of the IDP requirement for the Winthrop Square project and also could facilitate additional units of non-IDP affordable housing provided by ACDC.



115 Winthrop Square Boston, Massachusetts

Figure 1-1
115 Winthrop Square Project



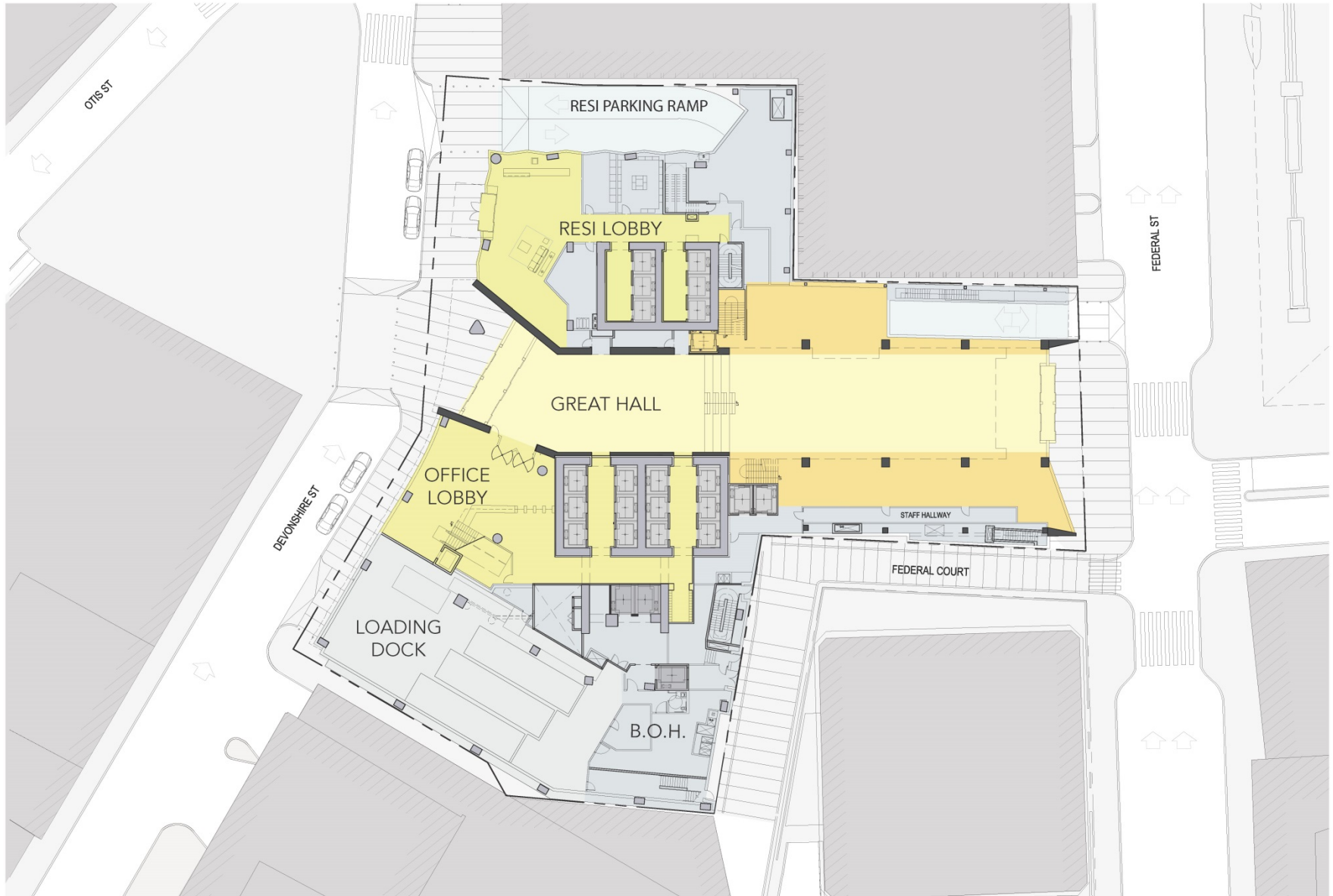
115 Winthrop Square Boston, Massachusetts

Figure 1-2
Aerial Context Plan



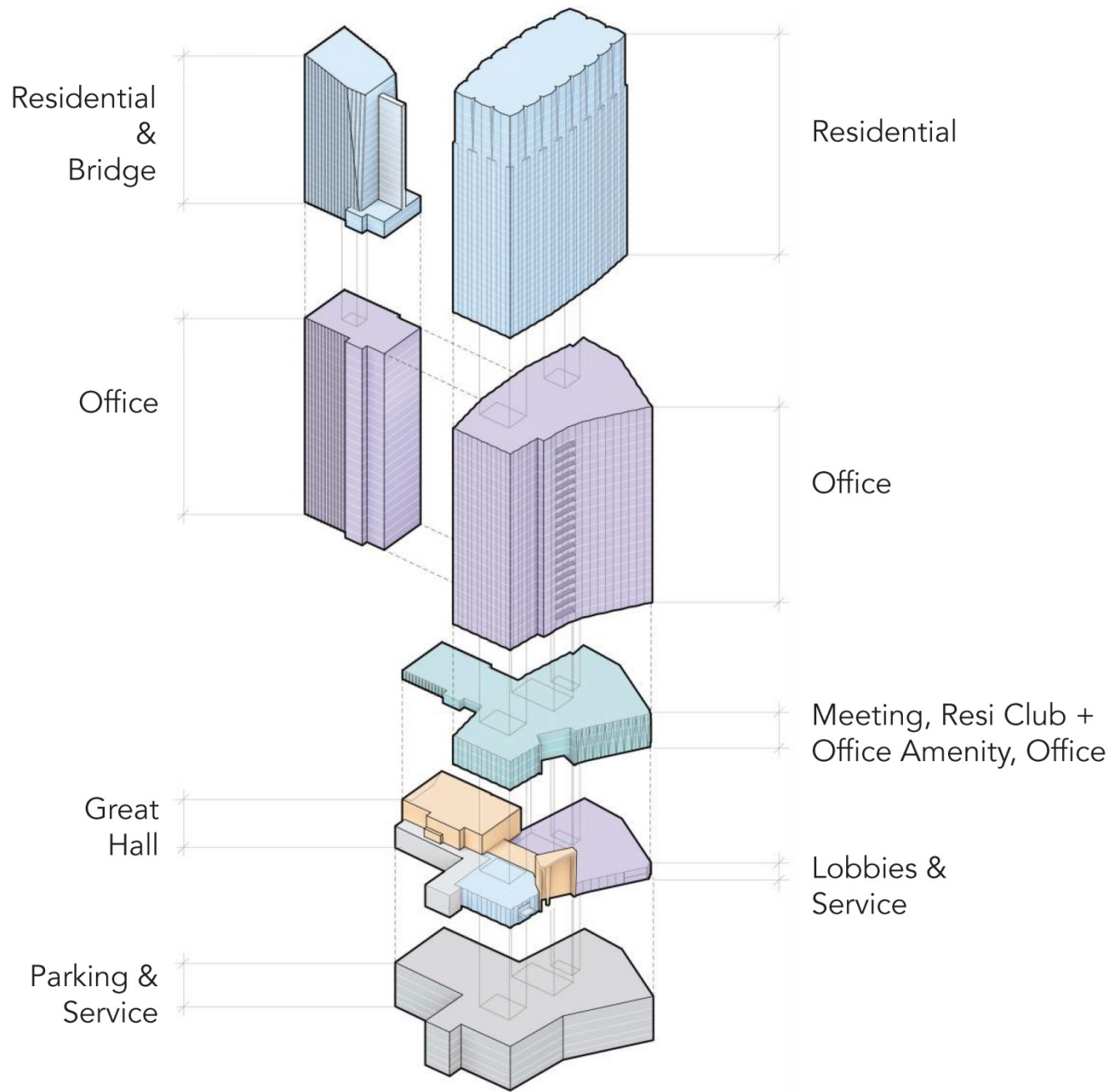
115 Winthrop Square Boston, Massachusetts

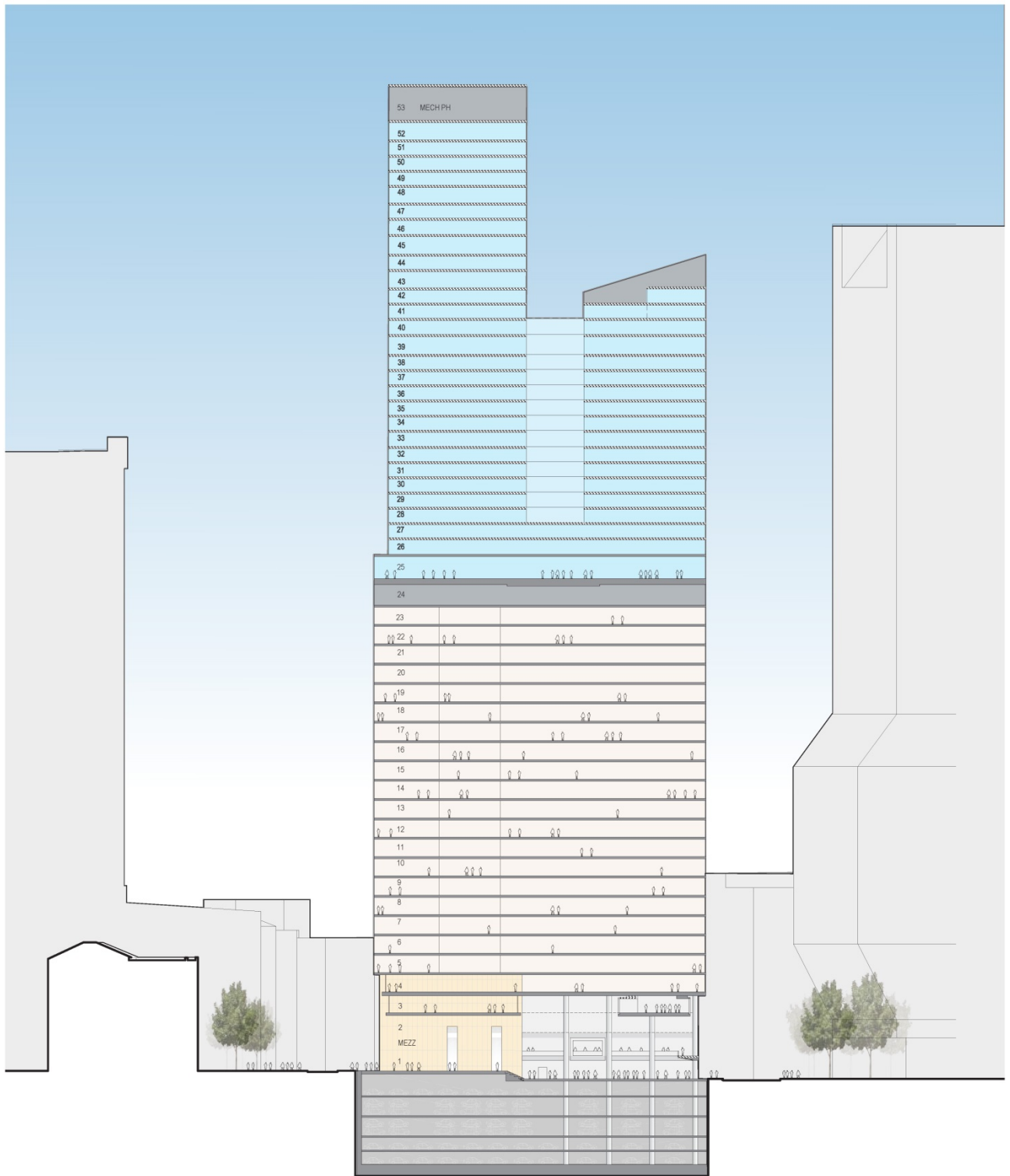
Figure 1-3
Context Plan



115 Winthrop Square Boston, Massachusetts

Figure 1-4
Site Plan





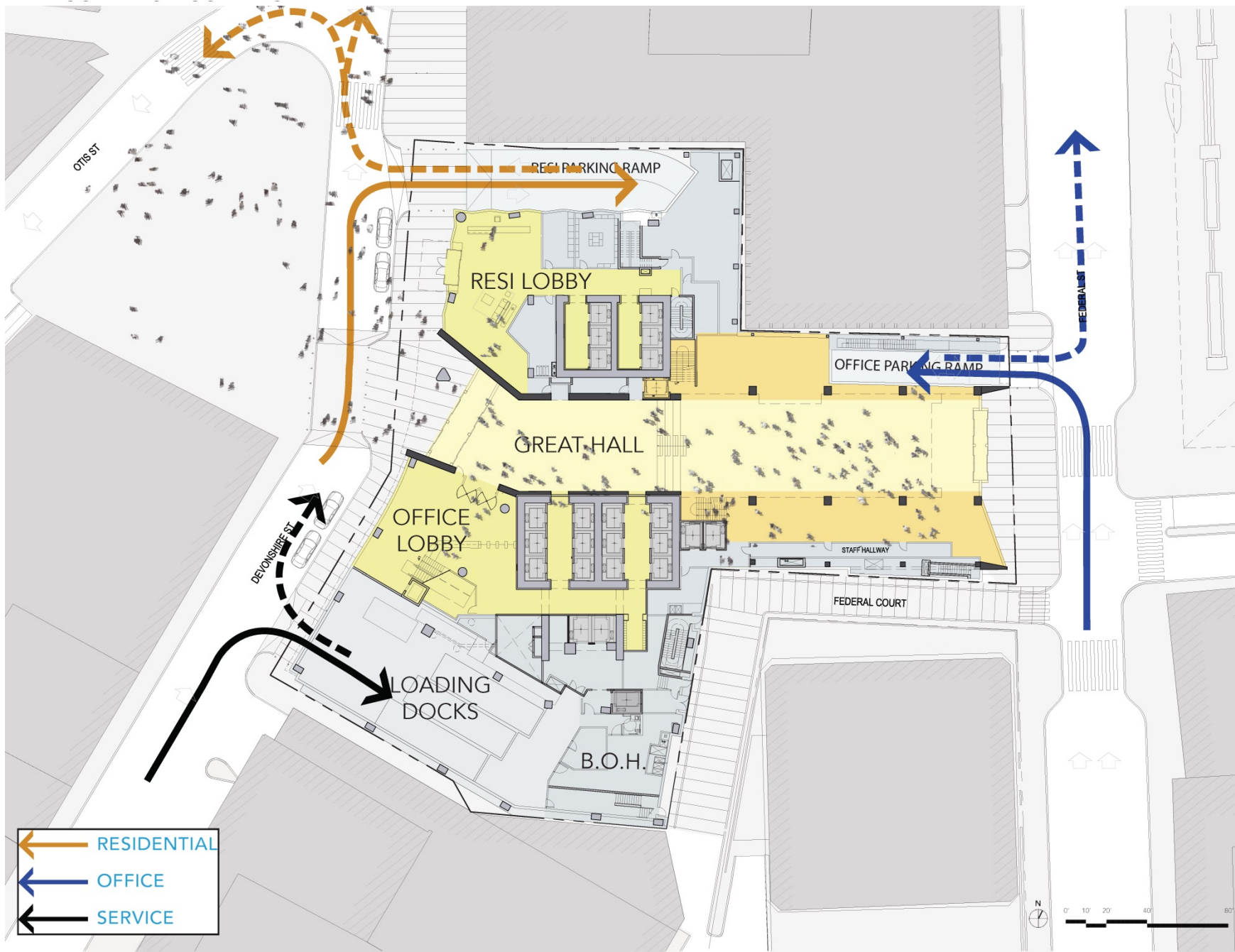
115 Winthrop Square Boston, Massachusetts

Figure 1-6
Building Section



115 Winthrop Square Boston, Massachusetts

Figure 1-7
Great Hall



115 Winthrop Square Boston, Massachusetts

Figure 1-8
Vehicular Circulation

2.0 Public Realm/Open Space/Winthrop Square

Winthrop Square will be designed as an energetic and inspiring destination at the heart of Downtown Boston that enhances the existing pedestrian network of open space in the downtown core. Located at a key crossroad of pedestrian movement and encircled by high quality buildings from a number of eras, the Square is envisioned as an urban room that expands to all of the surrounding building fronts, and links the adjacent streets and activities into one vibrant center. While the design of the Square will relate to the design of the Great Hall and other abutting buildings, Winthrop Square will have a distinctive stand-alone identity that can be experienced from within the Square, and visually from the surrounding area and from multiple levels of the surrounding buildings.

The design of the open space associated with the Great Hall and with Winthrop Square is planned to enhance and enliven the pedestrian experience adjacent to the Winthrop Square Tower as well as play a key role as a new anchor for the Financial District, knitting together Downtown Crossing, Shoppers Park, Dewey Square, and Post Office Square. The proposed streetscape and newly designed square will facilitate movement to and from the Great Hall as well as connections to the many other buildings and surrounding streets (Devonshire, Otis, Franklin and Federal) and pedestrian ways such as Winthrop Lane.

The program of the Square is foremost that of an engaging and relaxing passive open space to be enjoyed by all. The distinctive design will include seating and robust planting. It will include an activated center creating a visual interest throughout the day and throughout the year. From this center, the design undulates outwards, finding form in the Square's hard and softscaped elements. The ground plane emerges at varying levels to frame planting beds and create ample seating. Lighting will be used to highlight the walls and paths. These nestled linear elements create an elegant and contemplative atmosphere that can be enjoyed by individuals or groups of people. Flowering understory trees frame the central plaza while large canopy trees provide an edge. Ripples will be repeated within the planting beds through the color and height of the groundcover (see Figure 2-1 Draft Landscape Plan).

The current design includes a green passive sitting area as a focal point to the urban room that is formed by the surrounding buildings. Current and future pedestrian movement patterns through the Square will be facilitated through the disposition of the seating, planting and other elements. Ample pedestrian seating will be provided in different forms (both fixed and moveable). Additionally the tree planting, seatwalls and walkways will respond to the historic and contemporary buildings, notably that of One Winthrop Square as well as others.

Figures 2-2 through 2-11 provide additional graphics highlighting curb lines, pedestrian flow, planting strategy, a draft landscape plan and rendering for Franklin Street, additional renderings, expanded pedestrian realm and planting, off season water interest, relationship to surrounding buildings and lighting precedents.

Additional details on the sidewalks, crosswalks, design options to include full season interest, tree plantings, uses, connections, architectural elements, and wind mitigation as well as curb use and other comments are addressed in detail in the Response to Comments.

Street trees

Granite paving

Central Feature

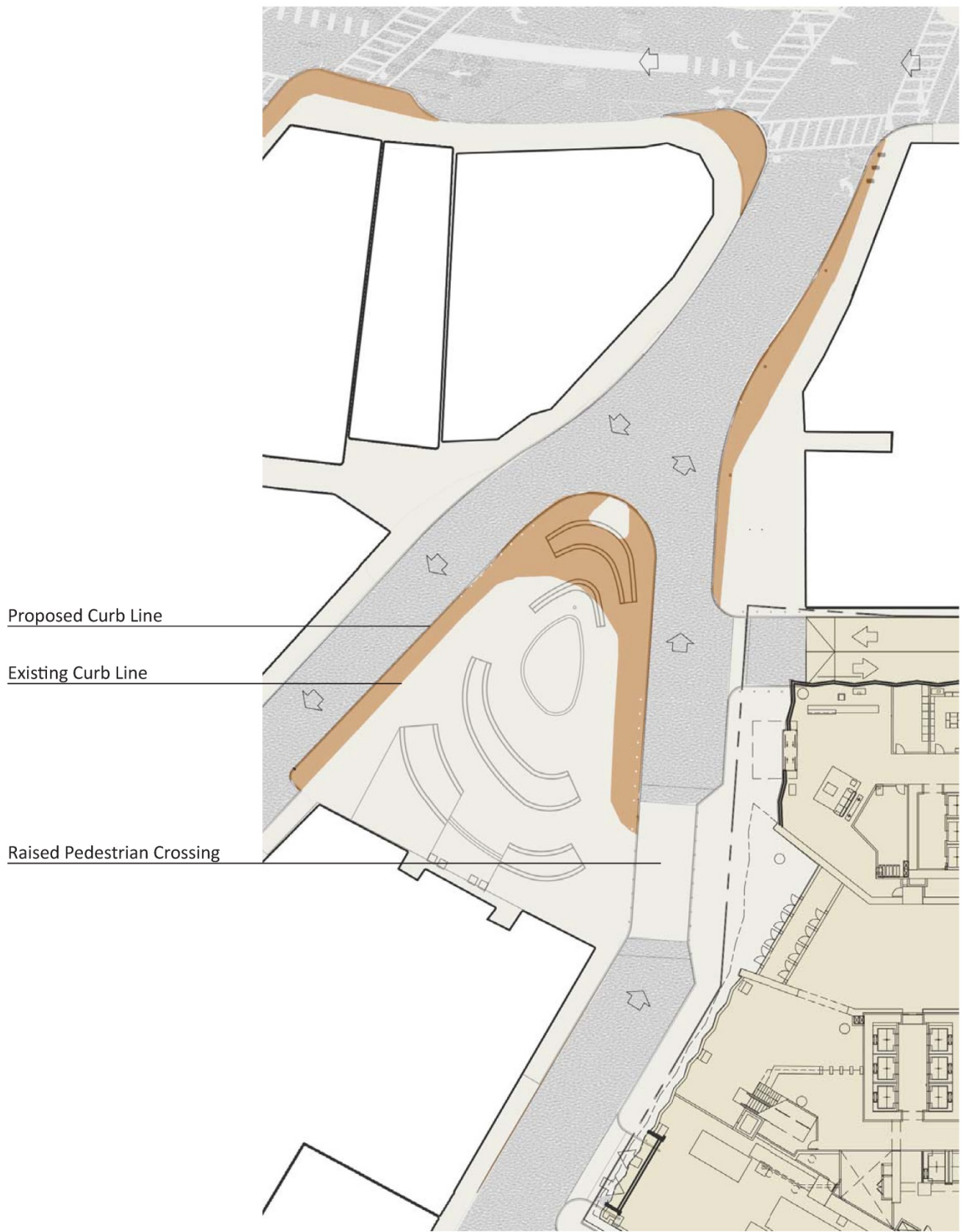
Flowering understory trees

Sculptural benches

Canopy trees

Pedestrian connection to
115 Winthrop







115 Winthrop Square Boston, Massachusetts

Figure 2-3
Pedestrian Flow



Canopy trees

Sculptural Seatwall

Movable Tables and Chairs

Nancy Sculpture





115 Winthrop Square Boston, Massachusetts

Figure 2-6
Franklin Street Draft Landscape Plan Rendering



Representative view from the Great Hall pedestrian crossing to Winthrop Lane



Representative view from Otis Street at Winthrop Lane to the Great Hall

115 Winthrop Square Boston, Massachusetts

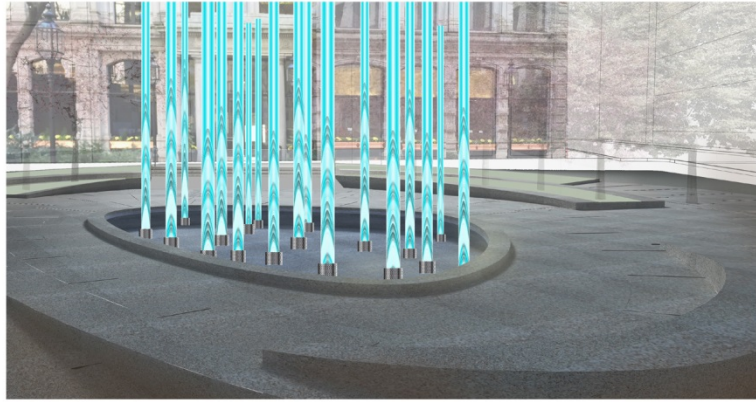
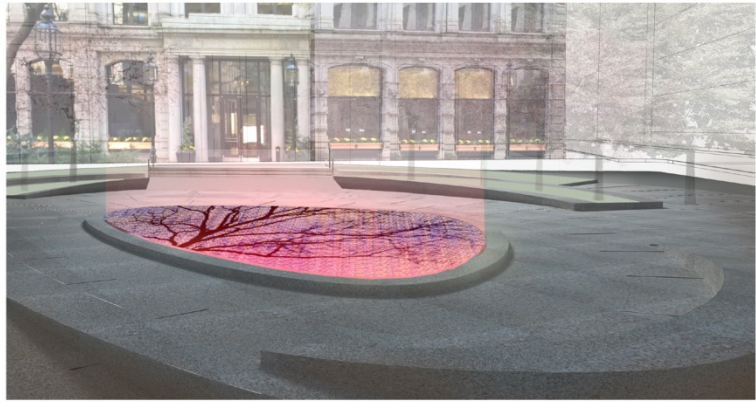
Previously planted trees in Shoppers Park

Proposed planting on Franklin Street

Proposed planting in Winthrop Square

Expanded sidewalks





115 Winthrop Square Boston, Massachusetts

Figure 2-9
Off-Season Water Feature Interest

① Wigglesworth Building
Address : 20 Winthrop Square



② Strong W.L. & Co. Bldg.
Address : 85 Franklin Street



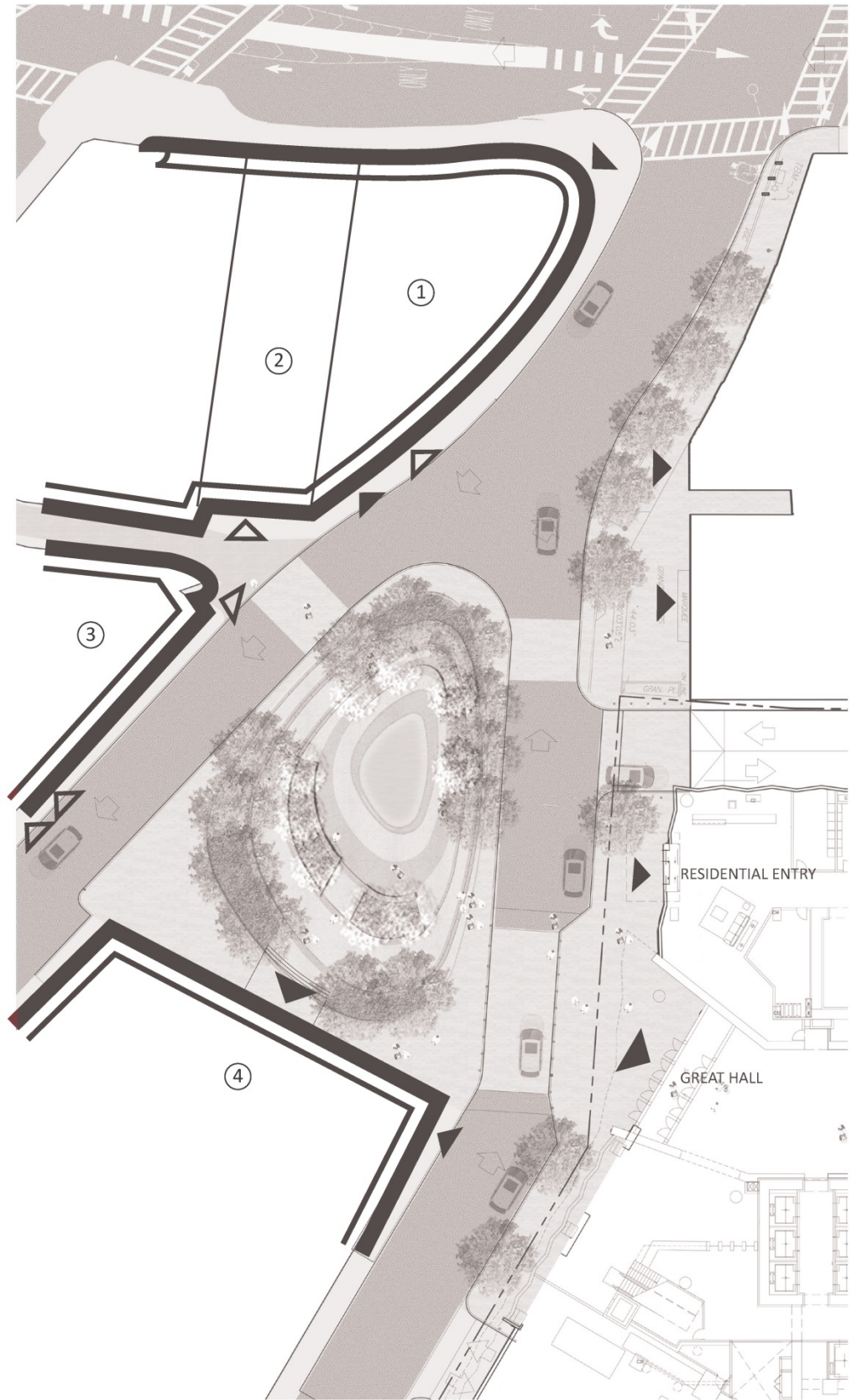
③ 1-11 Otis Street
Address: 1-11 Otis Street

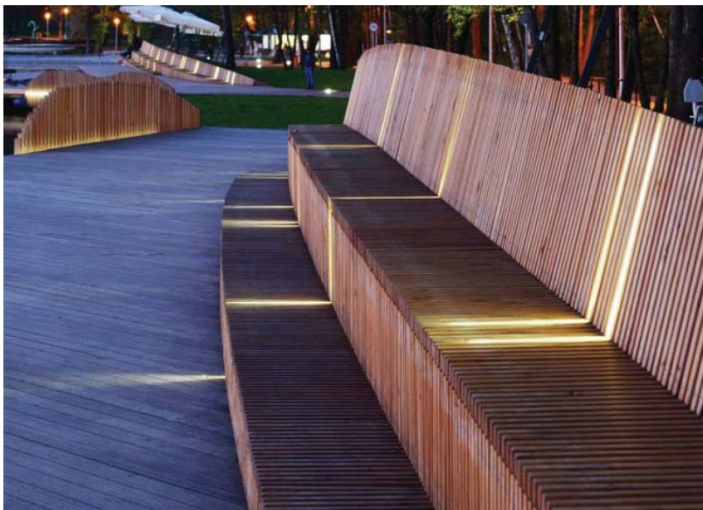


④ Beebe & Weld Bldg.
Address: 1-5 Winthrop Square



-  Accessible Entry
-  Stepped Entry





115 Winthrop Square Boston, Massachusetts

Figure 2-11
Lighting Precedents

3.0 Great Hall

The design of the Great Hall will be distinct from other parts of the building, and encourage people to use and enjoy the public and quasi-public spaces that are located both in and above the Great Hall on multiple levels and include food and beverage space and floating flexible meeting rooms on levels two and three. The Great Hall will be a space where Bostonians can meet, work, collaborate, pass through, or just reflect in a beautiful urban setting on a day to day basis. Larger civic events will take place in the early evening and on weekends accommodating up to 350 people in the ground floor plane of the Great Hall (see Figure 1-7 Great Hall).

In addition to good design, the Project permits will require that the Great Hall be publicly accessible, active and civic in nature. The Proponent will prepare a management and operating plan that identifies how the objectives of the Great Hall will be implemented and sustainable. It is expected that the programming and revenues generated by the Great Hall will increase and enhance how the public experiences it and how it will maintain its availability for civic and community organizations both in the neighborhood and from across the city. This operating plan will be updated every three years and the Proponent will be required to report on the Great Hall's performance annually. The facility will be managed by an affiliated management company and include a director of the Great Hall. The management team expects to work closely with the Downtown Boston Business Improvement District (BID) to coordinate programming and safety. The Project will include, as part of its programming, an enhanced visual activity to bring people to this location for reasons beyond convenience or special events.

4.0 Urban Design

Since the publication of the Draft PIR the Proponent has conducted several additional meetings with the public, the BPDA, the Boston Civic Design Commission (BCDC), Light Boston, the Boston Preservation Alliance (BPA), abutters and other groups and individuals as well as conducted two public hearings. The result of these meetings and conversations has led to further design work on the Project massing and architecture.

The results of the design evolution are shown in Figures 1-1, 1-6 and Figures 4-1 through 4-8. In addition, Appendix A includes detailed views of the Project, including from the George Thorndike Angell Memorial Square at Post Office Square, South Station at the intersection of Atlantic Avenue and Summer Street (Dewey Square), the South End at Interstate 93 northbound, Boston Common at the Brewer Fountain and the Greenway as well as longer range views from Dudley Square, LoPresti Park, Piers Park Sailing Center, Dorchester Heights, as well as views from Cambridge, Somerville and Chelsea.

Design updates include lowering the east portion of building by several floors and redesigning the building to read as two towers linked together on each upper floor by a narrow skybridge. Figure 4-1 is a rendering and 4-2 is an elevation of the 115 Winthrop Square Project. This 'two-tower' design was further enhanced by shaping the building, allowing the two sides of the building to read as siblings rather than as a heavy single tower. At the main portion of the resulting west tower of the Project, the pleated façade is articulated at the sky plane, and represents the tallest portion of the building. The resultant "crown" breaks down the pleated façade, splitting them, and creating reveals as the building reaches the sky. The Federal Street portion (east tower) of the building provides an opportunity for a more dramatic sky-line expression such as the canted plane, and steps down from the main tower to better differentiate the building forms.

In studying the façade material, the Proponent and its team have responded to concerns about the solidity of the previous design, and have designed a simple pleated glazing. This helps the building read stronger vertically (see Figure 4-3 Building Facades). The 'bustle' or east tower, while having a more traditional office façade, also expresses vertically through the use of fins. The distinct façades will help make the tower distinguishable and more iconic. Additionally, lighting strategies are in development and will continue to be studied extensively with the BPDA with input from Light Boston. As seen in the attached nighttime rendering, the proposed building lighting will dramatically accentuate the change in pleats at the top of the building. The bifurcated nature of the crown provides the opportunity to integrate this lighting directly into the design of the building (see Figures 4-4, 4-5 and 4-6 indicating nighttime lighting). Further lighting studies will also include pedestrian level lighting, and a theater and lighting consultant is being utilized to design lighting within the Great Hall.

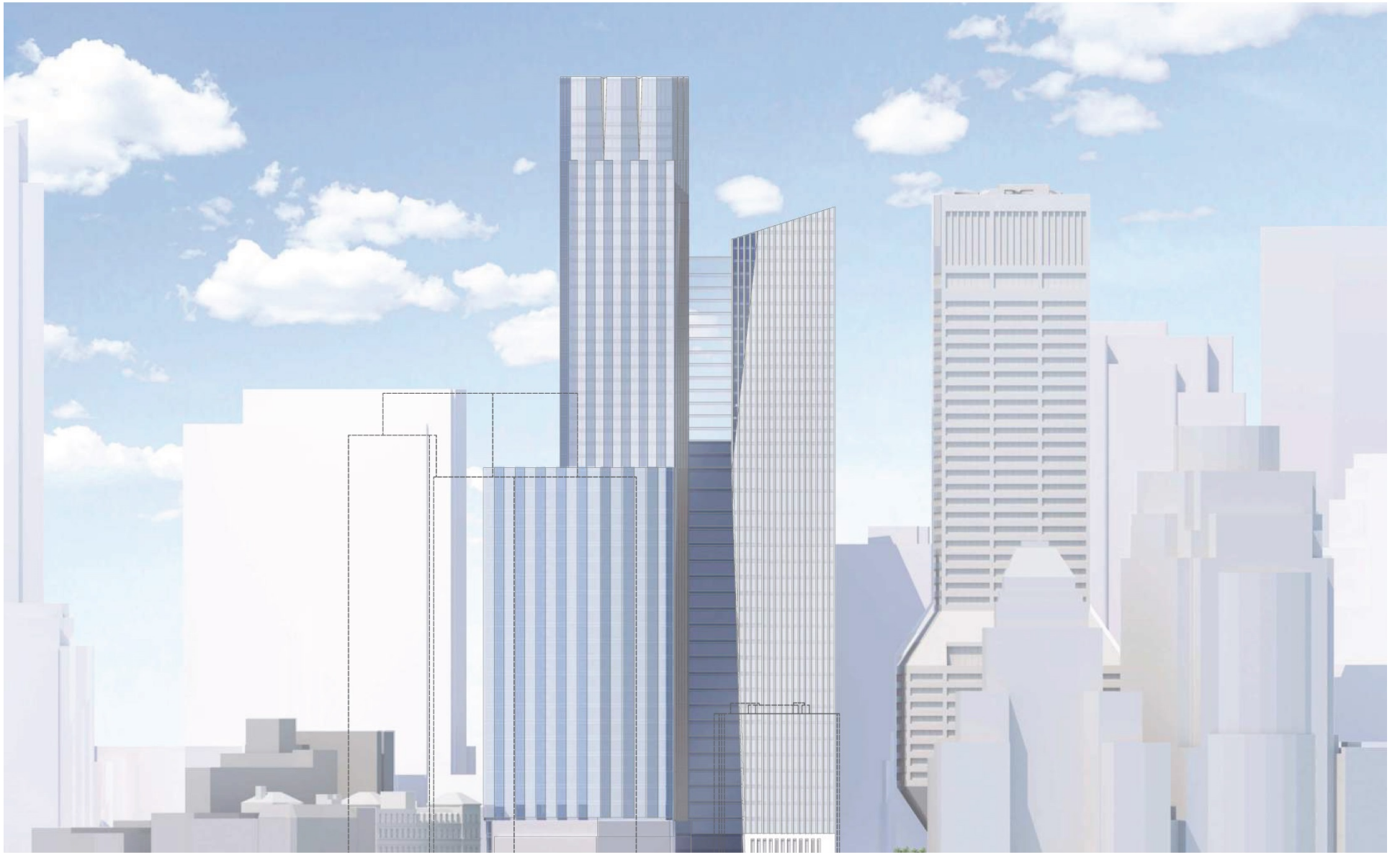
At the ground level, the team is creating a more robust connection between the Great Hall and nearby Winthrop Square open space. Adjustments include reorienting the office lobby entry, and canting the entry wall to more strongly reach towards the Square, making the entry more clear and grand (see Figure 4-7 Devonshire Entry). The opening has a strong portal expression with a multi-story opening to further emphasize the entry. At the ground plane on Federal Street, a more articulated entry will set into the Great Hall, allowing this side of the building to have a wider sidewalk to facilitate pedestrian flow (see Figure 4-8 Federal Street Entry). Within the Great Hall, the Proponent is working with theater consultants as well as Food and Beverage consultants to create a vibrant interior that is active daily, and still functional for special events. This program study includes a variety of stationary food kiosks and retail spaces towards the periphery on both the ground floor and mezzanine, leaving the central portion of the Hall and its 60' ceilings free for large events.

The Hall will be equipped with pre-set arrangements for various types of civic events such as large talks, fashion shows etc. A large ceiling installation is being studied, as well as an interactive video wall and a retractable large screen which would create a canvas for interactive and smart video content. The Proponent is working with the BPDA to develop the program within the Hall, as well as how it connects to the adjacent Winthrop Square outdoor space.



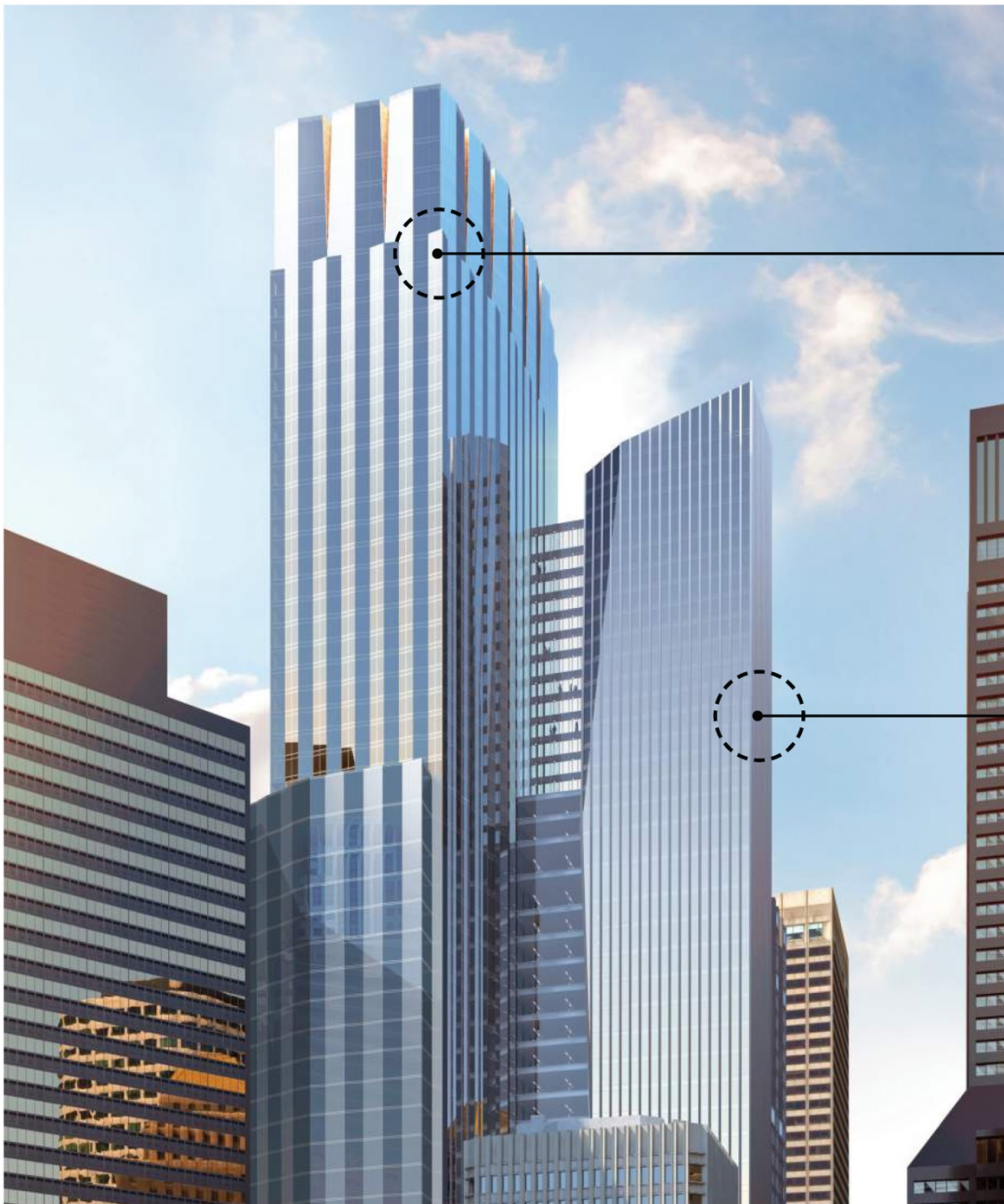
115 Winthrop Square Boston, Massachusetts

Figure 4-1
115 Winthrop Square Project Rendering



115 Winthrop Square Boston, Massachusetts

Figure 4-2
Elevation of 115 Winthrop Square Project



115 Winthrop Square Boston, Massachusetts

Figure 4-3
Building Facades



115 Winthrop Square Boston, Massachusetts

Figure 4-4
Nighttime Lighting



115 Winthrop Square Boston, Massachusetts

Figure 4-5
Aerial Nighttime Lighting



115 Winthrop Square Boston, Massachusetts

Figure 4-6
Building Nighttime Lighting



115 Winthrop Square Boston, Massachusetts

Figure 4-7
Devonshire Street Entrance



115 Winthrop Square Boston, Massachusetts

Figure 4-8
Federal Street Entrance

5.0 Circulation, Traffic and Transportation

The Project site is located in the heart of downtown Boston with direct access to major roadway arterials, public transit alternatives, and a vast system of sidewalks and bike lanes to connect the site with the surrounding community and adjacent neighborhoods. Boston's largest transit hub, South Station, is less than a five-minute walk, and all four MBTA rapid transit lines are located in proximity to the site. In addition, numerous MBTA local bus routes serve the downtown area, and there is a major MBTA commuter bus terminal across from the site on Federal Street, making this Project an ideal Transit Oriented Development (TOD).

5.1.1 *Site Access*

The proposed curb uses in the vicinity of the Project are shown in Figure 5-1. Along the Project's Devonshire Street frontage, two drop-off/pick-up spaces are located in front of the office lobby, and two drop-off/pick-up spaces are located in front of the residential lobby, just south of the residential driveway. The primary residential drop-off/pick-up is located off-street in the first below-grade parking level. The three existing State Police spaces on the Winthrop Square island will be re-located permanently under the demolition phase of the Construction Management Plan, and these spaces will not be returned to this location when the Project is complete. On the Otis Street side of Winthrop Square, the design of the public realm seeks to optimize the pedestrian accommodations and minimize impact to the existing curb uses.

On Federal Street the sidewalk/curb in front of the Great Hall is being expanded on both sides of Federal Street to reduce the pedestrian crossing distance while still allowing for two lanes of through traffic. Figure 5-1 shows a reduction of approximately 35 linear feet in the existing MBTA layover/staging curbside now given to pedestrian space.

Careful consideration was given to the potential need for large trucks to access the site. Although it is not anticipated that WB-50 trucks will likely be needed to support the Project, as requested by BTM, one of the loading bays is large enough to accommodate a WB-50 should it be necessary. A turning movement analysis for a WB-50 truck is shown in the Transportation Appendix with Devonshire Street remaining one-way as discussed later.

The proposed crossings, as shown on Figure 5-1 utilize wider sidewalks and "bump-outs" to minimize the pedestrian crossing distance, an important goal of this effort. Tabling is only proposed to provide a raised crosswalk on Devonshire Street at the Great Hall. Please also refer to the memorandum dated March 29, 2018 prepared by Walker Consultants which is included in the Transportation Appendix and addresses minimizing pedestrian/car conflict during ingress and egress to the below-grade parking garage at Federal Street.

Analysis of the Draft PIR trip generation indicates that on Federal Street there will be approximately 660 pedestrian movements entering and exiting the building during each peak hour, generated by building occupants alone. The analysis also indicates that on Devonshire Street there will be approximately 490 pedestrian movements entering and exiting the building during each peak hour, generated by building occupants alone. In addition, it is anticipated that on the order of 500 peak hour pedestrians in the area will use the Great Hall as a passageway in lieu of current pedestrian paths.

The Proponent has met with BTD and BPDA staff regarding the proposal to convert Devonshire Street to two-way traffic between Summer Street and the Project site. The intent of this proposal was to restrict truck traffic through Winthrop Square. At a meeting held on March 19, 2018, BTD staff stated that they did not support this as a permanent change and thus the Proponent will not pursue this as a permanent traffic change. The Construction Management Plan does consider a temporary closing of Devonshire Street in front of the Project site and thus a two-way Devonshire Street is required for the 100 Summer Street vehicles and the other users of this end of Devonshire Street during the construction of the Project.

The Proponent has also met with BTD and BPDA staff to present the concept for converting Summer Street between Otis Street and Arch Street to a two-way street. This proposal was suggested by a member of the Impact Advisory Group (IAG), but is not part of the Project. However, as requested by BTD, the Proponent is continuing to evaluate the concept.

5.1.2 *Parking*

The Project includes up to five levels below grade for residential vehicle drop-off and pick-up, and valet-assisted parking, and other uses described above. The proposed shared parking plan for the garage takes advantage of the availability of residential spaces available during the daytime on a weekday use by office commuters. The availability of shared spaces was based on an analysis of garage entry/exit data for Millennium Tower, yielding a daytime occupancy of 53% in the Millennium Tower garage on a weekday between 9:00 AM and 5:00 PM. Assuming an approximately 45% availability of residential spaces during a typical weekday, the garage in the proposed Project will yield approximately 135 (45% of 300) residential spaces available for sharing. As a result, a total of 385 (250 + 135) parking spaces will be available for office users, yielding an effective office parking ratio of 0.49 spaces per 1,000 SF. The sharing of parking spaces will be facilitated by valet operation of the garage.

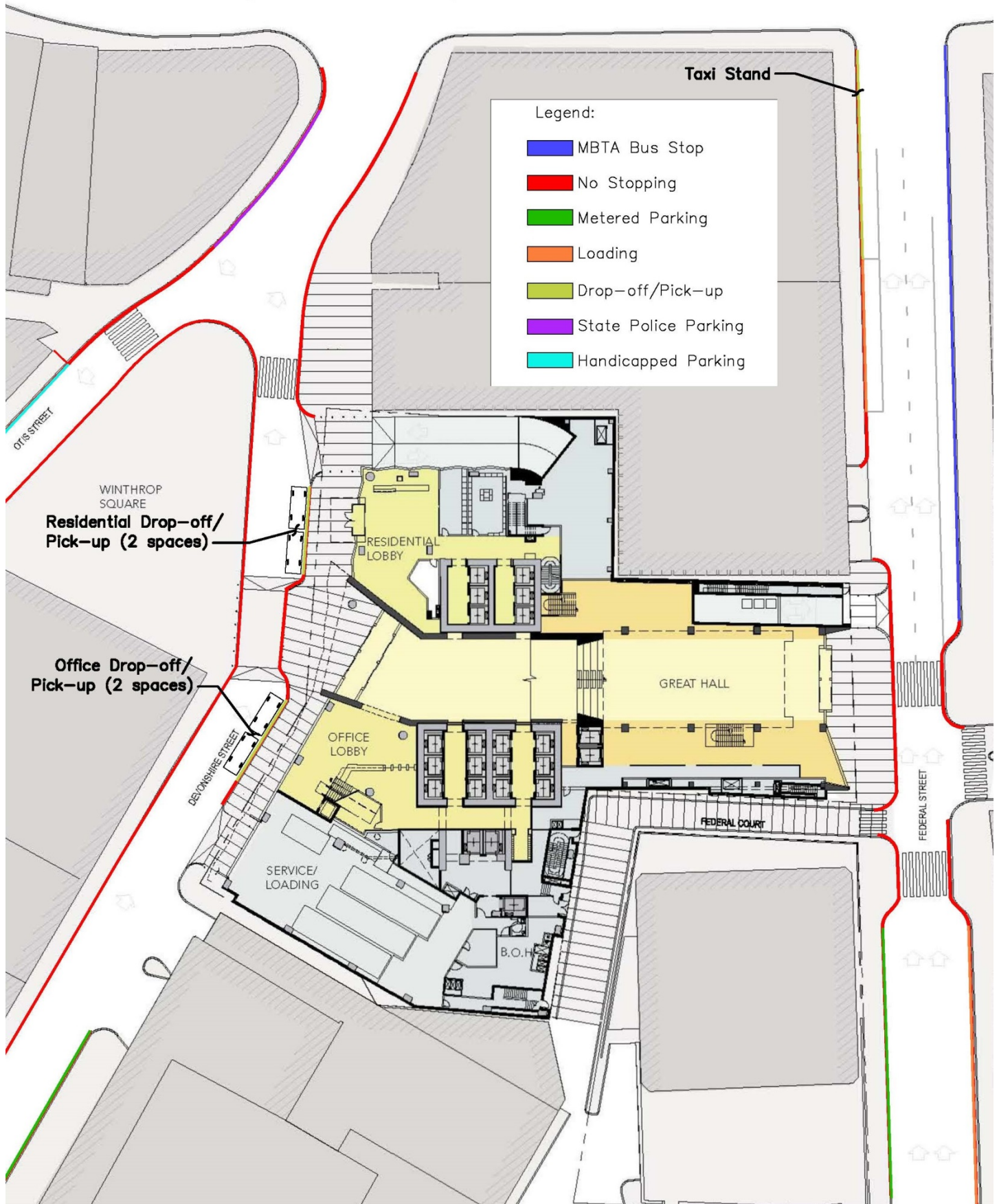
While the analysis suggests that the Project parking demand is about 14% higher than the proposed parking supply, the estimate likely does not reflect the strongly transit-oriented nature of the Project's location. In addition, it is recognized that some office employees will choose to park in other existing parking facilities in the area. In the

interest of not over-providing Project parking, the proposed supply of Project parking for up to 550 vehicles is consistent with the goal of minimizing dependence on auto travel, supported by the Project's comprehensive package of Transportation Demand Management (TDM) strategies.

The memorandum prepared by Walker Consultants included in the Transportation Appendix addresses aspects of parking operations, the parking entrance at Federal Street, and potential conflicts between pedestrians and the parking garage entries.

In addition, several of the garage levels are being designed with 12'-6" heights with use of parking stacker equipment. These higher ceiling heights allow the option for these below grade spaces to be used in the future for a potential grocery store use, and storage and other uses that do not need direct daylight.

Additional details on the circulation, site access, crosswalks, parking, traffic, mitigation and other comments are addressed in detail in the Response to Comments.



115 Winthrop Square Boston, Massachusetts

Figure 5-1
Curbside Uses

6.0 Geotechnical/Structural

The Proponent's engineers are currently completing its second phase of geotechnical explorations in order to advance the design and construction of the building's foundation system. These additional explorations include studies to reduce the potential for damage to surrounding buildings. The exploration program and additional soil borings are scheduled to be completed in late spring; however, several extensive analyses have been performed by Haley & Aldrich, the geotechnical engineer, in order to evaluate the proposed foundation system and its impact to abutting properties. In addition, various construction techniques/requirements have been evaluated with the goal to reduce the potential for damage to abutters. These include, but are not limited to, construction methods, additional exploration and design evaluations, and instrumentation and monitoring as described in more detail below.

6.1 *Construction Techniques*

In the areas of the site where the proposed construction is immediately adjacent to abutters, the abutters have requested that the Proponent mitigate movement and settlement potential. The Proponent has designed an increase in the diaphragm wall (slurry wall) in areas directly adjacent to abutting foundations to four feet thick walls, where typical projects in the City use slurry walls ranging from two and a half feet to three feet. Slurry walls of four feet thick are used when additional stiffness or strength is desired. Use of four foot thick walls results in less ground movement and will provide more protection to abutters. This increased slurry wall thickness has been successfully used on several other projects in the Boston area where adjacent structures were a concern.

Top/down construction techniques will be used to construct the below grade space in lieu of an open cut excavation. This technique consists of using the permanent garage floor slabs to laterally support the slurry walls as the basement excavation is being made. In addition, Load Bearing Elements (LBEs) are constructed to support the building columns that allow for construction of the superstructure to occur as the basement is being excavated. This technique has been successfully used on many projects throughout the City. The proven advantage of this system is that utilizing the permanent concrete garage floor slabs provides one of the stiffest possible support of excavation systems versus an open digging. This method of top/down will reduce the lateral deflection of the slurry wall and therefore increase the protection to the abutting properties.

To further reduce the risk to abutters during construction of the foundation system, the individual slurry wall panel size will be minimized in the locations adjacent to the abutting buildings. This construction method is used to minimize the effect of the wall installation. In addition, the location of the panel joints will be strategically located to further reduce risks to abutters' foundations.

6.2 *Exploration and Design Evaluations*

As mentioned above, the second phase of the exploration and testing program is underway. The results to date are consistent with the design assumptions. The design and subsurface information will continue to be shared with the abutters. Note that the Proponent has been sharing design information as the Project has been progressing with the abutters and their respective engineers and will continue to do so. Specifically, the following is being performed:

- ◆ Six bedrock wells are currently being installed within the site and a 24-hour pumping test is planned. This information will allow the team to finalize the design of the dewatering system and minimize the impact on the abutters. Current calculations indicate minimal impact to the abutters from the potential dewatering.
- ◆ A state of the art two-dimensional finite element computer model (versus the preliminary calculations which were based on mohr-coulumb model, the current model uses HS-Hardening soil model) has been developed to predict the movement of the slurry wall during construction and the impact on the abutters. These calculations have recently been shared with the abutters. This model predicts much lower levels of settlement (and impact) to the abutters than previously reported.

6.3 *Instrumentation and Monitoring*

An extensive instrumentation program has been developed for the site, much of which is already installed, to monitor the performance of the support of the excavation system and the effect on the abutters. This includes 179 survey points on abutters' structures, 10 vibration monitors, 42 crack gauges, 10 inclinometers, seven piezometers and one observation well.

Mitigation measures during construction will be developed should movements outside of predicted values be observed that may be detrimental to the abutters. These may involve modifications to the excavation sequence, installation of additional bracing, and changes to the dewatering approach.

6.4 *Continuing Geotechnical and Foundation Design*

The geotechnical design will continue to be further redefined through the design development and construction document phase of the Project in conjunction with the BPDA's customary design review process. Inspectional Services will not issue a foundation permit without a Certificate of Compliance from the BPDA and a geotechnical report. In addition, as mentioned above, the Proponent will continue to share its geotechnical information with the abutters and their engineers as the design is further developed during the BPDA's design review process.

Additional information regarding specific geotechnical impacts and specific questions from abutters are included in the Responses to Comments.

7.0 Environmental – Solar Glare

As described in the solar glare report provided for the Draft PIR, there is some localized reflectance along Federal and Devonshire streets. The Project team will work towards a reduction in the frequency and intensity of solar glare to any pedestrian or vehicular traffic. The Project team will expand the scope of the study to explicitly model the noted areas of concern as well as indicate the effectiveness of mitigation measures such as fins and mullions. This will be further refined as part of the BPDA's customary design review process. The updated design of the east tower and the bridge design will impact the results of the solar glare analysis and thus this updated massing and building configuration will be studied. In addition, the Proponent will work with 155 Federal Street to conduct more extensive studies of the 155 Federal Street's façade based on the actual attributes of that façade. These studies will assist in understanding the frequency and intensity of solar reflections from the proposed Project. Fins, mullions and glass material will all be reviewed as mitigation options. Additional more specific responses are provided in the response to comments section.

8.0 Other - -Robert Burns Statue

The Proponent is currently conducting research on the Robert Burns statue and the steps required for moving it. They look forward to working with the Fenway Civic Association (FCA) and will work with the FCA to coordinate efforts with the City of Boston, the Boston Arts Commission, the Parks and Recreation Department and the Boston Landmarks Commission regarding the potential move. The Proponent will absorb the reasonable costs associated with any relocation.

Response to Comments

RESPONSE TO COMMENTS

The Project has gone through an extensive community review process including over 80 meetings with public agencies, elected officials, abutters, interested parties, advocacy groups and others since the Project inception, and 27 meetings since the submission of the Draft Project Impact Report (PIR) on January 2, 2018. The BPDA received 95 comment letters on the Draft PIR from state agencies, IAG members and advocacy groups as well as the public. The comment letters addressed the numerous public benefits as well as urban design, site access, affordable housing, parking, functions of the Great Hall, geotechnical impact mitigations, wind impact mitigations, and solar and thermal glare. This filing responds to the BPDA's Request for Supplemental Information. A copy of the BPDA Request for Supplemental Information is included in this section.

As noted above, in total, the BPDA received letters from 95 commenters, and well over half were in support of the Project. Additionally, a petition signed by residents of Boston and the Islamic Society of Boston included 276 signatures in support of the Project as well as 139 support letters were received from the labor unions. Comment letters from agencies, the IAG members, interest groups and immediate abutters are individually identified in Table 1, and each comment is addressed in this section. Each letter has been assigned an abbreviation. The comment letters are reprinted in this section, and specific comments within each letter are noted in the margin with an abbreviation and a sequential numbering. Following the letter is a listing of the comments accompanied by a response to each.

Table 1 BPDA Request for Supplemental Information Scope and Comment Letters

<i>Commenter</i>	<i>Abbreviation</i>
BPDA Scoping Determination	BPDA
Public Agencies	
Boston Transportation Department	BTD
Massachusetts Port Authority (Massport)	MPA
IAG Members	
Ben Starr	BS
Interest/Community Groups	
YouthBuild Boston	YBB
Light Boston, Inc.	LB
WalkBoston	WB
Franklin Park Coalition, Michael Carpentier	FPC MC
Boston Preservation Alliance	BPA
Franklin Park Coalition, Blair Campbell	FPC BC
Urban League of Eastern Massachusetts	ULEM
Franklin Park Coalition, Sandy Bailey	FPC SB

Table 1 BPDA Request for Supplemental Information Scope and Comment Letters (Continued)

<i>Commenter</i>	<i>Abbreviation</i>
Franklin Park Coalition, Samantha Wechsler	FPC SW
Chinatown/South Cove Neighborhood Council, Sherry Dong	SCNC
Friends of the Public Garden	FPG
Fenway Civic Association, Matthew Brooks	FCA MB
Beatrice Nessen	BN
The Rose Kennedy Greenway Conservancy	RKGC
Downtown Boston Business Improvement District Corporation	BID
Chinatown Residents	CR
Immediate Abutters	
Farley & White	FW
Farley & White Simpson Gumpertz & Heger	SGH
B.E. Realty Limited Partnership	BE
MA-100 Summer Street Owner, LLC	SSO
Rockpoint	RP
AW Perry	AWP
<i>Issues Raised in Individuals' Comment Letters</i>	<i>Supplemental Information Filing Section</i>
Affordable Housing	Section 1.3
Urban Design	Section 4.0
Site Access	Section 5.1.1
Great Hall	Section 3.0
Parking	Section 5.1.2
Geotechnical Impacts	Section 6.0
Solar Glare	Section 7.0
Wind	Section 2.0

The subject matters raised in the majority of individuals' comment letters are identified at the end of Table 1 and the relevant sections of this filing are referenced. In addition, Section 2.0 below includes a list of the individual commenters, topics of interest, and references to the relevant sections of this filing.

1.0 BPDA Request for Supplemental Information Scope and Associated Comment Letters



March 30, 2018

Joseph Larkin
Millennium Partners
7 Water Street, Suite 200
Boston, MA 02109

Re: Request for Supplemental Information- 115 Winthrop Square

Dear Mr. Larkin:

Please find enclosed the Request for Supplemental Information for the proposed 115 Winthrop Square project located at 115 Winthrop Square, also known as 115 Federal Street in the Downtown neighborhood of Boston. The Request for Supplemental Information describes information required by the Boston Redevelopment Authority d/b/a the Boston Planning & Development Agency in response to the Draft Project Impact Report, which was submitted under Article 80B of the Boston Zoning Code on January 2, 2018. Additional information may be required during the course of review of the proposal.

If you have any questions regarding the Request for Supplemental Information or the review process, please contact me at (617) 918.4244.

Sincerely,

A handwritten signature in black ink that reads "Casey A. Hines".

Casey A. Hines
Senior Project Manager

CC: Brian Golden, BPDA
Sara Myerson, BPDA
Jonathan Greeley, BPDA
Lauren Shurtleff, BPDA
Jerome Smith, Mayor's Office of Neighborhood Services
Kathleen MacNeil, Millennium Partners

**BOSTON REDEVELOPMENT AUTHORITY
D/B/A BOSTON PLANNING & DEVELOPMENT AGENCY**

**REQUEST FOR SUPPLEMENTAL INFORMATION
115 WINTHROP SQUARE**

**SUBMISSION REQUIREMENTS
FOR SUPPLEMENTAL INFORMATION REQUEST**

PROPOSED PROJECT: 115 WINTHROP SQUARE

PROJECT SITE: 115 WINTHROP SQUARE, ALSO KNOWN AS 115 FEDERAL STREET, LOCATED BETWEEN DEVONSHIRE STREET AND FEDERAL STREET IN DOWNTOWN BOSTON

PROPONENT: MCAF WINTHROP, LLC
C/O MILLENIUM PARTNERS
7 WATER STREET, SUITE 200
BOSTON, MASSACHUSETTS 02109

DATE: MARCH 30, 2018

The Boston Redevelopment Authority (“BRA”) d/b/a The Boston Planning & Development Agency (“BPDA”) is issuing this Supplemental Information Request (“SIR”) in response to and based on the review of a Draft Project Impact Report (“DPIR”) for the 115 Winthrop Square project (the “Proposed Project”), which MCAF Winthrop, LLC (the “Proponent”) submitted to the BPDA on January 2, 2018. Notice of the receipt by the BPDA of the DPIR was published in the [Boston Herald](#) on January 2, 2018, which initiated a public comment period with a closing date of March 19, 2018. Comments received since then have subsequently been added as well.

This document is not a Preliminary Adequacy Determination as we are not requesting a Final Project Impact Report (“FPIR”). This document is only requesting that the Proponent provide more details around the information that was

submitted in the DPIR and respond to comments and feedback received during the comment period.

Since the filing of the DPIR the BPDA held an Impact Advisory Group (the "IAG") meeting on February 1, 2018 in the BPDA Board Room at Boston City Hall, which was advertised via the BPDA website, standard email notifications and sent out to the Downtown neighborhood distribution list. The BPDA also hosted two public meetings on February 12, 2018 and March 5, 2018 (which was in an Open House format). Both meetings were held at 33 Arch Street, 29th Floor. The public meetings were advertised in the Boston Sun as well as through the BPDA website and Twitter handle, and also sent out to the Downtown neighborhood email distribution list.

Written comments in response to the DPIR received by the BPDA from agencies of the City of Boston and Public Comments are included in the attached **Appendix**.

PROJECT SITE AND DESCRIPTION:

Project Site

Until recently 115 Winthrop Square was occupied by a four-story parking garage with a footprint of approximately 47,738 square feet located adjacent to Winthrop Square in the heart of the City of Boston's ("City") Financial District (the "Project Site"). The Project Site is bounded by 75/101 Federal Street to the north, 100 Summer Street to the south, Devonshire Street to the west and Federal Street to the east. Federal Court, a private way, lies between the Project Site and the parcel located at 133 Federal Street. The current street address of the Project Site is 115 Federal Street.

The Project Site historically was owned by the City and consisted of a parking garage for approximately 1,125 vehicles. The garage was closed in May 2013 and is currently in the process of being razed due to safety concerns.

In 2014, on its behalf, the City requested the BRA's assistance in acquiring the Project Site and issuing a Request for Interest ("RFI") for development of the property. The BRA acquired the Project Site from the City and on February 11, 2015 issued a Request for Interest ("RFI") for the purpose of soliciting ideas and plans for the redevelopment of the Project Site. A subsequent Request for Proposals ("RFP") was issued on March 9, 2016 and responses were due to the BRA on April 21, 2016. The RFP included a detailed set of requirements and criteria in the areas of urban

design, transportation, financial matters, public realm, as well as other areas. The BRA received six (6) responses to the RFP, which were reviewed and evaluated by a twelve (12) member interagency review committee, comprised of senior staff from both City departments and the BRA representing areas of experience and expertise such as development, urban design, finance, sustainability and the environment, economic development, affordable housing, transportation and the arts (collectively, the “Review Committee”).

After a complete review by the Review Committee of all six (6) of the RFP submissions, the Review Committee unanimously recommended selecting the proposal by Millennium Partners. On November 1, 2016, the BRA Board granted Tentative Designation status to Millennium Partners for the redevelopment of the Project Site.

Project Description

The Proposed Project as described in the DPIR will be a single tower of approximately 664 feet in height as measured in accordance with the Boston Zoning Code (“Code”) and will be a mix of complementary uses. The economic drivers of the Proposed Project, and most of the direct and indirect benefits that result, are from the residential and commercial office spaces. With approximately 500 residential units, the Proposed Project will expand the emerging critical mass of residents in the dynamic Downtown Crossing neighborhood while the commercial office space of approximately 750,000 square feet will set new standards for workplace efficiency, adaptability, environmental sustainability, and wellness. This forwardlooking commercial office space will ultimately increase its occupying organizations’ overall productivity, all while working with other property owners and stakeholders to reestablish Downtown Boston’s commercial preeminence.

The central focus of the Proposed Project, featured prominently at grade and connecting the Winthrop Square open space and points west to the financial district and points east toward Downtown Crossing, will be an approximately 12,000-square-foot space open and available to the public, currently referred to as the Great Hall. While intended to be momentous and beautiful in its own right, the Great Hall’s primary focus is to provide the operational and architectural scaffolding for educational, cultural, collaborative, and civic event uses in the space that may change through the day/night and the seasons, and as they may be reimagined over time.

Importantly, the Proposed Project will also meet the Mayor of Boston's most recently updated Inclusionary Development Policy (IDP) for affordable housing. In this effort, the Proponent is collaborating with Asian Community Development Corporation (Asian CDC), to explore opportunities to create affordable housing in Boston's Chinatown neighborhood.

PROJECT CHANGES FROM PNF TO DPIR:

As a result of feedback from neighbors, residents, community members, the BPDA, the City of Boston and other local, state and federal officials, further design and planning work and feedback from potential users, the following changes to the Proposed Project have occurred since the Proponent submitted the PNF in November 2016:

- While the square footage for proposed residential space has been reduced since the PNF (from up to 780,000 to approximately 710,000 square feet), the number of residential units has increased from 460 to approximately 500;
- The office space has increased from up to approximately 635,000 square feet to approximately 750,000 square feet;
- The PNF program included between 35,000 and 60,000 square feet of restaurant/retail, which has been revised to approximately 31,000 square feet of retail/restaurant and 21,000 square feet of meeting space available to occupants of the building as well as the public.
- The Proposed Project height has been reduced from the 775 feet presented in the PNF to a proposed zoning height of approximately 664 feet;
- An accelerator is not currently proposed as part of the Proposed Project, although the Proponent may consider including an accelerator or similar concept in the final design of the Proposed Project; and
- The Proposed Project is consistent with Massport/FAA height guidance.

In addition, there have been other developments related to the Proposed Project since the Proponent submitted the PNF, including:

- The enactment of Chapter 57 of the Acts of 2017, An Act Protecting Sunlight and Promoting Economic Development in the City of Boston, amends the portions of

the Massachusetts state laws governing new shadows from new structures on the Boston Public Garden and Boston Common described in Section 1.1 above;

- The FAA has issued its Aeronautical Study and it is currently circulating this study for Public Comment. The various points of the site have been determined to be 701' to 720' AMSL where no interruptions to air traffic operations will occur;
- The Proponent and the Friends of the Public Garden entered into a Memorandum of Agreement in which the Proponent agreed to contribute \$125,000 per year for 40 years following the completion of the Proposed Project to be used by the Friends for maintenance and enhancement of the Boston Common and the Boston Public Garden;
- Mayor of Boston Martin J. Walsh announced the preliminary allocations (subject to change as determined by the City) of most of the initial \$102 million of the projected \$152,790,000 purchase price for affordable housing and public parks and spaces across the City. Under the signed purchase agreement, the Proposed Project could yield an additional \$13,210,000 purchase price depending upon the final residential sales square footage.
- At the City's request and consistent with a MEPA Advisory Opinion issued on October 20, 2017, the Proponent has commenced demolition of the existing garage located on the Project Site. The garage had become a public safety hazard in need of immediate attention, particularly in light of the winter season as engineers recently noted that snow load would have a detrimental effect on the stability of the garage.

SUPPLEMENTAL IMPACT REPORT RESPONSE

The Request for Supplemental Information requests information that the BPDA requires for its review of the Proposed Project in connection with Article 80 of the Code, Development Review and Approval and other applicable sections of the Code.

In addition to responding to the comments attached in the **Appendix**, the following points are highlighted for additional emphasis and consideration:

Public Realm

- Clarify curb use overall, on both Devonshire and Federal Streets. BPDA 01
- Winthrop Square BPDA 02

- Design, landscape and programming still not entirely clear; develop stronger concept rationale. Consider the larger space more comprehensively as an urban room.
- More detail on tabling plans and the expanded sidewalk. BPDA 03
- Water feature proposal should be for all seasons. BPDA 04
- Tree removal and new landscape are proposed due to age of existing trees and height of soil that has developed over time - need a closer look at grading and tree replacement strategy. BPDA 05
- Consider including some active uses; consider role/type of outdoor seating. BPDA 06
- How might this work with Downtown BID programming (e.g., retail kiosks or food trucks)?
- Connection to Winthrop Lane - develop the notion of this space as part of a network, and as an opportunity for public art. BPDA 07
- Provide more information on any architectural elements considered for the plaza and sidewalk. BPDA 08
- Define more closely the wind mitigation devices and strategy, including street trees. BPDA 09
- Strengthen the idea of linking connective spaces by describing general enhancements to and on Tontine Crescent to provide wayfinding and public realm connectivity between Shoppers Park and Winthrop Square. Are there any wind issues along this corridor that might suggest additional wind mitigation? BPDA 10
- The sequence of spaces, including the Great Hall, should be legible and attractive day and night. Please develop a night time civic illumination plan to this end, which includes both the building and the spaces it helps to define. BPDA 11
- Develop the notion of a forecourt space on Federal Street to enhance the sense of entry to the Great Hall here. Additionally, how does the Federal Street public realm contribute to that goal. BPDA 12

Great Hall

- Generally, the design and programming should be more developed. BPDA 13
- Currently, the design includes flexible spaces and mentions collaboration with the Downtown BID - provide further detail on how this will be managed. BPDA 14
- There is still a desire to explore a civic anchor program. BPDA 15
- The DPIR design no longer relates to Winthrop Square, but Federal Street instead; the Great Hall needs to read strongly as a significant invitation on *both* sides (see Public Realm comments). BPDA 16

- Strengthen the design of the Winthrop Square connection, which is critical - if BPDA 17 considered as an extended threshold, this strategy might also work in developing the design of the Federal Street side.
- Develop greater design specificity on the entrance portals on both the BPDA 18 Devonshire and Federal Street sides (*i.e.*, how is the entry denoted?). And is the entry an extension of the Great Hall character (as it was in the original scheme) or is it truly an expression of portal/threshold?
- Simplify the expression and idea of the Great Hall, and make sure that it BPDA 19 reads strongly as a public space first, before populating it with other elements that might confuse that reading.
- Retail is largely absent - elaborate on the potential of either a permanent or BPDA 20 temporary retailing strategy - or retail pop-ups/kiosks, if relevant.
- Explore greater flexibility; but maintain connectivity to the greatest extent BPDA 21 possible.

Urban Design

- Present massing and design evolution from the PNF, to the DPIR, and BPDA 22 onwards.
- The proponent returning to the simple, strong vertical detail, is a welcome development. Further design details should be forthcoming for the key BPDA 23 elements of the building and facade.
- For the 'two-tower' idea (*i.e.*, one building that reads as two towers), explore BPDA 24 alternative design strategies for the bridge connection between the primary Tower and the 'bustle' to minimize the heaviness of the single T-shaped tower and maximize the sense of separation/transparency between the massing elements. That exploration should include an evaluation of varying height/SF scenarios for the 'bustle' as well as opportunities for greater setbacks or equivalent strategies. Examples include:
 - A variant on the 'two-tower' idea includes the notion of a canted tower element, which could create more of a threshold space outside the Great Hall at the base and provide some dynamic qualities above, including the top.
 - Another variant starts with the Great Hall threshold space and suggests long, elegantly modest setbacks, which culminate against the primary tower, like some of the elements of Rockefeller Center or the McCormack Post Office building.
- What is the design strategy for the tops of the tower and the 'bustle' or 'T'? BPDA 25 How do they relate and/or differ? Might they have different lighting strategies to enhance a two-tower, or just rich architectural, reading?

- Provide more detailed elevations and skyline views, including from Dewey BPDA 26 Square, the Greenway, and Interstate 93 northbound.
- As noted above, the Great Hall entries on both Devonshire and Federal BPDA 27 Streets need further study.
- Maximize the appearance and animation of 'Public' vs. 'private' frontage BPDA 28 along Devonshire Street.
- Develop initial thoughts on the design, scale, lighting, and material treatment BPDA 29 (including the potential of doors) of the parking entries, and the residential lobby adjacent to the entry off Devonshire Street.

Circulation, Traffic + Transportation

- Site access
 - Minimize pedestrian crossing distances as much as possible (related to BPDA 30 tabling plan and/or enhanced crossings at key intersections or nodes - *e.g.*, to Winthrop Lane and Matthews Street).
 - Project anticipated pedestrian volumes and desire lines to support BPDA 31 tabling plan, additional crosswalks, etc.
 - Further study needed on two-way versus one-way Devonshire Street; BPDA 32 and two-way Summer Street from Otis to Arch Streets.
- Parking
 - Will there be flexibility built in for a future non-parking use? BPDA 33
 - Clarify projects, existing and planned, in the 'No Build' Alternative BPDA 34 analysis.
 - Re-analyze parking demand and further explain how shared parking BPDA 35 will work within the garage, including the functional impact on parking ratios.
 - Clarify all aspects of parking operations. BPDA 36
 - Is a single lane parking entrance at Federal Street sufficient? Please BPDA 37 detail traffic management strategy to prevent queuing issues on Federal Street and any access alternatives studied.
 - Minimize any conflicts between pedestrians and the parking garage BPDA 38 entries, in all cases favoring the pedestrian movements.

Geotechnical/Structural

- Abutters on both sides have raised geotechnical concerns that need to be BPDA 39 addressed.
- Better define the geotechnical and engineering/construction technique aspects of the Proposed Project that will maximize the structural integrity of

the extended site and minimize any settlement risks associated with construction, excavation and any associated dewatering activities.

- Geotechnical Report/Structural Plan from Millenium Partners is needed (and BPDA 40 they have acknowledged is forthcoming).

Environmental

Additional solar glare testing shall be conducted based on the massing and design BPDA 41 that responds to the aforementioned Urban Design comments.

1. Visual Glare Impacts on pedestrians, drivers, adjacent facades and open spaces, including but not limited to the Boston Common, the Boston Public Garden, the Norman B. Leventhal Park, and the Rose Kennedy Greenway.
2. Thermal Impacts on pedestrians, drivers, adjacent facades and open spaces including but not limited to, the Boston Common, the Boston Public Garden, the Norman B. Leventhal Park, and the Rose Kennedy Greenway.

Mitigation measures shall be fully described and incorporated in the analysis.

Other

- Evaluate and respond to request that the Robert Burns Statue be returned to BPDA 42 Back Bay Fens.

BPDA SCOPING DETERMINATION

BPDA 01 Clarify curb use overall, on both Devonshire and Federal Streets.

Existing curb use regulation in the study area were presented in Figure 4-5 in the Draft PIR. Proposed curb uses in the vicinity of the Project are shown on Figure 5-1.

Along the Project's Devonshire Street frontage, two drop-off/pick-up spaces are located in front of the office lobby, and two drop-off/pick-up spaces are located in front of the residential lobby, just south of the residential driveway. The primary residential drop-off/pick-up is located off-street in the first below-grade parking level. The three existing State Police spaces on the Winthrop Square island will be re-located permanently under the demolition phase of the Construction Management Plan, and these spaces will not be returned to this location when the Project is complete. On the Otis Street side of Winthrop Square, the design of the public realm seeks to optimize the pedestrian accommodations and minimize impact to the existing curb uses.

On Federal Street, the curb in front of the Great Hall is being expanded on both sides of Federal Street to reduce the pedestrian crossing distance while still allowing for two lanes of through traffic. Figure 5-1 shows a reduction of approximately 35 linear feet in the existing MBTA layover/staging curbside now given to pedestrian space.

BPDA 02 Winthrop Square. Design, landscape and programming still not entirely clear; develop stronger concept rationale. Consider the larger space more comprehensively as an urban room.

The Winthrop Square design will include an activated center creating a visual interest throughout the day and throughout the year. From this center, the design undulates outwards, finding form in the Square's hard and softscaped elements. The ground plane emerges at varying levels to frame planting beds and create ample seating. Lighting will be used to highlight the walls and paths. These nestled linear elements create an elegant and contemplative atmosphere that can be enjoyed by individuals or groups of people. Flowering understory trees frame the central plaza while large canopy trees provide an edge. Ripples will be repeated within the planting beds through the color and height of the groundcover (Figure 2-1 Draft Landscape Plan).

The current design includes a green passive sitting area as a focal point to the urban room that is formed by the surrounding buildings. Current and future pedestrian movement patterns through the Square will be facilitated through

the disposition of the seating, planting and other elements. Ample pedestrian seating will be provided in different forms (both fixed and moveable). Additionally the tree planting, seatwalls and walkways will respond to the historic and contemporary buildings, notably that of Winthrop Square as well as others during the BPDA's design review process.

The concept for Winthrop Square has been conceived with the understanding that it will be developed further with substantive input from the BPDA, the public and others.

BPDA 03 More detail on tabling plans and the expanded sidewalk.

An elevated crosswalk will connect Winthrop Square to the main Great Hall entrance doors. Curb line changes can be seen on Figure 2-2 Existing and Proposed Curb Lines. Sidewalks are proposed to be expanded on the east and west sides of Winthrop Square and on the east side of Devonshire Street north of the Square as well as at the southwest corner of Devonshire and Franklin streets. In total, pedestrian surfaces are proposed to be expanded by approximately 3,800 square feet in Winthrop Square.

BPDA 04 Water feature proposal should be for all seasons.

The team's current design includes full season interest. A water feature or sculpture that embodies winter interest, lighting and graphics are included (Figure 2-9).

BPDA 05 Tree removal and new landscape are proposed due to age of existing trees and height of soil that has developed over time – need a closer look at grading and tree replacement strategy.

The team is working with the utility companies and will organize test pits to confirm that tree plantings can occur in specific locations. In addition, the current Winthrop Square does not meet the grading requirements of MABB. Compliant grading is a priority with the new design.

BPDA 06 Consider including some active uses; consider role/type of outdoor seating. How might this work with Downtown BID programming (e.g., retail kiosks or food trucks)?

The Winthrop Square design will include areas for both passive and active uses that can both compliment and facilitate the Downtown Boston BID's effort to enliven the public realm in the district. The design currently accommodates

ample fixed seating. Movable seating opportunities will be discussed with the BID as moveable seating requires on-going maintenance. Currently the BID does not allow for food trucks within the district. This can be re-visited with the BID based on the needs of the community

BPDA 07 Connection to Winthrop Lane – develop the notion of this space as part of a network, and as an opportunity for public art.

The design strengthens the existing connection to Winthrop Lane. The curb line of the Square has been moved north, providing increased pedestrian space and allowing for safer crossing from Winthrop Lane to the Square and across Devonshire Street in two locations. Planting bed and bench orientation frame the passage from Winthrop Lane (Figure 2-3 Pedestrian Flow).

BPDA 08 Provide more information on any architectural elements considered for the plaza and sidewalk.

There are no architectural elements such as a canopy, trellis or kiosk intended for Winthrop Square. Bollards will be located at either edge of the raised pedestrian crossing and light poles will be located along the street and throughout Winthrop Square. Based on extensive wind tunnel studies, trees will be required as mitigation on the Devonshire Street sidewalk at Franklin Street. The Proponent has reviewed the traffic turns and can extend the curb line in order to facilitate the trees required (Figure 2-2 Existing and Proposed Curb lines).

BPDA 09 Define more closely the wind mitigation devices and strategy, including street trees.

Wind studies performed by RWDI indicate only one location requiring mitigation– along Devonshire Street, near the corner of Franklin Street. Studies done to date indicate that wind conditions could be improved to an acceptable level through the strategic planting of street trees that retain their leaves. In this regard trees such as English Oaks or columnar European Beech will be planted along the east side of Devonshire Street between 115 Winthrop Street and Franklin Street. The number, placing and species of the trees will be carefully studied in association with RWDI to arrive at a planting strategy that achieves acceptable wind conditions.

BPDA 10 Strengthen the idea of linking connective spaces by describing general enhancements to and on Tontine Crescent to provide wayfinding and public realm connectivity between Shoppers Park and Winthrop Square. Are there any wind issues along this corridor that might suggest additional wind mitigation?

There are no wind related issues in this area created by the Project. Significant improvements are proposed for Tontine Crescent. Proposed sidewalk widening along Franklin Street will add 7,500 square feet of pedestrian space between Shoppers Park and Devonshire Street. Street trees, planting beds as well as moveable and fixed seating will provide for a greener, more activated connection (Figures 2-5 and 2-6, Franklin Street Draft Landscape Plan and Rendering).

BPDA 11 **The sequence of spaces, including the Great Hall, should be legible and attractive day and night. Please develop a night time civic illumination plan to this end, which includes both the building and the spaces it helps to define.**

An illumination strategy is included in the design scope. Lighting will be consistent with LEED guidelines, and will focus on public safety and comfort in addition to aesthetic expression. The Proponent will work with City Street Lighting to coordinate the lighting in the public way.

BPDA 12 **Develop the notion of a forecourt space on Federal Street to enhance the sense of entry to the Great Hall here. Additionally, how does the Federal Street public realm contribute to that goal.**

See updated description, plans, and imagery shown in Section 4 Urban Design.

BPDA 13 **Generally, the design and programming should be more developed.**

Please see Section 3.0 for a description of the Great Hall. See also updated description, plans, and imagery shown in Section 4 Urban Design.

BPDA 14 **Currently, the design includes flexible spaces and mentions collaboration with the Downtown BID – provide further detail on how this will be managed.**

Affiliates of the Proponent and the Downtown Boston BID have collaborated on public realm improvements, safety and quality of life matters as well as programming for a number of years through regular discussions with the Project's development team and operating managers. The Proponent expects that collaboration will continue, in particular on improvements and program to Winthrop Square, the Tontine Crescent and into the programming of the Great Hall, where the Downtown BID's real time insight into the district is invaluable. As part of the operating plan for community and civic engagement of the Great Hall that will be prepared well in advance of the Project opening, the Proponent

will create a board of advisors and will ask the Downtown Boston BID to be on that Board. The Proponent will also seek their guidance on the public realm design and area safety matters.

BPDA 15 **There is still a desire to explore a civic anchor program.**

See updated description, plans, and imagery shown in Section 4.0 Urban Design as well as Section 3.0 Great Hall.B

PDA 16 **The DPIR design no longer relates to Winthrop Square, but Federal Street instead; the Great Hall needs to read strongly as a significant invitation on both sides (see Public Realm comments).**

See updated description, plans, and imagery shown in Section 4.0 Urban Design.

BPDA 17 **Strengthen the design of the Winthrop Square connection, which is critical – if considered as an extended threshold, this strategy might also work in developing the design of the Federal Street side.**

See updated description, plans, and imagery shown in Section 4.0 Urban Design.

BPDA 18 **Develop greater design specificity on the entrance portals on both the Devonshire and Federal Street sides (i.e., how is the entry denoted?). And is the entry an extension of the Great Hall character (as it was in the original scheme) or is it truly an expression of portal/threshold?**

See updated description, plans, and imagery shown in Section 4.0 Urban Design.

BPDA 19 **Simplify the expression and idea of the Great Hall, and make sure that it reads strongly as a public space first, before populating it with other elements that might confuse that reading.**

See updated description, plans, and imagery shown in Section 4.0 Urban Design.

BPDA 20 **Retail is largely absent - elaborate on the potential of either a permanent or temporary retailing strategy - or retail pop-ups/kiosks, if relevant.**

See updated description, plans, and imagery shown in Section 4.0 Urban Design. A strategy to use permanent food and retail kiosks is currently being studied to be built along the perimeter of the Great Hall at the Low Ground and Mezzanine.

BPDA 21 Explore greater flexibility; but maintain connectivity to the greatest extent possible.

See updated description, plans, and imagery shown in Section 4.0 Urban Design.

BPDA 22 Present massing and design evolution from the PNF, to the DPIR, and onwards.

See updated description, plans, and imagery shown in Section 4.0 Urban Design.

BPDA 23 The proponent returning to the simple, strong vertical detail, is a welcome development. Further design details should be forthcoming for the key elements of the building and facade.

See updated description, plans, and imagery shown in Section 4.0 Urban Design.

BPDA 24 For the 'two-tower' idea (i.e., one building that reads as two towers), explore alternative design strategies for the bridge connection between the primary Tower and the 'bustle' to minimize the heaviness of the single T-shaped tower and maximize the sense of separation/transparency between the massing elements. That exploration should include an evaluation of varying height/SF scenarios for the 'bustle' as well as opportunities for greater setbacks or equivalent strategies. Examples include:

- ◆ A variant on the 'two-tower' idea includes the notion of a canted tower element, which could create more of a threshold space outside the Great Hall at the base and provide some dynamic qualities above, including the top.
- ◆ Another variant starts with the Great Hall threshold space and suggests long, elegantly modest setbacks, which culminate against the primary tower, like some of the elements of Rockefeller Center or the McCormack Post Office building.

Through an extensive BCDC and BPDA design review process, numerous design studies were completed before reaching the proposed Project design which was approved at the May 1, 2018 BCDC meeting. See updated description, plans, and imagery shown in Section 4.0 Urban Design.

- BPDA 25** **What is the design strategy for the tops of the tower and the ‘bustle’ or ‘T’? How do they relate and/or differ? Might they have different lighting strategies to enhance a two-tower, or just rich architectural, reading?**
- See updated description, plans, and imagery shown in Section 4.0 Urban Design.
- BPDA 26** **Provide more detailed elevations and skyline views, including from Dewey Square, the Greenway, and Interstate 93 northbound.**
- Appendix A includes more detailed views of the Project, including from the George Thorndike Angell Memorial Square at Post Office Square, South Station at the intersection of Atlantic Avenue and Summer Street (Dewey Square), the South End at Interstate 93 northbound, Boston Common at the Brewer Fountain and the Greenway. In addition, included are longer range views from Dudley Square, LoPresti Park, Piers Park Sailing Center, Dorchester Heights, as well as views from Cambridge, Somerville and Chelsea.
- BPDA 27** **As noted above, the Great Hall entries on both Devonshire and Federal Streets need further study.**
- See updated description, plans, and imagery shown in Section 4.0 Urban Design.
- BPDA 28** **Maximize the appearance and animation of ‘Public’ vs. ‘private’ frontage along Devonshire Street.**
- See updated description, plans, and imagery shown in Section 4.0 Urban Design.
- BPDA 29** **Develop initial thoughts on the design, scale, lighting, and material treatment (including the potential of doors) of the parking entries, and the residential lobby adjacent to the entry off Devonshire Street.**
- See updated description, plans, and imagery shown in Section 4.0 Urban Design. Further development of specific store-front conditions and materials will continue to evolve as the exterior design is studied.
- BPDA 30** **Minimize pedestrian crossing distances as much as possible (related to tabling plan and/or enhanced crossings at key intersections or nodes - e.g., to Winthrop Lane and Matthews Street).**

The proposed crossings, as shown on Figure 5-1, utilize wider sidewalks and “bump-outs” to minimize the pedestrian crossing distance, an important goal of this effort. Tabling is only proposed to provide a raised crosswalk on Devonshire Street at the Great Hall.

BPDA 31 Project anticipated pedestrian volumes and desire lines to support tabling plan, additional crosswalks, etc.

Analysis of the Draft PIR trip generation indicates that on Federal Street there will be approximately 660 pedestrian movements entering and exiting the building during each peak hour, generated by building occupants alone. The analysis also indicates that on Devonshire Street there will be approximately 490 pedestrian movements entering and exiting the building during each peak hour, generated by building occupants alone. In addition, it is anticipated that on the order of 500 peak hour pedestrians in the area will use the Great Hall as a passageway in lieu of current pedestrian paths.

BPDA 32 Further study needed on two-way versus one-way Devonshire Street; and two-way Summer Street from Otis to Arch Streets.

The Proponent has met with BTM and BPDA staff regarding the proposal to convert Devonshire Street to two-way traffic between Summer Street and the Project site. The intent of this proposal was to restrict truck traffic through Winthrop Square. At a meeting on March 19, 2018, the BTM staff stated that they did not support this as a permanent change and thus the Proponent will not pursue this as a permanent traffic change. The Construction Management Plan does consider a temporary closing of Devonshire Street in front of the Project site and thus a two-way Devonshire is required for the 100 Summer Street vehicles and the other users of this end of Devonshire Street during the construction of the Project.

The Proponent has also met with BTM and BPDA staff to present the concept for converting Summer Street between Otis Street and Arch Street to a two-way street. This proposal was suggested by a member of the IAG, but is not part of the Project. However, as requested by BTM, the Proponent is continuing to evaluate the concept.

BPDA 33 Will there be flexibility built in for a future non-parking use?

Several of the garage levels are being designed with 12’-6” heights with use of parking stacker equipment. These higher ceiling heights allow the option for these below grade spaces to be used in the future for a potential grocery store use, and storage and other uses that do not need direct daylight.

BPDA 34 Clarify projects, existing and planned, in the ‘No Build’ Alternative analysis.

Based on a review of projects in the Downtown that have been built or planned, the following five projects were determined to have impact in the study area and were included in the No-Build analysis: 102-110 Broad Street;

- ◆ Congress Square;
- ◆ 55 India Street;
- ◆ South Station Air Rights; and
- ◆ One Bromfield.

It should be noted that just after the 115 Winthrop Square Draft EIR/PIR was filed (January 2, 2018), the Project Notification Form for the One Post Office Square development was filed on January 5, 2018. That project was approved by the BPDA Board on March 15, 2018. However, the PNF states that *“While the Project will result in additional office space and supporting amenities, the amount of on-site parking will actually be reduced by approximately 71 spaces. Consequently, traffic increases associated with the redevelopment project will be minimal.”* As only minimal traffic increases are projected for that project, it is reasonable to assume that any increases are covered by the 0.25% per year background growth assumed in the Draft EIR/PIR analysis.

BPDA 35 Re-analyze parking demand and further explain how shared parking will work within the garage, including the functional impact on parking ratios.

A detailed analysis of parking supply and demand was presented in Section 4.8 of the Draft PIR, comparing the projected demand using ITE methodology and using the ULI methodology. While the analysis suggests that the Project parking demand is about 14% higher than the proposed parking supply, the estimate likely does not reflect the strongly transit-oriented nature of the Project’s location. In addition, it is recognized that some office employees will choose to park in other existing parking facilities in the area. Further, in the interest of not over-providing Project parking, the proposed supply of Project parking for up to 550 vehicles is consistent with the goal of minimizing dependence on auto travel, supported by the Project’s comprehensive package of Transportation Demand Management strategies.

The Project includes up to five levels below-grade parking for residential vehicle drop-off and pick-up, and valet-assisted parking and other uses described previously. The proposed shared parking plan for the garage takes advantage of the availability of residential spaces available during the daytime on a

weekday use by office commuters. The availability of shared spaces was based on an analysis of garage entry/exit data for Millennium Tower, yielding a daytime occupancy of 53% in the Millennium Tower garage on a weekday between 9:00 AM and 5:00 PM. Assuming an approximately 45% availability of residential spaces during a typical weekday, the garage in the proposed Project will yield approximately 135 (45% of 300) residential spaces available for sharing

As a result, a total of 385 (250 + 135) parking spaces will be available for office users, yielding an effective office parking ratio of 0.49 spaces per 1,000 SF. The sharing of parking spaces will be facilitated by valet operation of the garage.

BPDA 36 Clarify all aspects of parking operations.

Please see the memorandum prepared by Walker Consultants included in the Transportation Appendix.

BPDA 37 Is a single lane parking entrance at Federal Street sufficient? Please detail traffic management strategy to prevent queuing issues on Federal Street and any access alternatives studied.

Please see the memorandum dated March 29, 2018 prepared by Walker Consultants included in the Transportation Appendix.

BPDA 38 Minimize any conflicts between pedestrians and the parking garage entries, in all cases favoring the pedestrian movements.

Please refer to the memorandum dated March 29, 2018 prepared by Walker Consultants which is included in the Transportation Appendix and addresses minimizing pedestrian/car conflict during ingress and egress to the garage at Federal Street.

BPDA 39 Abutters on both sides have raised geotechnical concerns that need to be addressed. Better define the geotechnical and engineering/construction technique aspects of the Proposed Project that will maximize the structural integrity of the extended site and minimize any settlement risks associated with construction, excavation and any associated dewatering activities.

Please see Section 6.0.

BPDA 40 Geotechnical Report/Structural Plan from Millennium Partners is needed (and they have acknowledged is forthcoming).

Comments have been noted and are addressed in BPDA Response to Comment 39.

BPDA 41 Additional solar glare testing shall be conducted based on the massing and design that responds to the aforementioned Urban Design comments.

1. Visual Glare Impacts on pedestrians, drivers, adjacent facades and open spaces, including but not limited to the Boston Common, the Boston Public Garden, the Norman B. Leventhal Park, and the Rose Kennedy Greenway.
2. Thermal Impacts on pedestrians, drivers, adjacent facades and open spaces including but not limited to, the Boston Common, the Boston Public Garden, the Norman B. Leventhal Park, and the Rose Kennedy Greenway.

Mitigation measures shall be fully described and incorporated in the analysis.

As described in the solar glare report provided for the Draft PIR, there is some localized reflections along Federal and Devonshire streets. The Project team will work towards mitigating potential impacts. The Project team will expand the scope to explicitly model the noted areas of concern as well as indicate the effectiveness of mitigation measures such as mullions and fins which are now more present in the vertical expression of the proposed design. This will be further refined as part of the BPDA's customary design review process.

BPDA 42 Evaluate and respond to request that the Robert Burns Statue be returned to Back Bay Fens.

The Proponent is currently conducting research on the sculpture and the steps required for moving the sculpture. They look forward to working with the FCA and will work with the FCA to coordinate efforts with the City of Boston, the Boston Arts Commission, the Parks and Recreation Department and the Boston Landmarks Commission regarding the potential move. The Proponent will absorb the reasonable costs associated with any relocation.



BOSTON
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March 28, 2018

Brian Golden, Director
Boston Planning & Development Agency
One City Hall Square, 9th Floor
Boston, MA 02201

RE: Draft Project Impact Report: 115 Winthrop Square

Dear Mr. Golden,

Thank you for the opportunity to comment on the 115 Winthrop Square Draft Project Impact Report (DPIR), which follows on the Boston Transportation Department (BTD) comment letter dated March 6, 2017 on the Project Notification Form (PNF).

In the DPIR, the project includes the development of approximately 1.592 million square gross square feet of residential, office, amenity, shared meeting space, retail, restaurant and Great Hall development. The development project includes approximately 500 residential units, 750,000 square feet of office and 31,000 square feet of retail/restaurant/Great Hall. The project proposes approximately 500 parking spaces.

BTD thanks the Proponent for addressing many of the concerns raised in the PNF letter. Based on the DPIR and the more fully developed project, we would like to make the following comments as well:

Circulation Around the Site and Site Access

The project's entrance at Federal Street, as well as the pedestrian connection to Winthrop Square through the Great Hall, has the potential to attract many pedestrians to cross Federal Street at the project entrance. The Proponent has proposed a pedestrian crossing across Federal Street at this location, with several designs. BTD would propose that the major considerations in designing this connection are: creating a safe crossing; maintaining two lanes of travel; and accommodating the many buses that stop and lay over just after the crossing. To those ends, BTD suggests the Proponent create a design that minimizes pedestrian crossing distance. Further, please project anticipated pedestrian volumes and desire lines, which you could then use to explore the feasibility/desirability of interventions such as tabling the crossing and/or a second crosswalk across Federal Street.

BTD 01

Because of the complexity of the intersection of Devonshire, Summer and Lincoln, BTD does not support the proposal to make any part of this block of Devonshire two-way. The Proponent has brought to our attention a proposal to make the block of Summer from Otis to Arch two-way. BTD sees that this could have positive impacts

BTD 02


MARTIN J. WALSH, Mayor

on circulation in the area, and therefore supports the Proponent's analyzing the benefits and costs of the proposal further, considering the impacts on on-street parking, as well as traffic impacts.

As stated in BTB's PNF letter, we prefer all residential and office vehicular access to be from Federal Street so as to create a pleasant pedestrian environment, with as few vehicular conflicts as possible. The Proponent should continue to explore this possibility. BTB 03

Transportation Mitigation

Though the DPIR claims that their impact to individual bus routes is limited, there remains a large commuter demand for bus connections from North Station to downtown, South Station, the Seaport and City Point, as well as coming north on the Silver Line from the South End and Roxbury. Doubtless, the office uses at this development would contribute to that demand. Appropriate mitigation would include the funding of a plan and design for bus priority lanes from North Station to South Station. This will be coordinated with bus priority measures that are being developed independently in South Boston, as well as the Silver Line. This will be scoped out as project progresses.

In the DPIR, the Proponent proposes retiming for Summer and Surface/Purchase; Summer and High; and Congress and Milk. In 2008/2009 and again in 2014/2015, downtown signals were retimed to promote efficient flow of pedestrians, transit, bicyclists, and motor vehicles throughout the district. In line with this five-year cycle, and because these signals are all interdependent, appropriate mitigation would include traffic signal retiming and coordination in the surrounding downtown area, to be scoped out as the project progresses.

As mentioned in BTB's PNF letter, we would like to see robust pedestrian connections created to downtown crossing. We are pleased that the Proponent has proposed planning, designing, and constructing a permanent plaza at Tontine Crescent (Franklin Street from Devonshire to Hawley). As part of the process, attention should be paid to Franklin and Devonshire, where new signal equipment may be needed. As mentioned in BTB's PNF letter, we encourage the Proponent to propose improvements to the other connections to Downtown Crossing: Winthrop Lane and Summer Street. BTB 04

Finally, as mentioned in BTB's PNF letter, per the City of Boston Bicycle Parking Guidelines, BTB will be looking for the provision of a bike share station, to be sited by BTB. BTB 05

Transportation Demand Management (TDM)

BTB thanks the Proponent for beginning to detail its TDM plan, including commitments to provide real-time transportation information; car sharing spaces; joining a Transportation Management Association; bicycle parking; on-site bike fixing station; transit subsidies; unbundled residential parking; passing costs of parking on to tenants; bike share and car share memberships and consolidating package delivery.

BTB is pleased to see the Proponent's commit to subsidizing transit, bike share and car share memberships; BTB would like to see more detailed proposals on these, and would encourage a high level of subsidy. BTB 06

BTB is pleased to see the Proponent propose an employee and resident survey, as well as collecting garage volume data. BTB would like the Proponent to include the output from this survey in its Annual Report. BTB 07

As mentioned in BTB's PNF letter, we would like to see the Proponent propose shower/changing facilities per the City of Boston Bicycle Parking Guidelines. May people's hesitancy to bike to work is partially due to not feeling clean when they arrive; shower/changing facilities help make this a more attractive choice. BTB 08

Parking

The Proponent proposes 550 parking spaces, with 250 dedicated to the 790,000 SF of office and retail uses (0.32 spaces per KSF) and 300 dedicated to the 500 residential units (0.60 spaces per unit), which are within BTB policy maximum parking ratios for downtown. The DPIR proposes that some portion of the parking would be shared between residential and other uses. BTB supports shared spaces if it reduces the number of parking spaces built, but not necessarily if it retains the same number of spaces, as that functionally increases parking ratios. Please spell out how many of the spaces are proposed to be shared, and for what uses. BTB 09

BTB thanks the Proponent for proposing that residential parking would be unbundled. Regarding employee and retail parking, BTB would prefer if people have to pay every time they decide to park at the location; in other words, no weekly, monthly or annual parking passes would be issued. BTB 10

If parking is sold to a building tenant, BTB would like the lease to include a provision whereby the tenant cannot offer parking passes of duration greater than one day. Employees would either only pay for parking when they use a space, or would be offered a cash allowance in lieu of a parking space (parking cash-out). All parking should be charged at market rates. BTB 11

Regarding retail parking, BTB notes that the Air Pollution Control Commission (APCC) views retail and general use parking differently. BTB would like the Proponent to address the following questions: If the Proponent is proposing retail and not general use parking, how will it make clear that this is only for retail in the building? How will you know whether a person entering the garage is destined for on-site retail, rather than off-site uses? Will there be signage on the street notifying people that there is parking? BTB 12

Thank you for providing information on publically accessible parking in the vicinity. BTB encourages the Proponent to inquire as to whether any might be made available through agreement, thereby lessening the need to build parking spaces at this location.

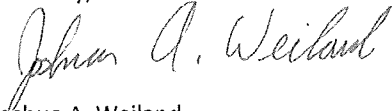
BTB is expecting the Proponent to supply the required amount of bicycle parking as per the City's Bicycle Parking Guidelines. If abutting sidewalks do not offer enough room for the required number of outdoor spaces, the City is willing to discuss the installation of outdoor bicycle parking elsewhere in downtown. The Proponent should describe the proposed location for internal bicycle parking, with the understanding that it should be located in an area that is convenient for bicyclists so as to make this as attractive an option as possible. BTB 13

As mentioned in BTB's PNF letter, there are State Police parking spaces around Winthrop Square. The Proponent should work with BTB and the State Police to find an alternate location for that parking should their proposal remove parking from Winthrop Square, both during construction and after. The Proponent could look into providing parking in their garage. BTB 14

Loading

In BTD's PNF letter, we suggest the provision of three loading bays that will accommodate WB-50 trucks. The BTD 15 Proponent states that the largest truck needed to support the project is a WB-40. BTD suggests one bay be large enough to have a WB-50.

Sincerely,



Joshua A. Weiland

Transportation Planner

Boston Transportation Department

Cc: Vineet Gupta, Director of Policy and Planning
John DeBenedictis, Director of Engineering

BOSTON TRANSPORTATION DEPARTMENT

BTD 01 The Proponent has proposed a pedestrian crossing across Federal Street at this location, with several designs. BTD would propose that the major considerations in designing this connection are: creating a safe crossing; maintaining two lanes of travel; and accommodating the many buses that stop and lay over just after the crossing. To those ends, BTD suggests the Proponent create a design that minimizes pedestrian crossing distance. Further, please project anticipated pedestrian volumes and desire lines, which you could then use to explore the feasibility/desirability of interventions such as tabling the crossing and/or a second crosswalk across Federal Street.

The Proponent shares the same goals as BTD for the design of the Federal Street pedestrian crossing at this important node. The Site Plan Figure 5-1 shows the proposed widening of the sidewalks and the “bump-outs” suggested while still providing two through lanes of traffic. A range of design concepts was presented to the BTD Commissioner and staff from BTD and BPDA on March 19, 2018 for consideration. The TAPA and PIC process dictate the final curb alignments.

The Proponent anticipates that on Federal Street there will be approximately 660 pedestrian movement entering and exiting the building during each peak hour, generated by building occupants alone. In addition, it is anticipated that on the order of 500 peak hour existing pedestrian movements in the area will use the Great Hall in lieu of their current pathway.

BTD 02 Because of the complexity of the intersection of Devonshire, Summer and Lincoln, BTD does not support the proposal to make any part of this block of Devonshire two-way. The Proponent has brought to our attention a proposal to make the block of Summer from Otis to Arch two-way. BTD sees that this could have positive impacts on circulation in the area, and therefore supports the Proponent’s analyzing the benefits and costs of the proposal further, considering the impacts on on-street parking, as well as traffic impacts.

The Proponent has noted that BTD does not support the proposal to convert Devonshire Street to two-way traffic between Summer Street and the Project site as a permanent change. With regard to the concept for converting Summer Street between Otis Street and Arch Street to a two-way street, raised by a member of the IAG, the Proponent will complete an inventory of curbside uses so that BTD and the neighborhood can continue to consider this.

BTD 03 As stated in BTD’s PNF letter, we prefer all residential and office vehicular access to be from Federal Street so as to create a pleasant pedestrian environment, with as few vehicular conflicts as possible. The Proponent should continue to explore this possibility.

The Proponent has investigated the possibility of providing all vehicle access on Federal Street, but has determined that this is not feasible largely because it would significantly impact the Great Hall. The vehicular trip generation and associated use of the residential driveway on Devonshire Street is relatively small, and it is not anticipated that it will significantly impact the pedestrian environment on Devonshire Street and around Winthrop Square.

BTD 04 As mentioned in BTD’s PNF letter, we would like to see robust pedestrian connections created to downtown crossing. We are pleased that the Proponent has proposed planning, designing, and constructing a permanent plaza at Tontine Crescent (Franklin Street from Devonshire to Hawley). As part of the process, attention should be paid to Franklin and Devonshire, where new signal equipment may be needed. As mentioned in BTD’s PNF letter, we encourage the Proponent to propose improvements to the other connections to Downtown Crossing: Winthrop Lane and Summer Street.

Careful attention has been paid and turning radii included as part of the proposed design of Franklin and Devonshire streets to ensure that adequate geometry is provided for larger vehicles and buses, including any potential need for new signal equipment. Turning analyses for the intersection are included in the Transportation Appendix.

BTD 05 Finally, as mentioned in BTD’s PNF letter, per the City of Boston Bicycle Parking Guidelines, BTD will be looking for the provision of a bike share station, to be sited by BTD.

The Proponent has agreed to work with the BTD on executing a TAPA which will consider a bike share station to be located by BTD as part of the overall Project mitigation.

BTD 06 BTD is pleased to see the Proponent’s commit to subsidizing transit, bike share and car share memberships; BTD would like to see more detailed proposals on these, and would encourage a high level of subsidy.

The TAPA will be explicit in describing the detail of mitigation and subsidies provided by the Project to various transit, bike share, and car share memberships.

BTD 07 **BTD is pleased to see the Proponent propose an employee and resident survey, as well as collecting garage volume data. BTD would like the Proponent to include the output from this survey in its Annual Report.**

The Proponent will include output from a resident survey in its Annual Report required as part of the TAPA.

BTD 08 **As mentioned in BTD’s PNF letter, we would like to see the Proponent propose shower/changing facilities per the City of Boston Bicycle Parking Guidelines. May people’s hesitancy to bike to work is partially due to not feeling clean when they arrive; shower/changing facilities help make this a more attractive choice.**

The Proponent will provide showers and a locker room in the amenity area which is available to tenants in the building.

BTD 09 **The Proponent proposes 550 parking spaces, with 250 dedicated to the 790,000 SF of office and retail uses (0.32 spaces per KSF) and 300 dedicated to the 500 residential units (0.60 spaces per unit), which are within BTD policy maximum parking ratios for downtown. The DPIR proposes that some portion of the parking would be shared between residential and other uses. BTD supports shared spaces if it reduces the number of parking spaces built, but not necessarily if it retains the same number of spaces, as that functionally increases parking ratios. Please spell out how many of the spaces are proposed to be shared, and for what uses.**

Approximately 135 (45% of 300) residential spaces will be available for sharing with office users during weekdays. As a result, while the residential ratio remains at 0.6 units per unit, the effective office parking ratio will be up to 0.49 spaces per 1,000 SF, still within BTD policy ratios. The concept of sharing recognizes that the basic ratio of 0.32 spaces per 1,000 SF of office and retail is very low and is effectively increased without building additional parking spaces.

BTD 10 **BTD thanks the Proponent for proposing that residential parking would be unbundled. Regarding employee and retail parking, BTD would prefer if people have to pay every time they decide to park at the location; in other words, no weekly, monthly or annual parking passes would be issued.**

The Proponent expects that retail parking will require the user to pay every time they park. Regarding parking for employees, the Proponent will encourage users to pay every time through a secure debit or credit card on a file system and as such, encourage the user to make a decision to pay for parking every time they

travel to the facility. No weekly or annual parking passes will be issued and monthly parking passes will be discouraged; however, the decision to offer employee parking will be between the employer and their employees.

BTD 11 If parking is sold to a building tenant, BTD would like the lease to include a provision whereby the tenant cannot offer parking passes of duration greater than one day. Employees would either only pay for parking when they use a space, or would be offered a cash allowance in lieu of a parking space (parking cash-out). All parking should be charged at market rates.

No weekly or annual parking passes will be issued and monthly parking passes will be discouraged but ultimately it will be based on the decision of the employer and their employees. The Proponent cannot require employers to offer a cash allowance in lieu of a parking space to its employees. Parking is expected to be charged at market rates.

BTD 12 Regarding retail parking, BTD notes that the Air Pollution Control Commission (APCC) views retail and general use parking differently. BTD would like the Proponent to address the following questions: If the Proponent is proposing retail and not general use parking, how will it make clear that this is only for retail in the building? How will you know whether a person entering the garage is destined for on-site retail, rather than off-site uses? Will there be signage on the street notifying people that there is parking?

The retail parking will not be available to the general public for a fee. It is provided only to support retail tenants/employees, etc. in the same way the office parking will support office tenants/employees.

BTD 13 BTD is expecting the Proponent to supply the required amount of bicycle parking as per the City's Bicycle Parking Guidelines. If abutting sidewalks do not offer enough room for the required number of outdoor spaces, the City is willing to discuss the installation of outdoor bicycle parking elsewhere in downtown. The Proponent should describe the proposed location for internal bicycle parking, with the understanding that it should be located in an area that is convenient for bicyclists so as to make this as attractive an option as possible.

Bicycle storage is located in the garage and is near the employee locker rooms. Additional showers and lockers are provided in the amenity area.

BTD 14 As mentioned in BTD's PNF letter, there are State Police parking spaces around Winthrop Square. The Proponent should work with BTD and the State Police to find an alternate location for that parking should their proposal remove parking from Winthrop Square, both during construction and after. The Proponent could look into providing parking in their garage.

Three of the State Police parking spaces have been discussed with the State Police to be relocated to a garage as part of the Site Demolition Construction Management Plan.

BTD 15 In BTD's PNF letter, we suggest the provision of three loading bays that will accommodate WB-50 trucks. The Proponent states that the largest truck needed to support the project is a WB-40. BTD suggests one bay be large enough to have a WB-50.

Although it is not anticipated that WB-50 trucks will likely be needed to support the Project, as requested by BTD, one of the loading bays is large enough to accommodate a WB-50 should it be necessary. A turning movement analysis for a WB-50 truck is shown in the Transportation Appendix with Devonshire Street remaining one-way.



Massachusetts Port Authority
One Harborside Drive, Suite 200S
East Boston, MA 02128-2090
Telephone (617) 568-5950
www.massport.com

February 6, 2018

Secretary Matthew A. Beaton
Executive Office of Energy & Environmental Affairs
Attn: MEPA Office
Page Czepiga, EEA #15610
100 Cambridge Street, Suite 900
Boston, MA 02114

Subject: 115 Winthrop Square DEIR (EEA #15610)

Dear Secretary Beaton:

On behalf of the Massachusetts Port Authority (Massport), thank you for the opportunity to submit comments on the *Draft Environmental Impact Report* (DEIR) filing for the 115 Winthrop Square Project. As presented in the DEIR, the Project seeks to build an approximately 664-foot-tall (710 feet above mean sea level), ±1.5 million sf mixed use building at 115 Winthrop Square in Boston. Massport supports new development projects that strengthen our economy and provide employment opportunities to its residents. As stated in our previous project comments, Massport's main aviation priority is to ensure aircraft are able to operate in a safe and efficient manner in and around Boston-Logan International Airport and that issue remains the focus of our comments on the DEIR.

Massport is pleased that the project has been redesigned to comply with the height limit guidance MPA 01 defined by the *Boston- Logan International Airport Composite Map of Critical Airspace Surfaces* (Logan Airspace Map, attached). The Federal Aviation Administration (FAA) recently completed their airspace review of the project through the federal 7460 process (Aeronautical Study 2017-ANE-1347-OE). In their filing to the FAA, the proponent submitted 13 points of the building ranging from 702 – 720 AMSL. The maximum heights as defined by these points are consistent with the Logan Airspace Map. We concur with the FAA finding that a building in this location with the proposed maximum building heights would have no operational impacts on Boston Logan. It is important, however, that the maximum building heights reflect all rooftop mechanical/HVAC units, signage, antenna, lighting, architectural features, etc.

Massport expects that the tall crane(s) needed to construct the tower will impact Logan operations MPA 02 when they are at heights of greater than 710-feet AMSL. The Proponent will be required to file construction-phase 7460 forms with the FAA no later than 45 days prior to construction. We encourage that this process begins as early as possible to avoid delays and minimize the time period the cranes are at their greatest heights. Separate forms have to be filed for the building and the

construction cranes. Massport would be pleased to work with the Proponent during the design process and during construction to minimize the impact of the cranes on Logan airspace.

Thank you for your consideration of our comments. Please feel free to contact me at (617) 568-3524 or at sdalzell@massport.com if you wish to discuss any of our concerns.

Sincerely,

Massachusetts Port Authority



Stewart Dalzell, Deputy Director
Environmental Planning and Permitting

Cc: T. Glynn, E. Freni, J. Doolin, J. Prankevicius, H. Morrison, F. Leo, S. Gongal/Massport
G. Latrell/FAA
J. Larkin/Millennium Partners
D. Sweeney/City of Boston
C. Tracy/BPDA
C. Schlessinger/Epsilon Associates

Enclosures:

Boston-Logan International Airport Composite of Critical Airspace Surfaces Map

Boston – Logan International Airport
Composite of Critical Airspace Surfaces

Legend

Surface Elevations (MSL)



Dashed lines identify transition from "Flat" to "Sloping" surface.
Contour Interval = 25 FT

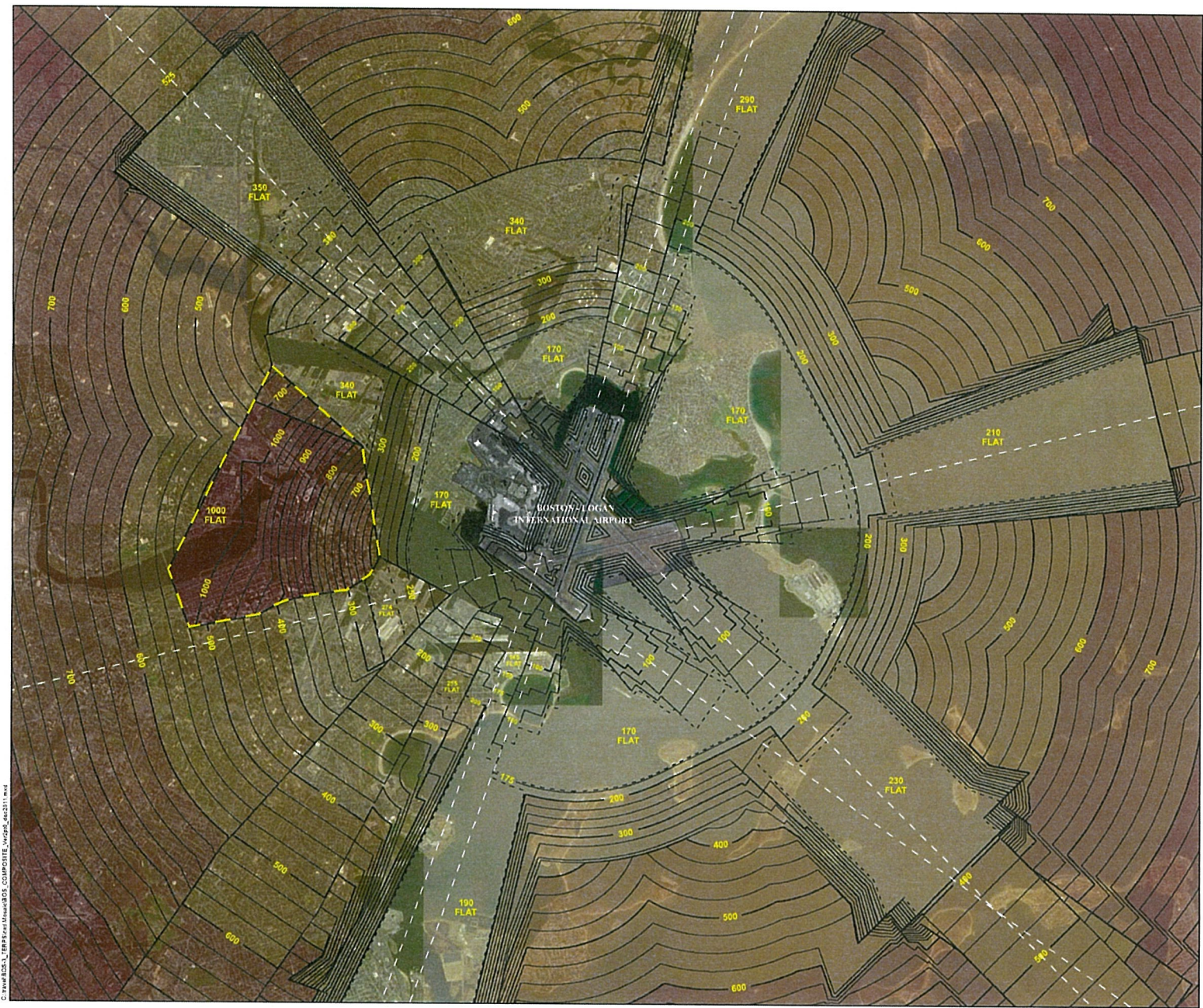
Notes:

1. This Composite Map is intended for informational and conceptual planning purposes only and does not represent actual survey data nor should it be used in the development of a FAA Form 7460. Massport does not certify the accuracy, information or title to the properties contained in this plan nor make any warranties of any kind, express or implied, in fact or by law, with respect to boundaries, easements, restrictions, claims, overlaps, or other encumbrances affecting such properties.
2. This Composite Map does not replace the FAA's 7460 review process. Consistency with the surfaces shown on this map does not ensure that the proposal will be acceptable to the FAA and air carriers. Massport reserves the right to re-assess, review and seek modifications to projects that may be consistent with this Composite Map but that through the FAA 7460 process are found to have unexpected impacts to Boston Logan's safety or efficiency.
3. Surface elevations are referenced in feet Above Mean Sea Level (AMSL - NAVD88)

COMPOSITE MAP PARAMETERS

SURFACE TYPES	RUNWAYS
CIRCLE-TO-LAND	ALL RUNWAYS (EXCEPT 14)
ICAO/AC ONE ENGINE INOP	4R, 4L, 9, 14, 15R, 22L, 22R, 27, 33L
IFR STND DEPARTURE	4R, 9, 14, 15R, 22L*, 22R*, 27*, 33L
IFR NON-STND DEPARTURE	4L
ILS APPROACH	4R, 15R, 22L, 27, 33L
ILS MISSED APPROACH	4R*, 15R, 22L, 27, 33L**
LOCALIZER APPROACH**	4R, 15R, 22L, 27, 33L
LNAV APPROACH**	4R, 15R, 22L, 27, 32, 33L
LNAV MISSED APPROACH	4R, 15R, 22L, 27, 32, 33L
PART 77 - STANDARD	EAST OF 4R/22L
PART 77 - VFR ONLY	WEST OF 4R/22L (N. OF DOWNTOWN)
VISIBILITY (CIRCLING)	ALL RUNWAYS (EXCEPT 14)
VISIBILITY (STRAIGHT-IN)	4R, 15R, 22L, 27, 32, 33L
VNAV APPROACH	4R, 15R, 27, 33L
VNAV MISSED APPROACH	4R, 15R, 27, 33L

* PROCEDURE DERIVED FROM PREVIOUS CRITERIA
** CAT I AND CAT II
*** CAT I 3000 FEET OBSTACLE
**** ACCOUNTS FOR 1.5 GRIFF DOWN



C:\pwworkspace\massport\BOS_COMPOSITE_V02\FR_462311.mxd

MASSACHUSETTS PORT AUTHORITY (MASSPORT)

MPA 01 Massport is pleased that the project has been redesigned to comply with the height limit guidance defined by the Boston- Logan International Airport Composite Map of Critical Airspace Surfaces (Logan Airspace Map, attached). The Federal Aviation Administration (FAA) recently completed their airspace review of the project through the federal 7460 process (Aeronautical Study 2017-ANE-1347-OE). In their filing to the FAA, the proponent submitted 13 points of the building ranging from 702 – 720 AMSL. The maximum heights as defined by these points are consistent with the Logan Airspace Map. We concur with the FAA finding that a building in this location with the proposed maximum building heights would have no operational impacts on Boston Logan. It is important, however, that the maximum building heights reflect all rooftop mechanical/HVAC units, signage, antenna, lighting, architectural features, etc.

The maximum building heights provided do reflect all rooftop mechanical/HVAC units, signage, antenna, lighting, architectural features, etc.

MPA 02 Massport expects that the tall crane(s) needed to construct the tower will impact Logan operations when they are at heights of greater than 710-feet AMSL. The Proponent will be required to file construction-phase 7460 forms with the FAA no later than 45 days prior to construction. We encourage that this process begins as early as possible to avoid delays and minimize the time period the cranes are at their greatest heights. Separate forms have to be filed for the building and the construction cranes. Massport would be pleased to work with the Proponent during the design process and during construction to minimize the impact of the cranes on Logan airspace.

The Proponent will file separate construction-phase 7460 forms with the FAA no later than 45 days prior to construction. The Contractor, Suffolk Construction has been in touch with Massport and will work closely with Massport as it did on the Millennium Tower project which had a crane of similar height.



Casey Hines <casey.a.hines@boston.gov>

115 Winthrop Square-

1 message

Ben Starr [REDACTED]

To: Casey Hines <casey.a.hines@boston.gov>

Tue, Feb 6, 2018 at 10:23 PM

Hi Casey –

I just wanted to follow up on my conversation with you prior to the meeting regarding Codman Island and potential mitigation dollars. As I mentioned, Codman Island is a unique public space that was put in place when Mayor White flipped Charles Street between Beacon St and Cambridge St from northbound to southbound in 1982. I couldn't help but notice during the shadow study presentation that the shadow actually cuts all the way through Codman Island during its longest stretch in March. **BS 01**

Codman Island is maintained by the Beacon Hill Civic Association along with help from the Friends of the Public Garden and the Beacon Hill Garden Club. It takes a beating from drunk drivers coming north on Charles St who end up stuck on it in the middle of the night a few times a year. I believe mitigation dollars were applied to Codman Island in the past from some of the Pru Development but I will need to clarify.

This article provides a little more of a picture.

<http://beaconhilltimes.com/2011/01/11/city-taking-steps-to-improve-safety-conditions-at-codman-island/>

Thanks Casey.

Ben

BS 01 I just wanted to follow up on my conversation with you prior to the meeting regarding Codman Island and potential mitigation dollars. As I mentioned, Codman Island is a unique public space that was put in place when Mayor White flipped Charles Street between Beacon St and Cambridge St from northbound to southbound in 1982. I couldn't help but notice during the shadow study presentation that the shadow actually cuts all the way through Codman Island during its longest stretch in March.

Codman Island is an important safety and aesthetic component of the Beacon and Charles streets intersection with Boston Common and the Public Garden. The Proponent is contributing \$125,000 per year for the Public Garden, Boston Common and the Commonwealth Mall and would suggest that a portion of this funding be looked into for Codman Island.



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Executive Director
Ken Smith

March 19, 2018

Ms. Casey A. Hines
Project Manager
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201-1007

Re: Winthrop Square

Dear Ms. Hines:

We have been following Millennium Partners' efforts to transform Boston's downtown with the redevelopment of the old Winthrop Square Garage site. Now that the old parking garage no longer is standing, we are hoping to witness a groundbreaking sooner than later.

We believe it is critical for this part of downtown to benefit from the kind of dramatic upgrade that the Millennium Partners created in years past in the former Combat Zone and in Downtown Crossing. YB 01

We strongly encourage the city to move this project forward promptly.

Sincerely,

Kenneth Smith
Executive Director

YOUTHBUILD BOSTON

YB 01 We believe it is critical for this part of downtown to benefit from the kind of dramatic upgrade that the Millennium Partners created in years past in the former Combat Zone and in Downtown Crossing.

The Proponent appreciates the comments of YouthBuild and plans to continue its relationship with this organization that it has had in the past.



LIGHT Boston

Illuminating Our City's Unique History, Culture and Future

March 19, 2018

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Casey Hines, Senior Project Manager - Development Review
Boston Planning & Development Agency, Boston City Hall
One City Hall Square, Boston, MA 02201
casey.a.hines@boston.gov

Subject: **DPIR Comment - 115 Winthrop Square**

Dear BPDA -

Civic Illumination does not appear to be anywhere in the formal Draft Project Impact Report requirements. How can such an application be comprehensive without it?

This letter is to comment not only on specific aspects of the DPIR for the 115 Winthrop Square project, but also to bring attention to the remarkable omission of nighttime aspects of a project. While the City's overall Project Review, as well as the BCDC and criteria used by BPDA staff do begin to consider lighting, the formal Report does not even require documentation of intent, much less address possible results. We are without sun half of our hours (vernal equinox: 3/20/18- sunrise 6:45am DST, sunset 6:56pm DST). Few things affect our physical well-being and appreciation of our city more than the way we light and perceive our world during the dark hours.

Improved illumination of our built environment, our city's heritage, and our citizens' public realm has been the focus of LIGHT Boston's advocacy for more than two decades. We appear to be the city's only continuous, objective voice concerned with the *quality* (rather than just the quantity) of illumination. We have completed notable built examples of "good" lighting, and appear to have become the go-to organization working with the broader lighting constituency for a superior after-dark city.

1. Address Lighting as a Basic Requirement

Illumination is at the heart of how any project will be perceived 50% of the time. Hence skillful, thoughtful, creative lighting is just as important to a successful project as are Wind, Shadow, Traffic and other matters given thousands of words, charts, illustrations, etc., in the Application. If the City does not require lighting issues to be addressed *before* the project is accepted, it loses much of its ability to improve or correct them later, there being no paper-trail of comment upon which to build.

2. Current Regulation – Illumination Ignored

Absent a set of lighting requirements for the current Report - such as illuminance levels, color temperature and color rendering properties, light trespass and light pollution considerations, along with sustainability and energy usage - the presentations to reviewing agencies and the public have left much of the story untold. Even at this early

LUMINARIES

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Oliver C. Colburn, Esq
Henry Lee
Paul D. Mustone - LC
Robert B. O'Brien

FOUNDER

Anne Byrd Reed Witherby
President 1996-2005



design stage, this is not acceptable since intent and performance, rather than detailed solutions, are germane. Lighting is intrinsic to our understanding of the project. Illumination is not just decoration. It is central to artistic intent as well as public safety.

As to waiting for later in the design review process for illumination to be reviewed, it is true that lighting instruments can be (and frequently are) added on later. Similarly, developing ground level approaches to site lighting after the fact is quite common. But without addressing what illumination is generally desired, as well as specific lighting issues, it may be too late later on. It is not unusual for changes that would improve the result of what has already been approved and budgeted, to prove impractical or too expensive later. Developing and presenting intended results for the nighttime aspects of the project, even if only by way of example, are germane now. (The Landscape sections of this proponent's Application has done this to effect.) LB 01

3. Scoping Determination – Is There No Nighttime?

The Scoping Determination of April 10, 2017, written in response to the PNF, ignores the question of civic illumination as we pointed out in our 1/20/17 comment letter (attached to the transmitting email). Our comment identified concern that the issue of illumination had not even been discussed, nor lighting reconized as an issue. Civic Illumination was raised as an issue almost a year ago. LB 02

The current Determination list of Public Benefits (page 5) completely ignores the potential benefits that might accrue to the city from a superior nighttime environment in terms of lighting to be created by this project. Indeed might not the City want to suggest to this strong, sophisticated and successful proponent that it could aspire to setting an extraordinary example for civic illumination of future development.

4. Nighttime Image of the building

The lighting of the building exterior itself becomes the cityscape identifier. The BPDA submission does not require, or apparently even allow, the Proponent to discuss intent, such as it has done its the recent DEIR. In that document, the project was proclaimed "a beacon on the Boston skyline", although oddly no nighttime skyline image was required. Nor provided. LB 03

Presentation of this critical design aspect, especially for such a notably tall building as proposed (the tallest by far in the neighborhood), with its opportunity for a positive contribution to the quality of our nighttime skyline, merits (indeed, requires) development, presentation and review.



5. Elevations and Form – Is This All There Is?

(a) Rooftop

As currently presented in the DPIR, the rather banal flattop roofscape suggests that this **LB 04** proponent and its design team, known for some of the most elegant new large buildings in town, do indeed intend to develop the top into something more expressive. It seems unlikely that what is currently shown is their final intent, since any nighttime revelation of *this* design would likely be undistinguished. Samples – beginning with local efforts and continuing all the way to international successes, might be presented for discussion. Since the Lighting Design consultant is not yet a member of the design team, could not the proponent at least submit “something like” images to show intent.

Indeed, we note that the lighting consultant is integral to the successful creative work of the design team for a large and complicated project. The lighting designer’s talents and knowledge of the creative possibilities and rapidly developing technology should be included from the beginning, rather than being asked to just “light it up” later as a garnish to a design *fait accompli*.

(b) Elevations

Similarly, does not the modelling of the shaft and lower level elements themselves **LB 05** require substantial design development, since what is shown is as well likely only a placeholder? Without more exposition of the building form, it is a sizable leap of faith to assume that it will be possible to make the project a remarkable object, as anything of this size and scope demands. Lighting will likely play a significant part in a successful solution.

(c) Groundplane

Ground floor areas including proximate entourage, especially for the re-design of that **LB 06** much overlooked urban treasure, Winthrop Square with its “outdoor room walls”, merit the diligent attention and understanding of how lighting can make a place. Comprehensive lighting design not only includes lighting quantity (footcandles, etc.) on the walking or driving surfaces, but considers all of the visual elements within the field of view, such as light sources, signs, and spill light from buildings. The design should also take into account the concerns for public sidewalks and the needs of individuals with limited vision. Design for low vision persons is typically good practice for others with normal vision.

6. Potentials for the Urban Fabric

The possibilities (indeed responsibility and opportunity) abound for the proponent to **LB 07** take the leadership role, being the biggest kid on the block, for the improvement and long-term maintenance of the adjacent Winthrop Square “public room”. No one will have overlooked that the square *a priori* adds extraordinary value to the project, thus mandating that it be improved for nighttime, as well as daytime, place-making.



So too the northeast link across the heavily trafficked Otis Street and the the Federal Street streetscape across into Matthews Street. These all are important elements to the success not only of the project itself, but also to the new neighborhood being created by the expansion of residential building to the Federal Street area. Civic Lighting and making this a signature nighttime place is a remarkable and unique opportunity.

7. Interior lighting of public spaces

Views of public spaces *within* the project are shown in renderings, but also are not required in the Report. The proposed public room of the Great Hall is potentially such a significant public benefit to the neighborhood – indeed, to the city that its lighting should be further addressed. Since lighting “makes” the scene at different times of day, various days of the week and in the rich array of events over the course of a year, illumination intent is, again, central to success. The Great Room’s purposes and possibilities, (including the intent to facilitate theatrical lighting for performances by companies of modest means), should be considered early on in the review process of public realm impacts. LB 08

8. Historic Resources - Winthrop Square, the Tontine Crescent and Franklin Street

The proponent appears to be well aware of the opportunities in its relationship to the surrounding neighborhood, especially the historic fabric of the Otis Street wall, the former Tontine Crescent and Franklin Street, as well as the Winthrop Building itself. We urge the proponent to indeed implement its city fabric goals stated in the DEIR, by enhancing the linkage between Shoppers Park and Winthrop Square. The historic character of the buildings and urban fabric along this path, also reflected in the architecture of the existing buildings lining Franklin Street, should all be celebrated. LB 09

Could this not be achieved through public and private investment in this resource and with an agreement for the area with the City for the design, management and long-term maintenance of street lighting which has such a dominant effect on the nighttime city. It is worth noting, by way of unhappy example, that in the same nearby neighborhood, cooperation on street lighting, albeit with later revision, has *not* been successfully achieved. Glare from the street lighting, as well as too cool a source temperature, seriously compromise the subtle and sophisticated lighting of Burnham’s Summer Street elevation of the former Filene’s building.

9. Economy, Tourism and Safety

The project clearly intends to contribute to the reality of Boston as an attractive venue, both in daytime and at night. An after-dark destination with all its economic ramifications, and the creation of a desirable nighttime and weekend public realm surrounding the project itself, as well as nighttime safety (pedestrian and vehicular) requires serious consideration of exemplary civic illumination. LB 10



Judging by recent building lighting in the Seaport District, more effective control is needed to protect from over-lighting and intrusive graphic identity grandstanding. So also the potentially catastrophic environmental effects of uncontrolled all-night, all-season illumination resulting in massive bird kill. More positively, successful nocturnal wayfinding and being responsive to Dark Sky concerns are nowhere addressed in the Report. These are significant oversights that we urge the City to correct.

Conclusion

Boston is a city which aspires to maintaining and expanding its vibrant nightlife while providing a safe and accessible after-dark reality. LIGHT Boston agrees with the City's planning and development agencies that the nighttime aspects of the public realm fall well within their purview. The proponent's failure to address Civic Illumination in the Report cannot be faulted however, simply because the City's formal criteria do not require lighting to be addressed. Hence we are both "flying blind" and missing a singular opportunity for aspiration. The DPIR is quite incomplete without civic illumination.

Sincerely yours,

President, LIGHT Boston, Inc

for

LIGHT Boston *Illuminating Our City's Unique Culture, Heritage and Future*

Note:

Some members of our Board have recused themselves from participating in drafting this letter, anticipating that they may be later involved in the project.

LIGHT Boston comment letter of 1/20/2017 is attached to transmitting email.

TODD LEE FAIA LEED AP - ARCHITECT
85 EAST INDIA ROW - 32H BOSTON MA 02110
[REDACTED] VOICE TXT
[REDACTED]

LB 01 It is true that lighting instruments can be (and frequently are) added on later. Similarly, developing ground level approaches to site lighting after the fact is quite common. But without addressing what illumination is generally desired, as well as specific lighting issues, it may be too late later on. It is not unusual for changes that would improve the result of what has already been approved and budgeted, to prove impractical or too expensive later. Developing and presenting intended results for the nighttime aspects of the project, even if only by way of example, are germane now.

The Proponent and its architect, Handel Architects are happy to consult with Light Boston on the site lighting in coordination with the requirements of the City of Boston Street Lighting division and in coordination with LEED Platinum rules. There are unique opportunities to improve the lighting in this neighborhood, in particular, in relation to Winthrop Square. The Proponent welcomes a dialogue about the appropriate lighting. It is not too late, as the Project moves from permitting to design development, the Proponent will engage Light Boston in a discussion and has committed to present the Project at an upcoming Light Boston board meeting.

LB 02 The Scoping Determination of April 10, 2017, written in response to the PNF, ignores the question of civic illumination as we pointed out in our 1/20/17 comment letter. Our comment identified concern that the issue of illumination had not even been discussed, nor lighting recognized as an issue. Civic illumination was raised as an issue almost a year ago.

The Proponent looks forward to working with the City and Light Boston on the exterior lighting concepts. The crown of the tower will be lit, coordinating the lumens and timing with the rules of LEED Platinum (Figure 4-6 Building Top Nighttime Lighting). The Proponent will use photometrically accurate 3D modeling techniques to predict illuminance levels and capture aesthetic qualities. These lighting models will be used to test contextual appropriateness and visual cohesiveness with the neighborhood.

LB 03 The lighting of the building exterior itself becomes the cityscape identifier. The BPDA submission does not require, or apparently even allow, the Proponent to discuss intent, such as it has done in the recent DEIR. In that document, the project was proclaimed "a beacon on the Boston skyline", although oddly no nighttime skyline image was required. Nor provided.

Recent post-Draft PIR design review meetings with BCDC have shown the nighttime intent for the crown of the building (Figures 4-4 through 4-6 for nighttime lighting).

- LB 04** As currently presented in the DPIR, the rather banal flattop roofscape suggests that this proponent and its design team, known for some of the most elegant new large buildings in town, do indeed intend to develop the top into something more expressive. It seems unlikely that what is currently shown is their final intent, since any nighttime revelation of this design would likely be undistinguished. Samples — beginning with local efforts and continuing all the way to international successes, might be presented for discussion. Since the Lighting Design consultant is not yet a member of the design team, could not the proponent at least submit “something like” images to show intent. Indeed, we note that the lighting consultant is integral to the successful creative work of the design team for a large and complicated project. The lighting designer’s talents and knowledge of the creative possibilities and rapidly developing technology should be included from the beginning, rather than being asked to just “light it up” later as a garnish to a design fait accompli.

See updated description, plans, and imagery shown in Section 4.0 Urban Design. The Proponent has presented look and feel images to the city, as well as beginning to work with a lighting design consultant resulting in preliminary renderings which show the proposed direction for lighting at the top of the building (Figures 4-4 through 4-6).

- LB 05** Similarly, does not the modelling of the shaft and lower level elements themselves require substantial design development, since what is shown is as well likely only a placeholder? Without more exposition of the building form, it is a sizable leap of faith to assume that it will be possible to make the project a remarkable object, as anything of this size and scope demands. Lighting will likely play a significant part in a successful solution.

See updated description, plans, and imagery shown in Section 4.0 Urban Design.

- LB 06** Ground floor areas including proximate entourage, especially for the re-design of that much overlooked urban treasure, Winthrop Square with its “outdoor room walls”, merit the diligent attention and understanding of how lighting can make a place. Comprehensive lighting design not only includes lighting quantity (footcandles, etc.) on the walking or driving

surfaces, but considers all of the visual elements within the field of view, such as light sources, signs, and spill light from buildings. The design should also take into account the concerns for public sidewalks and the needs of individuals with limited vision. Design for low vision persons is typically good practice for others with normal vision.

The Proponent will not only follow IES Standards, regulations, and codes required for lighting quantity, but also design a lighting system that satisfies basic human needs for visual information through a qualitative approach.

LB 07 The possibilities (indeed responsibility and opportunity) abound for the proponent to take the leadership role, being the biggest kid on the block, for the improvement and long-term maintenance of the adjacent Winthrop Square “public room”. No one will have overlooked that the square a priori adds extraordinary value to the project, thus mandating that it be improved for nighttime, as well as daytime, place-making. So too the northeast link across the heavily trafficked Otis Street and the Federal Street streetscape across into Matthews Street. These all are important elements to the success not only of the project itself, but also to the new neighborhood being created by the expansion of residential building to the Federal Street area. Civic Lighting and making this a signature nighttime place is a remarkable and unique opportunity.

The Proponent agrees on the high-importance of Winthrop Square being successful, especially in the evening hours. A comprehensive lighting package is part of the design scope of the Square’s enhancement. Lighting will not only ensure that the safety and feel of the Square is optimized in the night-time hours but will be part of the overall design to make the Square more inviting. Several landscape elements have been conceived with lighting in mind, namely the sculptural benches and any central water or sculptural feature (Figure 2-11 Lighting Precedents).

LB 08 Views of public spaces within the project are shown in renderings, but also are not required in the Report. The proposed public room of the Great Hall is potentially such a significant public benefit to the neighborhood — indeed, to the city that its lighting should be further addressed. Since lighting “makes” the scene at different times of day, various days of the week and in the rich array of events over the course of a year, illumination intent is, again, central to success. The Great Room’s purposes and possibilities, (including the intent to facilitate theatrical lighting for performances by companies of modest means), should be considered early on in the review process of public realm impacts.

See updated description, plans, and imagery shown in Section 4.0 Urban Design. The Proponent will continue to work on the use and design of the Great Hall with the city, throughout the continuing required design review process. These reviews will include the various lighting strategies required for successful use.

LB 09 The proponent appears to be well aware of the opportunities in its relationship to the surrounding neighborhood, especially the historic fabric of the Otis Street wall, the former Tontine Crescent and Franklin Street, as well as the Winthrop Building itself. We urge the proponent to indeed implement its city fabric goals stated in the DEIR, by enhancing the linkage between Shoppers Park and Winthrop Square. The historic character of the buildings and urban fabric along this path, also reflected in the architecture of the existing buildings lining Franklin Street, should all be celebrated.

Could this not be achieved through public and private investment in this resource and with an agreement for the area with the City for the design, management and long-term maintenance of street lighting which has such a dominant effect on the nighttime city. It is worth noting, by way of unhappy example, that in the same nearby neighborhood, cooperation on street lighting, albeit with later revision, has not been successfully achieved. Glare from the street lighting, as well as too cool a source temperature, seriously compromise the subtle and sophisticated lighting of Burnham's Summer Street elevation of the former Filene's building.

The Proponent has suggested alternative street lighting to City Lights, but the LED cool white lighting is a standard that the City has asked be maintained. The Proponent plans to create a lighting plan for buildings in the Tontine Crescent as a way to encourage building owners to consider ways to light their buildings as well as a plan for buildings in Winthrop Square.

LB 10 The project clearly intends to contribute to the reality of Boston as an attractive venue, both in daytime and at night. An after-dark destination with all its economic ramifications, and the creation of a desirable nighttime and weekend public realm surrounding the project itself, as well as nighttime safety (pedestrian and vehicular) requires serious consideration of exemplary civic illumination.

The Proponent agrees, and the civic illumination is being carefully considered and designed with the landscape architecture, architecture and lighting consultant.



March 19, 2017

Casey Hines, Senior Project Manager -
Boston Planning and Development Agency
Boston City Hall
One City Hall Square
Boston, MA 02201

Re: 115 Winthrop Square

Dear Ms. Hines:

WalkBoston has reviewed the Draft Environmental Impact Report for this project and offers the comments below.

This new landmark for the city replaces an obsolete parking garage adjacent to Winthrop Square. As part of our review of the tower we have discussed the project and analyzed it to determine what new elements are positive for pedestrians.

1. The Great Hall proposed for the property remains a substantial feature of the lower floors of the building. It is an expansive space that will become a gathering place with the potential to attract people from around Downtown Boston and other neighborhoods to participate in its facilities and the programs that will be made possible by the construction of this building. It is open on both ends and connects between abutting streets in a mid-block location. The prominent, strategic location will make the ground level of the building into a passageway. We support the creation of the passageway and also the proposal to have programs and facilities that encourage many uses and users of the space.
2. It remains important to describe the types of programs and the agency or individuals who will be assigned the tasks for programming the space and how it will be managed. The Great Hall is not intended to be a new food court, but something more substantial, containing activities that attract people into the space and involve them in programs that are interesting and educational, as well as pleasurable reasons that people will visit the space continually over time. We believe that it will be necessary to provide ongoing support for the management of this space to make it a real neighborhood asset and encourage the developer to consider uses that attract a diversity of users. WB 01
3. Wind studies of the effects of this building in juxtaposition with other significant structures have led to a determination to enclose the Great Hall, rather than leave it open to the outside, at least during cold weather. This should protect and assist in establishing and managing the uses within the Hall itself, as well as protecting individuals from gusts or periodic and protracted winds at the edge of the building. WB 02
4. A pedestrian mid-block crossing of Federal Street has been proposed that would narrow the street width and perhaps raise the crossing itself as a traffic-calming element adjacent to

MAKING MASSACHUSETTS MORE WALKABLE

Old City Hall | 45 School Street | Boston MA 02108 | 617.367.9255 | info@walkboston.org | www.walkboston.org | Twitter: [@walkboston](https://twitter.com/walkboston)

the building. This proposal will be a welcome addition that will help create the new path encouraged by the opening of the lower floors of the building to allow pedestrians a convenient shortcut through the area.

5. The proposed pedestrianization of Winthrop Square has become a major feature of the proposal, with wider sidewalks, narrower streets, unifying paving and landscaping designed to transform the square and make it a more desirable and useable feature of the neighborhood. By making major changes to narrow Devonshire and Otis Streets on both sides of the square, the proposal may yield a diminished presence of vehicles through movement and parking. With new landscaping added, the overall effect will be to make the square seem larger and less passive in serving people working or living nearby. It would also be much more pleasant for pedestrians passing through the midblock passage created by the building and connecting to the narrow passages on the opposite side of the square.
6. We hope that active uses can be incorporated into a redesign of Winthrop Square, where now the sole occupant is often trees. Consideration should be given to a need for play space or facilities such as structures or sculptures that attract and delight children as well as adults. Space for food trucks might be built into the design as a means for attracting people into the square. Comfortable, wind protected benches would be appropriate and a welcome addition to a cut through path serving a midblock passage that thread between downtown buildings. WB 03
7. We are relieved that most of the shadows that will fall on the Common have been alleviated.

Thank you very much for your consideration of our comments.

Sincerely,



Wendy Landman
Executive Director

WALKBOSTON

WB 01 It remains important to describe the types of programs and the agency or individuals who will be assigned the tasks for programming the space and how it will be managed. The Great Hall is not intended to be a new food court, but something more substantial, containing activities that attract people into the space and involve them in programs that are interesting and educational, as well as pleasurable reasons that people will visit the space continually over time. We believe that it will be necessary to provide ongoing support for the management of this space to make it a real neighborhood asset and encourage the developer to consider uses that attract a diversity of users.

The Proponent agrees.

WB 02 Wind studies of the effects of this building in juxtaposition with other significant structures have led to a determination to enclose the Great Hall, rather than leave it open to the outside, at least during cold weather. This should protect and assist in establishing and managing the uses within the Hall itself, as well as protecting individuals from gusts or periodic and protracted winds at the edge of the building.

During the wind tunnel study it was determined that doors will be required at the entrances to the Great Hall.

WB 03 We hope that active uses can be incorporated into a redesign of Winthrop Square, where now the sole occupant is often trees. Consideration should be given to a need for play space or facilities such as structures or sculptures that attract and delight children as well as adults. Space for food trucks might be built into the design as a means for attracting people into the square. Comfortable, wind protected benches would be appropriate and a welcome addition to a cut through path serving a midblock passage that thread between downtown buildings.

The proposed landscape design for Winthrop Square incorporates sculptural and artistic elements. The central feature, whether a water feature or sculptural art piece, will create visual interest throughout the day and throughout the year, while the sculptural benches offer their own opportunity for play. Robust planting in the beds flanking the benches on all sides will provide some wind protection.

The proposed design for Winthrop Square has been laid out to provide for multiple paths of travel along the east west desire lines, from Winthrop Lane to buildings on the east side of Devonshire Street (see Figure 2-7 for rendered images of proposed design and Figure 2-3 for a pedestrian flow diagram).

The Proponent understands that the Boston Business Improvement District (BID) has restrictions on food trucks in the district. This can be re-visited with the BID based on the needs of the community.



FRANKLIN
PARK
COALITION

March 19, 2018

Ms. Casey A. Hines
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201-1007

Re: Winthrop Square

Dear Ms. Hines:

As a member of the Board of Directors of the Franklin Park Coalition, I am writing in support of Millennium Partners' redevelopment of the old Winthrop Square Garage site.

A financial investment of more than \$1 billion in Boston is a commitment that deserves the full support of the city and all the agencies whose approval is critical to its success. This project will not only benefit the city with initial payments, but also with regular tax revenues for many years to come.

Even more important, I believe, is the commitment Millennium has made for jobs for Bostonians, and the extra effort I understand they are making for young people of color to get vocational training that would lead to employment in this project. Franklin Park sits at the crossroads of Boston's minority community, and I hope that this project may benefit many in our community through access training and job opportunities Millennium through their commitment. FPC MC 01

I would be remiss to not mention that we at the Franklin Park Coalition are also excited about the prospective additional benefits that Millennium's redevelopment and investment will help usher in for Boston's open spaces and parks, including historic, Franklin Park, and additional affordable housing.

Yours truly,

Michael Carpentier

FRANKLIN PARK COALITION, MICHAEL CARPENTIER

FPC MC 01 Even more important, I believe, is the commitment Millennium has made for jobs for Bostonians, and the extra effort I understand they are making for young people of color to get vocational training that would lead to employment in this project.

The Proponent is very committed to its MOU on Diversity, Equity and Inclusion and looks forward to this project being a model for diversity in future private development.

BOSTON PRESERVATION ALLIANCE

March 19, 2018

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Catharine Sullivan

Anthony Ursillo

Peter Vanderwerker

Executive Director

Gregory J. Galer, Ph.D.

The Otis House
141 Cambridge Street
Boston, MA 02114
617.367.2458

bostonpreservation.org

Ms. Casey Hines
Boston Planning and Development Agency
One City Hall Square
Boston, MA 02201
Via email: casey.a.hines@boston.gov
Re: 115 Winthrop Square DPIR

Dear Ms. Hines,

The Boston Preservation Alliance is Boston's primary, non-profit advocacy organization that protects and promotes the use of historic buildings and landscapes in all of the city's neighborhoods. With 35 Organizational Members, 103 Corporate Members, and a reach of 35,000 friends and supporters we represent a diverse constituency advocating for the thoughtful evolution of the city and celebration of its unique character. We appreciate the opportunity to offer comments on projects that impact the historic character of the city.

The Alliance was disappointed that neither the Article 80 nor MEPA processes were further along in advance of the Home Rule Petition for "An Act Protecting Sunlight and Promoting Economic Development in the City of Boston." Additionally, we feel these reviews are slated to conclude while the design of the project continues to significantly evolve, limiting the ability for the community to provide specific feedback on the most current iteration of the proposal. However, we do appreciate the information provided in the proponent's DPIR. It includes a fairly thorough analysis of shadow and the tower's effect on the Boston skyline and views from various pedestrian perspectives, for the full distance of shadow rather than some pre-determined distance from the project site. These data provide a helpful understanding of impacts such a large project will have on the city.

There are, however, some areas where we feel additional information is needed in order to allow a full assessment of the project and help us collectively assure such a meaningful project can best contribute to the future of Boston while supporting and enhancing existing and historic features that contribute to the city's unique environment. We appreciate the fact that the building continues to evolve (as it has significantly from earlier versions) in response to feedback the design team is receiving, and the proponent has been open to continued dialog with the community to enhance the proposal. We look forward to continued discussion directly with them. In particular, we believe there needs to be further examination of the proposal's engagement with its adjacencies and therefore request additional renderings and exploration of and alternatives to:

BPA 01

- The Devonshire Street façade as it meets Winthrop Square. We question if the current plan best engages the pedestrian experience and Winthrop Square itself. We recognize that the proponent has been clear that the redesign of the park at Winthrop Square is still in development, and we encourage a thoughtful, community-engaged process. We specifically feel that the design needs to better connect Winthrop Lane, the Square/Park and the “Great Hall” all the way through to Federal Street. The project presents tremendous opportunity for activation of currently underutilized Winthrop Square and Devonshire Street, and we feel the current design fails to deliver on the possibilities there.
- The Federal Street and Federal Court façade, more specifically how the proposal relates to the Paul Rudolph designed building on Federal Street, considered by many to be an important example of mid-century-modern design by a prominent architect. BPA 02
- The relationship of the podium/bustle to the heights of adjacent buildings and the historic buildings that ring Winthrop Square, where a stronger datum line engaging these historic cornice elevations could provide a more intimate feeling of a cohesive outdoor “room” for the park. BPA 03
- How the proposal appears at night, both at great distances on the Boston skyline as well as to the immediate pedestrian experience. There has been little examination of this important design element of such a large project. We look forward to reviewing that aspect of the proposal and to see what opportunities may arise through this development to enhance adjacent areas and connect Winthrop Square to Downtown Crossing, perhaps through enhancement of the nearby Tontine Crescent. BPA 04
- Additionally, while we applaud the proposal’s creative approach to the “Great Hall” as a flexible, community-engaged, multipurpose space, we are concerned that there is an inherent conflict between the programming, particularly at the ground floor level (as opposed to the smaller floating meeting rooms), and the desire for connectivity through the “Hall” between Federal Street and Winthrop Square. There needs to be further examination of how, for example, a program (perhaps paid, private, invitation-only such as a business breakfast/presentation) would preclude the open, pedestrian-friendly experience that has been identified as a major goal of the project. BPA 05

While we support the many positive contributions this development provides to the city, turning a defunct parking garage into both a revenue generator for the city and a driver of vibrancy to this part of downtown, we also feel it is important to recognize that development of this scale does not come without permanent negative impacts to

national and state register and Landmark properties. In our dialog with Millennium Partners we have mutually acknowledged that the success of the City of Boston results from an aggregation of many layers of change, and it is important that the new layers our generation creates respect those of preceding generations by minimizing negative impacts to the existing, historic built environment and ameliorating acknowledged impacts through mitigation.

This building will have long-lasting impacts on historic resources, both within the vicinity of the site and to the farthest reaches of the shadows created by the tower. Unlike some other development proposals in the city, the analysis of the DPIR shows that no single, particular site is overwhelmingly impacted, rather we see a smaller scale diminution over a wider area – reduced skyplane visibility, intrusion to the background and context of existing historic buildings, and the long-term impact of shadows and wind to microclimates that negatively impact the health of historic resources (e.g. deterioration of materials, microbial growth, ice dams) that we have learned are often not revealed for some time after construction.

Impacts such as these are not unique to this project, but are increasingly impactful to our historic city and poorly compensated for, leaving historic resources that have existed for generations increasingly threatened and burdened. If the purpose of the MEPA and Article 80 processes is to truly examine the impacts of projects such as this we cannot ignore the deteriorating effects of changes to microclimates, context of historic buildings, and viewsheds and must set out a process to empower a long-term, positive offset that will protect historic resources.

After initial conversations with both Millennium Partners and BPDA staff where we found receptivity, we recommend that this project should provide mitigation funds that serve to initiate a city-wide preservation fund, supported by contributions from development projects in Boston. We offer assistance in creating and managing this fund which would serve to fill a dire need in the city and bridge a large gap in financial support for Boston's historic resources. The unique character of our neighborhoods draws residents, investors, and visitors who make possible the same development that is diminishing that very character. It is a delicate balance, and it is crucial for the success of our city that our historic fabric is maintained. We feel that a preservation fund is an effective means to do so and the time has come to set this needed tool in place. We hope to work with the proponent, state and city agencies to evolve this fund through mitigation of this project from concept to reality.

BPA 06

We look forward to continued engagement with this project team and the BPDA.

Sincerely,



Greg Galer
Executive Director

CC:

Mayor Martin J. Walsh, City of Boston
Senator Joseph Boncore
Senator William Brownsberger
Senator Sonia Chang-Diaz
Representative Evandro C. Carvalho
Representative Jay Livingstone
Representative Aaron Michlewitz
Representative Byron Rushing
Brona Simon, Massachusetts Historical Commission
City Councilor Andrea Campbell
City Councilor Michael Flaherty
City Councilor Annissa Essaibi-George
City Councilor Ayanna Pressley
City Councilor Michelle Wu
City Councilor Lydia Edwards
City Councilor Ed Flynn
City Councilor Frank Baker
City Councilor Timothy McCarthy
City Councilor Matt O'Malley
City Councilor Kim Janey
City Councilor Josh Zakim
City Councilor Mark Ciommo
Kathleen MacNeill, Millennium Partners
Joseph Larkin, Millennium Partners
Cindy Schlessinger, Epsilon Associates
David Carlson, Boston Planning and Development Agency/BCDC
Rosanne Foley, Boston Landmarks Commission
Jonathan Greeley, Boston Planning and Development Agency
Elizabeth Vizza, Friends of the Public Garden
Todd Lee, Light Boston
Wendy Landman, Walk Boston

BOSTON PRESERVATION ALLIANCE

BPA 01 ...we believe there needs to be further examination of the proposal's engagement with its adjacencies and therefore request additional renderings and exploration of and alternatives to:

The Devonshire Street façade as it meets Winthrop Square. We question if the current plan best engages the pedestrian experience and Winthrop Square itself. We recognize that the proponent has been clear that the redesign of the park at Winthrop Square is still in development, and we encourage a thoughtful, community-engaged process. We specifically feel that the design needs to better connect Winthrop Lane, the Square/Park and the "Great Hall" all the way through to Federal Street. The project presents tremendous opportunity for activation of currently underutilized Winthrop Square and Devonshire Street, and we feel the current design fails to deliver on the possibilities there.

The landscape design for Winthrop Square has been advanced. As part of this process, public presentations have provided valuable feedback on design ideas and functional aspects of the design, including an understanding of dominant pedestrian desire lines through Winthrop Square and the importance of the connection to Winthrop Lane. The current design strengthens this connection by providing for multiple pedestrian routes through Winthrop Square, between the 'Great Hall' and Winthrop Lane (Figure 2- 3 Pedestrian Flow).

See updated description, plans, and imagery shown in Section 4.0 Urban Design.

BPA 02 The Federal Street and Federal Court façade, more specifically how the proposal relates to the Paul Rudolph designed building on Federal Street, considered by many to be an important example of mid-century-modern design by a prominent architect.

The Proponent agrees that the Paul Rudolph designed building known as 133 Federal Street is an important example of mid-century modern architecture and feels that the Project design pays appropriate deference to this building, particularly as one were to approach it from the south on Federal Street.

See the updated description, plans, and imagery shown in Section 4.0 Urban Design.

BPA 03 The relationship of the podium/bustle to the heights of adjacent buildings and the historic buildings that ring Winthrop Square, where a stronger datum line engaging these historic cornice elevations could provide a more intimate feeling of a cohesive outdoor “room” for the park.

See updated description, plans, and imagery shown in Section 4.0 Urban Design. The Proponent has made great efforts to study and understand adjacent datum points, and to incorporate them into the design of the buildings and its setbacks. The space enclosing Winthrop Square, and the adjacent street wall has specifically been studied as part of this process. See also Figure 2-7 Landscape Rendering and 2-10 Relationship to Surrounding Buildings.

BPA 04 How the proposal appears at night, both at great distances on the Boston skyline as well as to the immediate pedestrian experience. There has been little examination of this important design element of such a large project. We look forward to reviewing that aspect of the proposal and to see what opportunities may arise through this development to enhance adjacent areas and connect Winthrop Square to Downtown Crossing, perhaps through enhancement of the nearby Tontine Crescent.

The nighttime appearance of the building includes a lighted area of the crown. This concept will continue to be developed as the design evolves through the Article 80 review process with LEED and dark sky policies considered.

The connection between Winthrop Square and Downtown Crossing, especially as linked by the Tontine Crescent, is a strategy being closely examined with not only landscape strategies, but also the city as it relates to pedestrian, bicycle and vehicular traffic.

BPA 05 Additionally, while we applaud the proposal’s creative approach to the “Great Hall” as a flexible, community-engaged, multipurpose space, we are concerned that there is an inherent conflict between the programming, particularly at the ground floor level (as opposed to the smaller floating meeting rooms), and the desire for connectivity through the “Hall” between Federal Street and Winthrop Square. There needs to be further examination of how, for example, a program (perhaps paid, private, invitation-only such as a business breakfast/presentation) would preclude the open, pedestrian-friendly experience that has been identified as a major goal of the project.

First and foremost, the first floor of the Great Hall is a pedestrian friendly environment. It is expected that much of the programming that takes place in the Great Hall will complement the pedestrian experience. To the extent there

are public/private events in the Great Hall like a street, some of them will occur with people walking by or they would typically be in the evening or weekends, when pedestrian activity is at a minimum.

The Proponent continues to work with the BPDA and BCDC to ensure that the Great Hall is active through all days and times of the week that it is open. The Great Hall concept is that it will remain open during business hours and after hours and weekends. It will be open for larger civic events, both public and private, in order to create a sustainable economic model.

BPA 06 After initial conversations with both Millennium Partners and BPDA staff where we found receptivity, we recommend that this project should provide mitigation funds that serve to initiate a city-wide preservation fund, supported by contributions from development projects in Boston. We offer assistance in creating and managing this fund which would serve to fill a dire need in the city and bridge a large gap in financial support for Boston's historic resources.

The Proponent agrees that Boston's historic resources are often underfunded and has had initial conversations with the Boston Preservation Alliance and the BPDA and, looks forward to engaging in a dialogue with the Massachusetts Historical Commission, so as to reach agreement on the appropriate amount of and management of the contribution that the Proponent would like to make. The Proponent hopes that such an agreement could serve as a possible guide for future new developments to consider.



Casey Hines <casey.a.hines@boston.gov>

Winthrop Square

1 message

Campbell, Blair [REDACTED]
To: "casey.a.hines@boston.gov" <casey.a.hines@boston.gov>

Sun, Mar 18, 2018 at 9:23 PM

Dear Ms. Hines:

As a member of the Board of Directors of the Franklin Park Coalition, I am writing in support of Millennium Partners' redevelopment of the old Winthrop Square Garage site.

A financial investment of more than \$1 billion in Boston is a commitment that deserves the full support of the city and all the agencies whose approval is critical to its success. This project will not only benefit the city with initial payments, but also with regular tax revenues for many years to come.

Even more important, I believe, is the commitment Millennium has made for jobs for Bostonians, and the extra effort I understand they are making for young people of color to get vocational training that would lead to employment in this project. **FPC BC 01**

Yours truly,

Blair Campbell

FPC Board Treasurer

sappi

Inspired by life

Blair Campbell
FI Business Process Engineer
Sappi North America
255 State Street | Boston, MA | 02109
Tel [REDACTED] | Mobile [REDACTED]
[REDACTED] | www.sappi.com

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FRANKLIN PARK COALITION, BLAIR CAMPBELL

FPC BC 01 Even more important, I believe, is the commitment Millennium has made for jobs for Bostonians, and the extra effort I understand they are making for young people of color to get vocational training that would lead to employment in this project.

See response to FPC MC 01



Urban League of Eastern Massachusetts

88 Warren Street, Roxbury, MA 02119

617-442-4519

March 14, 2018

Ms. Casey A. Hines
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201-1007

Re: Winthrop Square – Jobs and Affordable Housing

Dear Ms. Hines:

We are aware of Millennium's plans to revitalize Boston's downtown with the redevelopment of the old Winthrop Square Garage site. We are also aware of Millennium's previous successful redevelopment efforts in the Downtown Crossing section of Boston.

We can all agree that Boston is in need of more affordable housing and Millennium's Winthrop Square project will help to close that gap. Plus it will create more tax revenue from the existing site for years to come. ULEM 01

As President & CEO of the Urban League of Eastern Massachusetts a Boston nonprofit that concentrates on workforce development and raising individuals and their families out of poverty with gainful employment. Millennium's commitment to more jobs for Bostonians with an extra push to help minority youth receive training in the building trades and ultimately employment in this project as well as future projects is very much in sync with our mission.

We are in full support of moving this project forward as soon as possible.

Sincerely yours,

Darnell Williams

Darnell Williams
President & CEO

URBAN LEAGUE OF EASTERN MASSACHUSETTS

ULEM 01 We can all agree that Boston is in need of more affordable housing and Millennium's Winthrop Square project will help to close that gap. Plus it will create more tax revenue from the existing site for years to come. As President & CEO of the Urban League of Eastern Massachusetts a Boston nonprofit that concentrates on workforce development and raising individuals and their families out of poverty with gainful employment. Millennium's commitment to more jobs for Bostonians with an extra push to help minority youth receive training in the building trades and ultimately employment in this project as well as future projects is very much in sync with our mission.

The Proponent is committed to its MOU on Diversity, Equity and Inclusion and looks forward to this project being a model for diversity in future private development.



FRANKLIN
PARK
COALITION

March 16, 2018

Ms. Casey A. Hines
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201-1007

Re: Winthrop Square

Dear Ms. Hines:

As a member of the Board of Directors of the Franklin Park Coalition, I am writing in support of Millennium Partners' redevelopment of the old Winthrop Square Garage site.

A financial investment of more than \$1 billion in Boston is a commitment that deserves the full support of the city and all the agencies whose approval is critical to its success. This project will not only benefit the city with initial payments, but also with regular tax revenues for many years to come.

Even more important, I believe, is the commitment Millennium has made for jobs **FPC SB 01** for Bostonians, and the extra effort I understand they are making for young people of color to get vocational training that would lead to employment in this project.

Sincerely,

Sandy Bailey
Vice president of the board
Franklin Park Coalition

FRANKLIN PARK COALITION, SANDY BAILEY

FPC SB 01 Even more important, I believe, is the commitment Millennium has made for jobs for Bostonians, and the extra effort I understand they are making for young people of color to get vocational training that would lead to employment in this project.

See response to FPC MC 01



FRANKLIN
PARK
COALITION

March 16, 2018

Ms. Casey A. Hines
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201-1007

Re: Winthrop Square

Dear Ms. Hines:

On behalf of the board and staff of the Franklin Park Coalition, I am writing in support of Millennium Partners' efforts to transform Boston's downtown with the redevelopment of the old Winthrop Square Garage site.

We have been following Millennium's efforts, and now that the old parking garage is **FPC SW 01** no longer standing, we hope that there will be a groundbreaking sooner rather than later. We would very much like to see this part of downtown benefit from the kind of upgrade that Millennium Partners created in the former Combat Zone and in Downtown Crossing.

We are in full support of this project, and we strongly encourage the city to move this project forward promptly.

Sincerely,

Samantha Wechsler
Interim Executive Director

FRANKLIN PARK COALITION, SAMANTHA WECHSLER

FPC SW 01 We have been following Millennium's efforts, and now that the old parking garage is no longer standing, we hope that there will be a groundbreaking sooner rather than later. We would very much like to see this part of downtown benefit from the kind of upgrade that Millennium Partners created in the former Combat Zone and in Downtown Crossing.

Comment noted.

華埠 / 南灣社區議會

Chinatown / South Cove Neighborhood Council

75 Kneeland St., Suite 204
Boston, MA 02111

March 15, 2018

Casey Hines, Project Manager
Boston Planning and Development Agency
Boston City Hall Square
One City Hall Square
Boston, MA 02201-1007

Re: Winthrop Square Draft Project Impact Report

Dear Ms. Hines:

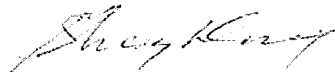
On behalf of the Chinatown/South Cove Neighborhood Council, I am pleased to write in support of the Millennium Partners Winthrop Square project.

The development of this City asset will provide significant benefits to Chinatown and all of the neighborhoods of Boston. The project brings one-time revenue, recurring property taxes, new jobs, open space and public housing renovation funds to the City. And, if selected, the proposed Parcel 12 development which is supported by the IDP from this project will create 171 units of affordable housing in Chinatown and a potential location for a permanent library for our community. SCNC 01

Representatives from Millennium presented the latest plans to the CNC at our February 20, 2018 meeting and it was voted to support the Winthrop Square project going forward.

Thank you for your consideration.

Sincerely,


Sherry Dong, Co-Moderator

SCNC 01 The development of this City asset will provide significant benefits to Chinatown and all of the neighborhoods of Boston. The project brings one-time revenue, recurring property taxes, new jobs, open space and public housing renovation funds to the City. And, if selected, the proposed Parcel 12 development which is supported by the IDP from this project will create 171 units of affordable housing in Chinatown and a potential location for a permanent library for our community.

The Proponent filed a Response to the City of Boston’s RFP for the Parcel 12 site and looks forward to working with the Community to develop Parcel 12 with assistance from the Winthrop Square Project.



Leslie Singleton Adam
Chair

Colin Zick
First Vice Chair

Valerie Burns
Vice Chair

Abigail Mason
Vice Chair

Catherine Bordon
Secretary

William C. Clendaniel
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Elizabeth Vizza
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Allan Taylor

Henry Lee
President Emeritus

HONORARY

Ann K. Collier
Nina Doggett
Barbara Hostetter

EX OFFICIO

Jeanne Burlingame
Jim Hood
Sherley Smith

March 14, 2018

Ms. Casey Hines

Senior Project Manager, Development Review

Boston Planning & Development Agency

One City Hall, 9th Floor

Boston, MA 02201

RE: COMMENT LETTER
115 Winthrop Square DPIR

Dear Ms. Hines,

We are writing to comment on Millennium Partners' very extensive DPIR regarding the 115 Winthrop Square project. As you know, the Friends of the Public Garden has been an active participant in the review of this project since its inception. We have been actively involved in the Article 80 process as well as the City's successful Home Rule Petition to amend the state shadow laws pertaining to the Public Garden and the Boston Common.

The Friends' primary concern throughout this process has been the protection of the Boston Common, the Public Garden, and the Commonwealth Avenue Mall from additional new shadows. With the amendment to the 1990 and 1993 State Shadow Laws, the current proposed building's shadow impacts have been legalized. Nonetheless, we continue to have fundamental concerns about the precedent that has been set by a one-time exemption from the Shadow Laws, and we will vigorously oppose any further encroachment of shadows on the City's landmark parks not permitted within the limits defined by the Laws.

In reviewing the DPIR, we were disappointed to see that Millennium has erroneously described a significant public benefit to the Common. Millennium's commitment to donate \$125,000/year for 40 years is described in the DPIR as going to the Friends, which is incorrect. The monies will in fact be paid to the Historic Park Fund at The Boston Foundation, and we believe a correction to this effect should be issued.

The Friends has worked collaboratively with Mayor Walsh, Commissioner Cook, and Millennium Partners to agree on a path that ensures the availability of additional funding that will contribute to raising the level of excellence of these three historic parks. We are pleased that the Mayor has committed in writing that \$28 million from the sale of the

Winthrop Square Garage will be directed to the Common, with \$5 million of that amount being allocated to maintenance. Since some of those funds are already in the City's coffers, we look forward to working closely with the Parks and Recreation Department as soon as possible to develop a master plan for the Boston Common that will form the framework for prioritizing much-needed capital improvements.

We also look forward to establishment of the trust fund in the City's Treasury Department into which the \$5 million of the \$28 million will be deposited to supplement annual city budgeted maintenance funds for the Common.

The Friends continues to serve as the primary not-for-profit advocate that works to protect Boston's first public parks. We are proud of our partnership with the City for over four decades to achieve our joint commitment to ensure that the Common, the Garden, and the Mall achieve the level of excellence that the community expects and deserves.

Thank you for the opportunity to comment on the DPIR.

Sincerely,



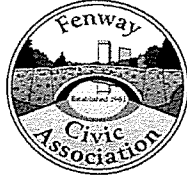
Elizabeth Vizza
Executive Director

Brian Golden, Director, Boston Planning and Development Agency
Senator Joseph Boncore
Senator William Brownsberger
Representative Jay Livingstone
Representative Aaron Michlewitz
Representative Byron Rushing
City Council President Andrea Campbell
City Councilor Annissa Essaibi George
City Councilor Michael Flaherty
City Councilor Ed Flynn
City Councilor Ayanna Pressley
City Councilor Michelle Wu
City Councilor Josh Zakim

FRIENDS OF THE PUBLIC GARDEN

FPG 01 In reviewing the DPIR, we were disappointed to see that Millennium has erroneously described a significant public benefit to the Common. Millennium's commitment to donate \$125,000/year for 40 years is described in the DPIR as going to the Friends, which is incorrect. The monies will in fact be paid to the Historic Park Fund at The Boston Foundation, and we believe a correction to this effect should be issued.

The Proponent corrects its statement in the Draft PIR/EIR that the financial contribution of \$125,000 per year for 40 years (the "Contribution") is being made to the Friends of the Public Garden. The donation is being made pursuant to the terms of a Memorandum of Agreement between the Friends of the Public Garden, Inc. and MCAF Winthrop LLC, pursuant to which (i) the Proponent has agreed to make the Contribution and (ii) the Friends have agreed to use the Contribution solely for the maintenance and enhancement of the Parks, all as more particularly set forth in the Memorandum of Agreement. The Memorandum of Agreement further provides that the Friends have made arrangements with the Boston Foundation to accept, hold and disburse the Contribution. The funds are to be used solely for the maintenance and enhancement of the Boston Common, the Public Garden, and the Commonwealth Avenue Mall. Please see Appendix C for a copy of the executed Memorandum of Agreement.



March 14, 2018

Ms. Casey Hines
Boston Planning & Development Agency
Boston City Hall
Boston, MA 02201

Re: 115 Winthrop Square Draft Project Impact Report (DPIR)

Dear Ms. Hines:

The Fenway Civic Association (FCA) is the Fenway neighborhood's oldest and all-volunteer neighborhood group that accepts no public or developer funds. Founded in 1961, our mission is to promote a safe and vital neighborhood that serves the interest of its residents. Our residents view their surrounding historic parks as a major contributor to their quality of life. Like our own Emerald Necklace, the Boston Common and Public Garden are an amazing public legacy that can never be replaced.

1.3 Updates since ENF/PNF filings:

The FCA does not typically comment on projects outside our neighborhood, reserving rare comments for project issues relevant to our community. With this in mind, we submitted comments on two issues to the 115 Winthrop Square (the "Project") Plan Notification Form (PNF) in December, 2016: First a concern regarding the deficiency of the filing in meeting state laws protecting the Boston Common & the Boston Public Garden from new shadows and how this violation might impact other city projects which may cast shadows onto parkland, and second, a request that the Robert Burns statue, which was purloined to Winthrop Square in 1975, be returned home to its original Back Bay Fens location. Regarding our first concern, we understand that with current modifications and amended legislation through Chapter 57 of the Acts of 2017, the Project has satisfied state legal requirements regarding shadows cast onto parkland. We encourage the Millennium Partners (the "Proponent") to continue working with the Friends of the Public Garden to address project impact to the Public Garden, Boston Commons, and Commonwealth Avenue Mall. FCA MB 01

1.4 Public Benefits Summary:

We understand the Proponent's commitment of investment to the City of Boston, including payments towards the Boston Common, Public Garden and Commonwealth Mall, Franklin Park, and the Emerald Necklace. The Back Bay Fens is the oldest section of the Emerald Necklace, and is a park with heavy use & significant needs. We request that city dedicate a portion of the Emerald Necklace investment specifically to the Back Bay Fens to address the need for capital rehabilitation and restoration projects.

2.2.2 Project Description: Open Space/Winthrop Square:

The Project's open space describes the intent to enhance and enliven passive space with new design, in FCA MB 02 consultation with the Proponent, BPDA, Business Improvement District, and neighbors. It acknowledges the Robert Burns statue lies within the scope of public realm improvements, and our request that the statue be returned to its original location within the Back Bay Fens.


As stated in our previous comment letter, the Robert Burns statue was created by sculptor Henry Hudson Kitson and originally situated in proximity to sculptor Daniel Chester French's monument to John Boyle O'Reilly in the Back Bay Fens. The juxtaposition of the two works was a deliberate way to honor Scottish and Irish literary figures in a pastoral setting reminiscent of the locales within the body of their literary works. Further, the Burns statue possesses continued relevance to the Fenway neighborhood, with Peterborough, Kilmarnock, and Queensberry streets in the abutting West Fenway named after locations in Burns' works. Given its significance and ties to the neighborhood, it was unfortunate that this statue was removed from the Fenway, without notice or public process, for the benefit of a private developer.

The Fenway Civic Association is a recognized steward of parks and open spaces through its numerous contributions to the Back Bay Fens, including: service as Park Overseers with the Emerald Necklace Conservancy, service on the Muddy River Oversight Committee, service on the Emerald Necklace Conservancy Rose Garden Committee, initiators of past Massachusetts Arborist Association Day of Service projects in the Back Bay Fens, and initiators of and fundraisers for recent conservation efforts & capital improvements to the Johnson Memorial Gates & Westland Avenue Gateway.

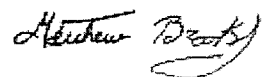
Consistent with our ongoing work and stewardship, we request the return of the Robert Burns statue to the FCA MB 03 Back Bay Fens, and will work to support coordination of those efforts by the Proponent. We have met with the Project team, and have discussed the considerations involving statue ownership, approvals, conservation, and coordination required between the City of Boston, the Boston Arts Commission, the Boston Parks & Recreation Department, and the Boston Landmarks Commission. We have obtained conservation reports and assessments performed up to 2007. FCA is willing to coordinate these efforts, and understand their cost would be borne by the Proponent as a means to both accomplish the statue's return and to proceed with the redesign of open space at Winthrop Square.

Thank you for the opportunity to offer these comments,

-Marie Fukuda



-Matthew Brooks



FCA MB 01 The FCA does not typically comment on projects outside our neighborhood, reserving rare comments for project issues relevant to our community. With this in mind, we submitted comments on two issues to the 115 Winthrop Square (the "Project") Plan Notification Form (PNF) in December, 2016: First a concern regarding the deficiency of the filing in meeting state laws protecting the Boston Common & the Boston Public Garden from new shadows and how this violation might impact other city projects which may cast shadows onto parkland, and second, a request that the Robert Burns statue, which was purloined to Winthrop Square in 1975, be returned home to its original Back Bay Fens location. Regarding our first concern, we understand that with current modifications and amended legislation through Chapter 57 of the Acts of 2017, the Project has satisfied state legal requirements regarding shadows cast onto parkland. We encourage the Millennium Partners (the "Proponent") to continue working with the Friends of the Public Garden to address project impact to the Public Garden, Boston Commons, and Commonwealth Avenue Mall.

Please see Response to Comment FPG 01.

FCA MB 02 The Project's open space describes the intent to enhance and enliven passive space with new design, in consultation with the Proponent, BPDA, Business Improvement District, and neighbors. It acknowledges the Robert Burns statue lies within the scope of public realm improvements, and our request that the statue be returned to its original location within the Back Bay Fens.

The Proponent is currently conducting research on the sculpture and the steps required for moving the sculpture. They look forward to working with the FCA and will work with the FCA to coordinate efforts with the City of Boston, the Boston Arts Commission, the Parks and Recreation Department and the Boston Landmarks Commission regarding the potential move. The Proponent will absorb the reasonable costs associated with any relocation.

FCA MB 03 Consistent with our ongoing work and stewardship, we request the return of the Robert Burns statue to the Back Bay Fens, and will work to support coordination of those efforts by the Proponent. We have met with the Project team, and have discussed the considerations involving statue ownership, approvals, conservation, and coordination required between the City of Boston, the Boston Arts Commission, the Boston Parks & Recreation Department, and the Boston Landmarks Commission. We have obtained

conservation reports and assessments performed up to 2007. FCA is willing to coordinate these efforts, and understand their cost would be borne by the Proponent as a means to both accomplish the statue's return and to proceed with the redesign of open space at Winthrop Square.

Please see Response to Comment FCA MB 02 above.

Beatrice Nessen
19 Charles River Square
Boston, MA 02114

March 13, 2018

Ms. Casey Hines
Senior Project Manager, Development Review
BPDA
One City Hall Square -9th Floor
Boston, MA 02201

RE: Winthrop Square DPIR

Dear Ms. Hayes:

Millennium Partner's Draft Project Impact Report is thorough, containing quite a great deal of information and data. However, I find that it is difficult to make comments on a design that is still in development. It seems that the project proponent is eager to keep the Article 80 process moving forward, and I cannot blame them given the magnitude of this project. Nonetheless for a reviewer many questions remain unanswered given that the design is evolving.

It is disappointing that the architecture of what is to be a very significant building seems geared to maximizing the return on investment rather than creating an iconic addition to Boston's downtown and skyline. The fact that the building will contain more square footage than previously in spite of its reduced height is a testament to my preceding statement. BN 01

In Chapter 7, Urban Design, the proponents states that the design principles include recognition of the its location at the epi-center of downtown as well as of the open space and parks surrounding it, which are identified as "Urban Treasures." I am particularly concerned about how this building and its Great Hall will relate to Winthrop Square and its historic scaled architecture. It is important that the building and the Great Hall do not overpower this "urban treasure." It is important that pedestrians still feel welcome and comfortable in the "urban room" of Winthrop Square and that when entering it from the alley between the Square and Arch Street, the pedestrian feels welcome and respected by the Square's new environment and scale. Another concern is how the proposed urban plan will overcome the increased extent of shadow that will be cast on the Square. BN 02
BN 03

Section 7.4 discusses enhancing the Tontine Crescent, the Franklin Street link between Shoppers' Park and Winthrop Square. The DPIR talks in generalities about enhancement by widening the pedestrian flow and by creating "a series of green and open spaces that invite pedestrian activity." The proponent needs to provide more detailed information about their plans to accomplish these goals. BN 04

One important way that the Winthrop Square tower can enhance the connection to Shoppers' Park and the Downtown Crossing would be to enhance this link with nighttime lighting that illuminates the curve of Franklin Street, the echo of the Tontine Crescent, and the beautiful scale and historic architecture of the buildings lining Franklin Street. Currently this street appears "dead" during the dark hours. To make Boston a night time city, attractive to the younger populace as well as new residents in the Millennium Tower and downtown, the BPDA needs to focus on the importance of lighting as a place making tool as well as an public safety measure. I strongly suggest that the BPDA and Millennium Partners work together to create a lighted Tontine Crescent in order to truly create a strong link between Downtown Crossing and the newly formed residential and commercial Winthrop Square. **BN 05**

Thank you for the opportunity to comment on this project. I would suggest that the BPDA require the project proponent to share with the public the outcome of its current design exploration before the Final PIR is submitted.

Yours truly,

A handwritten signature in blue ink, appearing to read "Beatrice Nessen", with a stylized flourish at the end.

Beatrice Nessen

BN 01 It is disappointing that the architecture of what is to be a very significant building seems geared to maximizing the return on investment rather than creating an iconic addition to Boston’s downtown and skyline. The fact that the building will contain more square footage than previously in spite of its reduced height is a testament to my preceding statement.

The Proponent believes, and hopes the writer can agree with time, that the Project will be an iconic addition to Boston’s Downtown and skyline, and is working with both the BPDA design team. On May 1, 2018 the BCDC approved the Project’s design.

BN 02 In Chapter 7, Urban Design, the proponents states that the design principles include recognition of the its location at the epi-center of downtown as well as of the open space and parks surrounding it, which are identified as “Urban Treasures.” I am particularly concerned about how this building and its Great Hall will relate to Winthrop Square and its historic scaled architecture. It is important that the building and the Great Hall do not overpower this “urban treasure.” It is important that pedestrians still feel welcome and comfortable in the “urban room” of Winthrop Square and that when entering it from the alley between the Square and Arch Street, the pedestrian feels welcome and respected by the Square’s new environment and scale.

The Proponent has made efforts to align entrances and setbacks so they relate to the adjacent architecture, especially at Winthrop Square. The design team is working extensively to make Winthrop Square welcoming and safe for pedestrians. See Section 4.0 for a full update of the Urban Design changes including a description of the Great Hall entry and the One Winthrop building datum. See also updated Figure 2-10 Relationship to Surrounding Buildings that illustrates the sensitive relationship of the adjacent buildings to the Winthrop Square open space and the connection to Winthrop Lane.

BN 03 Another concern is how the proposed urban plan will overcome the increased extent of shadow that will be cast on the Square.

Winthrop Square is currently a shaded open space, despite this, the proposed landscape plan for Winthrop Square will provide for increased light penetration into the center of the Square. Trees surrounding the Square will give way to an open center (Figure 2-1 Draft Landscape Plan). In addition, contemporary lighting elements will illuminate the Square from within.

BN 04 Section 7.4 discusses enhancing the Tontine Crescent, the Franklin Street link between Shoppers' Park and Winthrop Square. The DPIR talks in generalities about enhancement by widening the pedestrian flow and by creating "a series of green and open spaces that invite pedestrian activity." The proponent needs to provide more detailed information about their plans to accomplish these goals.

The Proponent has been working with the BPDA and BTM to create a more pedestrian experience at the Tontine Crescent. A pilot tactile intervention is being implemented by the City with the assistance from the Proponent this summer to test the BPDA and BTM's idea for the narrowing of Franklin Street between Hawley and Arch streets. The proposed final condition on Franklin Street include planting, seating and expanded pedestrian space (Figures 2-5 and 2-6 Franklin Street Draft Landscape Plan and Rendering). This new green space, combined with expanded pedestrian realm and planting along Devonshire Street and into Winthrop Square will enhance the pedestrian experience (Figure 2-8 Proposed Expanded Pedestrian Realm and Planting).

BN 05 One important way that the Winthrop Square tower can enhance the connection to Shoppers' Park and the Downtown Crossing would be to enhance this link with nighttime lighting that illuminates the curve of Franklin Street, the echo of the Tontine Crescent, and the beautiful scale and historic architecture of the buildings lining Franklin Street. Currently this street appears "dead" during the dark hours. To make Boston a night time city, attractive to the younger populace as well as new residents in the Millennium Tower and downtown, the BPDA needs to focus on the importance of lighting as a place making tool as well as an public safety measure. I strongly suggest that the BPDA and Millennium Partners work together to create a lighted Tontine Crescent in order to truly create a strong link between Downtown Crossing and the newly formed residential and commercial Winthrop Square.

The Proponent agrees with this comment and hopes to provide guidelines and suggestions to the property owners along the section of Franklin Street known as the Tontine Crescent to enhance lighting. The pedestrian level of the Tontine Crescent design will include lighting features such as uplights for trees, lighting for small eating areas, etc.

Rose Kennedy Greenway Conservancy
185 Kneeland Street
Boston, MA 02111

April 9th, 2018

Casey Hines
Senior Project Manager
Boston Planning and Development Agency
One City Hall Square
Boston, MA 02201

Dear Ms. Hines,

The Rose Kennedy Greenway Conservancy has been pleased to participate as a member of the Impact Advisory Group for the 115 Winthrop Square Development proposed by Millennium Partners. We appreciate being involved by the Boston Planning and Development Agency.

The sale of this land and the construction of this proposed building will have dramatic positive fiscal impact on the City of Boston. Initial purchasing income, and regular tax revenues will benefit the city for many years to come. Replacing a derelict garage with a dense development near transit will help enliven downtown. We look forward to welcoming many Winthrop Square residents and visitors on the Rose Kennedy Greenway in the years to come. The Conservancy appreciates the City's \$5M committed contribution from the sale to support our work maintaining, programming, and improving The Greenway for the public. **RKGC 01**

It is clear that Millennium Partners values well-programmed civic spaces for 115 Winthrop Square. With years of experience programming The Greenway, the Conservancy is uniquely positioned to offer comments on the opportunities, challenges and operational realities of the proposed public spaces.

- The Great Hall must be great. As the design evolves for the building, BPDA should assure that the soaring vision for the Great Hall is matched in the architecture, materials, and planned program. The initial renderings were more inspiring than later iterations have been. **RKGC 02**
- The success of the Great Hall as a public space will be determined by the reliability of ongoing funding. There are extensive costs associated with maintaining and programming an active public space. Endowing the programming and care will assure that the vision is funded. This is a critical lesson of The Greenway that should be applied **RKGC 03**

to this space. Identifying reliable, consistent funding streams for public space programming is critical.

- Governance of the Great Hall will significantly influence just how “public” the public realm feels. Privately owned and operated public spaces face inherent conflicts in incentives; Millennium's responsibility is to its bottom line, which will frequently be misaligned with the public's interest for the public space. Establishing/designating (and funding) a non-profit to program the space would assure that the public vision is realized. **RKGC 04**
- Millennium Partners is committed to improving the eponymous park across the street. It's critically important that the park have a robust public process, as planned. Winthrop Square Park, although small, is currently graced by a healthy stand of Honey Locust trees that offer a rare urban canopy; while their lifespan may be “only” 10-15 years following the development completion, this is longer than the lifespan of many stressed urban trees. What happens to these trees and the public park should be hard thought, sustainably financed, and well maintained. **RKGC 05**

We look forward to continued collaboration with the Millennium Partners and the City to ensure that this important site receives the development worthy of its prominent location.

Sincerely,



Jesse Brackenbury

Executive Director

Rose Kennedy Greenway Conservancy

Cc:

Jim Kalustian, Chair, Rose Kennedy Greenway Conservancy Board of Directors

THE ROSE KENNEDY GREENWAY CONSERVANCY

RKGC 01 The sale of this land and the construction of this proposed building will have dramatic positive fiscal impact on the City of Boston. Initial purchasing income, and regular tax revenues will benefit the city for many years to come. Replacing a derelict garage with a dense development near transit will help enliven downtown. We look forward to welcoming many Winthrop Square residents and visitors on the Rose Kennedy Greenway in the years to come. The Conservancy appreciates the City's \$5M committed contribution from the sale to support our work maintaining, programming, and improving The Greenway for the public.

Comment noted.

RKGC 02 The Great Hall must be great. As the design evolves for the building, BPDA should assure that the soaring vision for the Great Hall is matched in the architecture, materials, and planned program. The initial renderings were more inspiring than later iterations have been.

Please see Section 3.0 and 4.0 for additional information regarding the Great Hall and the Proponent's commitments to an operating plan.

RKGC 03 The success of the Great Hall as a public space will be determined by the reliability of ongoing funding. There are extensive costs associated with maintaining and programming an active public space. Endowing the programming and care will assure that the vision is funded. This is a critical lesson of The Greenway that should be applied to this space. Identifying reliable, consistent funding streams for public space programming is critical.

Please see Section 3.0 for additional information regarding the Great Hall and the Proponent's commitments to an operating plan.

RKGC 04 Governance of the Great Hall will significantly influence just how "public" the public realm feels. Privately owned and operated public spaces face inherent conflicts in incentives; Millennium's responsibility is to its bottom line, which will frequently be misaligned with the public's interest for the public space. Establishing/designating (and funding) a non-profit to program the space would assure that the public vision is realized.

Please see Section 3.0 for additional information regarding the Great Hall and the Proponent's commitment to an operating plan that will address the concern noted here.

RKGC 05 Millennium Partners is committed to improving the eponymous park across the street. It's critically important that the park have a robust public process, as planned. Winthrop Square Park, although small, is currently graced by a healthy stand of Honey Locust trees that offer a rare urban canopy; while their lifespan may be "only" 10-15 years following the development completion, this is longer than the lifespan of many stressed urban trees. What happens to these trees and the public park should be hard thought, sustainably financed, and well maintained.

The Proponent appreciates the stated concern. Please see Section 2.0 for additional information on Winthrop Square and the investigative work that needs to be done prior to a determination on the status of the honey locust trees. In addition, a separate public hearing will be held prior to tree removal.

April 9, 2018



Downtown Boston
Business Improvement District
Corporation

Ms. Casey Hines
Senior Project Manager
BPDA
One City Hall Sq.
Boston, MA 02201

Dear Ms. Hines:

As part of the DPIR comment period phase of the ongoing review process for the 115 Winthrop Square development, I am writing as President and CEO of the Downtown Boston Business Improvement District (DBBID).

The Downtown Boston Business Improvement District (DBBID) is a private non-profit organization made up of hundreds of property and business owners. Our mission is to significantly improve the experience of all who work, live, visit, shop and go to school in our 34-block area. Since the DBBID began full operations in spring 2011, it has invested nearly \$33 million in the area. Our investment has contributed to the rebirth of the heart of Downtown Boston, an area which is very important to the entire City, was in decline for decades and was especially impacted during the 2008 downturn. Since the DBBID's formation, its 350+ commercial property owner members have seen their assessed property values increase by \$2.9 billion, from \$4.6 billion in FY12 to \$7.5 billion in FY18. Our member properties paid \$179.1 million in property taxes in FY17, nearly \$32.4 million more than in FY12. As a result of DBBID members' new developments and investments, hundreds of new businesses and thousands of new residents now call this district their home.

Speaking for the DBBID area, I continue to support this proposal. Millennium Partners has proposed a transformative, cutting-edge tower featuring exceptionally environmentally-friendly "green" engineering. The proposal's mixed-use aspects should help expand Downtown Crossing's 24/7 lifestyle deeper into the Financial District. Its innovative plan for its commercial office space should help attract startup companies, further contributing to the DBBID area's high-tech renaissance. Finally, the Great Hall concept, if properly designed, managed, and curated, should establish a vibrant new civic space in the heart of Downtown. BID 01

Speaking for the community of abutting stakeholders in Winthrop Square and along Federal Street, I am aware of some serious concerns. DPIR comment letters submitted by the owners of 75-101 Federal St., 133 Federal St., 155 Federal St., 10 High St., and 100 Summer St. have articulated potential problems and issues ranging from tower design, massing, and proximity to adjacent towers, to transportation impacts and geotechnical and structural engineering considerations. Each of these abutters are, like Millennium Partners, DBBID property owner members. BID 02

In the spring of 2016, several months before Millennium Partners was awarded the Winthrop Square Garage site development rights, the DBBID brought together abutting stakeholders—including representatives of several of the properties noted above—to discuss the blighted and hazardous conditions created by the crumbling garage. In a letter to the BPDA, this abutters group underscored the variety of reasons why an immediate demolition of the garage was in the best long-term interests of the community. The letter proposed several recommendations—such as a

greenspace or surface parking lot—that could serve as satisfactory temporary uses for the public, until a developer was selected.

Now, with the garage demolition nearly complete, I urge the BPDA, Millennium Partners, and the direct abutters to continue in the cooperative and engaged spirit exemplified by that original group. With considerable challenges—known and unknown—still remaining, it is vital that the stakeholders engage in productive dialogue to mitigate any issues that have been raised.

Revisiting specific areas of concern outlined in my January 2017 comment letter, I noted that the project proposes significant changes to the local traffic circulation and that further studies should be conducted in that realm. I am glad that Millennium Partners undertook extensive transportation and traffic analyses as part of its DPIR submission. That said, the DBBID staff remains very concerned about possible impacts relating to this project’s transportation and traffic proposals. BID 03

In tandem with these transportation- and traffic-related concerns, the DBBID staff would like to work as closely as possible with Millennium Partners and Suffolk Construction to mitigate and troubleshoot any potential disruptions caused by construction. Therefore, we request that DBBID staff be involved as the City is drafting its Construction Management Plan (CMP). BID 04

My prior comment letter also addressed how the project proposes to interact with, and enhance, its surrounding public area. There are two overarching aspects to this: the Great Hall, and Winthrop Square Park.

I am pleased that Millennium Partners continues to refine the Great Hall concept, which will require a robust operating plan in order to thrive as a great new civic space. My prior letter identified public restrooms as a critical component to the Great Hall, given the high volume of pedestrian traffic it is likely to attract—as well as the area’s relative lack of this key amenity. I continue to strongly urge that public restrooms be included in the final design and operating plan. It is hard to conceive of how the Great Hall can function successfully without them. BID 05

Meanwhile, the proposed redesign of Winthrop Square Park is a multifaceted challenge—one that can reap great dividends if done skillfully. At the same time that enhancements are being considered, the Park’s historic character, in terms of its namesake, its plantings, the Robert Burns statue, and its graceful accentuation of 1 Winthrop Square’s stately architecture, should be carefully considered. BID 06


The redesign of Winthrop Square Park should be considered in tandem with the prevailing pedestrian traffic circulation. Winthrop Lane serves as a delightful portal for walkers traversing from Downtown Crossing to the Financial District. Currently, they are funneled from Winthrop Lane to 75-101 Federal Street’s Devonshire Street entrance, and from there to Federal Street, with its numerous MBTA bus transit options and proximity to Post Office Square Park & Garage. How will any proposed redesign of Winthrop Square Park and its pedestrian access take that into account? The DBBID looks forward to collaborating with Millennium Partners and abutters on these important questions as the project evolves. BID 07

Finally, considering the entire Downtown Boston BID, I reiterate my prior letter’s call for this project to stimulate an investment of City capital to catalyze streetscape improvements within our service area. DBBID staff, working closely with City officials, have identified infrastructure initiatives that would eliminate some chronic—and hazardous—“hotspots” (persistent sinkholes, etc.). Such initiatives would transform and enhance degraded areas that experience more pedestrian BID 08

traffic than anywhere else in New England. It has been years since the DBBID area has been given a major infusion of infrastructure funding. Now is the time to rectify this glaring deficiency.

I look forward to continuing to work with the BPDA, abutting DBBID property owner members, and other stakeholder communities on this vitally important redevelopment project in the heart of downtown Boston.

Sincerely,



Rosemarie E. Sansone
President & CEO
Downtown Boston Business Improvement District

Cc:

The Honorable Martin J. Walsh, Mayor, City of Boston

The Honorable Andrea Campbell, President, Boston City Council
The Honorable Ed Flynn, District 2 Councilor, Boston City Council
The Honorable Frank Baker, District 3 Councilor, Boston City Council
The Honorable Mark Ciommo, District 9 Councilor, Boston City Council
The Honorable Lydia Edwards, District 1 Councilor, Boston City Council
The Honorable Annissa-Essaibi George, At-Large Councilor, Boston City Council
The Honorable Michael Flaherty, At-Large Councilor, Boston City Council
The Honorable Kim Janey, District 7 Councilor, Boston City Council
The Honorable Timothy McCarthy, District 5 Councilor, Boston City Council
The Honorable Matthew O'Malley, District 6 Councilor, Boston City Council
The Honorable Ayanna Pressley, At-Large Councilor, Boston City Council
The Honorable Michelle Wu, At-Large Councilor, Boston City Council
The Honorable Josh Zakim, District 8 Councilor, Boston City Council

The Honorable Joseph Boncore, Senator, 1st Suffolk & Middlesex District
The Honorable Aaron Michlewitz, Representative, 3rd Suffolk District

DOWNTOWN BOSTON BUSINESS IMPROVEMENT DISTRICT

BID 01 Speaking for the DBBID area, I continue to support this proposal. Millennium Partners has proposed a transformative, cutting-edge tower featuring exceptionally environmentally-friendly “green” engineering. The proposal’s mixed-use aspects should help expand Downtown Crossing’s 24 7 lifestyle deeper into the Financial District. Its innovative plan for its commercial office space should help attract startup companies, further contributing to the DBBID area’s high-tech renaissance. Finally, the Great Hall concept, if properly designed, managed, and curated, should establish a vibrant new civic space in the heart of Downtown.

The Proponent appreciates this comment and its affiliates are a long standing member of the BID.

BID 02 Speaking for the community of abutting stakeholders in Winthrop Square and along Federal Street, I am aware of some serious concerns. DPIR comment letters submitted by the owners of 75-10 1 Federal St., 133 Federal St., 155 Federal St., 10 High St., and 100 Summer St. have articulated potential problems and issues ranging from tower design, massing, and proximity to adjacent towers, to transportation impacts and geotechnical and structural engineering considerations. Each of these abutters are, like Millennium Partners, DBBID property owner members.

Comments and the Proponent’s responses to letters from abutters are included in this section.

BID 03 Revisiting specific areas of concern outlined in my January 2017 comment letter, I noted that the project proposes significant changes to the local traffic circulation and that further studies should be conducted in that realm. I am glad that Millennium Partners undertook extensive transportation and traffic analyses as part of its DPIR submission. That said, the DBBID staff remains very concerned about possible impacts relating to this project’s transportation and traffic proposals.

Please see Section 5.0 for additional information regarding transportation which has evolved after meetings with BTB.

BID 04 In tandem with these transportation- and traffic-related concerns, the DBBID staff would like to work as closely as possible with Millennium Partners and Suffolk Construction to mitigate and troubleshoot any potential disruptions caused by construction. Therefore, we request that DBBID staff be involved as the City is drafting its Construction Management Plan (CMP).

A CMP will be submitted to the BTB prior to issuance of the building permit. The Proponent, as it has done through the demolition, plans to continue discussions on the Project's CMP with the BID prior to its submission to BTB.

BID 05 I am pleased that Millennium Partners continues to refine the Great Hall concept, which will require a robust operating plan in order to thrive as a great new civic space. My prior letter identified public restrooms as a critical component to the Great Hall, given the high volume of pedestrian traffic it is likely to attract—as well as the area's relative lack of this key amenity. I continue to strongly urge that public restrooms be included in the final design and operating plan. It is hard to conceive of how the Great Hall can function successfully without them.

Please see Response to Comment AWP 13, restrooms are being provided as part of the Great Hall.

BID 06 Meanwhile, the proposed redesign of Winthrop Square Park is a multifaceted challenge—one that can reap great dividends if done skillfully. At the same time that enhancements are being considered, the Park's historic character, in terms of its namesake, its plantings, the Robert Burns statue, and its graceful accentuation of 1 Winthrop Square's stately architecture, should be carefully considered.

Please see Sections 2.0 and 8.0 of the Supplemental Information for information and discussion of the Robert Burns Statue.

BID 07 The redesign of Winthrop Square Park should be considered in tandem with the prevailing pedestrian traffic circulation. Winthrop Lane serves as a delightful portal for walkers traversing from Downtown Crossing to the Financial District. Currently, they are funneled from Winthrop Lane to 75-101 Federal Street's Devonshire Street entrance, and from there to Federal Street, with its numerous MBTA bus transit options and proximity to Post Office Square Park & Garage. How will any proposed redesign of Winthrop Square Park and its pedestrian access take that into account? The DBBID looks forward to collaborating with Millennium Partners and abutters on these important questions as the project evolves.

The Proponent expects to continue to collaborate with the BID as the Winthrop Square design continues to be developed. The pedestrian circulation through Winthrop Lane as well as several other major pedestrian connections are part of the design consideration.

BID 08

Finally, considering the entire Downtown Boston BID, I reiterate my prior letter's call for this project to stimulate an investment of City capital to catalyze streetscape improvements within our service area. DBBID staff, working closely with City officials, have identified infrastructure initiatives that would eliminate some chronic—and hazardous—"hotspots" (persistent sinkholes, etc.). Such initiatives would transform and enhance degraded areas that experience more pedestrian traffic than anywhere else in New England. It has been years since the DBBID area has been given a major infusion of infrastructure funding. Now is the time to rectify this glaring deficiency.

The Proponent as a member of the BID supports any initiative that engages the City in investing in the Downtown area.

Brian Golden, Director BPDA

One City Hall Square Boston MA 02201

Feb. 1st, 2018

BRA

'18 FEB 8 AM 9:45:57

Winthrop Sq., Affordable Housing Payments by Millennium

On behalf of many Chinatown residents we asking you make sure Millennium pays full amount for Affordable Housing as in Mayors Order.

They need pay: for 500 condos, 18% is for 90 Affordable.

Millennium has 640,000 square area for condos, this is 1,280 sq for average unit. They will selling for average price of \$1,500 for square ft.

Average selling unit 1,280 sq x \$1,500 is \$1,900,000.

Mayor Order: half the number between selling and \$380,000 is:

1,900,000 less 380,000 is \$1,520,000 divided by 2 is \$760,000

And for total pay 90 Affordable x \$760,000 is to pay \$68,000,000.

After Millennium selling all condos, BPDA need true number and calculate penthouse very expensive prices to calculation to resulting in more paying by Millennium.

We asking no more GIFTS to Millennium like Menino give them for Millennium tower. They only paid \$15,000,000 but they should paying \$90,000,000 because they needed 66 Affordable for 442 market units. \$1,800 average price and unit average size 1,700 sq the average sold unit was \$3,000,000 and half number with \$200,000 buy out old number was \$1,400,000. For 66 Affordable it is 66 x \$1,400,000 to be \$90,000,000. No more free for Millennium CR 01

Cc: Maura Healy, MASS AG.

Fox news Boston

Boston Globe

We thank you for helping community !

CHINATOWN RESIDENTS

CR 01 We asking no more GIFTS to Millennium like Menino give them for Millennium tower. They only paid \$15,000,000 but they should paying \$90,000,000 because they needed 66 Affordable for 442 market units. \$1,800 average price and unit average size 1,700 sq the average sold unit was \$3,000,000 and half number with \$200,000 buy out old number was \$1,400,000. For 66 Affordable it is 66 x \$1,400,000 to be \$90,000,000. No more free for Millennium.

Please refer to section 1.3 and the response to SCNC 01.

FARLEY | WHITE

INTERESTS

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18TH FLOOR
BOSTON, MA 02110

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F. 617.338.2387
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March 28, 2018

BY E-Mail and By Hand Delivery

Brian P. Golden, Director
Boston Planning & Development Agency
City Hall, Ninth Floor
One City Hall Square
Boston, MA 02201

BRA

'18 MAR 28 AM 11:58:59

Re: Proposed Project at 115 Winthrop Square

Dear Director Golden:

We are the owners of property located at 155 Federal Street and 10 High Street, located approximately 130 feet from the proposed project at 115 Winthrop Square. While we were pleased to see a project of the scale originally proposed built on the site in the Project Notification Form ("PNF"), we have two primary concerns about the current design set forth in the Draft Environmental Impact Report/Project Impact Report (the "DPIR") and application for Planned Development Area No. 117 ("PDA") filed by Millennium Partners. These are reflections and massing.

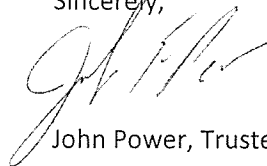
The current design in the DPIR and PDA calls for a face of the building roughly paralleling the Federal Court property line. This is a large planar surface which is planned to consist primarily of reflective glass and creates our greatest concern. Essentially, for us, this is one big flat mirror. As this lies to the north of our building, it will reflect sunlight into our building. This will affect our cooling needs and will negatively impact our tenants' ability to be comfortable and to use computer screens when the sun's reflection is directed toward their windows. This wall was considerably smaller in the earlier design and was rendered in the PNF as if it were dramatically less reflective. A large portion of this mass was proposed as a "Solaria" which consisted of seven double floors on top of the Great Hall. It is now conventional office and residential space and rises to 680 feet. FW 01

We engaged Simpson Gumpertz & Heger ("SGH") to help us analyze reflection impacts on our property. SGH examined the report by Rowan Williams Davies & Irwin Inc. that was included with the DPIR at Attachment G as well as the Detailed Solar Reflection Analysis on 155 Federal Street Building dated February 9, 2018, and prepared their own analysis as well. As set forth in the SGH report, a copy of which is enclosed, the proposed tower will create intolerable glare conditions at 155 Federal Street and 10 High Street. We urge the developer to make adjustments to its design as suggested by SGH. In particular, we ask that the following changes be implemented: FW 02

- Reduce the size of the south facing façade.
- Include substantial quantities of non-reflective materials on this façade and/or introduce articulation that reduce the duration and intensity of glare.
- Change the selected glass to a less reflective product.

We are also concerned about the project's massing. While the new design is shorter in height than what FW 03 was proposed in the PNF, the project size is considerably larger, with the increased floor area achieved by filling most of the lot area for a dramatically greater height. The resulting design is, in our estimation, a graceless form which negatively impacts the neighborhood and lacks functional and esthetic merit. The new design blocks nearly all view of the sky from our northern side. We believe that Millennium should be urged to reduce floor area of the higher floors and return to a form that gives greater emphasis to its exterior esthetic.

Sincerely,



John Power, Trustee of KNH Realty Trust

Enclosure

cc: Mayor Marty Walsh
City Councilor Edward Flynn
Casey Hines, Project Manager, Boston Planning & Development Agency
Jonathan Greeley, Director of Development Review, Boston Planning & Development Agency
David Carlson, Deputy Director for Urban Design, Boston Planning & Development Agency

3816421.3

FW 01 The current design in the DPIR and PDA calls for a face of the building roughly paralleling the Federal Court property line. This is a large planar surface which is planned to consist primarily of reflective glass and creates our greatest concern. Essentially, for us, this is one big flat mirror. As this lies to the north of our building, it will reflect sunlight into our building. This will affect our cooling needs and will negatively impact our tenants' ability to be comfortable and to use computer screens when the sun's reflection is directed toward their windows. This wall was considerably smaller in the earlier design and was rendered in the PNF as if it were dramatically less reflective. A large portion of this mass was proposed as a "Solaria" which consisted of seven double floors on top of the Great Hall. It is now conventional office and residential space and rises to 680 feet.

RWDI is currently working with the Project Architect, Handel, the Proponent and the BPDA to reasonably reduce the impact of any reflections on surrounding buildings. The revised bustle design to a thin bridge and an east tower at the higher elevations provides new opportunity to mitigate glare on adjacent properties. New glare studies will be done specifically for the 155 Federal Street building based on data provided by 155 Federal Street so that the property can be appropriately modeled.

FW 02 As set forth in the SGH report, a copy of which is enclosed, the proposed tower will create intolerable glare conditions at 155 Federal Street and 10 High Street. We urge the developer to make adjustments to its design as suggested by SGH. In particular, we ask that the following changes be implemented:

- ◆ Reduce the size of the south facing façade.
- ◆ Include substantial quantities of non-reflective materials on this façade and/or introduce articulation that reduce the duration and intensity of glare.
- ◆ Change the selected glass to a less reflective product.

RWDI agrees that these recommendations will act to reduce impacts, however none will eliminate the issue. Some of the recommendations may lead to a more dangerous condition (e.g. horizontal shades which collect ice and snow and will shed down to street level in winter as noted by SHG) or will simply shift the problem to other buildings (i.e. changing angles and heights of the proposed

tower). In addition, in the case of façade articulation, some features may make things worse by acting to scatter reflected light over a larger area of the 155 Federal Street building and/or other buildings. With this in mind, and based on the revised east tower design, RWDI will evaluate a variety of scenarios with the Project team to assess those that actually serve to reduce solar reflections onto adjacent properties. These studies will be shared with representatives of 155 Federal Street and the BPDA to reduce the intensity and frequency of reflections.

FW 03

We are also concerned about the project’s massing. While the new design is shorter in height than what was proposed in the PNF, the project size is considerably larger, with the increased floor area achieved by filling most of the lot area for a dramatically greater height. The resulting design is, in our estimation, a graceless form which negatively impacts the neighborhood and lacks functional and esthetic merit. The new design blocks nearly all view of the sky from our northern side. We believe that Millennium should be urged to reduce floor area of the higher floors and return to a form that gives greater emphasis to its exterior esthetic.

See updated description, plans, and imagery shown in Section 4.0 Urban Design.



26 March 2018

Mr. Roger W. Altreuter
Farley White Interests
155 Federal Street, Suite 1800
Boston, MA 02110

Project 180373 – Daylighting Consulting Services, 155 Federal Street and 10 High Street,
Boston, MA

Dear Mr. Altreuter:

At your request, we reviewed the two solar reflection analysis reports prepared by RWDI for the Winthrop Square Tower project. This letter summarizes our comments and recommendations based on the results, and where warranted, we provide modifications to RWDI's recommendations. We also performed a comparative point-in-time glare analysis to illustrate the effect of reflections from the perspective of occupants in the above-named building. We have not conducted a detailed review of RWDI's modeling approach, nor have we performed parallel studies to replicate their findings.

1. INTRODUCTION

Millennium Partners (MP) is proposing to build an approximately fifty-five-story tower, Winthrop Square Tower, to the north of two Farley White (FW)-owned buildings in downtown Boston: 155 Federal Street and 10 High Street, which are connected buildings. The Winthrop Square Tower plans to include an all glass south elevation that will reflect visible and infrared light onto the FW-owned buildings. MP retained RWDI to study the solar reflections on neighboring buildings.

FW requested Simpson Gumpertz & Heger Inc. (SGH) review the RWDI reports to identify and articulate the potential impact of reflections on the two FW-owned buildings. Carpenter Norris Consulting, Inc. assisted SGH with the review and point-in-time glare analysis described further below.

1.1 Reflectance in Codes

Building and energy codes have evolved to include stringent glazing performance requirements to reduce internal energy loads by reflecting the sun's light rather than allowing it to penetrate to the interior. As a consequence, the reflected heat and light impacts the exterior public domain (reflected glare and urban heat island) and adjacent buildings (reflected glare and added cooling loads). Governing bodies around the world are starting to recognize and address this concern by modifying local zoning codes or urban development ordinances to require the use of low reflectance materials. For example, Australia, Hong Kong, Shanghai, and Singapore all have prescriptive limits on facade reflectance. In North America, requirements for low reflectance glass

and adding opaque features to facades exist in some cities to limit bird strikes. We are not aware of any maximum allowable reflectance regulations in Boston. In the absence of such regulations, our letter focuses on the benefits of reducing reflectance as they apply to 155 Federal Street and 10 High Street, but also “by reflection” to the surrounding public and private domains.

2. SUMMARY OF RWDI REPORTS

We reviewed the following reports prepared by RWDI:

- Winthrop Square Tower, Detailed Solar Reflection Analysis, dated 7 December 2017.
- Winthrop Square Tower, Detailed Solar Reflection Analysis on 155 Federal Street Building, dated 9 February 2018.

RWDI performed a detailed, three-dimensional analysis of computer simulated daylight and thermal reflections. RWDI also specifically analyzed the effect of reflections at three locations (Receptor Points F29, F30, and F31) on the 155 Federal Street facade. In general, RWDI’s analysis compares the “as-of-right” development (the maximum building volume that zoning allows) to the proposed Winthrop Square Tower.

The south elevation of Winthrop Square Tower is assumed to be completely covered by glass – a conservative scenario because glass is more reflective than the metal frames. RWDI modeled Viracon’s VRE1-54 glazing at the Winthrop Square Tower. The south elevation does not include architectural features to break up the reflective surfaces, such as the vertical fin projections or saw-tooth panels on the west elevation. This is an important assumption because the results are highly dependent on both the form and materiality of the facade.

RWDI notes that visible light reflections at intensities as low as 150 W/m² are visible to people. For solar heat gain, RWDI grouped visible light and thermal energy together, noting that combined intensities greater than 1,500 W/m² would lead to short term thermal discomfort, and greater than 2500 W/m² are a human safety concern. For reference, direct sunlight is 800 W/m². The metrics and criteria apply to exterior conditions, such as for pedestrians and drivers. RWDI modified the criteria to apply to facades, and studied three specific locations on the north elevation of 155 Federal Street.

RWDI concludes the following with respect to 155 Federal Street:

- Reflections will cause a visual nuisance to occupants of adjacent buildings, including 155 Federal Street, but visual impact is characterized as moderate.
- Many reflections are frequent and long in duration (the plots for Receptor Point F29 show the condition occurs every day of the year for an average duration 29 min., and maximum duration 107 min.).
- Occupants can look away or close blinds to address the concern.
- Safety thresholds are not exceeded for damaging glare or thermal impacts, as defined by the above criteria.
- Thermal impact is low because reflected irradiance is generally less than 150 W/m².

RWDI proposes the following mitigation options to address the potential for damaging or irritating reflections on the west elevation of Winthrop Square Tower:

- **Building Mounted Shading Devices:** Saw-tooth and vertical fin architectural features on the west elevation help to prevent convergence, and reduce the frequency and intensity of some reflections, particularly because the west elevation is concave.
- **Glazing Surface Modification:** Frost or roughen exterior glass surface to diffuse light.
- **Glazing Change-out:** Select glass that lowers the full spectrum reflectance.

RWDI does not specifically outline mitigation strategies for 155 Federal Street because its analysis shows the thermal impact is low and visual impact is moderate.

3. DISCUSSION

Based on our review of RWDI's report, we summarize the potential visual and thermal impacts to 155 Federal Street due to reflections from Winthrop Square Tower. We also include comments and recommendations on potential mitigation strategies.

3.1 Visual Impacts

RWDI uses metrics and criteria appropriate for evaluating solar reflections within exterior contexts, such as for pedestrians and drivers. However, the modified criteria RWDI uses for the adjacent buildings is not the industry standard method to evaluate glare within an interior office context. From the perspective of building occupants in an office, Daylight Glare Probability (DGP) is more appropriate to quantify the probability of glare.

SGH 01

DGP is the percent probability a person would be disturbed by visual light sources and has been validated by several studies. The DGP values are binned into four "visual comfort classes" with 95% confidence intervals (Wienold 2009, based on Wienold and Christoffersen 2006¹). The four classes are: Imperceptible, Perceptible, Disturbing, and Intolerable.

To evaluate discomfort glare attributable to Winthrop Square Tower, we modeled the DGP for an occupant looking out and at the tower's south elevation from inside a typical office at (roughly) the Receptor Point F29 location. We used the computer software DIVA for Rhinoceros to perform the calculations. DIVA uses Radiance (developed by Lawrence Berkley National Laboratory), and Daysim to perform the DGP calculations. Figs. 1 and 2 below show the overall context and location of Receptor Point F29 modeled at 155 Federal Street.

¹ Weinold, J., Dynamic Daylight Glare Evaluation. Building Simulation 2009, Eleventh International IBPSA Conference, 2009.

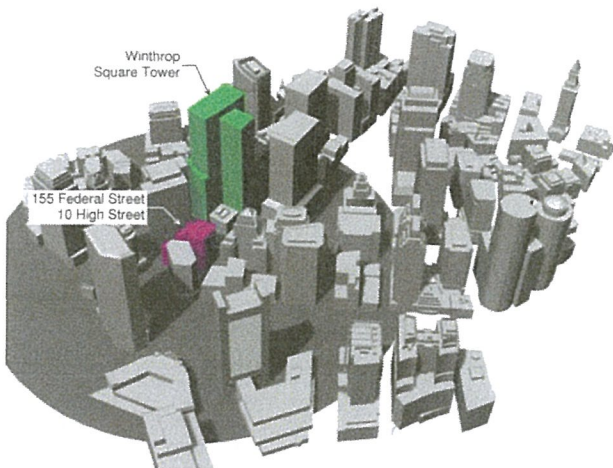


Figure 1 – Context model (looking north).



Figure 2 – Approximate location of model office at the north elevation of 155 Federal Street.

We calculated DGP with and without Winthrop Square Tower to review the impact on DGP. We assume the VRE1-54 glass for Winthrop Square Tower and VE1-2M glass (assumed since specific glazing type not available) for 155 Federal Street. No visual comfort shades are included. We modeled glare on 2 January at 12:14 p.m., a representative time of the day with the longest impact from reflections according to RWDI's report. We selected an occupant view point, from a seated position facing the exterior glazing to the north.

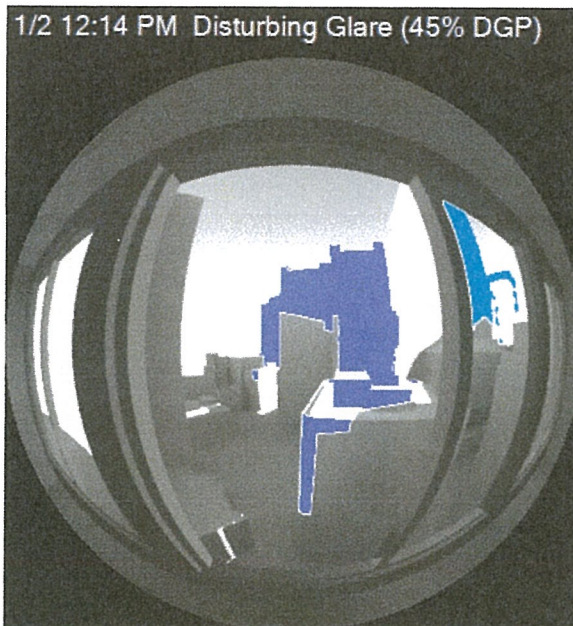


Figure 3 – DGP based on existing conditions at model office location in Fig. 2.

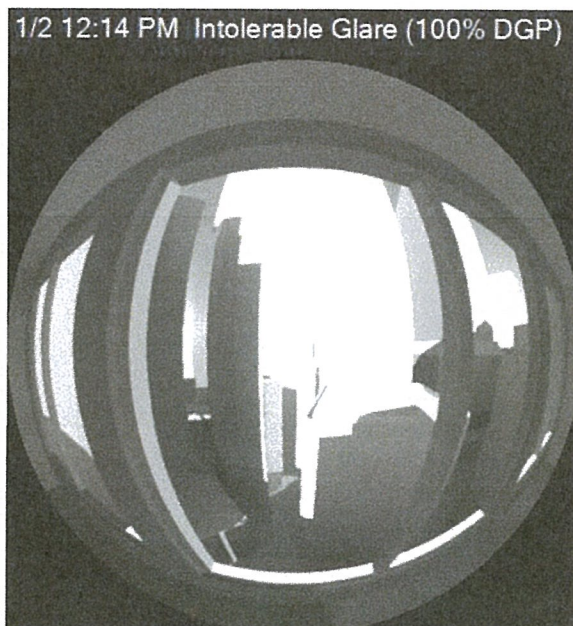


Figure 4 – DGP with new Winthrop Square Tower at model office location in Fig. 2.

Our results (Figs. 3 and 4) show that when Winthrop Square Tower is added to the view, DGP increases from disturbing to intolerable. This result is specific to one upper and less obstructed location (point of view) and at one point in time. RWDI also studied two lower and more obstructed locations, Receptor Points F30 and F31, however, it is important to note this glare condition is not isolated to these three locations and would likely cover a large portion of the north elevation. Further study is needed to show the path of reflections over the day across the north elevation and to understand the extents of intolerable glare conditions. SGH 02

Since we understand that the “as-of-right” tower and the proposed tower would likely both cause an intolerable glare condition, we recommend considering the mitigation strategies listed in Section 3.3 below to reduce the duration of intolerable glare. It would be quite difficult, if not impossible, to reduce the DGP back to a disturbing glare level similar to the existing conditions without the tower.

3.2 Thermal Impacts

RWDI’s analysis shows the impact of reflected thermal energy is low. The reflected thermal energy in winter is roughly 150 W/m^2 , and in summer is much lower at 50 W/m^2 or less because the sun is higher in the sky. A better understanding of the impact of the additional reflected energy requires further study of the existing mechanical systems and conditions at 155 Federal Street. For example, if the mechanical system currently has the capacity to manage the winter heating load, an additional 150 W/m^2 from reflections off the new tower for 1 hr could trigger cooling at the north elevation that may or may not be available. On the other hand, the reflected energy in winter may help reduce the need for heating. The additional 50 W/m^2 summer load should be managed by typical mechanical system safety factors, but there could be overheating issues if existing systems are operating at their full capacity. Therefore, it is necessary to review the existing building mechanical system in detail and understand if the duration and intensity of reflected thermal energy at different times of the year would help or overwhelm the existing systems. SGH 03

One item that RWDI’s report does not directly address is the potential for accelerated deterioration of materials due to added thermal and ultraviolet radiation. While the radiation may not be enough to melt or deform materials, some roofing materials and sealants degrade more quickly if exposed to significant radiation. Further study is needed to determine if 155 Federal Street includes materials that are sensitive to this kind of degradation. SGH 04

3.3 Mitigation Options

We generally agree with RWDI’s suggested mitigation strategies, and add the following comments for the south elevation of Winthrop Square Tower:

- **Building Orientation:** Consider rotating the south elevation angle to redirect light away from the north elevation of 155 Federal Street. SGH 05
- **Facade Articulation:** The present south elevation generates consistent glare on 155 Federal Street because it is flat like a mirror. The introduction of a faceted rather than flat articulation (similar to the saw-tooth features on the west elevation) would reduce the duration and intensity glare on 155 Federal Street. SGH 06

- **South Elevation Area:** Consider changing the shape and height of the south elevation to reduce the overall surface area that reflects light onto the north elevation of 155 Federal Street. SGH 07
- **Architectural Features:** Consider breaking up the continuous reflective glass facade by introducing as much façade area as possible clad in a lower reflectance material. For example, reflections can be reduced if spandrel and other opaque areas are converted from glazed panels to a dark-colored, matte finish panel, such as a lower reflectance Alucabond panel. Enlarging spandrels by raising sill heights to cover a larger surface area is another strategy to lower the overall average reflectance of the facade. The specific size and materiality requires further study. SGH 08
- **Shading Devices:** Consider adding external shading such as fins or overhangs to prevent some of the direct sun from reflecting off the tower. The shading devices have an added benefit of reducing the cooling loads in the tower, but are surfaces on which snow and ice can accumulate. SGH 09
- **Glazing Selection:** Consider other glazing options that meet the same or better U-factor, solar heat gain coefficient (SHGC) and visual light transmittance (VLT) as VRE1-54, but with a lower external reflectance. The proposed Viracon VRE1-54 glazing has 32% external visual reflectance, 37% external solar reflectance, and 47% VLT. As an example to consider, Viracon's VNE1-63 is only 10% external visual reflectance, with substantially better VLT at 62%, and has a slightly better U-factor and SHGC. At different angles, the reflectance could be higher, therefore further analysis is required to verify the overall impact. SGH 10

While these strategies may not eliminate intolerable glare conditions, they may help to reduce the intensity and duration of each occurrence. Further study is needed to confirm which of the above-listed strategies or combination of strategies are the most effective at mitigating reflections. As noted by RWDI, an occupant that relocates or looks away can remove a glare condition, therefore viewpoint is critical. However, in most office areas, and given the intolerable glare duration, it may be onerous on some occupants to relocate. SGH 11

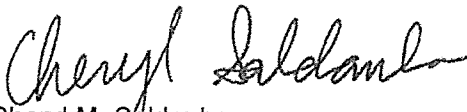
An additional strategy to help reduce intolerable glare is to deploy interior visual comfort shades. Under the existing conditions, occupants may not need to deploy interior visual comfort shades as frequently to address the disturbing glare conditions. However, once Winthrop Square Tower is built, occupants would need to deploy the shades more frequently to address the intolerable glare, which reduces daylight penetration and blocks view to the exterior. At some locations, such as Receptor Point F29, shades may need to be deployed daily, whereas in other locations, such as Receptor Point F30 or F31, it may only be needed during summer and shoulder seasons. Studies show that once shades are closed, they are not often re-opened once the glare condition has elapsed. One option to consider is installing a woven fabric shade that allows some daylight penetration and allows some view to the exterior, but would reduce glare. SGH 12

4. CONCLUSIONS AND RECOMMENDATIONS

Based on our review of the RWDI reports and our DGP analysis, we conclude and recommend the following for Winthrop Square Tower:

- Winthrop Square Tower will increase the DGP from disturbing to intolerable levels for portions of the north elevation of 155 Federal Street and 10 High Street. This occurs every day over the course of the year for some locations, and different durations for other locations. We recommend additional analysis to determine the area of the facade impacted. SGH 13
- RWDI notes the thermal impacts to 155 Federal Street are low, with additional reflected loads ranging from 50 to 150 W/m² depending on the time of year. We recommend further study of 155 Federal Street's mechanical systems to determine if the existing capacity can manage the additional loads. SGH 14
- We recommend Winthrop Square Tower consider adjustments to the south elevation to reduce reflections onto 155 Federal Street, including but not limited to: reducing the size/height of the south elevation, modifying the angle of the south elevation, modifying the size and materiality of spandrels, adding other architectural features or shading devices, and selecting less reflective glazing. Further study is needed to evaluate which combination of mitigation strategies are most effective to reduce the intensity or duration of reflections onto 155 Federal Street. SGH 15

Sincerely yours,



Cheryl M. Saldanha
Senior Staff II – Building Enclosures



Peter E. Nelson, P.E.
Senior Principal
MA License No. 32413 (Structural)

SGH 01 ... the modified criteria RWDI uses for the adjacent buildings is not the industry standard method to evaluate glare within an interior office context. From the perspective of building occupants in an office, Daylight Glare Probability (DGP) is more appropriate to quantify the probability of glare.

When assessing visual glare potential from reflected sunlight, RWDI uses a metric which is employed by the FAA when assessing glare impacts on pilots and airport staff. RWDI chooses to use this metric for two reasons:

1. The FAA metric is based on glare's ability to cause a physical reaction in the eye, as opposed to the subjective ranking system used with the DGP metric. The effectiveness of using DGP has been investigated in numerous recent academic studies which highlighted the fact that a person's subjective ranking of glare can be affected by many factors not accounted for in DGP, which can lead to inconsistent results.
2. Accurate DGP predictions rely heavily on a detailed understanding of the material properties of the surrounding built environment as well as the material properties of windows and walls within the space of interest. These factors are typically unknown for older existing buildings, as evidenced in the SGH report whereby the study assumes the type of glass for the 155 Federal Street building.

By focusing on the presence of reflected sunlight at the façade itself, the current study provides a comprehensive understanding of the potential for glare regardless of the interior condition of any effected spaces. In this case we feel this approach to be robust and less subjective than using DGP.

SGH 02 Our results (Figs. 3 and 4) show that when Winthrop Square Tower is added to the view, DGP increases from disturbing to intolerable. This result is specific to one upper and less obstructed location (point of view) and at one point in time. RWDI also studied two lower and more obstructed locations, Receptor Points F30 and F31, however, it is important to note this glare condition is not isolated to these three locations and would likely cover a large portion of the north elevation. Further study is needed to show the path of reflections over the day across the north elevation and to understand the extents of intolerable glare conditions.

RWDI's analysis was for three representative points along the façade to yield a general understanding of the potential impact across the 155 Federal Street building, in the same way that SGH only simulated a single view point at a single

time of day in their simulations. RWDI will further study the new tower design and the potential solar reflection impacts on 155 Federal Street. Throughout the revised study, RWDI will work with the Project team to assess various mitigative strategies to try and reduce the intensity and duration of solar reflection onto 155 Federal Street building.

SGH 03 RWDI's analysis shows the impact of reflected thermal energy is low. The reflected thermal energy in winter is roughly 150 W/m², and in summer is much lower at 50W/m² or less because the sun is higher in the sky. A better understanding of the impact of the additional reflected energy requires further study of the existing mechanical systems and conditions at 155 Federal Street. For example, if the mechanical system currently has the capacity to manage the winter heating load, an additional 150 W/m² from reflections off the new tower for 1 hr could trigger cooling at the north elevation that may or may not be available. On the other hand, the reflected energy in winter may help reduce the need for heating. The additional 50W/m² summer load should be managed by typical mechanical system safety factors, but there could be overheating issues if existing systems are operating at their full capacity. Therefore, it is necessary to review the existing building mechanical system in detail and understand if the duration and intensity of reflected thermal energy at different times of the year would help or overwhelm the existing systems.

RWDI's analysis is intended to provide an understanding of the intensities of reflections which impact *the façade* of the 155 Federal Street building. Depending on wall construction only a fraction of the energy would actually transmit into the building. Moreover, the distance between the towers and the percentage of time that the 155 Federal Street building would be in reflection makes it unlikely that existing mechanical systems would be disturbed by reflections from the Project.

SGH 04 One item that RWDI's report does not directly address is the potential for accelerated deterioration of materials due to added thermal and ultraviolet radiation. While the radiation may not be enough to melt or deform materials, some roofing materials and sealants degrade more quickly if exposed to significant radiation. Further study is needed to determine if 155 Federal Street includes materials that are sensitive to this kind of degradation.

RWDI cannot comment on the deterioration of materials for two reasons, firstly RWDI are not experts in the properties of building materials, and secondly, there are many variables that contribute to the degradation of building components such as moisture, relative humidity and freeze thaw cycles. The building already

experiences these conditions along with direct solar radiation from the sun. These environmental factors all occur independently without the presence of the new Winthrop Square Project.

SGH 05 Building Orientation: Consider rotating the south elevation angle to redirect light away from the north elevation of 155 Federal Street.

From a glare perspective, while this will reduce (but likely not eliminate) glare impacts on the 155 Federal Street building, this would likely simply shift the impacts onto another property as well as introduce other urban design issues. See updated description, plans, and imagery shown in Section 4.0 Urban Design.

SGH 06 Facade Articulation: The present south elevation generates consistent glare on 155 Federal Street because it is flat like a mirror. The introduction of a faceted rather than flat articulation (similar to the saw-tooth features on the west elevation) would reduce the duration and intensity glare on 155 Federal Street.

See updated description, plans, and imagery shown in Sections 1.0 and 4.0 Urban Design. Fins and mullion articulation have been introduced on the east tower and the architect will work closely with RWDI to tailor their design to minimize the frequency and duration of glare.

SGH 07 South Elevation Area: Consider changing the shape and height of the south elevation to reduce the overall surface area that reflects light onto the north elevation of 155 Federal Street.

See updated description, plans, and imagery shown in Section 4.0 Urban Design which shows a revised design.

SGH 08 Architectural Features: Consider breaking up the continuous reflective glass façade by introducing as much façade area as possible clad in a lower reflectance material. For example, reflections can be reduced if spandrel and other opaque areas are converted from glazed panels to a dark-colored, matte finish panel, such as a lower reflectance Alucabond panel. Enlarging spandrels by raising sill heights to cover a larger surface area is another strategy to lower the overall average reflectance of the facade. The specific size and materiality requires further study.

The architect will work closely with RWDI as the façade materials and architectural features are refined during the continuing design review process with the BPDA.

SGH 09 **Shading Devices:** Consider adding external shading such as fins or overhangs to prevent some of the direct sun from reflecting off the tower. The shading devices have an added benefit of reducing the cooling loads in the tower, but are surfaces on which snow and ice can accumulate.

Façade materials, mullions, fins and the exact glass material will be further studied through the continuing design review process with the BPDA. RWDI agrees that external overhangs and fins can prevent some reflections but can be a hazard in the winter time.

SGH 10 **Glazing Selection:** Consider other glazing options that meet the same or better U-factor, solar heat gain coefficient (SHGC) and visual light transmittance (VLT) as VRE1-54, but with a lower external reflectance. The proposed Viracon VREI-54 glazing has 32% external visual reflectance, 37% external solar reflectance, and 47% VLT. As an example to consider, Viracon's VNEI-63 is only 10% external visual reflectance, with substantially better VLT at 62%, and has a slightly better U-factor and SHGC. At different angles, the reflectance could be higher, therefore further analysis is required to verify the overall impact.

Previous RWDI reports noted using lower reflectivity glazing as a viable solution to reduce but not eliminate the visual impact of reflections from the proposed tower. During ongoing design review with the BPDA, the effectiveness of VNEI-63 glazing with respect to reducing solar glare will be explored by RWDI and the architect. Glazing will be studied with the BPDA through the continuing design review and chosen against several criteria including performance and glare mitigation as the design progresses.

SGH 11 **While these strategies may not eliminate intolerable glare conditions, they may help to reduce the intensity and duration of each occurrence. Further study is needed to confirm which of the above-listed strategies or combination of strategies are the most effective at mitigating reflections. As noted by RWDI, an occupant that relocates or looks away can remove a glare condition, therefore viewpoint is critical. However, in most office areas, and given the intolerable glare duration, it may be onerous on some occupants to relocate.**

RWDI agrees that further design refinements are required and have been engaged by the Proponent to continue strategies as the design progresses. The 155 Federal Street building is included in the scope and the façade facing the Project will be fully studied with respect to the visual and thermal effects of reflected sunlight.

SGH 12 An additional strategy to help reduce intolerable glare is to deploy interior visual comfort shades. Under the existing conditions, occupants may not need to deploy interior visual comfort shades as frequently to address the disturbing glare conditions. However, once Winthrop Square Tower is built, occupants would need to deploy the shades more frequently to address the intolerable glare, which reduces daylight penetration and blocks view to the exterior. At some locations, such as Receptor Point F29, shades may need to be deployed daily, whereas in other locations, such as Receptor Point F30 or F31, it may only be needed during summer and shoulder seasons. Studies show that once shades are closed, they are not often re-opened once the glare condition has elapsed. One option to consider is installing a woven fabric shade that allows some daylight penetration and allows some view to the exterior, but would reduce glare.

RWDI agrees that interior visual comfort shades will likely reduce glare.

SGH 13 Winthrop Square Tower will increase the DGP from disturbing to intolerable levels for portions of the north elevation of 155 Federal Street and 10 High Street. This occurs every day over the course of the year for some locations, and different durations for other locations. We recommend additional analysis to determine the area of the façade impacted.

See Response to Comment SGH 02 regarding the visual impact and the Response to Comment for SGH 11 regarding the Proponent's intention to perform additional analysis. As stated above, the DGP metric is very subjective and is very sensitive to the assumptions made in the SGH report. Visual glare impacting the façade of 155 Federal Street that faces the Project will be studied further.

SGH 14 RWDI notes the thermal impacts to 155 Federal Street are low, with additional reflected loads ranging from 50 to 150 W/m² depending on the time of year. We recommend further study of 155 Federal Street's mechanical systems to determine if the existing capacity can manage the additional loads.

See Response to Comment SGH 03 regarding the thermal impacts. Thermal impacts from the solar glare of the Project will not cause disruption to the mechanical systems of 155 Federal Street.

SGH 15 We recommend Winthrop Square Tower consider adjustments to the south elevation to reduce reflections onto 155 Federal Street, including but not limited to: reducing the size/height of the south elevation, modifying the

angle of the south elevation, modifying the size and materiality of spandrels, adding other architectural features or shading devices, and selecting less reflective glazing. Further study is needed to evaluate which combination of mitigation strategies are most effective to reduce the intensity or duration of reflections onto 155 Federal Street.

See Responses to Comments for SGH 05 to SGH 012 regarding mitigation options. As mentioned in a previous response, such articulations to the façade may cause problems elsewhere. The Project team will evaluate a variety of strategies to reduce solar reflection.

B.E. REALTY LIMITED PARTNERSHIP

Two Charlesgate West • Boston, MA 02215-3552 • 617/638-3365 • Fax 617/638-3386

March 19, 2018

BRA

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Brian Golden
Director
Boston Planning & Development Agency
One City Hall, ninth floor
Boston, Massachusetts 02201

Dear Brian:

The BPDA encouraged us to express our strong feelings about this development. In general, we are supportive of a redevelopment of the Winthrop garage site. However, we have serious concerns with the current proposal. Our comments are as follows:

1. As a direct abutter and a 25-year owner of 133 Federal Street building, we are supportive of a development which enhances the Central Business District (CBD), the surrounding buildings, and particularly the abutting buildings. We have been cooperating by allowing a water connection on our property which has caused water damage to our building. We have cooperated in temporary closures to Federal Court to assist Millennium Partners (MP) in facilitating the demolition of the existing garage. We have also allowed hazardous waste to be moved onto our property from the demolished garage to facilitate its removal.
2. The City and BPDA are both the seller of this land and the regulator of this development. This seems to have created a significant conflict of interest. The City and BPDA do not appear to be balancing these two roles and the unprecedented 34.5 FAR mid-block development is poor urban design and extremely detrimental to the surrounding buildings and the entire CBD.
3. We have met with MP and the BPDA on several occasions in an effort to provide BE 01 input into the integration of this development with the neighborhood and surrounding buildings and to enhance the urban planning and design solution with little to no progress.
4. This new development is about 37% larger than the RFP development submittal BE 02 by MP resulting in an unprecedented 34.5 FAR

5. This 34.5 FAR is even more detrimental to good urban planning as this is a Mid-Block site with existing 350 ft. and 400 ft. towers on each side. This is a significant deviation from MP's RFP proposal and, to our knowledge, such high walls and dense massing in such close proximity to existing buildings occurs nowhere else in Boston. It is our view that this proposed design is inconsistent with best practices in urban planning and will create significant adverse impacts on the office rents in the surrounding buildings. BE 03

6. The perimeter of the proposed development has only approximately a 30% street frontage. The average ratio of exterior wall to street frontage for large buildings in Boston is closer to 75%. Thus, this creates very close abutting buildings with limited light and surrounding space. This creates a poor working environment for the existing office space and the new proposed office space and will adversely affect the value and tax basis for these buildings. BE 04

7. Structural issues are extremely important. MP has told us and the other abutters that they will not have their structural plans completed prior to the end of the comment period. Given the size of this project, the depth of the foundations and the proximity to abutting buildings, the BPDA should keep the comment period open until MP's structural plan is presented and all abutters have had a reasonable time to evaluate and comment. BE 05

8. The proposed building dwarfs 133 Federal Street, which is a Paul Rudolf building. BE 06

9. Federal Court has been used for parking for 133 Federal Street since it was built in 1960, and this parking has become very important to the 133 Federal Street building. The deeded right of vehicle pass through on Federal Court is critical to the operation of the 133 Federal Street building. BE 07

10. We understand that MP intends to put an in/out ramp to their garage immediately adjacent to the existing 75/101 Federal ramp on Federal Street, further compromising the streetscape and creating potential traffic and pedestrian bottlenecks and safety issues. BE 08

11. The Great Hall is now not even a Good Hall as it is narrower and darker, and the entrances have been reduced to possibly make it a Lost Hall. BE 09

12. The BCDC emphasized many of these same points as described above. In fact, BE 10 one member of the BCDC called this a Bait and Switch by MP. The BCDC also felt the massive T-shaped building is no longer an elegant and iconic building as required in the RFP. MP's original RFP did meet these criteria.

13. The owners of 133 Federal Street building have discussed with the BPDA a BE 11 possible residential tower on our plaza and partially over our existing building. MP's development next door with an excessive FAR will be extremely detrimental to our reasonable development plan.

14. In response to the RFP, MP proposed a 775' tall building with 1,153,000 SF. The BE 12 area was confirmed in their Letter of Intent. The DPIR list the project area as 1,581,000 at a reduced height of 664' from the original submission. MP has increased the square footage of the building by approximately 37%. With the 37% increase in area MP has only proposed about a 10% increase in the purchase price.

15. This overly dense T-shaped tower was panned by the BCDC and no longer is an BE 13 iconic structure representing the "Best of Boston".

Sincerely,



Steven B. Belkin
Chairman

SBB:dj

B.E. REALTY LIMITED PARTNERSHIP

BE 01 We have met with MP and the BPDA on several occasions in an effort to provide input into the integration of this development with the neighborhood and surrounding buildings and to enhance the urban planning and design solution with little to no progress.

The Proponent has met and has had conversations with representatives of B. E. Realty Limited Partnership, the owners of 133 Federal Street, on a number of occasions, and the Proponent does not agree with most of B. E. Realty's inputs. The Proponent encourages continued dialogue particularly around ground level improvements to Federal Court, the private way that the Proponent shares with 133 Federal Street and 100 Summer Street.

BE 02 This new development is about 37% larger than the RFP development submittal by MP resulting in an unprecedented 34.5 FAR.

The project in the Project Notification Form dated November 8, 2016 was described as approximately 1,100,000 to 1,500,000 square feet. The project as described in the Draft PIR and as advanced through the on-going BPDA design review was 1,592,000 square feet, an increase of approximately 6.2%. The Draft PIR studies were based upon the 1,592,000 square feet

Please see Appendix E for the Block FAR analysis prepared by Handel Architects.

The Project's significant FAR is in alignment with the extraordinary level of Public Benefits that the Project provides city-wide and which have been articulated throughout the public process.

BE 03 This 34.5 FAR is even more detrimental to good urban planning as this is a Mid-Block site with existing 350 ft. and 400 ft. towers on each side. This is a significant deviation from MP's RFP proposal and, to our knowledge, such high walls and dense massing in such close proximity to existing buildings occurs nowhere else in Boston. It is our view that this proposed design is inconsistent with best practices in urban planning and will create significant adverse impacts on the office rents in the surrounding buildings.

A FAR calculation alone, whether significant or insignificant, is not a determinant of good urban planning, rather a project in its entirety must be evaluated. In this effort, the Proponent has continued to work with the BPDA and BCDC to advance the design. See updated description, plans and imagery shown in Section 4.0 Urban Design. On May 1, 2018, the BCDC voted to approve the Project's design.

It is the Proponent's view that the extraordinary investment being made into the Project site and the immediate surroundings as well as the economic activity and the Project's vibrancy will have a positive effect on the economic health of Downtown Boston and the City itself. Indeed this has been the effect of many other significant projects in the City and most recently with the Millennium Tower and Burnham building redevelopment, a project completed by an affiliate of the Proponent.

BE 04 **The perimeter of the proposed development has only approximately a 30% street frontage. The average ratio of exterior wall to street frontage for large buildings in Boston is closer to 75%. Thus, this creates very close abutting buildings with limited light and surrounding space. This creates a poor working environment for the existing office space and the new proposed office space and will adversely affect the value and tax basis for these buildings.**

The Proponent disagrees with the average street face percentages referenced above. The City has plenty of examples of lower street frontages including many of the buildings along Tremont Street, many Back Bay buildings and numerous buildings downtown including on Congress, Federal and Franklin streets. See Appendix E.

In addition, the Project is on a uniquely shaped infill site which impacts the ratio indicated, and makes direct comparison difficult; furthermore, this calculation does not take into consideration the area of Federal Court shared private way, which if taken into consideration would be significantly more than that stated by B. E. Realty. The Project steps back from its property line where direct abutters are adjacent and built on the property line with no setback. It is the Proponent's view, backed up by their investment, that the new proposed office space will likely be the highest rent generating office space in the City considering limited views. The proposed Project offers a substantial increase in annual real estate taxes for the City and further, the Proponent believes that the value of property in the Downtown area will improve as a result of the development of the proposed Project.

BE 05 **Structural issues are extremely important. MP has told us and the other abutters that they will not have their structural plans completed prior to the end of the comment period. Given the size of this project, the depth of the foundations and the proximity to abutting buildings, the BPDA should keep the comment period open until MP's structural plan is presented and all abutters have had a reasonable time to evaluate and comment.**

City of Boston Inspectional Services Department (ISD) require a geotechnical report and structural report prior to the issuance of any foundation permit. In addition, as part of the Article 80 review, the BPDA has continuing design review authority and must approve the design development plans, as well as the foundation plans. The BPDA sign off is required prior to the issuance of a permit from ISD. Since this process is part of the Article 80 review and the abutters have made their concerns public, there is no reason to leave the comment period open. Comments have been noted and will be addressed as noted in Response to Comment BPDA 39.

BE 06 The proposed building dwarfs 133 Federal Street, which is a Paul Rudolf building.

The historical and architectural significance of 133 Federal Street has been a clear consideration in the Project's design. As illustrated in the attached plans and renderings in Section 4.0 Urban Design, the design respects and complements the architecturally significant Paul Rudolf building at 133 Federal Street.

BE 07 Federal Court has been used for parking for 133 Federal Street since it was built in 1960, and this parking has become very important to the 133 Federal Street building. The deeded right of vehicle pass through on Federal Court is critical to the operation of the 133 Federal Street building.

The Proponent has similar right in Federal Court as 133 Federal Street and the 100 Summer Street buildings and these legal rights will be maintained without change. Federal Court is a private way, and each party having an interest in Federal Court has the right to pass and repass over Federal Court without material interference to the other owners. No party (*i.e.*, 133 Federal Street, 100 Summer Street or the Proponent) has the right to use Federal Court for parking if that parking would cause a material interference to the other owners' rights of passage. The Proponent is hopeful that all property rights holders can work together to come up with a better use and design for Federal Court after completion of the building. The Proponent is working with 133 Federal Street and 100 Summer Street to arrange for the temporary use of Federal Court in order to protect workers and the public during construction.

BE 08 We understand that MP intends to put an in/out ramp to their garage immediately adjacent to the existing 75/101 Federal ramp on Federal Street, further compromising the streetscape and creating potential traffic and pedestrian bottlenecks and safety issues.

An analysis of the operations of the proposed Federal Street in/out garage ramp is included in the memorandum prepared by Walker Consultants presented in the Transportation Appendix.

BE 09 **The Great Hall is now not even a Good Hall as it is narrower and darker, and the entrances have been reduced to possibly make it a Lost Hall.**

The Proponent disagrees with this conclusion however agrees that the entrances on both Devonshire and Federal streets need to be made more prominent and the design is moving significantly in that direction, resulting in the BCDC approval on May 1, 2018. See updated description, plans, and imagery shown in Section 4.0 Urban Design.

BE 10 **The BCDC emphasized many of these same points as described above. In fact, one member of the BCDC called this a Bait and Switch by MP. The BCDC also felt the massive T-shaped building is no longer an elegant and iconic building as required in the RFP. MP's original RFP did meet these criteria.**

The Proponent has completed several design review committee meetings with the BCDC commissioners and the design has advanced, resulting in approval from the BCDC on May 1, 2018. See updated images (Figures 1-1 through 1-8 and Figures 4-1 through Figure 4-8).

BE 11 **The owners of 133 Federal Street building have discussed with the BPDA a possible residential tower on our plaza and partially over our existing building. MP's development next door with an excessive FAR will be extremely detrimental to our reasonable development plan.**

The proposed Project has no effect on the zoning rights of 133 Federal Street, the Paul Rudolph designed mid-century modern building referenced in the Boston Preservation Alliance letter and in this comment letter. The reasonableness of building a residential tower to the south and partially over the Paul Rudolph building, requiring enhanced zoning rights, is an open question.

BE 12 **In response to the RFP, MP proposed a 775' tall building with 1,153,000 SF. The area was confirmed in their Letter of Intent. The DPIR list the project area as 1,581,000 at a reduced height of 664' from the original submission. MP has increased the square footage of the building by approximately 37%. With the 37% increase in area MP has only proposed about a 10% increase in the purchase price.**

The purchase price for the land is not a proposal, it has been agreed to by contract with the City after a comprehensive public selling process, and is as follows: \$102 million paid at transfer of the land, plus \$100 per saleable square foot of residential condominiums paid at unit sales, which, by way of example, would be an additional \$60 million, if the final project were to include 600,000 square feet of sellable residential space.

BE 13 This overly dense T-shaped tower was panned by the BCDC and no longer is an iconic structure representing the “Best of Boston.”

See updated description, plans, and imagery shown in Section 4.0 Urban Design. The design has advanced, resulting in approval from the BCDC on May 1, 2018.

MA-100 Summer Street Owner, L.L.C.
c/o Equity Office Properties
100 Summer Street
Boston, MA 02110

BRA
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March 19, 2018

**BY EMAIL and
HAND DELIVERY**

Brian Golden
Director
Boston Planning and Development Agency
One City Hall Square, 9th Floor
Boston, MA 02201-1007

Re: Draft Environmental Impact Report/Project Impact Report dated January 2, 2018
(the "DEIR/DPIR") for Winthrop Square Tower project (the "Project")

Dear Mr. Golden:

I am writing on behalf of MA-100 Summer Street Owner, L.L.C. ("MA-100 Summer Street"), which owns the 32-story office building commonly known as 100 Summer Street in Boston, to express our objections to the DEIR/DPIR.

Over the past several months, we have been meeting with representatives of MCAF Winthrop LLC and its geotechnical engineers at Haley & Aldrich, Inc. ("Haley & Aldrich") and other members of its project team to discuss our concerns with the Project, which will be constructed on the property immediately adjacent to 100 Summer Street and commonly known as 115 Federal Street (the "Project Site"). As part of this effort, we have engaged geotechnical engineers (GZA GeoEnvironmental, Inc.), structural engineers (McNamara/Salvia, Inc.) and traffic engineers (Vanasse & Associates, Inc.) to study the potential impacts of the project upon our property at 100 Summer Street. We recently shared with MCAF Winthrop LLC the traffic study report prepared on our behalf by Vanasse & Associates, Inc. with respect to the project and expect to continue to work with MCAF Winthrop LLC to address the traffic issues raised in that study. We are hopeful that these concerns regarding traffic issues can be resolved as part of these ongoing discussions.

Our concerns with respect to the potential impacts of the project on the structural integrity of our property at 100 Summer Street stand in a different light altogether. Given the seriousness of these concerns, we have informed MCAF Winthrop LLC that we feel obliged to submit this letter outlining our concerns regarding the incomplete and erroneous geotechnical information in the DEIR/DPIR.

The information that MCAF Winthrop LLC has provided to us indicates that the Project will involve the construction of a new tower building 700 feet in height and extending five levels below grade over substantially all of the Project Site. The foundation wall for the new building will be located on the property line between the Project Site and 100 Summer Street, within eight feet of the foundation of the 100 Summer Street office building. We further understand that the excavation plan will involve the mass excavation of the soils at the Project Site to the bedrock below, requiring excavation to approximately El. -47, or approximately 75 feet below the existing grade at the property line between the Project Site and 100 Summer Street.

In the course of our discussions with MCAF Winthrop LLC, Haley & Aldrich provided SSO 01 us with a copy of its Geotechnical Investigation and Interim Foundation Design Recommendation Report dated November 15, 2017 regarding the Project (the “11/15/17 Geotechnical Report”). In the 11/15/17 Geotechnical Report, Haley & Aldrich concluded, based on its investigation of the soil conditions below the Project Site and 100 Summer Street, its review of the structural plans for 100 Summer Street and its modelling of potential settlement impacts associated with the excavation work, that the building at 100 Summer Street will likely experience 1 to 1.5 inches of settlement as a result of the excavation work associated with the construction of the foundation and five-level subsurface parking garage for the Project assuming the general contractor employs “good construction techniques.” Moreover, the 11/15/17 Geotechnical Report states that this amount of settlement does not include the additional settlement associated with the dewatering activity at the Project Site. Haley & Aldrich has subsequently indicated to our geotechnical engineers at GZA GeoEnvironmental, Inc. that the dewatering activity associated with the Project may increase the amount of differential settlement by another .2 inches. Based on these findings of MCAF Winthrop LLC’s geotechnical engineers at Haley & Aldrich, we have been awaiting a further report from Haley & Aldrich regarding the steps that must be taken to protect the property at 100 Summer Street from experiencing the levels of settlement that Haley & Aldrich has estimated will be caused by the Project, which we are advised may cause significant structural damage to our building. MCAF Winthrop LLC has recently informed us, however, that Haley & Aldrich will not issue its follow-on report until after the public comment period on the DEIR/DPIR has expired.

The DEIR/DPIR that MCAF Winthrop LLC submitted to the Boston Planning and SSO 02 Development Agency and the Executive Office of Energy and Environmental Affairs states (at p. 5-135) that the nearby buildings, including 100 Summer Street, “are supported on deep foundations bearing in very competent strata (glacial till or bedrock) at estimated depths ranging from about 50 to 80 feet, and are not anticipated to experience adverse movements as a result of the planned construction.” This statement is not correct in two important respects. First, the 11/15/17 Geotechnical Report prepared by Haley & Aldrich states that the building at 100 Summer Street is supported on concrete caissons bearing in glacial soil at varying depths between approximately El. 0 and El. -20, or approximately 28 to 48 feet below grade. At no point, therefore, do the concrete caissons supporting 100 Summer Street extend to a depth of 50 to 80 feet below grade. We understand that MCAF Winthrop LLC has acknowledged this error in the DEIR/DPIR and has recently corrected it in the FEIR for the project and its recent status update to the BPDA regarding the geotechnical analysis for the project. We nevertheless want to underscore the significance of this erroneous statement in the DEIR/DPIR because the excavation and dewatering work associated with the construction of the foundation and five-level

subsurface parking garage for the Project will extend to a depth of 75 feet below grade over the Project Site, or 27 to 47 feet below the concrete caissons supporting 100 Summer Street.

The statement in the DEIR/DPIR that the building at 100 Summer Street is “not anticipated to experience adverse movements as a result of the planned construction” is also not correct. As Haley & Aldrich has itself acknowledged, the proposed construction work will cause the building at 100 Summer Street to experience a significant amount of differential settlement on the order of 1.2 to 1.7 inches, which we understand may well compromise the structural integrity of the building at 100 Summer Street. The DEIR/DPIR also states in conclusory fashion (at p. 5-134) that the “foundation design and construction will be conducted to control and limit potential adverse impacts, especially to adjacent structures, using methods that have proven successful on many similar projects in Boston.” This statement fails to account for the fact that Haley & Aldrich has predicted that the building at 100 Summer Street will experience 1.2 to 1.7 inches of differential settlement even if the contractor employs “good construction techniques.” The DEIR/DPIR nowhere indicates that the “proven methods” of construction referenced therein will ensure that the building at 100 Summer Street does not experience the differential settlement that Haley & Aldrich has predicted.

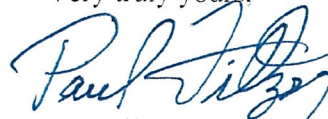
SSO 03

In sum, the statements in the DEIR/DPIR regarding the impacts of the Project upon the building at 100 Summer Street are not supported by the existing engineering work performed by Haley & Aldrich and reviewed by our engineering team. As the proponent of the Project, MCAF Winthrop LLC has an obligation to ensure that the construction of the Project does not adversely impact the structural integrity of the nearby buildings, and to share the engineering support for its conclusions with our engineers so that we may satisfy ourselves that the Project will not adversely impact our property. To this point in time, MCAF Winthrop LLC has failed to do so.

SSO 04

On March 12, 2018, we sent a letter to MCAF Winthrop LLC detailing the concerns set forth in this letter regarding the potential structural impacts of the project upon our property and requesting that MCAF Winthrop LLC agree to extend the public comment period with respect to the DEIR/DPIR until the follow-on Haley & Aldrich report has been prepared and reviewed by our engineers. On March 15, 2018, MCAF Winthrop LLC informed us in writing that it would not agree to extend the comment period. Under the circumstances, therefore, we have no choice but to express our strong objection to the Project, which should not be approved until the geotechnical analysis has been completed and our engineers have been afforded an opportunity to review the same.

Very truly yours,



Paul Filtzer

SSO 01 In the course of our discussions with MCAF Winthrop LLC, Haley & Aldrich provided us with a copy of its Geotechnical Investigation and Interim Foundation Design Recommendation Report dated November 15, 2017 regarding the Project (the "11/15/17 Geotechnical Report"). In the 11/15/17 Geotechnical Report, Haley & Aldrich concluded, based on its investigation of the soil conditions below the Project Site and 100 Summer Street, its review of the structural plans for 100 Summer Street and its modelling of potential settlement impacts associated with the excavation work, that the building at 100 Summer Street will likely experience 1 to 1.5 inches of settlement as a result of the excavation work associated with the construction of the foundation and five-level subsurface parking garage for the Project assuming the general contractor employs "good construction techniques." Moreover, the 11/15/17 Geotechnical Report states that this amount of settlement does not include the additional settlement associated with the dewatering activity at the Project Site. Haley & Aldrich has subsequently indicated to our geotechnical engineers at GZA GeoEnvironmental, Inc. that the dewatering activity associated with the Project may increase the amount of differential settlement by another .2 inches. Based on these findings of MCAF Winthrop LLC's geotechnical engineers at Haley & Aldrich, we have been awaiting a further report from Haley & Aldrich regarding the steps that must be taken to protect the property at 100 Summer Street from experiencing the levels of settlement that Haley & Aldrich has estimated will be caused by the Project, which we are advised may cause significant structural damage to our building. MCAF Winthrop LLC has recently informed us, however, that Haley & Aldrich will not issue its follow-on report until after the public comment period on the DEIR/DPIR has expired.

The Proponent understands the concerns expressed by 100 Summer Street Owner stated above. Section 6.0 of this Supplemental Information provides additional information about design changes and refinements to construction techniques that the Proponent will take to minimize impacts to 100 Summer Street and other abutters, such as the use of top/down construction. In addition, Haley & Aldrich, the Proponent's geotechnical engineer, has recently completed more sophisticated computer modeling which, together with the revised design and construction techniques, indicate that the impact to the 100 Summer Street will be reduced to levels that have not produced structural damage on similar construction projects in and around Boston. It is anticipated that the results of the additional ground water testing described in Section 6.0 together with further refinement of the Winthrop Square Project design will further mitigate the impacts on 100 Summer Street.

The Proponent has recently shared this latest analysis and will share the results of the additional testing and continued design refinement with 100 Summer Street Owner.

The Proponent also acknowledges that although the comment period for the Draft PIR has concluded, the BPDA requires continuing design review of the Project, including design development and construction documents, and the City of Boston Inspection Services Department will not issue a foundation permit without a final geotechnical report.

SSO 02

The DEIR/DPIR that MCAF Winthrop LLC submitted to the Boston Planning and Development Agency and the Executive Office of Energy and Environmental Affairs states (at p.5-135) that the nearby buildings, including 100 Summer Street, “are supported on deep foundations bearing in very competent strata (glacial till or bedrock) at estimated depths ranging from about 50 to 80 feet, and are not anticipated to experience adverse movements as a result of the planned construction.” This statement is not correct in two important respects. First, the 11/15/17 Geotechnical Report prepared by Haley & Aldrich states that the building at 100 Summer Street is supported on concrete caissons bearing in glacial soil at varying depths between approximately El. 0 and El. -20, or approximately 28 to 48 feet below grade. At no point, therefore, do the concrete caissons supporting 100 Summer Street extend to a depth of 50 to 80 feet below grade. We understand that MCAF Winthrop LLC has acknowledged this error in the DEIR/DPIR and has recently corrected it in the FEIR for the project and its recent status update to the BPDA regarding the geotechnical analysis for the project. We nevertheless want to underscore the significance of this erroneous statement in the DEIR/DPIR because the excavation and dewatering work associated with the construction of the foundation and five-level subsurface parking garage for the Project will extend to a depth of 75 feet below grade over the Project Site, or 27 to 47 feet below the concrete caissons supporting 100 Summer Street.

The Proponent understands the concerns of 100 Summer Street Owner and agrees that the underlying information about its building must be correct. A public comment letter was sent to the BPDA by the Proponent (as included in Appendix D) which summarized additional information about 100 Summer Street’s structure received from 100 Summer Street’s engineers. The calculations recently issued to 100 Summer Street Owner include accurate information about the building’s structure and foundations. Together with the other factors described herein, including more sophisticated modeling and revised construction techniques, these revised calculations show a reduced impact to 100 Summer Street.

SSO 03 The statement in the DEIR/DPIR that the building at 100 Summer Street is “not anticipated to experience adverse movements as a result of the planned construction” is also not correct. As Haley & Aldrich has itself acknowledged, the proposed construction work will cause the building at 100 Summer Street to experience a significant amount of differential settlement on the order of 1.2 to 1.7 inches, which we understand may well compromise the structural integrity of the building at 100 Summer Street. The DEIR/DPIR also states in conclusory fashion (at p. 5-134) that the “foundation design and construction will be conducted to control and limit potential adverse impacts, especially to adjacent structures using methods that have proven successful on many similar projects in Boston.” This statement fails to account for the fact that Haley & Aldrich has predicted that the building at 100 Summer Street will experience 1.2 to 1.7 inches of differential settlement even if the contractor employs “good construction techniques.” The DEIR/DPIR nowhere indicates that the “proven methods” of construction referenced therein will ensure that the building at 100 Summer Street does not experience the differential settlement that Haley & Aldrich has predicted.

The most recent calculations predict that the impact to 100 Summer Street will be limited and consistent with other Haley & Aldrich historical projects in the City of Boston that did not cause structural damage on similarly situated adjacent structures. The Proponent understands that each building project and the abutters are unique and therefore the Proponent also has committed as described in Section 6.3 to an extensive instrumentation program for monitoring construction activities.

SSO 04 In sum, the statements in the DEIR/DPIR regarding the impacts of the Project upon the building at 100 Summer Street are not supported by the existing engineering work performed by Haley & Aldrich and reviewed by our engineering team. As the proponent of the Project, MCAF Winthrop LLC has an obligation to ensure that the construction of the Project does not adversely impact the structural integrity of the nearby buildings, and to share the engineering support for its conclusions with our engineers so that we may satisfy ourselves that the Project will not adversely impact our property. To this point in time, MCAF Winthrop LLC has failed to do so.

The Proponent agrees that the construction of the Project should not adversely impact the structural integrity of nearby buildings. The Proponent has shared its engineering calculations to date, most recently an interim report based on additional calculations and engineering evaluations. The more sophisticated computer modeling and factoring in the revised construction techniques outlined in Section 6.0 shows a reduction in the predicted impacts to 100

Summer Street. The Proponent's geotechnical engineer, Haley & Aldrich, has not completed the ground water testing and continues to refine the foundation design. This ongoing data and analysis will continue to be shared with the 100 Summer Street Owner when available.

MA-100 Summer Street Owner, L.L.C.
c/o Equity Office Properties
100 Summer Street
Boston, MA 02110

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'18 MAR 12 PM 12:32:37

March 12, 2018

**BY EMAIL and
FIRST CLASS MAIL**

MCAF Winthrop LLC
c/o Kathleen MacNeil
Millennium Partners
7 Water Street
Boston, MA 02109

Re: Draft Environmental Impact Report/Project Impact Report dated January 2, 2018
(the "DEIR") for Winthrop Square Tower project (the "Project")

Dear Kathy:

I am writing on behalf of MA-100 Summer Street Owner, L.L.C. ("MA-100 Summer Street"), which owns the 32-story office building commonly known as 100 Summer Street in Boston, to express our objections to the DEIR.

As you know, over the past several months, we have been meeting with you, your geotechnical engineers at Haley & Aldrich, Inc. ("Haley & Aldrich") and other members of your project team to discuss our concerns with the Project, which will be constructed on the property immediately adjacent to 100 Summer Street and commonly known as 115 Federal Street (the "Project Site"). Based on the information that you and Haley & Aldrich have provided to us, we understand that the Project will involve the construction of a new tower building 700 feet in height and extending five levels below grade over substantially all of the Project Site. The foundation wall for the new building will be located on the property line between the Project Site and 100 Summer Street, within eight feet of the foundation of the 100 Summer Street office building. We further understand that the excavation plan will involve the mass excavation of the soils at the Project Site to the bedrock below, requiring excavation to approximately E.L. -47, or approximately 75 feet below the existing grade at the property line between the Project Site and 100 Summer Street.

As you also know, in the course of our discussions, Haley & Aldrich provided us with a copy of its Geotechnical Investigation and Interim Foundation Design Recommendation Report dated November 15, 2017 regarding the Project (the "11/15/17 Geotechnical Report"). In the 11/15/17 Geotechnical Report, Haley & Aldrich concluded, based on its investigation of the soil conditions below the Project Site and 100 Summer Street, its review of the structural plans for 100 Summer Street and its modelling of potential settlement impacts associated with the

excavation work, that the building at 100 Summer Street will likely experience 1 to 1.5 inches of differential settlement as a result of the excavation work associated with the construction of the foundation and five-level subsurface parking garage for the Project assuming the general contractor employs "good construction techniques." Moreover, the 11/15/17 Geotechnical Report states that this amount of differential settlement does not include the additional settlement associated with the dewatering activity at the Project Site. Haley & Aldrich has subsequently indicated to our geotechnical engineers at GZA GeoEnvironmental, Inc. ("GZA") that the dewatering activity associated with the Project may increase the amount of settlement by another .2 inches. Based on these findings of your geotechnical engineers at Haley & Aldrich, we have been awaiting a further report from Haley & Aldrich regarding the steps that must be taken to protect the property at 100 Summer Street from experiencing the levels of differential settlement that Haley & Aldrich has estimated will be caused by the Project, which we are advised may cause significant structural damage to our building. You have recently informed us that Haley & Aldrich will not issue its follow-on report until after the public comment period on the DEIR has expired. We are very troubled by this development.

The DEIR that MCAF Winthrop LLC submitted to the Boston Planning and Development Agency and the Executive Office of Energy and Environmental Affairs states (at p. 5-135) that the nearby buildings, including 100 Summer Street, "are supported on deep foundations bearing in very competent strata (glacial till or bedrock) at estimated depths ranging from about 50 to 80 feet, and are not anticipated to experience adverse movements as a result of the planned construction." This statement is not correct in two important respects. First, the 11/15/17 Geotechnical Report prepared by Haley & Aldrich states that the building at 100 Summer Street is supported on concrete caissons bearing in glacial soil at varying depths between approximately El. 0 and El. -20, or approximately 28 to 48 feet below grade. At no point, therefore, do the concrete caissons supporting 100 Summer Street extend to a depth of 50 to 80 feet below grade. This is quite significant because the excavation and dewatering work associated with the construction of the foundation and five-level subsurface parking garage for the Project will extend to a depth of 75 feet below grade over the Project Site, or 27 to 47 feet below the concrete caissons supporting 100 Summer Street.

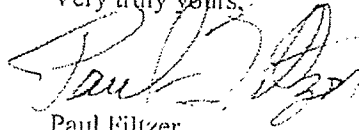
SSO 01

The statement in the DEIR that the building at 100 Summer Street is "not anticipated to experience adverse movements as a result of the planned construction" is also not correct. As Haley & Aldrich has itself acknowledged, the proposed construction work will cause the building at 100 Summer Street to experience a significant amount of differential settlement on the order of 1.2 to 1.7 inches, which we understand may well compromise the structural integrity of the building at 100 Summer Street. The DEIR also states in conclusory fashion (at p. 5-134) that the "foundation design and construction will be conducted to control and limit potential adverse impacts, especially to adjacent structures, using methods that have proven successful on many similar projects in Boston." This statement fails to account for the fact that Haley & Aldrich has predicted that the building at 100 Summer Street will experience 1.2 to 1.7 inches of differential settlement even if the contractor employs "good construction techniques." The DEIR nowhere indicates that the "proven methods" of construction referenced therein will ensure that the building at 100 Summer Street does not experience the differential settlement that Haley & Aldrich has predicted.

SSO 02

The statements in the DEIR regarding the impacts of the Project upon the building at 100 Summer Street are not supported by the existing engineering work performed by Haley & Aldrich and reviewed by our engineering team. As the proponent of the Project, MCAF Winthrop LLC has an obligation to ensure that the construction of the Project does not adversely impact the structural integrity of the nearby buildings, and to share the engineering support for its conclusions with our engineers so that we may satisfy ourselves that the Project will not adversely impact our property. To this point in time, MCAF Winthrop LLC has failed to do so. Under the circumstances, therefore, we strongly urge MCAF Winthrop LLC to agree extend the comment period with respect to the DEIR until such time as the follow-on Haley & Aldrich report has been completed and we have had an opportunity to review it with our engineering team. In the event that MCAF Winthrop LLC refuses to do so, we will have no choice but to submit a letter to BPDA and EOEa opposing the approval of the Project.

Very truly yours,

A handwritten signature in black ink, appearing to read "Paul Filtzer", written in a cursive style.

Paul Filtzer

Director – Portfolio Management

SSO 01 The DEIR/DPIR that MCAF Winthrop LLC submitted to the Boston Planning and Development Agency and the Executive Office of Energy and Environmental Affairs states (at p.5-135) that the nearby buildings, including 100 Summer Street, “are supported on deep foundations bearing in very competent strata (glacial till or bedrock) at estimated depths ranging from about 50 to 80 feet, and are not anticipated to experience adverse movements as a result of the planned construction.” This statement is not correct in two important respects. First, the 11/15/17 Geotechnical Report prepared by Haley & Aldrich states that the building at 100 Summer Street is supported on concrete caissons bearing in glacial soil at varying depths between approximately El. 0 and El. -20, or approximately 28 to 48 feet below grade. At no point, therefore, do the concrete caissons supporting 100 Summer Street extend to a depth of 50 to 80 feet below grade. We understand that MCAF Winthrop LLC has acknowledged this error in the DEIR/DPIR and has recently corrected it in the FEIR for the project and its recent status update to the BPDA regarding the geotechnical analysis for the project. We nevertheless want to underscore the significance of this erroneous statement in the DEIR/DPIR because the excavation and dewatering work associated with the construction of the foundation and five-level subsurface parking garage for the Project will extend to a depth of 75 feet below grade over the Project Site, or 27 to 47 feet below the concrete caissons supporting 100 Summer Street.

Please see the response to SSO 01 in the March 19, 2018 letter.

SSO 02 The statement in the DEIR/DPIR that the building at 100 Summer Street is “not anticipated to experience adverse movements as a result of the planned construction” is also not correct. As Haley & Aldrich has itself acknowledged, the proposed construction work will cause the building at 100 Summer Street to experience a significant amount of differential settlement on the order of 1.2 to 1.7 inches, which we understand may well compromise the structural integrity of the building at 100 Summer Street. The DEIR/DPIR also states in conclusory fashion (at p. 5-134) that the “foundation design and construction will be conducted to control and limit potential adverse impacts, especially to adjacent structures using methods that have proven successful on many similar projects in Boston.” This statement fails to account for the fact that Haley & Aldrich has predicted that the building at 100 Summer Street will experience 1.2 to 1.7 inches of differential settlement even if the contractor employs “good construction techniques.” The DEIR/DPIR nowhere indicates

that the “proven methods” of construction referenced therein will ensure that the building at 100 Summer Street does not experience the differential settlement that Haley & Aldrich has predicted.

Please see the response to SSO 03 in the March 19, 2018 letter.

March 19, 2018

By Email

Mr. Brian P. Golden, Director
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201-1007

Re: 115 Winthrop Square Project

Dear Director Golden:

I am writing in connection with the proposed 115 Winthrop Square project, which is currently under review by the Boston Planning & Development Agency under Article 80B (Large Project Review) of the Boston Zoning Code.

Rockpoint Group, L.L.C. ("Rockpoint") is a Boston-based real estate private equity fund sponsor and Registered Investment Advisor with over \$13.5 billion of assets under management. Rockpoint acts as a fiduciary for its investors, which include public pension funds, among others. Through its affiliates, Rockpoint is the owner of just over 2 million square feet of Class A office space in the immediate vicinity of the 115 Winthrop Square project ("Project"), including the abutting 75-101 Federal Street building, which contains approximately 850,000 square feet of first class office space and ground floor retail/restaurant/bank uses, as well as an approximately 140 space underground parking garage accessed solely from Federal Street. Rockpoint also owns the 100 High Street and 160 Federal Street office buildings directly across the street from the site of the Project, and those buildings together, contain an additional approximately 925,000 square feet of first class office space, together with ground floor retail and restaurant uses on Federal and High Streets. Rockpoint also owns the 99 Summer Street office tower at the intersection of Summer and Devonshire Streets, which contains approximately 300,000 square feet of first class office space together with ground floor retail uses.

In addition to these office properties, Rockpoint affiliates own 100 Arlington Street, the Taj Boston Hotel and the Renaissance Boston Waterfront Hotel; our portfolio in Boston previously included properties such as 265 Franklin Street, One Beacon Street, 99 High Street, 711 Atlantic Ave, 18 Tremont Street, 451 D Street and 27-43 Wormwood Street, as well as the Park Plaza Hotel and The Mandarin Oriental Hotel.

Mr. Brian P. Golden, Director

March 19, 2018

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In short, Rockpoint thinks Boston is a dynamic city in which to do business, which is why RP 01 we were initially delighted when the City chose Millennium Partners to redevelop the former Winthrop Square Garage site into a first-class office and residential tower with a dramatic "Great Hall" that would front on Federal Street. We watched with interest as that project progressed through initial City filings under the City's Article 80B process, and we focused on how a thoughtfully designed and executed new development could help fill the empty gap in the heart of Boston's financial district.

However, the Project as outlined in the Draft Environmental Impact Report/Draft Project Impact Report filed with the BPDA is dramatically different from the building shown in the design plans included in the initial Project Notification Form filing under Article 80B. I want to emphasize that we are not opposed to the height of the Project; rather, we think the combination of the Project's massing and density will have a substantial negative effect on the City streetscape along both Devonshire and Federal Streets, as well as on the use and operation of 75-101 Federal Street and that building's structural stability. Our specific concerns are as follows:

1. Massing. The project now before the BPDA and the Boston Civic Design Commission is RP 02 not at all the project proposed by the proponent in response to the BPDA's initial Request for Proposals (RFP) for the garage site and later shown in the Project Notification Form filed by the proponent with the BPDA under Article 80B of the Boston Zoning Code. First and foremost, the project depicted in the PNF plans contained approximately 1,100,000 square feet of gross floor area, and the project as now proposed is about 500,000 square feet larger, or almost 50% larger than the project depicted in the PNF. This change is not attributable to the Federal Aviation Administration's determination that the project as originally opposed would interfere with aviation navigation; indeed, at the initial BCDC hearing on the Project, the proponent stated that the resultant loss of square footage from that FAA determination was only 120,000 square feet, not the additional 500,000 square feet that is being shown in the current design plans.

The revised massing of the Project gives us great pause and raises significant concerns RP 03 for Rockpoint as the owner of the 75-101 Federal Street, 160 Federal Street, 100 High Street and 99 Summer Street buildings. The Federal Street elevation now extends straight up the face of the building, with a correspondingly bulkier massing, and the resulting building design places the Project directly adjacent to the 75-101 Federal Street Building at a distance of only 22 feet on average and as close as 14 feet. By contrast, typical minimum building separation distances for high rise towers in Boston are closer to 40 feet (One Lincoln Street and 100 Summer Street) to 50 feet or more (125 + 145 High Street, One Federal Street and One Beacon Street).

The design of the proposed project thus creates a “looming” effect not only on the 75- 101 Federal Street building, but also on other buildings in the area such as the suite of historic buildings framing Winthrop Square, as well as Winthrop Square itself. This design is inconsistent with the City’s own RFP for the Winthrop Square garage site, which called for the building’s massing to “enhance the composition of the surrounding buildings” and to provide “appropriate setbacks.” RP 04

We ask that the proponent be required to revise the project design to create more setbacks from adjacent buildings and reduce the massing on the Federal Street frontage. We enclose a massing analysis which illustrates the massing incongruities of the Project in relation to existing tall buildings in Boston.

2. Density. As outlined in the draft Development Plan for the Planned Development Area that is proposed to be created at the Garage parcel, the project will have a 34.5 maximum Floor Area Ratio (FAR). This FAR is substantially (*i.e.*, more than 25%) in excess of the FAR approved for other tall Boston office buildings, such as the One Financial Center tower, with an FAR of about 27, or the 53 State Street/Exchange Place tower, with an FAR of about 28. Furthermore, the Project will be a mid-block, “infill” building, whereas buildings of this scale in Boston are more typically located on a full City block (such as the 200 Clarendon Street and the Federal Reserve buildings) or on corner lots (such as the 28 State Street, 60 State Street and 100 Summer Street buildings). The project site’s mid-block location demands an especially sensitive massing solution which sadly, is not represented in the Project’s current design. RP 05

As noted above, we ask that the proponent be required to revise the Project design to create a massing that is more sensitive to its setting. We note that the comments we are raising in this letter with respect to massing and density mirror those raised by numerous Boston Civic Design Commissioners at the February 6, 2018 BCDC public hearing on the Project. We note further that as of the date of this letter, the Project has not received a recommendation of design approval from the BCDC. While we recognize that the BCDC’s role under Articles 28 and 80 of the Boston Zoning Code is advisory only, we hope that the Project design will be changed to be responsive to the BCDC’s expressed concerns; we are unaware of another instance where the BPDA has approved a project of this size and scale without a recommendation of design approval from the BCDC. RP 06

3. Parking. We retained an independent transportation engineering firm with extensive experience on Boston projects to undertake a peer review of the traffic analysis contained in the DEIR/DPIR. They have noted that the traffic analysis should have taken into account (per usual BPDA and Boston Transportation Department protocols), the Millennium Tower/Burnham Building and One Post Office Square projects in conjunction with the development of future No-Build traffic volumes within the study area. In RP 07

Mr. Brian P. Golden, Director

March 19, 2018

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In addition, the traffic analysis uses vehicular modal split assumptions for the residential component of the Project that are notably lower than other projects in the downtown area which recently underwent BPDA Article 80 review, such as Congress Square, the South Station Air Rights project, the One Bromfield residential project, and the 110 Broad Street project. In each of those cases, the residential vehicular modal split was 28% or higher (see also the "Access Boston" data); for the Project, the vehicular modal split assumption for the Project is set at 18%, substantially lower than other recent Article 80 assessments (and without any accompanying explanation).

In addition, paradoxically, the DEIR/DPIR discusses the availability of residents' spaces for day-time office and commercial parkers; however, according to the data in the DEIR/DPIR, the majority of automobiles owned by residents of the Project will remain on-site for the duration of a typical weekday (see the vehicular modal split of 18%), thus making those spaces unavailable for a shared parking system. RP 08

We ask that the parking demand section of the DEIR/DPIR, particularly with respect to the proposed residential use, be re-analyzed and clarified in a Supplemental Submission, and that sufficient parking be provided to accommodate expected user demand at the Project. RP 09

4. Traffic and Area Circulation, and Pedestrian Safety. The independent peer review we commissioned of the traffic analysis in the DEIR/DPIR revealed numerous nearby intersections which exhibit movements currently operating at Level of Service (LOS) F or which will degrade to a LOS F as a result of the Project. Furthermore, we are concerned about the proposed location of the garage entry/exit for the office and commercial portion of the Project: directly adjacent to the existing garage exit/entrance for the 75-101 Federal Street building. In addition, the garage entry/exit for the Project is proposed to be only a single lane, and the DEIR/DPIR is unclear as to how this single lane system can operate without causing considerable queuing on Federal Street and, how it will operate (in or out) during non-peak hours.

The DEIR/DPIR indicates that nearly 300 vehicles will enter the garage during a single morning rush hour period, or nearly 5 vehicles per minute. This will be in addition to vehicles that enter the existing 75-101 Federal Street garage located just to the north. We think it is inevitable that the left lane of Federal Street will become a stacking lane for the garage at the Project. Our independent transportation consultant found it impossible to assess the adequacy of the internal queuing capacity at the Project based upon the early stage design plans included within the DEIR/DPIR. We think it goes without saying that there should be adequate vehicle queuing capacity internal to the Project so that the impact of the building's design is not externalized to Federal Street, thereby compromising traffic operations as well as pedestrian safety. RP 10

We believe that the single entry/exit lane system for the Project garage will create even more vehicular congestion on Federal Street and potentially High Street. As the City is well aware, Federal Street is already a very busy street with an MBTA bus hub located directly across the street from the project site, as well as very heavy pedestrian traffic due to the street's prominence as a pedestrian connector in the Downtown area and its role as a direct pedestrian access route to and from South Station. RP 11

The DEIR/DPIR estimates that in the morning rush hour, over 1,700 pedestrians traverse Federal Street, and in the evening rush hour, over 1,960 pedestrians traverse Federal Street. The proposed side-by-side garage entrances for the Project and the 75-101 Federal Street building may make pedestrian passage on the west side of Federal Street near-impossible, leading to even more pedestrian traffic on the east side of Federal Street and unsafe (unsanctioned) pedestrian mid-block crossings for those people who ultimately wish to access either 75-101 Federal Street or other office buildings, such as One Federal Street.

We ask that the proponent be required to present additional traffic analysis and design changes in a Supplemental Submission as follows:

- a. Clarify and elaborate on the operation of its parking operations at the Project, including specifics as to internal queuing space and gate/ticket operations; provide sufficient queuing space internal to the building; explain how the single entrance/exit lane will operate in off-peak hours; and explain how the single entrance/exit lane will preclude on-street vehicular queuing on Federal Street. RP 12
- b. Explain the proposed vehicular residential modal split and reconcile that number with the expected number of vehicular spaces expected to be available during the day for non-residential parkers. Our independent transportation consultant suggests that the number of vehicular spaces that will be available for non-residential Project users during the day will be substantially less than the proponent has suggested in the DEIR/DPIR. RP 13
- c. ULI parking demand data is referenced in the DEIR/DPIR, using a base parking ratio of 0.5 spaces/unit, although the ULI data more frequently used is base parking demand of over 1.0 space/unit. The approach used by the proponent is more suitable to a suburban setting, where residents are much more often using their cars to access their work places. We think this needs to be reconsidered. RP 14
- d. We think the proponent should redesign the garage entrance away from the entrance to the 75-101 Federal Street building and revise the building design to include two lanes of drive aisles to accommodate the projected traffic volumes adequately. RP 15

5. Structural Considerations. We have retained the engineering firms of MacNamara/Salvia and Sanborn Head to advise us on the structural and geotechnical implications of the Project as designed. Our consultants have concerns about the impacts the proposed building construction will have on nearby buildings, including the 75-101 Federal Street building - specifically, the settlement that our building will experience as a result of the deep below-grade construction and significant vertical loads imposed on the Project. The structural aspect of the Project is extremely complex given the close proximity of the existing adjacent office towers and their foundation systems. RP 16

The designers of the Project have informed our consultants that the proponent will likely proceed with the "top/down" construction methodology, whereby the new load-bearing elements of the Project (LBE's) will be driven into the bedrock to support up to 30 levels of the new 50+ story building, while the construction will be progressing in two directions, up and down simultaneously. Once the floors have been placed up to the 30th floor, the building's loads will be transferred to the building's "concrete core walls," whereby the LBE's will become "sacrificial." It is our understanding that this method of load transfer will be the first of its kind for a high-rise building in Boston, and as such, it will require a great deal of study and independent review during the design process prior to moving forward with construction. For this reason alone, we have deep concerns about the Project, in addition to those listed above.

At this time, a limited amount of geotechnical design information has been provided to us by the Proponent, and the data that has been provided is wholly inadequate for us to truly evaluate the true impact of the planned construction of the Project on the 75-101 Federal Street building. Our consultants have indicated that the settlement at the 75-101 Federal Street building as outlined in the DEIR/DPIR may be significantly understated, and as direct abutters to the Project, we are very concerned about the prospect of facing a building settlement situation similar to that which Millennium Partners is currently facing in San Francisco.

We think it is incumbent upon the BPDA to require that the Proponent provide in a Supplemental Submission, much more information than has been made available to protect not only the nearby buildings, but also the safety of the public.

For us, it is clearly vital that the proponent address these concerns so that we can protect our significant investment in 75-101 Federal Street.

6. Environmental Impacts. We reviewed the wind study included as part of the DEIR/DPIR and note that there is a point at the corner of Devonshire and Franklin Street where the proposed building will create a dangerous wind condition. The proponent's proposal – RP 17

to plant one or more trees at that location to mitigate the wind conditions – is not feasible, as the southeast corner of the Devonshire/Franklin Street intersection is already narrow, at only eight feet wide. It also already carries substantial foot traffic, particularly heading to and from nearby South Station.

We did a count of pedestrian volumes at that location from Tuesday, February 27, 2018 through Thursday, March 1, 2018 and found that in the morning, between 2,080 and 2,236 people passed through this corner, and in the evening rush hour, between 2,298 and 2,383 people passed through this corner. (The time periods studied were 7:00 - 9:30 a.m. and 4:00 - 6:00 p.m., respectively.)

We ask that the proponent devise an alternative solution to the dangerous wind condition the proposed Project would create, in lieu of the tree planting proposed. We think the proponent should be looking at the design of the Project to ameliorate the difficult wind conditions the Project will create in the downtown area. We ask that this additional wind study be included in a Supplemental Submission. RP 18

7. Devonshire Street. We note the design plans set forth in the DEIR/DPIR to change the Devonshire Street curb conditions, and we look forward to working with the proponent and the City to understand all of the proposed changes and make sure that they encompass logical changes, such as the extension of the “tabletop” treatment to Winthrop Square, to a portion of the curb adjacent to the 75-101 Winthrop Square. We would like to see these revised design plans in a Supplemental Submission. RP 19
8. Winthrop Square. We agree with the observation of a number of the BCDC members at their February 6th public hearing, that Winthrop Square is a gem that should continue to be so for the benefit of the public generally, and not re-landscaped so as to seem an extension of the Great Hall at the proposed project. We are delighted that the proponent has committed to maintain Winthrop Square in perpetuity, and we hope that the City will undertake the redesign process for Winthrop Square so that all abutters and other interested stakeholders may participate. RP 20

We are delighted at the many public benefits which the proponent has proposed for the City of Boston, and we are confident that in its role as the Seller of the project site, the BPDA will memorialize those commitments in a manner that will bind the proponent and any future owner of the project site so that the public can enjoy the project’s many proposed benefits forever.

We hope that that in considering its future approval of the Project, the BPDA in its capacity as a regulatory agency will take into consideration the serious urban design, traffic, structural and other issues we have raised, and require that the proponent submit a Supplemental Submission which addresses each of these concerns.

Mr. Brian P. Golden, Director
March 19, 2018
Page 8

Thank you for your consideration of our comments, and we look forward to the responses of the BPDA and the proponent, and to reviewing the Supplemental Submission we believe is necessary to address the foregoing concerns adequately.

Sincerely,

A handwritten signature in black ink, appearing to be 'RH' or similar initials, written in a cursive style.

Ron Hoyl
General Counsel

Enclosure (1)

cc: Casey Hines, BPDA (By email)
Jonathan Greeley, BPDA (By email)
David Carlson, BPDA (By Email)

ROCKPOINT

RP 01 In short, Rockpoint thinks Boston is a dynamic city in which to do business, which is why we were initially delighted when the City chose Millennium Partners to redevelop the former Winthrop Square Garage site into a first-class office and residential tower with a dramatic "Great Hall" that would front on Federal Street. We watched with interest as that project progressed through initial City filings under the City's Article 80B process, and we focused on how a thoughtfully designed and executed new development could help fill the empty gap in the heart of Boston's financial district.

Comment noted.

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The project described in the Project Notification Form dated November 8, 2016 was described as approximately 1,100,000 to 1,500,000 square feet. The project included in the Draft PIR and as advanced through the on-going BPDA design review was 1,592,000 square feet, an increase of approximately 6.2%.

RP 03 The revised massing of the Project gives us great pause and raises significant concerns for Rockpoint as the owner of the 75-101 Federal Street, 160 Federal Street, 100 High Street and 99 Summer Street buildings. The Federal Street elevation now extends straight up the face of the building, with a correspondingly bulkier massing, and the resulting building design places the Project directly adjacent to the 75-101 Federal Street Building at a distance of only 22 feet on average and as close as 14

feet. By contrast, typical minimum building separation distances for high rise towers in Boston are closer to 40 feet (One Lincoln Street and 100 Summer Street) to 50 feet or more (125 + 145 High Street, One Federal Street and One Beacon Street).

Please see Appendix E prepared by Handel Architects outlining various conditions of buildings being closer together.

The proposed Project shares a long irregularly shaped mid-block side lot line with the 75-101 Federal Building that was purchased by the current owners in 2015. Originally built in 1986 as an expansion to 75 Federal Street, 101 Federal Street was built to a height of about 400 feet and with a significant number of windows within three feet of the shared mid-block side lot line and without a property restriction over the City owned Project site. Property owners in the densely developed areas throughout the City often have buildings with sidewalls built on or close to a mid-block side lot line knowing that in the few conditions where there are windows in the sidewall, the views from these windows may be restricted in the future.

Additionally, while there are a number of examples in Boston of significant buildings near to each other and even touching, it is because there is not an intervening street between building sites and 101 Federal Street was built so close to the shared mid-block side lot line with windows, that the 40 foot condition referenced above is not met. The proposed Project, as noted above, is set back on average over 20 feet from the shared mid-block lot line (except on the lowest two floors where the former garage and 101 Federal Street touched and for a vertical exit stair which is 12 feet away). Please see the plan of the mid-block lot line condition between the proposed Project and 101 Federal Street included in Appendix E noted above.

RP 04 The design of the proposed project thus creates a “looming” effect not only on the 75-101 Federal Street building, but also on other buildings in the area such as the suite of historic buildings framing Winthrop Square, as well as Winthrop Square itself. This design is inconsistent with the City’s own RFP for the Winthrop Square garage site, which called for the building’s massing to “enhance the composition of the surrounding buildings” and to provide “appropriate setbacks.”

We ask that the proponent be required to revise the project design to create more setbacks from adjacent buildings and reduce the massing on the Federal Street frontage. We enclose a massing analysis which illustrates the massing incongruities of the Project in relation to existing tall buildings in Boston.

The Proponent disagrees with these conclusions. Additionally, the design continues to advance in consultation with the Boston Civic Design Commission (which voted to approve the revised Project design on May 1, 2018), the BPDA and the public. Please see Section 4.0 Urban Design.

RP 05 ...the project will have a 34.5 maximum Floor Area Ratio (FAR). This FAR is substantially (i.e., more than 25%) in excess of the FAR approved for other tall Boston office buildings, such as the One Financial Center tower, with an FAR of about 27, or the 53 State Street/Exchange Place tower, with an FAR of about 28. Furthermore, the Project will be a mid-block, "infill" building, whereas buildings of this scale in Boston are more typically located on a full City block (such as the 200 Clarendon Street and the Federal Reserve buildings) or on corner lots (such as the 28 State Street, 60 State Street and 100 Summer Street buildings). The project site's mid-block location demands an especially sensitive massing solution which sadly, is not represented in the Project's current design.

Please see the city block FAR analysis included in Appendix E.

RP 06 While we recognize that the BCDC's role under Articles 28 and 80 of the Boston Zoning Code is advisory only, we hope that the Project design will be changed to be responsive to the BCDC's expressed concerns; we are unaware of another instance where the BPDA has approved a project of this size and scale without a recommendation of design approval from the BCDC.

The Proponent has worked with the City of Boston and BCDC throughout the Article 80 process to advance and refine the design as would be expected in the Article 80 process. On May 1, 2018, the BCDC approved the Project. See updated description, plans, and imagery shown in Section 4.0 Urban Design.

RP 07 We retained an independent transportation engineering firm with extensive experience on Boston projects to undertake a peer review of the traffic analysis contained in the DEIR/DPIR. They have noted that the traffic analysis should have taken into account (per usual BPDA and Boston Transportation Department protocols), the Millennium Tower/Burnham Building and One Post Office Square projects in conjunction with the development of future No-Build traffic volumes within the study area. In addition, the traffic analysis uses vehicular modal split assumptions for the residential component of the Project that are notably lower than other projects in the downtown area which recently underwent BPDA Article 80 review, such as Congress Square,

the South Station Air Rights project, the One Bromfield residential project, and the 110 Broad Street project. In each of those cases, the residential vehicular modal split was 28% or higher (see also the “Access Boston” data); for the Project, the vehicular modal split assumption for the Project is set at 18%, substantially lower than other recent Article 80 assessments (and without any accompanying explanation).

The future traffic volumes included all planned/approved projects that were not operational at the time when turning movement counts were collected, per usual BPDA and Boston Transportation Department protocols. The Burnham Building was fully constructed and operational by fall of 2014, and Millennium Tower was completed in July 2016. Therefore, traffic volumes associated with those projects were included in the analysis.

The Project Notification Form for the One Post Office Square development was filed on January 5, 2018, just after the 115 Winthrop Square Draft EIR/ PIR was filed (January 2, 2018), and was therefore not included. That project was approved by the BPDA Board on March 15, 2018. However, the PNF states that *“While the Project will result in additional office space and supporting amenities, the amount of on-site parking will actually be reduced by approximately 71 spaces. Consequently, traffic increases associated with the redevelopment project will be minimal.”* As only minimal traffic increases are projected for that project, it is reasonable to assume that any increases are covered by the 0.25% per year background growth assumed in the Draft EIR/PIR analysis.

The Proponent reviewed the BTDA 2000-2010 Access Boston mode shares for Area 2 during development of mode splits for the Project. However, the data supporting these mode shares are very dated. Further, they are generalized for a very large area of Downtown. By contrast, the CTPP 2006-2010 Census data are more recent and are specific to a much smaller area defined by a Census Zone. Comparison of the two sources indicates that the auto mode split downtown (specifically in the area where the Project is located) has gone down, while the walk/bike mode split has gone up.

In addition, the trip generation calculations for the residential portion of the Draft EIR/PIR were compared to the existing parking data from the Millennium Tower. The Millennium Tower was considered to be the best possible comparable project in the area due to its location close to Winthrop Square and the fact that it is owned and managed by the Proponent. The parking data for the latest month available at the time the analysis was performed (October 2017) was performed. For a typical weekday, there were approximately 369

in/out movements from the garage for the 452-unit residential tower (of which 422 units were occupied at the time). The Millennium Tower vehicle trip generation rate was therefore determined to be 0.87 trips per day (total in and out). When this ratio is applied to the 115 Winthrop Square Project, the proposed 500 units would generate 435 daily trips, which is slightly lower than the 500 daily trips studied in the Draft EIR/PIR. The parking data for Millennium Tower are included in the Transportation Appendix.

The examples of other residential projects cited were based on the older BTM data. However, the Proponent believes that the more recent Census-based American Community Survey (ACS) data used in the Draft EIR/PIR is more representative for this Project, particularly as it yields trip generation rates slightly higher than the actual data for Millennium Tower.

RP 08 In addition, paradoxically, the DEIR/DPIR discusses the availability of residents' spaces for day-time office and commercial parkers; however, according to the data in the DEIR/DPIR, the majority of automobiles owned by residents of the Project will remain on-site for the duration of a typical weekday (see the vehicular modal split of 18%), thus making those spaces unavailable for a shared parking system.

The availability of residential spaces available during the daytime on a weekday for use by office commuters in the Draft PIR was based on the same October 2017 garage entry/exit data used to determine the trip generation rates for Millennium Tower discussed in the Response to Comment RP 07 above. It was determined that the daytime occupancy in the Millennium Tower garage on a weekday between 9:00 AM and 5:00 PM was 53% (226 occupied spaces out of 425 spaces). This analysis indicates that approximately 45% of residential spaces are available during a typical weekday. In light of the comparability of the residential component of the Winthrop Square Project with Millennium Tower, this availability of shared parking was incorporated in the Draft PIR analysis.

RP 09 We ask that the parking demand section of the DEIR/DPIR, particularly with respect to the proposed residential use, be re-analyzed and clarified in a Supplemental Submission, and that sufficient parking be provided to accommodate expected user demand at the Project.

Please refer to responses to Comment RP 07 and RP 08.

RP 10 We think it goes without saying that there should be adequate vehicle queuing capacity internal to the Project so that the impact of the building's design is not externalized to Federal Street, thereby compromising traffic operations as well as pedestrian safety.

Please refer to the memorandum dated March 29, 2018 prepared by Walker Consultants which is included in the Transportation Appendix.

RP 11 We believe that the single entry/exit lane system for the Project garage will create even more vehicular congestion on Federal Street and potentially High Street. As the City is well aware, Federal Street is already a very busy street with an MBTA bus hub located directly across the street from the project site, as well as very heavy pedestrian traffic due to the street's prominence as a pedestrian connector in the Downtown area and its role as a direct pedestrian access route to and from South Station.

The Draft EIR/PIR estimates that in the morning rush hour, over 1,700 pedestrians traverse Federal Street, and in the evening rush hour, over 1,960 pedestrians traverse Federal Street. The proposed side-by-side garage entrances for the Project and the 75-101 Federal Street building may make pedestrian passage on the west side of Federal Street near-impossible, leading to even more pedestrian traffic on the east side of Federal Street and unsafe (unsanctioned) pedestrian mid-block crossings for those people who ultimately wish to access either 75-101 Federal Street or other office buildings, such as One Federal Street.

The Proponent agrees that the safety of pedestrians at this important pedestrian node is a crucial priority. The proposed pedestrian crossings are not in fact mid-block crossings. Rather, they will be crosswalks at the intersection of Federal Street, Federal Court and Matthews Street which are missing today, and will significantly improve the pedestrian accommodations that exist today. Please also refer to the memorandum dated March 29, 2018 prepared by Walker Consultants which is included in the Transportation Appendix.

RP 12 Clarify and elaborate on the operation of its parking operations at the Project, including specifics as to internal queuing space and gate/ticket operations; provide sufficient queuing space internal to the building; explain how the single entrance/exit lane will operate in off-peak hours; and explain how the single entrance/exit lane will preclude on-street vehicular queuing on Federal Street.

Please refer to the memorandum dated March 29, 2018 prepared by Walker Consultants which is included in the Transportation Appendix.

RP 13 Explain the proposed vehicular residential modal split and reconcile that number with the expected number of vehicular spaces expected to be available during the day for non-residential parkers. Our independent transportation consultant suggests that the number of vehicular spaces that will be available for non-residential Project users during the day will be substantially less than the proponent has suggested in the DEIR/DPIR.

Please refer to the responses to Comments RP 07 and RP 08.

RP 14 ULI parking demand data is referenced in the DEIR/DPIR, using a base parking ratio of 0.5 spaces/unit, although the ULI data more frequently used is base parking demand of over 1.0 space/unit. The approach used by the proponent is more suitable to a suburban setting, where residents are much more often using their cars to access their work places. We think this needs to be reconsidered.

Please refer to the Response to Comments RP 07 and RP 08. The Proponent respectfully points out that the parking analysis specifically addresses the urban setting of the Project rather than a suburban setting.

RP 15 We think the proponent should redesign the garage entrance away from the entrance to the 75-101 Federal Street building and revise the building design to include two lanes of drive aisles to accommodate the projected traffic volumes adequately.

Such a redesign would significantly impact the design of the Great Hall. As discussed in the memorandum dated March 29, 2018 prepared by Walker Consultants which is included in the Transportation Appendix, the design as proposed will adequately accommodate the projected traffic volumes.

RP 16 Our consultants have concerns about the impacts the proposed building construction will have on nearby buildings, including the 75-101 Federal Street building - specifically, the settlement that our building will experience as a result of the deep below-grade construction and significant vertical loads imposed on the Project. The structural aspect of the Project is extremely complex given the close proximity of the existing adjacent office towers and their foundation systems.

The designers of the Project have informed our consultants that the proponent will likely proceed with the "top/down" construction methodology, whereby the new loadbearing elements of the Project (LBE's)

will be driven into the bedrock to support up to 30 levels of the new 50+ story building, while the construction will be progressing in two directions, up and down simultaneously. Once the floors have been placed up to the 30th floor, the building's loads will be transferred to the building's "concrete core walls," whereby the LBE's will become "sacrificial." It is our understanding that this method of load transfer will be the first of its kind for a high-rise building in Boston, and as such, it will require a great deal of study and independent review during the design process prior to moving forward with construction. For this reason alone, we have deep concerns about the Project, in addition to those listed above.

At this time, a limited amount of geotechnical design information has been provided to us by the Proponent, and the data that has been provided is wholly inadequate for us to truly evaluate the true impact of the planned construction of the Project on the 75-101 Federal Street building. Our consultants have indicated that the settlement at the 75-101 Federal Street building as outlined in the DEIR/DPIR may be significantly understated, and as direct abutters to the Project, we are very concerned about the prospect of facing a building settlement situation similar to that which Millennium Partners is currently facing in San Francisco.

Comments have been noted. Please see Response to Comment BPDA 39.

RP 17

Environmental Impacts. We reviewed the wind study included as part of the DEIR/DPIR and note that there is a point at the corner of Devonshire and Franklin Street where the proposed building will create a dangerous wind condition. The proponent's proposal to plant one or more trees at that location to mitigate the wind conditions is not feasible, as the southeast corner of the Devonshire/Franklin Street intersection is already narrow, at only eight feet wide. It also already carries substantial foot traffic, particularly heading to and from nearby South Station.

Over the course of the Project, RWDI tested 28 configurations that include wind mitigation on the tower itself. The shelf of the building, or intersection between the Office and Residential section of the tower, specifically on the Devonshire Street side, substantially helped improve the wind comfort conditions at grade. However, any further wind mitigation measures to the tower itself that were explored had no appreciable benefits to grade level wind conditions, especially at the corner of Franklin and Devonshire streets. Hence, the only appropriate solution was to reduce the localized elevated wind conditions in the form of landscaping.

Sidewalk widening along the east side of Devonshire Street, north of Winthrop Square, will provide adequate space for street trees.

- RP 18** We ask that the proponent devise an alternative solution to the dangerous wind condition the proposed Project would create, in lieu of the tree planting proposed. We think the proponent should be looking at the design of the Project to ameliorate the difficult wind conditions the Project will create in the downtown area. We ask that this additional wind study be included in a Supplemental Submission.

Please see Response to Comment RP 17. Only localized treatment in the form of landscaping or a sculptural element will improve the wind comfort conditions at the corner of Devonshire and Franklin streets.

- RP 19** Devonshire Street. We note the design plans set forth in the DEIR/DPIR to change the Devonshire Street curb conditions, and we look forward to working with the proponent and the City to understand all of the proposed changes and make sure that they encompass logical changes, such as the extension of the “tabletop” treatment to Winthrop Square, to a portion of the curb adjacent to the 75-101 Winthrop Square. We would like to see these revised design plans in a Supplemental Submission.

The Proponent is continuing to work with BPDA and BTM to develop the preferred curb conditions on Devonshire Street for all abutting uses as well as the Project itself. This work will continue with the BPDA as part of continuing Design Review required under the Article 80 process.

- RP 20** Winthrop Square. We agree with the observation of a number of the BCDC members at their February 6th public hearing, that Winthrop Square is a gem that should continue to be so for the benefit of the public generally, and not re-landscaped so as to seem an extension of the Great Hall at the proposed project. We are delighted that the proponent has committed to maintain Winthrop Square in perpetuity, and we hope that the City will undertake the redesign process for Winthrop Square so that all abutters and other interested stakeholders may participate.

The Proponent recognizes the importance of revitalizing Winthrop Square in a manner that maintains its independence from the 115 Winthrop Square Project. The Proponent feels the current design succeeds in maintaining independence while providing for pedestrian connections through Winthrop Square (Figure 2-1 Draft Landscape Plan).



April 9, 2018

Ms. Casey Hines
Senior Project Manager
Boston Planning & Development Agency
One City Hall Square, 9th Floor
Boston, MA 02201

Re: 115 Winthrop Square

Dear Ms. Hines:

Please accept this letter on behalf of A. W. Perry, Inc. in support of the project proposed by Millennium Partners (the "Developer") at 115 Winthrop Square. A. W. Perry is the owner of several buildings in the Downtown Crossing area, including 77 and 85 Franklin Street and Twenty Winthrop Square. These properties abut Winthrop Square and Winthrop Lane and are directly across the Square from the project.

We have been kept apprised of the Developer's progress, and we continue to AWP 01 believe that the project's benefits to the neighborhood and the City's economy far outweigh any negative impacts. The neighborhood has long been blighted by the decaying garage formerly situated on the site, and we are pleased that, in response to our and other abutters' prior expressions of concern, the BPDA and the Developer have demolished it, and the site appears poised for the new project. We look forward to seeing construction commence in the near future. It is an important step in continuing the economic rebirth that our Downtown is experiencing, as the project will attract more businesses and people to live, work and visit in the area. The planned great hall proposed for the project will provide programming and create an improved atmosphere for retail and other business activity.

Although we enthusiastically support the project, we point out the following impacts which should be addressed:

- Given the potential of attendees coming to public events in the great hall AWP 02 and that the building displaces a parking garage, which although it has been

closed, once provided public spaces, care should be taken to provide adequate on-site public parking.

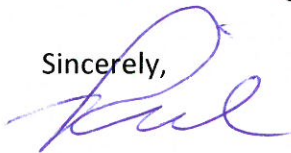
- Recent plans include major changes in traffic patterns in the Winthrop AWP 03 Square area, and these need continued study and discussion with all affected abutters.
- Careful planning and oversight of the property's loading is important given AWP 04 tight streets in the Winthrop Square area and the potential need for large trucks to access and leave the site, both during construction and building operation.
- In response to our prior request, the Developer has installed monitoring AWP 05 devices in our historic properties. We appreciate this step, and request that during construction, they avoid using construction methods that could cause damage to our and other historic properties.
- The developer should have a noise management program that minimizes AWP 06 disturbance during construction. In addition, assistance with rodent control at nearby properties is critical.
- Utility Infrastructure: The Developer needs to address issues of inadequate AWP 07 public utilities in the streets around the project. There have been numerous water, gas and steam leaks in the area and telecom lines have also been affected by rainy weather. A thorough review of steam, telecom, electric, gas and water utilities should be made, and major repairs or replacements should be completed to upgrade conditions to handle the additional capacity needed for the new project while correcting issues that have caused significant problems in the past. This will also reduce the chances that the new surfaces installed by the Developer will be damaged by constant excavation.
- The Developer is proposing what appear to be pavers on sidewalks and AWP 08 streets around Winthrop Square. Sidewalks adjacent to Twenty Winthrop Square, and possibly other properties, have areaways beneath them. Design and construction should be coordinated with the owners of affected properties. Given heavy bus, snow removal equipment and automobile AWP 09 traffic, careful consideration should be given to having street and sidewalk surfaces durable and easy to maintain. The design is inviting to pedestrians and is sure to attract many more people to the Square. Serious AWP 10 consideration should be given to eliminating the MBTA bus routes that utilize Devonshire and Otis Streets, as the bus traffic is inconsistent with the revitalized Square area and a potential danger to pedestrians.
- Winthrop Lane was developed and is managed and maintained by our AWP 11 company with contributions from our neighbors. Access to our loading dock near the Otis Street entrance to Winthrop Lane must continue. In AWP 12 addition, we would appreciate the cooperation and support of the developer in resurfacing Winthrop Lane so its quality is consistent with the quality of the improvements to Winthrop Square and surrounding streets,

while maintaining it as an important passageway and retaining the bronze “Boston Bricks” that are subject to oversight by the Brown Fund.

- We are active members of the Downtown Boston Business Improvement AWP 13 District (BID), which is chaired by the Vice Chair of our company, and as such, we and other owners have contributed significant dollars to fund programs, activities and improvements that have had a major impact on the rebirth of Downtown. We request that the Developer and the BPDA be required to coordinate with the BID during the planning process regarding street materials, wayfinding and daily operational issues which may affect BID staffing. The BID has identified a need for public restrooms, and given this need and plans to host events at 115 Winthrop Square, public restrooms, accessible to all, should be included in the project and be maintained by the owner.
- We understand that the City is receiving a total of \$153 million in exchange AWP 14 for the site, and much of this funding has been designated to fund improvements in other locations around the City. There are many capital needs within the BID, and we believe it is important that a significant amount of the funds be expended in the BID to improve streets and sidewalks and fund other capital improvements which have been identified as priorities by the BID. Downtown is the place where citizens from all of Boston’s neighborhoods come together; its properties generate a major portion of the City’s tax revenues and economic activity; and infrastructure investments here will maintain its vitality and improve the image of the City as a whole.

Subject to the above comments, we are strongly in favor of the project. We look forward to a cooperative relationship with the Developer and to the project becoming a reality, continuing the renaissance which is making our Downtown a vibrant and exciting place.

Sincerely,



Richard P. Beal
President

AWP 01 We have been kept apprised of the Developer's progress, and we continue to believe that the project's benefits to the neighborhood and the City's economy far outweigh any negative impacts. The neighborhood has long been blighted by the decaying garage formerly situated on the site, and we are pleased that, in response to our and other abutters' prior expressions of concern, the BPDA and the Developer have demolished it, and the site appears poised for the new project. We look forward to seeing construction commence in the near future. It is an important step in continuing the economic rebirth that our Downtown is experiencing, as the project will attract more business and people to live, work and visit in the area. The planned great hall proposed for the project will provide programming and create an improved atmosphere for retail and other business activity.

Comment noted.

AWP 02 Given the potential of attendees coming to public events in the great hall and that the building displaces a parking garage, which although it has been closed, once provided public spaces, care should be taken to provide adequate on-site public parking.

The now-demolished public parking garage was owned and operated by the City of Boston. Provision of public parking is subject to the Boston Downtown Parking Freeze, and would require a permit from the Boston Air Pollution Control Commission (BAPCC) which administers the Freeze. Consistent with the goals of the Freeze policy, the BPDA and BTDA do not encourage provision of public parking to support a mixed-use development such as the proposed Project. In any event, if justified, public parking spaces can only be approved by the BAPCC if there are spaces available in the "Freeze Bank".

AWP 03 Recent plans include major changes in traffic patterns in the Winthrop Square area, and these need continued study and discussion with all affected abutters.

No changes in traffic patterns in the Winthrop Square area are proposed as part of the Project. See Response to Comment BPDA 32.

AWP 04 Careful planning and oversight of the property's loading is important given tight streets in the Winthrop Square area and the potential need for large trucks to access and leave the site, both during construction and building operation.

Analysis of truck turning at the Project loading dock was included in the Draft PIR. In response to a request from BTM, a turning movement analysis for a WB-50 truck is shown in the Transportation Appendix. Loading activity will be controlled and monitored by the Project's loading dock management staff. Construction truck access and activity will be controlled through a Construction Management Plan (CMP) approved by the BTM.

AWP 05 In response to our prior request, the Developer has installed monitoring devices in our historic properties. We appreciate this step, and request that during construction, they avoid using construction methods that could cause damage to our and other historic properties.

Comment noted and the Project Team recognizes this concern and is taking steps to ensure that the construction means and methods consider the historic adjacent properties and the special precautions required.

AWP 06 The developer should have a noise management program that minimizes disturbance during construction. In addition, assistance with rodent control at nearby properties is critical.

Construction noise management will follow the City of Boston guidelines. A rodent control program is required as part of the issuance of a building permit.

AWP 07 Utility Infrastructure: The Developer needs to address issues of inadequate public utilities in the streets around the project. There have been numerous water, gas and steam leaks in the area and telecom lines have also been affected by rainy weather. A thorough review of steam, telecom, electric, gas and water utilities should be made, and major repairs or replacements should be completed to upgrade conditions to handle the additional capacity needed for the new project while correcting issues that have caused significant problems in the past. This will also reduce the chances that the new surfaces installed by the Developer will be damaged by constant excavation.

The Proponent appreciates the concern about steam and has been in contact with Veolia regarding steam leaking from their mains, including the 14" steam main in Devonshire Street. There are several utilities in Winthrop Square that are likely abandoned. The Proponent is planning on meeting with utility companies to explore this further.

AWP 08 **The Developer is proposing what appear to be pavers on sidewalks and streets around Winthrop Square. Sidewalks adjacent to Twenty Winthrop Square, and possibly other properties, have areaways beneath them. Design and construction should be coordinated with the owners of affected properties.**

Comment noted and the Proponent agrees. The Proponent recognizes that many of the sidewalks are of the historic granite blocks and are also area-ways. The Proponent plans to work closely with affected property owners as the sidewalk plans are developed. Eventually any modifications to the public sidewalks will require review and approval through the Public Improvement Commission. Currently, the sidewalk expansion will affect the southwest and southeast corner of Franklin and Devonshire streets. No changes are proposed for the sidewalk along 20 Winthrop Street south of the Franklin Street intersection. The design team is working closely with surveyors and civil engineers to ensure proposed changes do not affect existing buildings' subgrade areaways. Additional coordination will happen in the construction phase of the Project.

AWP 09 **Given heavy bus, snow removal equipment and automobile traffic, careful consideration should be given to having street and sidewalk surfaces durable and easy to maintain. The design is inviting to pedestrians and is sure to attract many more people to the Square.**

Comment noted, thank you. The design team is considering the realities of Boston weather and traffic. A durable and lasting ground plane is very important to the team and vital for the success of the Project.

AWP 10 **Serious consideration should be given to eliminating the MBTA bus routes that utilize Devonshire and Otis Streets, as the bus traffic is inconsistent with the revitalized Square area and a potential danger to pedestrians.**

The Proponent is unable to eliminate MBTA bus routes on Devonshire Street and Otis Street, as such changes are under the prevue of the MBTA, in collaboration with the City of Boston. However, the Proponent is working with the BTD and is exploring possible contribution to the Rapid Bus Transit Study as part of this Project.

AWP 11 **Winthrop Lane was developed and is managed and maintained by our company with contributions from our neighbors. Access to our loading dock near the Otis Street entrance to Winthrop Lane must continue.**

Comment noted. The proposed plan for Winthrop Square will not impact the loading dock on Winthrop Lane.

AWP 12 In addition, we would appreciate the cooperation and support of the developer in resurfacing Winthrop Lane so its quality is consistent with the quality of the improvements to Winthrop Square and surrounding streets, while maintaining it as an important passageway and retaining the bronze "Boston Bricks" that are subject to oversight by the Brown Fund.

The Proponent will always endeavor to be a good neighbor but it does not anticipate impacting or revising the pavement of Winthrop Lane.

AWP 13 We are active members of the Downtown Boston Business Improvement District (BID), which is chaired by the Vice Chair of our company, and as such, we and other owners have contributed significant dollars to fund programs, activities and improvements that have had a major impact on the rebirth of Downtown. We request that the Developer and the BPDA be required to coordinate with the BID during the planning process regarding street materials, wayfinding and daily operational issues which may affect BID staffing. The BID has identified a need for public restrooms, and given this need and plans to host events at 115 Winthrop Square, public restrooms, accessible to all, should be included in the project and be maintained by the owner.

Restrooms required by the Building Code will be a part of the Great Hall.

AWP 14 We understand that the City is receiving a total of \$153 million in exchange for the site, and much of this funding has been designated to fund improvements in other locations around the City. There are many capital needs within the BID, and we believe it is important that a significant amount of the funds be expended in the BID to improve streets and sidewalks and fund other capital improvements which have been identified as priorities by the BID. Downtown is the place where citizens from all of Boston's neighborhoods come together; its properties generate a major portion of the City's tax revenues and economic activity; and infrastructure investments here will maintain its vitality and improve the impact of the City as a whole.

The Proponent appreciates this comment as it is also a long standing member of the BID; however, the decision regarding distribution of the funds remains with the City.

2.0 List of Individual Commenters

Table 2 presents the individual commenters who submitted comments on the Draft PIR, the discussion topics raised in the individuals' comment letters, and references to the relevant sections within this filing. Additionally, a petition signed by residents of Boston and the Islamic Society of Boston included 276 signatures in support of the Project as well as 139 support letters were received from the labor unions. The topics discussed in the individuals' comment letters are also included in Table 1, above.

The letters assigned to a topic are not necessarily favorable or unfavorable. The letters noted as favorable were clearly favorable and did not express a topic of concern¹. The letters listed below can be accessed on the BPDA website.

Table 2 Individual Comment Letters Discussion Topics

<i>Commenter</i>	<i>Subject Matter(s)</i>	<i>Supplemental Information Filing Section</i>
Robert O'Brien Sheetmetal Worker's Union	Favorable Letter, Jobs	
Joseph, Warren, Local 7	Favorable Letter	
Adam Castiglioni	Great Hall, Urban Design	See Sections 3.0 and 4.0
Thomas MacDonald	Urban Design	See Section 4.0
Joseph Dickens	Favorable Letter, Tax Revenue, Jobs	
Ismali	Favorable Letter, Tax Revenue, Jobs	
Indecipherable Signature	Favorable Letter	
Indecipherable Signature	Favorable Letter	
Indecipherable Signature	Favorable Letter	
Indecipherable Signature	Favorable Letter	
Indecipherable Signature	Favorable Letter	
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Indecipherable Signature	Favorable Letter	

¹ Some comment letter signatures were not legible and are noted as "Indecipherable Signature."

Table 2 Individual Comment Letters Discussion Topics (Continued)

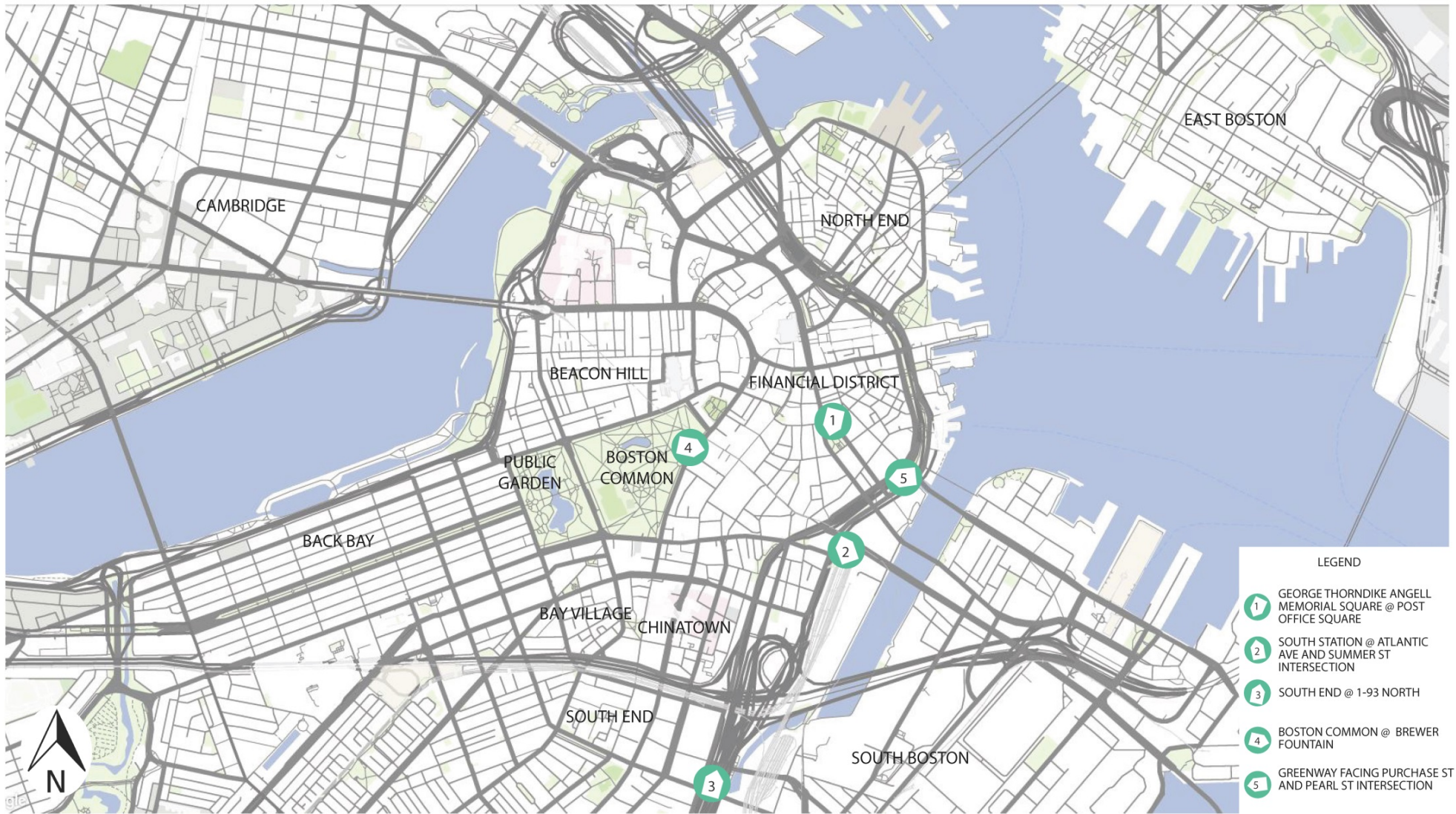
<i>Commenter</i>	<i>Subject Matter(s)</i>	<i>Supplemental Information Filing Section</i>
Indecipherable Signature	Favorable Letter	
Indecipherable Signature	Favorable Letter	
Indecipherable Signature	Favorable Letter	
Indecipherable Signature	Favorable Letter	
Indecipherable Signature	Favorable Letter	
Tim Lyne	Favorable Letter	
John Buttersworth	Favorable Letter	
Jimmy Papez	Favorable Letter	
Mohammed Aden	Favorable Letter, Jobs	
Mohamed Wausame	Favorable Letter, Jobs, Housing	
Jawab Aden	Favorable Letter, Jobs, Housing	
Mohamed Koreye	Favorable Letter, Jobs	
Osmuru Mahu Mahamed	Favorable Letter, Jobs	
Ismaili Ahmed	Favorable Letter	
Mohamed A. Hussein	Favorable Letter, Jobs, Housing	
Abdullahi Guzhou	Favorable Letter, Jobs, Housing	
Mohamed Abulkadir	Favorable Letter, Jobs, Housing	
Osman Isruaith	Favorable Letter	
Shelley Webster	Favorable Letter	
Nancy Gould	Favorable Letter	
Margaret Ventresca	Favorable Letter	
Frank Scala	Favorable Letter	
Thomas Burroughs	Favorable Letter	
Julia Rogers	Favorable Letter	
Nikolas Heleen	Favorable Letter	
Naren Deshpande	Favorable Letter	
Audrey Ng	Favorable Letter	
Edward McGrath	Urban Design, Great Hall	See Sections 3.0 and 4.0
Sara Pouladian	Favorable Letter	
Luke Loreti	Urban Design, Winthrop Square	See Section 2.0 and 4.0
Chinatown Residents	Affordable Housing	See Section 1.3
Mass Guy	Urban Design	See Section 4.0
Andrew Wiley	Urban Design	See Section 4.0
Eddie Hou	Urban Design	See Section 4.0
Anthony Tucker	Urban Design	See Section 4.0
Mike Russo	Urban Design	See Section 4.0
Elijah	Urban Design	See Section 4.0
Brian Blanchard	Urban Design	See Section 4.0

Table 2 Individual Comment Letters Discussion Topics (Continued)

<i>Commenter</i>	<i>Subject Matter(s)</i>	<i>Supplemental Information Filing Section</i>
Chris Richie	Urban Design	See Section 4.0
John Siino	Urban Design	See Section 4.0
Peter Zimmerman	Urban Design	See Section 4.0
Steven Fallon	Urban Design	See Section 4.0
Todd Gordon	Urban Design	See Section 4.0
Bret Clancy	Urban Design	See Section 4.0
Marcus Baker	Urban Design	See Section 4.0
Richard Taylor	Urban Design	See Section 4.0
Christian Cole	Urban Design	See Section 4.0
Christian Wissmuller	Urban Design	See Section 4.0
Andrew Espinosa	Urban Design	See Section 4.0
Eric Ford	Urban Design	See Section 4.0
Ryan Jacobs	Urban Design	See Section 4.0
Ryan Baryluk	Urban Design	See Section 4.0
David Howard	Urban Design	See Section 4.0

Appendix A

Skyline Views



- LEGEND
- 1 GEORGE THORNDIKE ANGELL MEMORIAL SQUARE @ POST OFFICE SQUARE
 - 2 SOUTH STATION @ ATLANTIC AVE AND SUMMER ST INTERSECTION
 - 3 SOUTH END @ 1-93 NORTH
 - 4 BOSTON COMMON @ BREWER FOUNTAIN
 - 5 GREENWAY FACING PURCHASE ST AND PEARL ST INTERSECTION

[VIEW KEY MAP](#)



EXISTING



PROJECT: 115 WINTHROP SQUARE PROPOSED DESIGN

115 Winthrop Square Boston, State

View 1

George Thorndike Angell Memorial Square at Post Office Square



EXISTING



PROJECT: 115 WINTHROP SQUARE PROPOSED DESIGN

115 Winthrop Square Boston, State

View 2
South Station at Atlantic Avenue and Summer Street Intersection



EXISTING



PROJECT: 115 WINTHROP SQUARE PROPOSED DESIGN



EXISTING



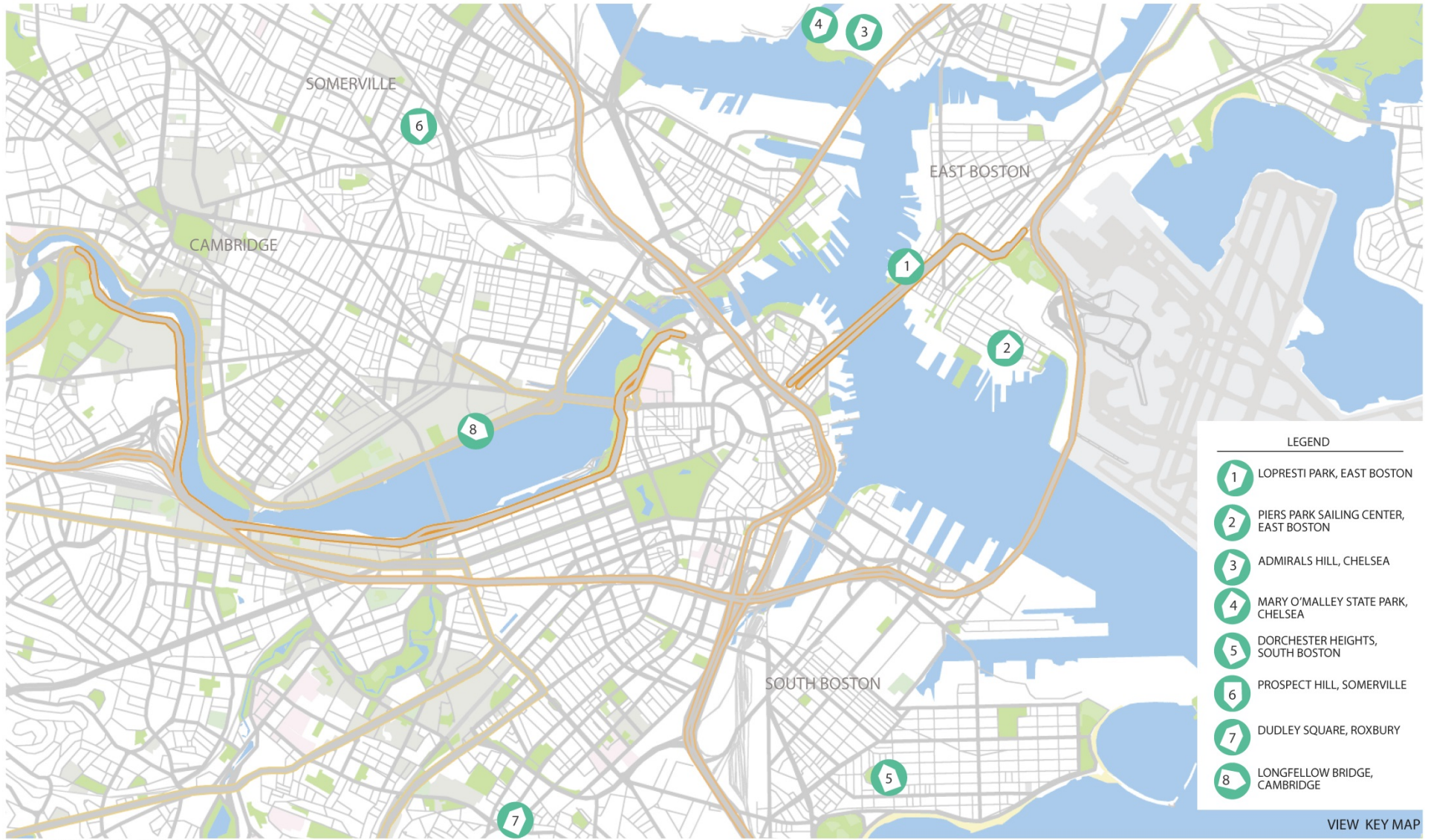
PROJECT: 115 WINTHROP SQUARE PROPOSED DESIGN



EXISTING



PROJECT: 115 WINTHROP SQUARE PROPOSED DESIGN



115 Winthrop Square Boston, Massachusetts

[View Key Map](#)



EXISTING



PROJECT: 115 WINTHROP SQUARE PROPOSED DESIGN



EXISTING:



PROJECT: 115 WINTHROP SQUARE PROPOSED DESIGN



EXISTING:



PROJECT: 115 WINTHROP SQUARE PROPOSED DESIGN



EXISTING:



PROJECT: 115 WINTHROP SQUARE PROPOSED DESIGN



EXISTING:



PROJECT: 115 WINTHROP SQUARE PROPOSED DESIGN



EXISTING:



PROJECT: 115 WINTHROP SQUARE PROPOSED DESIGN



EXISTING:



PROJECT: 115 WINTHROP SQUARE PROPOSED DESIGN

115 Winthrop Square Boston, Massachusetts

View 7
Dudley Square, Roxbury



EXISTING:



PROJECT: 115 WINTHROP SQUARE PROPOSED DESIGN

Appendix B

Transportation



16-2759.00

DATE: March 29, 2018
 TO: Kathleen MacNeil
 COMPANY: Millennium Partners
 ADDRESS: 7 Water Street, Suite 200
 CITY/STATE: Boston, MA 02109
 COPY TO:
 FROM: Arthur G. Stadig, P.E.
 PROJECT NAME: Winthrop Square
 PROJECT NUMBER: 16-2759.00

20 Park Plaza, Suite 1202
 Boston, MA 02116
 617.350.5040
 walkerconsultants.com

Kathleen,

Per your request we offer the following with regards to how the access control equipment will control the one-way ramp and queuing concerns of the abutter on Federal Street.

The Winthrop Square project is designed to handle approximately 550 vehicle spaces with 300 for residents and 250 for office parking. The residential vehicles will have exclusive access off Winthrop Square and will not use the access on Federal Street. Only office permit users will be allowed to use the entry/exit on Federal Street. This Federal Street entry/exit is a one-way ramp that will operate as an entry-only ramp during the AM office peak and an exit-only ramp during the PM office peak hour. The office vehicles operating in the opposite flow from the one-way ramp direction will use the residential access on Winthrop Square. The one-way ramp will change directions at the same designated times each day and night. In addition to appropriate dynamic signage for the ramp direction at the entry point on Federal Street, the monthly office users will become familiar with the operation.

The DEIR/DPIR indicates an AM peak hour volume of 295 trips and 235 exiting trips in the PM peak hour. The trip generation is based on the size of the office component of the building (780,000 SF) and not the amount of parking in the garage. As indicated in the DEIR/DPIR, the trips indicated are conservative and likely that some of these trips generated will park elsewhere in the neighborhood. The peak hour volume (PHV) for an urban office is typically 30%, although some garages in Boston servicing mostly office users have a PHV of less than that. Based on those typical PHVs, we anticipate the actual volumes to be less than the value indicated in the DEIR/DPIR. The DEIR/DPIR AM peak indicates approximately one vehicle every 12 seconds on average.

101 Federal Street is a two-level below grade facility and is licensed for approximately 170 vehicle spaces. Parkers are made up primarily of monthly parkers using the office space with some transient parkers. With this user profile, we expect the same tidal flow direction as the Federal Street entry/exit of the Winthrop Square garage. It is estimated approximately 50 cars drive in during the morning peak hour and the same number leave during the afternoon peak hour and there is minor counter flow during these peak hours. The garage will have a peak hour flow approximating about 1 car per minute on average using the same PHF as above.

Federal Street has a row of curbside parallel spaces on the west side of the street in front of 101 Federal and Winthrop Square. The street has two one-way lanes driving north and an additional row of parallel spaces on the east side of the street. During the morning, cars driving down Federal Street will either turn left into Winthrop Square or 101 Federal, or keep driving. There will be an increase of traffic because of the Winthrop Square development, but the entry configuration and access control equipment as described below can accommodate the above listed flow capacity. An occasional queue will happen when several vehicles arrive at the same time

or pedestrian traffic on the sidewalk delays entry. This small queue will dissipate quickly as the Federal Street entry into Winthrop Square can be operated as a free-flow in. Access control equipment is also located at the 2nd below grade level which allows substantial queue space on the ramp. This entry configuration operated in this manner will not create queues on Federal Street other than periodic delays for pedestrian traffic. Even with periodic queues, the 101 Federal Street vehicles can easily drive around the few cars to enter 101 Federal. During the afternoon peak when cars are exiting, cars from both facilities will pull up to the sidewalk. Naturally the car from Winthrop Square will have the right of way, but the sequencing of turns onto Federal Street will eventually be learned behavior by the monthly drivers making up most of the exiting traffic.

Based on the volume of vehicles that are entering and exiting the two facilities and the given configurations, we do not foresee any significant issues with flow or conflict.

INBOUND ACCESS CONTROL

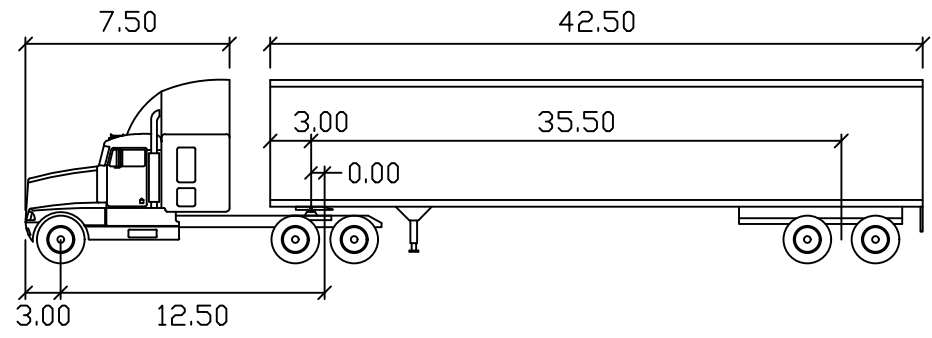
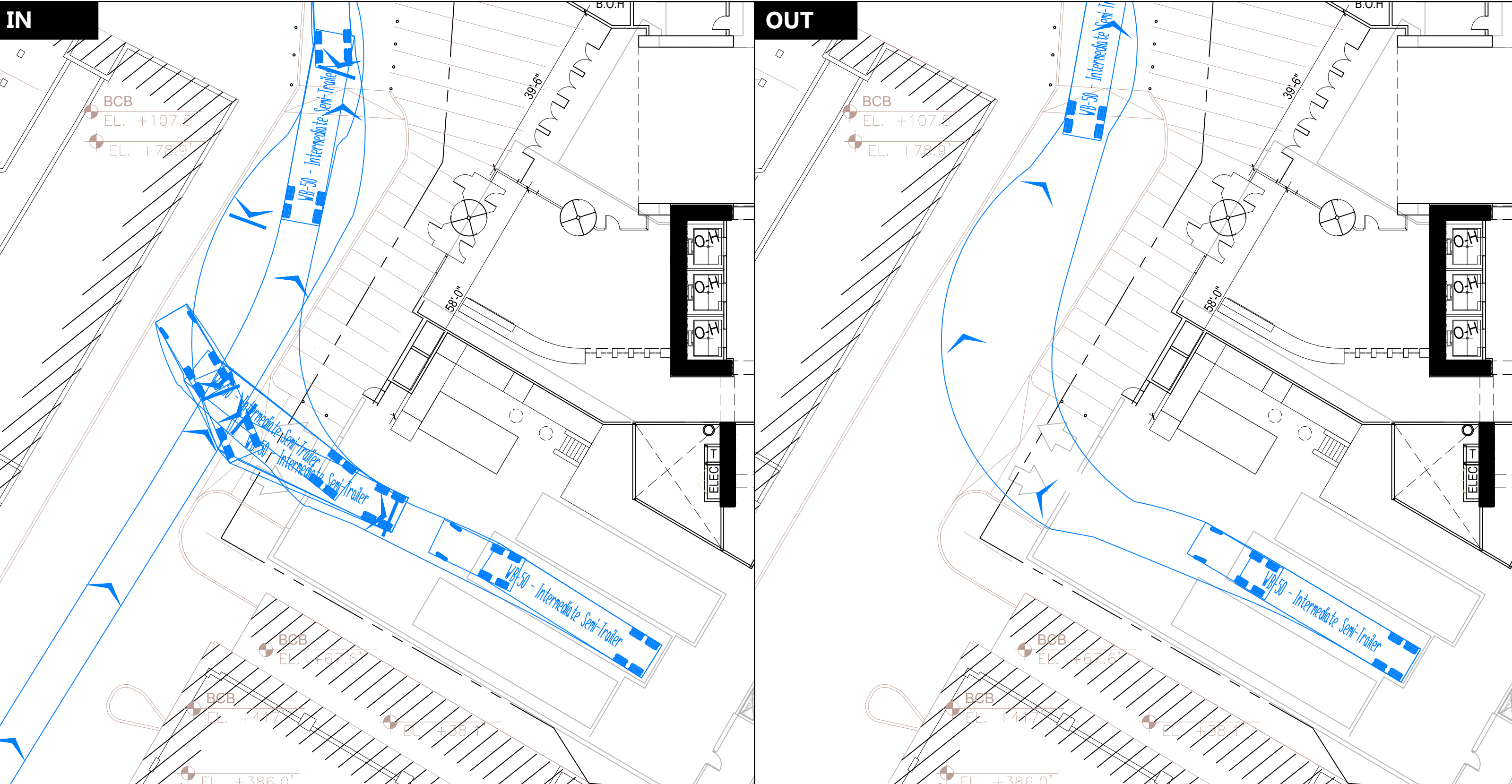
A high performance door will be used at the street entrance on Federal Street. This will likely remain open during the peak hours, which will allow very little in-bound delay or queueing. In this case, access control is provided on the 2nd parking level well into the garage with adequate ramp queueing. The lower level equipment has a calculated design queue of one vehicle which is much less than the entire ramp down to the 2nd parking level. In non-peak conditions, the door will typically be closed and the door is designed to open quickly (approximately 1 second) with little delay. When closed, the high performance door can be triggered with an automatic vehicle identification (AVI) transponder similar to EZ-Pass. This device has adequate read range that will trigger the opening of the door allowing the car to approach the door as it is fully opened resulting in little standing queue. With AVI, traditionally there is an arming loop that the car passes over to trigger the AVI to look for a signal. The AVI reader would be mounted over the garage door and be scanning all the time for a signal. The AVI reader would be signaled from the facility master computer to turn off when the ramp operates as an exit ramp.

The ramp is designed with an adequate transitional ramp just inside garage door at the face of the building, before becoming much steeper beyond. The shallower slope is recommended to transition from the sidewalk to a steeper slope on the main ramp and to allow for better flow and operation.

OUTBOUND ACCESS CONTROL

The access control equipment is located on the ramp below. Once the car passes through the auto gate, there is room to queue at the high performance door before turning onto the street. A conservative ramp slope inside the door is important for exiting traffic to allow for drivers to have a better sight line to the sidewalk over the hood of the car. Various pedestrian warning measures will be used as well such as an audio warning and/or flashing lights to warn pedestrians of an exiting vehicle. In addition, the Winthrop Square facility is staffed by parking operations personnel who can assist with minimizing sidewalk conflicts during peak exiting times.

Date	Time	Total Car in Garage	% Occupied	Time	Park In	Pull out	car movement Per Hour	Space Gained
Weekday Average								
1	7:00 AM	263	62%	7am-7.59am	4	24	29	20
1	8:00 AM	243	57%	8am-8.59am	9	21	30	12
1	9:00 AM	231	54%	9am-9.59am	12	13	25	0
1	10:00 AM	231	54%	10am-10.59am	9	13	22	4
1	11:00 AM	227	53%	11am-11.59am	10	10	20	1
1	12:00 PM	226	53%	12pm-12.59pm	10	12	21	2
1	1:00 PM	224	53%	1pm-1.59pm	11	10	21	0
1	2:00 PM	224	53%	2pm-2.59pm	10	13	22	3
1	3:00 PM	221	52%	3pm-3.59pm	13	10	23	-2
1	4:00 PM	223	53%	4pm-4.59pm	16	9	25	-6
1	5:00 PM	230	54%	5pm-5.59pm	19	10	28	-9
1	6:00 PM	239	56%	6pm-6.59pm	20	10	30	-10
1	7:00 PM	248	58%	7pm-7.59pm	17	6	23	-10
1	8:00 PM	258	61%	8pm-8.59pm	11	5	17	-6
1	9:00 PM	265	62%	9pm-9.59pm	10	4	14	-6
1	10:00 PM	271	64%	10pm-10.59pm	8	3	11	-4
1	11:00 PM	275	65%	11pm-11.59pm	3	2	5	-1
1	12:00 AM	276	65%	12am-12.59am	2	1	3	-1
1	1:00 AM	277	65%	1am-1.59am	2	0	2	-1
1	2:00 AM	278	65%	2am-2.59am	1	0	1	0
1	3:00 AM	278	65%	3am-3.59am	0	0	0	0
1	4:00 AM	278	65%	4am-4.59am	0	1	1	1
1	5:00 AM	278	65%	5am-5.59am	0	4	5	4
	6:00 AM	274	64%	6am-6.59am	2	13	14	11
				24 Hours Total	196	196	392	



WB-50	feet
Tractor Width	: 8.00
Trailer Width	: 8.50
Tractor Track	: 8.00
Trailer Track	: 8.50
Lock to Lock Time	: 6.0
Steering Angle	: 17.7
Articulating Angle	: 70.0

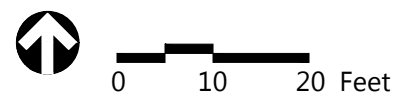


Figure 1
 Truck Turn Study (Staggered Dock) - WB-50
 Loading Dock 1
 115 Winthrop Square
 Boston, MA

April 2018

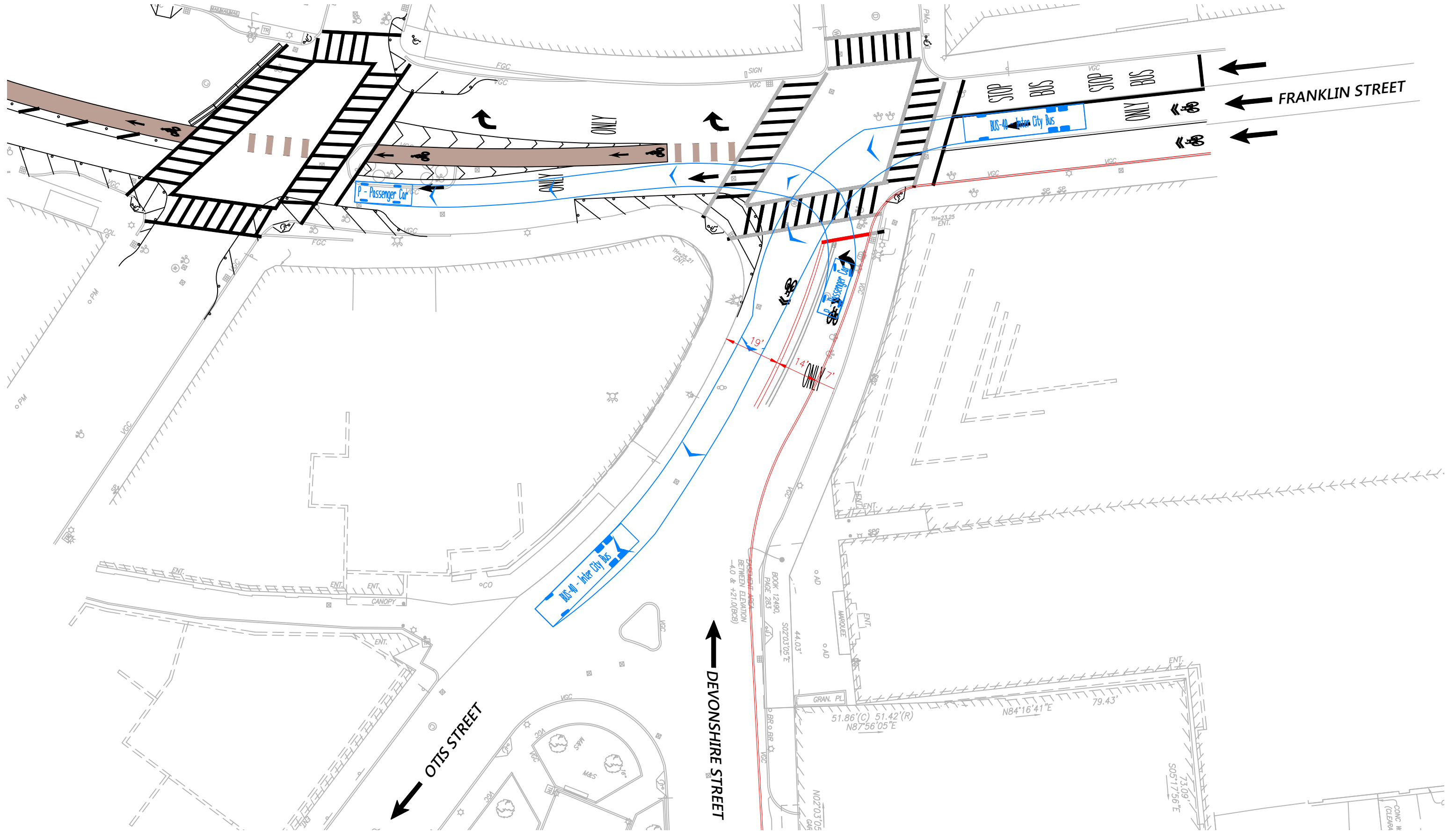


Figure 2
Turning Movement Analysis
Devonshire St/Otis St at Franklin St
115 Winthrop Square
Boston, MA

Attachment C

Friends of the Public Garden Memorandum of Agreement

MEMORANDUM OF AGREEMENT

This Memorandum of Agreement (this “**Agreement**”) is dated as of this 20th day of July, 2017 (the “**Effective Date**”) between the **Friends of the Public Garden, Inc.** (the “**Friends**”), a not for profit Massachusetts corporation with offices at 69 Beacon Street, Boston, Massachusetts 02108, and **MCAF Winthrop LLC** (“**MCAF**”), a limited liability corporation organized in Delaware with offices c/o Millennium Partners-Boston, 7 Water Street, Suite 200, Boston, Massachusetts 02109.

The Friends and MCAF shall hereinafter sometimes be referred to individually as a “**Party**” and collectively as the “**Parties**”.

RECITALS

1. The City of Boston, acting by and through the Boston Parks and Recreation Department (the “**City**”), a body politic and corporate and a political subdivision of the Commonwealth of Massachusetts with offices at City Hall, One City Hall Square, Boston, MA 02201, owns, operates and maintains, among other historic assets, Boston’s first public parks, the Boston Common, the Public Garden, and the Commonwealth Avenue Mall (collectively, the “**Parks**”). The Parks have each been designated as Boston Landmarks, and are listed as historic resources on the State Register of Historic Places. The Parks are important historical and civic resources for all citizens of Boston, and the need to keep the Parks in good condition and repair is an important civic objective.

2. The Friends is an organization that partners with the City in preserving and enhancing the Parks, and provides funding for that purpose.

3. MCAF has executed an agreement to purchase certain property located at 115 Winthrop Square, Boston (also known as 115 Federal Street, the “**Property**”) now owned by the Boston Redevelopment Authority d/b/a Boston Planning & Development Agency (“**BPDA**”), a public body politic and corporate, and to develop on the Property a 1.1 to 1.5 million square foot mixed-use tower project (the “**Project**”) containing residential, office, retail, restaurant, parking and other commercial uses as detailed in filings under Large Project Review pursuant to Article 80 of the Boston Zoning Code and under environmental impacts review pursuant to the Massachusetts Environmental Policy Act (the “**Permitting Documents**”). When constructed, the Project will cast shadows on the Parks.

4. In connection with the approvals for the Project, MCAF has advocated for the approval of legislation by the Massachusetts Legislature to amend the Chapter 362 of the Massachusetts Acts of 1990 and Chapter 384 of the Massachusetts Acts of 1992 (the “**Legislation**”) in the form attached to this Agreement as Exhibit A.

5. On June 27, 2017, the Friends submitted the testimony attached to this Agreement as Exhibit B to the Massachusetts Legislature (the “**Testimony**”), setting forth the Friends’ position on the Legislation and the Project. Among other things, the Friends noted in its testimony that it

was working toward an agreement with the City and MCAF with a goal to minimize or mitigate the impact of the shadows.

6. Accordingly, in recognition of the significance of the Parks, the mutual desire of the Parties to mitigate or minimize the impact of the shadows and the other goals set forth in the Testimony, (i) MCAF has agreed to make a financial contribution (the “**Contribution**”) and (ii) the Friends have agreed to use the Contribution solely for the maintenance and enhancement of the Parks, all as more particularly set forth in this Agreement.

7. The Friends has made arrangements with the Boston Foundation (the “**Foundation**”) to accept, hold and disburse the Contribution for the benefit of the Parks for purposes consistent with this Agreement.

8. The Friends and MCAF intend that the City, as the owner and operator of the Parks, is an intended third-party beneficiary of this Agreement. Consistent with that intent, the Parties intend and acknowledge that the City shall have the authority to seek enforcement of this Agreement by either Party, and that both Parties are estopped from claiming that the City may not seek enforcement of this Agreement.

NOW THEREFORE, in consideration of the promises and mutually dependent covenants set forth herein, and other good and valuable consideration, the receipt of which is hereby acknowledged, the Parties agree as follows:

AGREEMENT

A. The Project

1. MCAF intends to continue to advance the Project through the final design, permitting and approval processes in accordance with the requirements applicable to the Project and MCAF’s agreements with the BPDA and the City. The Parties acknowledge that MCAF is relying on the Testimony and this Agreement in proceeding with the Project.

2. The obligations of the Parties in this Agreement are contingent upon MCAF’s acquisition of the Property and its construction of the Project in a manner substantially as set forth in the Permitting Documents.

B. The Contribution

1. Beginning on the first day of the first month following MCAF’s receipt of the earlier of: (a) the initial Temporary Certificate of Occupancy for the Project; or (b) the initial Permanent Certificate of Occupancy for the Project, and continuing for a period of forty (40) years thereafter or until this Agreement is sooner terminated in accordance with its terms (the “**Term**”), MCAF shall make the Contribution consistent with the requirements of this Agreement in the amount of \$125,000.00 per year. The Contribution shall be paid to the Foundation quarterly in the amount of \$31,250.00 (each, a “**Payment**”) on the first day of the Term and on the first day of each third month thereafter, shall be held and disbursed by the Foundation to the Friends in a manner agreed to between the Friends and the Foundation, and

shall thereafter be used and administered by the Friends for purposes consistent with this Agreement. The Friends shall provide details pertaining to precisely where the Payments are to be directed in a notice to MCAF and the City not later than thirty (30) days following the Effective Date.

2. The Contribution shall be used solely for the maintenance and enhancement of the Parks and shall in no event be used for the Friends' general operating needs. From time to time, but not more frequently than annually, the City and/or MCAF, or both, shall be permitted to request that the Friends document the use of the Contribution by a letter confirming for the City and/or MCAF, or both, that the Contribution has been used solely for the purposes set forth in this Agreement.

3. Subject to the limitations set forth in paragraph B.2 above, the Friends shall be permitted to expend the Contribution in a manner and on a schedule it determines in its best judgement, consistent with its own requirements and any agreement it has now or may have then reached with the City.

C. Termination; Pre-Payment Right

This Agreement shall be in effect from the Effective Date through the end of the Term. At any time after the Effective Date up to five years prior to the end of the Term, MCAF shall have the right, but not the obligation, to pre-pay the entire (but not a portion of) of the Contribution by making a payment (a "**Pre-Payment**") to the Foundation of the then net present value of the outstanding amount of the Contribution, calculated using the weekly average yield reported by the Federal Reserve Board in the Federal Reserve Statistical Release H. 15 (519) as of the Friday immediately preceding the week in which the prepayment is made for U.S. Treasury Constant Maturities having a maturity equal to the remaining average life (rounded to the nearest published maturity) of the Term, or the then equivalent measure. Any Pre-Payment shall be made by MCAF and shall be disbursed by the Foundation in the same manner as the Payments. Upon receipt of a Pre-Payment, the Term shall be deemed to end, and this Agreement shall terminate.

D. Successors and Assigns; Right to Assignment

1. The obligations and benefits of this Agreement shall be binding upon and inure to the benefit of the Parties and their successors and assigns.

2. In the event that, at any time during the Term, the Friends ceases to exist or stops performing actual maintenance and enhancement activities on the Parks, the obligations, rights and responsibilities accruing to the Friends shall be automatically transferred to any successor not for profit organization, or, in the event there is no such successor organization, MCAF agrees that the Payments shall thereafter be donated to the City for the purpose of the maintenance and enhancement of the Parks.

3. MCAF shall have the option, without the consent of the Friends or the City, to assign this Agreement in whole or in part to: (i) an association of condominium unit owners

responsible for the management of all or substantially all of the Project; (ii) an association of condominium unit owners responsible for the management of all or substantially all of the residential portions of the Property; or (iii) provided a substantial portion of the Project is utilized for commercial purposes, a commercial condominium unit owner of a condominium unit in which a substantial portion of the Project's commercial space is located. Any other assignment of this Agreement by MCAF shall require the consent of the Friends, such consent not to be unreasonably withheld, conditioned or delayed.

E. Amendment

No amendment or modification of this Agreement shall be effective without the prior written agreement of each of the Parties.

F. Severability

If any term or provision of this Agreement or the application thereto to any person or circumstance shall, to any extent, be declared to be invalid or unenforceable, then the remainder of this Agreement or the application of such term or provision to other persons or circumstances, other than those as to which it would become invalid or unenforceable, shall not be affected thereby, and each term and provision of this Agreement shall be valid and enforceable to the fullest extent permitted by law.

G. Counterparts

This Agreement may be executed in counterparts and all such executed counterparts shall constitute one Agreement binding on each of the Parties, notwithstanding that all of the Parties are not signatories to the original or the same counterpart. In addition, any counterpart signature page may be executed by any Party wherever such Party is located. Signatures to this Agreement, any amendment hereof and any notice given hereunder, transmitted electronically or by telecopy, shall be valid and effective to bind the Party so signing.

H. Further Assurances; Miscellaneous Matters

The Parties each hereby agree that at any time and from time to time after the Effective Date, they shall, upon the request of any other Party, as the case may be, execute, acknowledge and deliver such further documents and do such further acts and things as such other Party may reasonably request in order to more fully carry out the purposes of this Agreement as contemplated hereunder.

I. No Discrimination; Conflicts of Interest

No Party shall discriminate against any employee or applicant for employment because of race, religion, creed, ancestry, color, sex, sexual orientation, gender identity, genetic information, age, disability, national origin or military veteran status. No member, officer, or employee of the Parties during his/her tenure or for one year thereafter shall have any interest, direct or indirect, in this Agreement.

J. Notices and Payments

All notices, requests, Payments, demands, elections, consents, approvals and other communications hereunder must be in writing and addressed as follows (or at any other address which any of the Parties may designate by notice):

If to the Friends: Friends of the Public Garden
69 Beacon Street
Boston, MA 02108
ATTN: Executive Director

If to MCAF: MCAF Winthrop LLC
c/o Millennium Partners-Boston
7 Water Street, Suite 200
Boston, MA 02109
ATTN: Joseph Larkin

and to: Millennium Partners
1995 Broadway, 3rd Floor
New York, NY 10023
ATTN: Chief Financial Officer

with a copy to: DLA Piper LLP (US)
33 Arch Street, 26th Floor
Boston, MA 02110-1447
ATTN: Brian Awe

Copies of all of the aforesaid notices, requests, Payments, demands, elections, consents, approvals and other communications shall also be provided to the intended third-party beneficiary by delivery to:

City of Boston
Law Department
Boston City Hall
One City Hall Square
Boston, MA 02201
ATTN: Corporation Counsel

Any notice required by this Agreement to be given or made within a specified period of time, or on or before a date certain, shall be deemed to have been duly given if delivered by hand during business hours, mailed by certified mail, return receipt requested, postage and fees prepaid, or

delivered by nationally-recognized overnight courier, shipping prepaid. A notice shall be deemed given when delivered or when delivery is refused.

K. Headings and Interpretation; Definitions

The headings of the sections of this Agreement are for convenience of reference only and shall not be considered a part hereof, nor shall they be deemed to limit or otherwise affect any of the terms or provisions hereof. Reference to the singular or plural shall be deemed to include the other where the context requires.

L. Applicable Law

This Agreement shall be governed by and construed under the laws of The Commonwealth of Massachusetts, without regard to choice of law provisions.

M. No Implied Agreement

No correspondence, course of dealing or submission of drafts or final versions of this Agreement between the Parties shall be deemed to create any binding obligations in connection with the transactions contemplated hereby, and no contract or obligation on the part of any Party shall arise unless and until this Agreement is fully executed by all of the Parties.

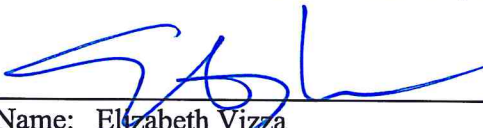
N. Authority

Each Party hereby represents and warrants that the execution and delivery of this Agreement has been duly authorized by all requisite action, and that the obligations of the Parties are enforceable by each other Party, jointly and severally, to the full extent of Massachusetts law.

[Remainder of page intentionally left blank]

IN WITNESS WHEREOF, the undersigned have executed this Agreement under seal as a Massachusetts instrument as of the date first above written.

FRIENDS OF THE PUBLIC GARDEN, INC.

By: 
Name: Elizabeth Vizza
Title: Executive Director

MCAF WINTHROP LLC

By: _____
Name:
Title:

The Boston Foundation joins in this Agreement for the sole purpose of acknowledging its agreement to accept, hold, and disburse the Contribution in a manner consistent with this Agreement:

By: _____
Kate Guedj
Vice President & Chief Philanthropy Officer
Duly authorized

Exhibits:

- A – The Legislation
- B – June 28, 2017 Testimony of the Friends of the Public Garden

IN WITNESS WHEREOF, the undersigned have executed this Agreement under seal as a Massachusetts instrument as of the date first above written.

FRIENDS OF THE PUBLIC GARDEN, INC.

By: _____
Name: Elizabeth Vizza
Title: Executive Director

MCAF WINTHROP LLC

By:  _____
Name: PHILIP H. LOVETT
Title: Vice President

The Boston Foundation joins in this Agreement for the sole purpose of acknowledging its agreement to accept, hold, and disburse the Contribution in a manner consistent with this Agreement:

By: _____
Kate Guedj
Vice President & Chief Philanthropy Officer
Duly authorized

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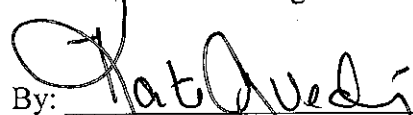
MCAF WINTHROP LLC

By: _____

Name:

Title:

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By:  _____

Kate Guedj

Vice President & Chief Philanthropy Officer

Duly authorized

Exhibits:

A – The Legislation

B – June 28, 2017 Testimony of the Friends of the Public Garden

**EXHIBIT A
H3749**

HOUSE DOCKET, NO. 4038 FILED ON: 6/12/2017

HOUSE No. 3749

By Mr. Michlewitz of Boston, a petition (accompanied by bill, House, No. 3749) of Aaron Michlewitz and Joseph A. Boncore (with the approval of the mayor and city council) relative to shadows cast by certain structures in the city of Boston. Municipalities and Regional Government. [Local Approval Received.]

The Commonwealth of Massachusetts

**In the One Hundred and Ninetieth General Court
(2017-2018)**

An Act protecting sunlight and promoting economic development in the city of Boston.

Be it enacted by the Senate and House of Representatives in General Court assembled, and by the authority of the same, as follows:

SECTION 1. Subsection (b) of section 2 of chapter 362 of the Acts of 1990 is hereby amended by striking out the words “, subject to the one acre exclusion set forth in the second sentence of subsection (c).”

SECTION 2. Subsection (c) of section 2 of chapter 362 of the Acts of 1990 is hereby amended by striking out the second sentence thereof.

SECTION 3. Section 2 of chapter 362 of the Acts of 1990 is hereby further amended by inserting after subsection (c) the following subsection:-

(d) Any structure located on property owned by the City of Boston on January first, two thousand and sixteen and located west of Federal Street, south of Franklin Street, east of Devonshire Street, and north of the intersection of High Street and Summer Street, which structure casts a new shadow upon the Boston Common for not more than two hours after the later of seven o’clock in the morning or the first hour after sunrise.

SECTION 4. Section 2 of chapter 384 of the Acts of 1992 is hereby amended by striking out the word “or” in the last line of subsection (b).

SECTION 5. Section 2 of chapter 384 of the Acts of 1992 is hereby further amended by striking out the period in the last line of subsection (c) and inserting in place thereof a semicolon and the word “or.”

SECTION 6. Section 2 of chapter 384 of the Acts of 1992 is hereby further amended by inserting after subsection (c) the following subsection:-

(d) Any structure located on property owned by the City of Boston on January first, two thousand and sixteen and located west of Federal Street, south of Franklin Street, east of Devonshire Street, and north of the intersection of High Street and Summer Street, which structure casts a new shadow upon the Public Garden for not more than forty-five minutes after the later of seven o’clock in the morning or the first hour after sunrise.

SECTION 7. As used in section 7 and section 8 of this act the following words shall have the following meanings:

“Article 48,” Article 48 of the Boston Zoning Code as it existed on March thirty-first, two thousand and seventeen.

“New shadow,” the casting of a shadow at any time on an area which is not cast in shadow at such time by a structure which exists or for which a building permit or local zoning entitlements through the Zoning Board of Appeal or Boston Zoning Commission have been granted on the date upon which application is made to the permit-granting authority for a proposed structure and which would not be cast in shadow by a structure conforming to as-of-right height limits allowed by the Boston Zoning Code as in force on March thirty-first, two thousand and seventeen. New shadow shall not include a de minimis shadow cast by an antenna, fence, flagpole, sign or other similar structure.

“Permit granting authority,” the Boston Zoning Board of Appeal, the Boston Zoning Commission, the Boston Redevelopment Authority or other public body authorized to grant permits or approvals pursuant to chapter 121A or chapter 121B of the General Laws, chapter 665 of the acts of 1956, as amended, of the Boston Zoning Code. Permit granting authority shall not include the Boston Inspectional Services Department, or any body or department succeeding in the duties thereof.

“Copley Square Park,” the land in the City of Boston bounded by Boylston Street, Clarendon Street, St. James Avenue, and Dartmouth Street, and under the care, custody management and control of the city Parks and Recreation Commission, excluding land occupied by Trinity Church.

“Structure,” a structure, as defined in the Massachusetts state building code, which is: (i) intended to be permanent; and (ii) not located within the boundaries of Copley Square Park.

SECTION 8. Notwithstanding any provisions of chapter 121A or chapter 121B of the General Laws, or chapter 665 of the acts of 1956, or any other general or special law to the contrary, no permit granting authority shall take any action which would authorize the construction of any structure within the Stuart Street District established by Article 48 which would cast a new shadow for more than two hours from eight o’clock in the morning through two-thirty in the afternoon on any day from March twenty-first to October twenty-first, inclusive, in any calendar year, on any area of Copley Square Park; provided, however, that the provisions of this section shall not apply to actions authorizing any structure that has received local zoning entitlements through the Zoning Board of Appeal or by virtue of being included in a development plan or planned development area master plan within the Stuart Street District, all as approved on or before March thirty-first, two thousand seventeen by the Boston Zoning Commission in accordance with chapter six hundred sixty-five of the acts of nineteen hundred and fifty-six, as such Board of Appeal relief or development plan may thereafter be amended; provided however,

that such amendment shall not permit construction of a structure which would cast additional new shadow as defined in Section 7 of this Act for more than two hours as aforesaid.

SECTION 9. The Boston Redevelopment Authority shall conduct a planning initiative for downtown Boston for an area including, but not limited to, the Midtown Cultural District established by Article 38 of the Boston Zoning Code and that area of the city known as the Financial District. The initiative shall be conducted in partnership with the community to examine the preservation, enhancement and growth of downtown Boston in order to balance growth with livability while respecting the importance of sunlight, walkability, and a dynamic mix of uses. The initiative shall culminate in a report that must include, but need not be limited to, recommendations concerning: development guidelines to facilitate predictable and appropriate development and community benefits; balancing area enhancement with the needs of existing residents, businesses and property owners; historic preservation; impacts of development on the environment, open space, and public realm, specifically including shadow impacts; and adaptability to the risks associated with climate change. The planning initiative shall commence within six months of the date of the passage of this act, and the Boston Redevelopment Authority shall publish the report on the planning initiative within three years from the passage of this act.

SECTION 10. This act shall take effect upon its passage.

[End of Exhibit A]

EXHIBIT B

June 28, 2017 Testimony of the Friends of the Public Garden

Testimony of Leslie Singleton Adam, Board Chair, Friends of the Public Garden, to the Joint Committee on Municipalities and Regional Government, regarding House Bill 3749

June 27, 2017

Good morning Chairmen Moore and O'Day, Vice Chairmen Timilty and Stanley, and members of the Committee. My name is Leslie Singleton Adam, and I am here as Board Chair of the Friends of the Public Garden to testify on House Bill 3749, titled An Act Protecting Sunlight and Promoting Economic Development in the City of Boston. While we are hesitant to take a formal position on the bill at this time, since we are engaged in discussions with the City of Boston and Millennium Partners on what we hope will be a mutually beneficial agreement that will protect our cherished downtown parks, I am here to offer some thoughts on the legislation and context about the issues it addresses.

First, I would like to provide some information on the history and mission of the Friends of the Public Garden. The Friends has worked in partnership with the City of Boston since 1970 to maintain, enhance, and advocate for the Boston Common, Public Garden, and Commonwealth Avenue Mall. When we first came into existence in the 1970s, the parks were in total disrepair. Today they are national treasures and are the heart of the city.

We are in the parks daily, working as guardians and gardeners for 1,700 trees, 53 acres of grass, and conservators of 42 pieces of public art, including the world-famous George Washington, Shaw Memorial, and Make Way for Ducklings statues. The Friends is able to invest more about \$1.6 million annually directly into the parks to more than match the city's annual appropriation through the Parks Department. With over 3,000 Members representing 133 communities in the Commonwealth, all of the funding for our work in the parks comes from private donations.

We care for the parks on a daily basis and work to restore the many fountains and statues that grace them. We raised \$4.4 million to renovate Brewer Fountain Plaza near Park Street Station to bring it to life with tables and chairs, music, a reading room, and an active food truck program. And we raised \$720,000 to restore and set up a maintenance fund for the famous "Angel" fountain (George Robert White Memorial fountain) in the Garden to its former glory, bringing the water back after 30 years.

We come to this issue not as hobbyists, but as experts in horticulture and longtime partners with the City. We have raised legitimate issues regarding the impact of the shadows the Winthrop Square Building will cast on our landmark parks. We still have strong reservations about a one-time amendment to laws that have worked to protect our parks while allowing development to continue in downtown Boston. But we are working toward an agreement that will result in a significant investment in the parks, as well as a comprehensive planning process for downtown development. Our goal is to minimize – or mitigate – the impact of the shadows and gain assurances about future exemptions from these laws.

We have been working closely with the Mayor and the BPDA, members of the City Council and the Boston legislative delegation – Reps. Jay Livingstone, Aaron Michlewitz and Byron Rushing and Sens. Will Brownsberger and Joe Boncore – and they have listened to our concerns. In this bill are assurances that the City will undertake a comprehensive downtown planning process – something we plan to be fully engaged in. Also in this bill is the elimination of the remaining approximately quarter acre of allowable shadow under the law in the so-called Shadow Bank.

We acknowledge that the City Council’s 10-3 vote was a clear statement of support, and that the Mayor is strongly supportive of this petition. However, the City consistently refers to this project as a once-in-a-lifetime opportunity, and we plan to hold them to that. We will oppose any further encroachment of shadows on the city’s landmark parks. And we hope that, in its consideration of this bill, the Committee will make it clear to the City that you will not entertain further exemptions to these laws that have protected our parks for over two decades while allowing robust economic development downtown.

Thank you for the opportunity to testify on this important matter.

[End of Exhibit B]

Appendix D

Letter from MCAF Winthrop LLC c/o MP Boston Dated March 19, 2018

**MCAF WINTHROP LLC
c/o MP Boston
7 Water St., 2nd Floor
Boston, MA 02109**

March 19, 2018

BY EMAIL

Boston Planning & Development Agency
City Hall - 9th Floor
One City Hall Square
Boston, MA 02201
Attention: Mr. Brian P. Golden, Director

RE: Draft Environmental Impact Report/Project Impact Report dated January 2, 2018 (DPIR) for
Winthrop Square Tower Project

Dear Director Golden:

Since the submission of the DPIR for the Project on January 2, 2018, we have continued working actively with abutting owners to identify and address potential impacts during the Project's excavation and foundation construction. As a result of those ongoing discussions and related investigations, updated geotechnical information regarding the abutting buildings has become available.

We now understand that the adjacent 101 Federal Street building is supported on deep foundations bearing in very competent strata (glacial till or bedrock) at estimated depths ranging from about 50 feet to 80 feet; the adjacent building at 100 Summer Street is supported on concrete caissons bearing in glacial soil at varying depths which extend to a depth of El. 0 to El. -20 Boston City Base (BCB), or approximately 28 feet to 48 feet below grade; and the adjacent building at 133 Federal Street is supported on belled concrete caisson founded in the glacial till at elevations ranging from approximately El. -20 to El. -36 BCB. We continue to investigate the foundations for One Winthrop Square but believe they are founded on footings bearing in the glacial or stiff marine soils.

We have provided reports and information from our geotechnical engineers at Haley & Aldrich to the abutters to the Project site, including early calculations based on initial information prepared to assist in determining what further analysis would be necessary. Haley & Aldrich expects to have further refined preliminary calculations prepared, and is scheduled to get additional boring information, in the coming weeks, and we will share that information with the relevant abutters in a follow-on geotechnical report that will serve as the basis for further discussions.

As has been the case throughout our ongoing conversations with abutters, we remain committed to identifying the geotechnical impacts of the Project on other buildings. Those impacts will be analyzed and the Project foundations designed to control and limit potential adverse effects on the abutting properties. We anticipate continuing our productive cooperation with the abutting owners in connection with these efforts.

Please contact me if I can provide any additional information.

Sincerely,

A handwritten signature in black ink that reads "Kathleen MacNeil". The script is cursive and somewhat stylized, with the first letters of each word being capitalized and prominent.

Kathleen C. MacNeil

Cc: Casey Hines

Appendix E

Boston Civic Design Commission Information

To: David Carlson, Executive Director, Boston Civic Design Commission

From: Blake Middleton FAIA, Partner, Handel Architects LLP

Date: 6 February 2018

Re: 115 Winthrop Square Massing

We are in receipt of the analysis prepared by neighbors of the Winthrop Square development dated 1/29/18. We respectfully wish to bring to the attention of the BCDC some observations on the arguments being made by the neighbors about the proposed setbacks and site density of this project.

Enclosed are a series of diagrams and analysis of the site condition with respect to other similar situations in downtown Boston. We have looked at the issue with respect to a) adjacency between buildings and b) density or site FAR.

The report prepared by the neighbors overlooks a few facts that tend to skew the analysis of the proposed Winthrop Square development:

- 1) There are no light or air easements on north, east, or south boundaries of the parcel.
- 2) Most of the large buildings used in the analysis are full block buildings. 115 Winthrop Square is mid-block condition. These are not equivalent massing conditions.
- 3) Typical mid-block conditions in downtown Boston have continuous street walls, and tall buildings abutting each other.
- 4) Urban density is more typically thought of, and zoning is created, considering the entire block, not just single buildings. Boston is a city of tight adjacencies between buildings on a block, oftentimes created by narrow alleys.
- 5) When the entire block of the project site is looked at holistically, the aggregate block FAR is 21.75, considerably smaller than several of the aggregate building FAR of the examples presented.

We hope the Commissioners will bear this in mind when evaluating this particular issue.

We look forward to further discussion on this topic at the appropriate forum.

WSQ

BCDC SUPPLEMENT 1

02/06/2018

Relevant Parameters:

MEETS REQUIREMENT

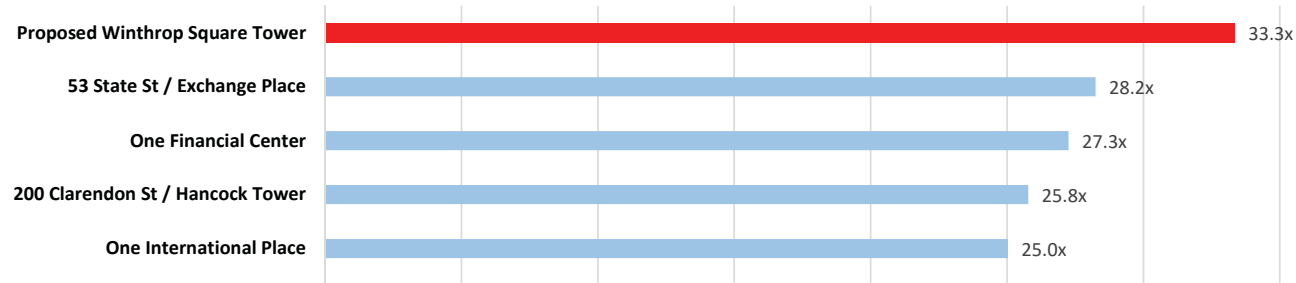
- The building's massing shall enhance the composition of surrounding buildings, and express its pivotal location at the heart of the financial district.
- The building shall reinforce the street walls along Devonshire and Federal Streets.
- The base of the building shall conform to the general massing of the district.
- 725 Maximum building height per FAA regulations.
- Appropriate setbacks shall be provided, to allow for a comfortable and lively pedestrian and retail environment.

BOSTON URBAN MORPHOLOGY

- Unlike other cities Boston's **urban morphology** is **more intimate** in scale
- **Blocks** tend to be **smaller**
- **Party-wall conditions** abound
- Historically buildings have been built **cheek to cheek**

BOSTONS LARGEST 5 BUILDINGS

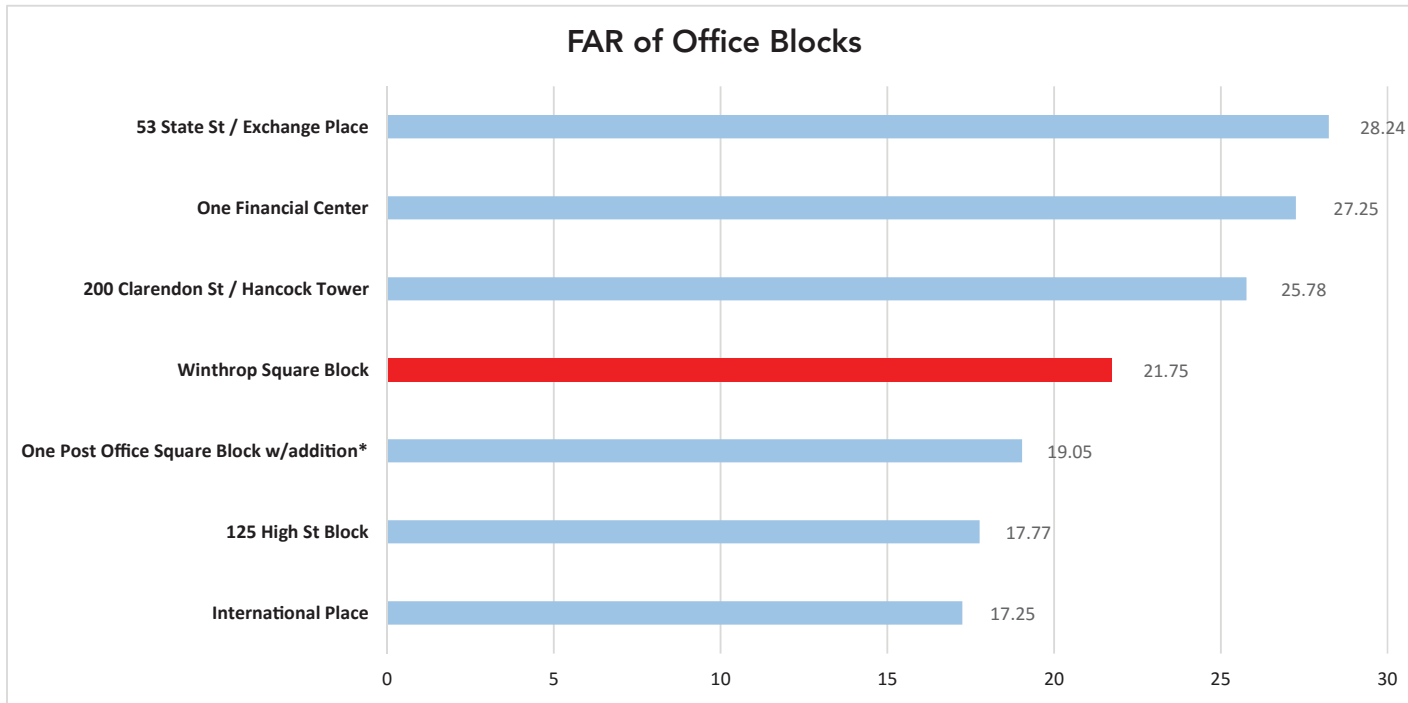
FAR of Boston's Largest Office Buildings
(> 1.0 million square feet)



MID BLOCK
FULL BLOCK
FULL BLOCK
FULL BLOCK
MULTI-BUILDING COMPLEX
ON ONE BLOCK

*Data on this page from others

FAR OF OFFICE BLOCKS

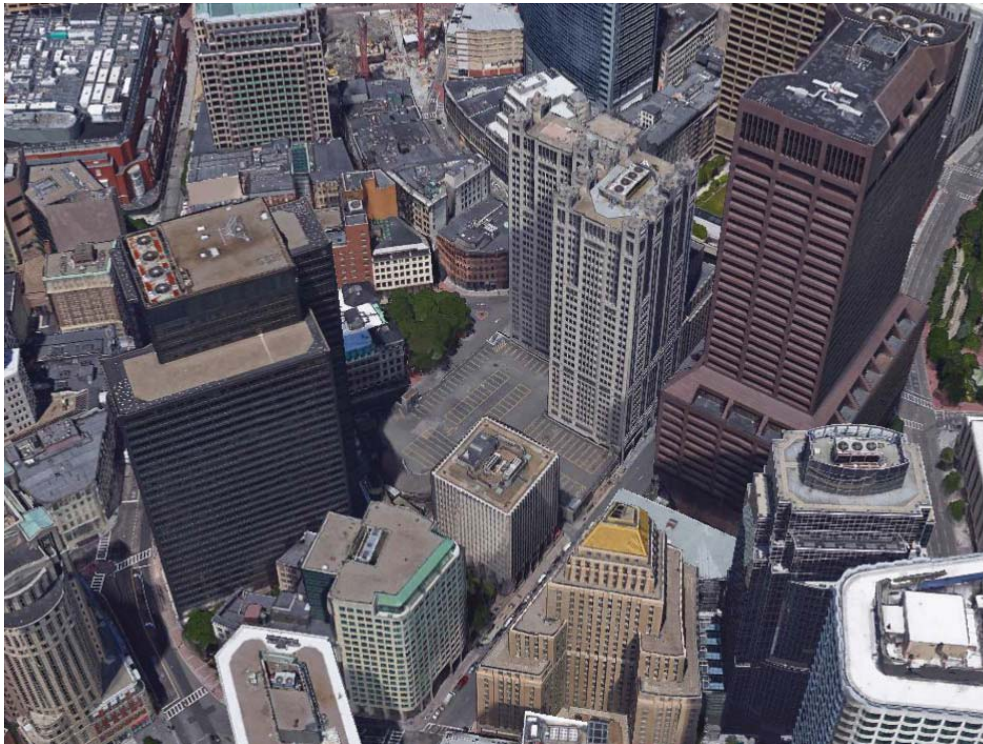


*estimated

*All figures approximate
**All areas from City of Boston assessor database

WINTHROP SQUARE

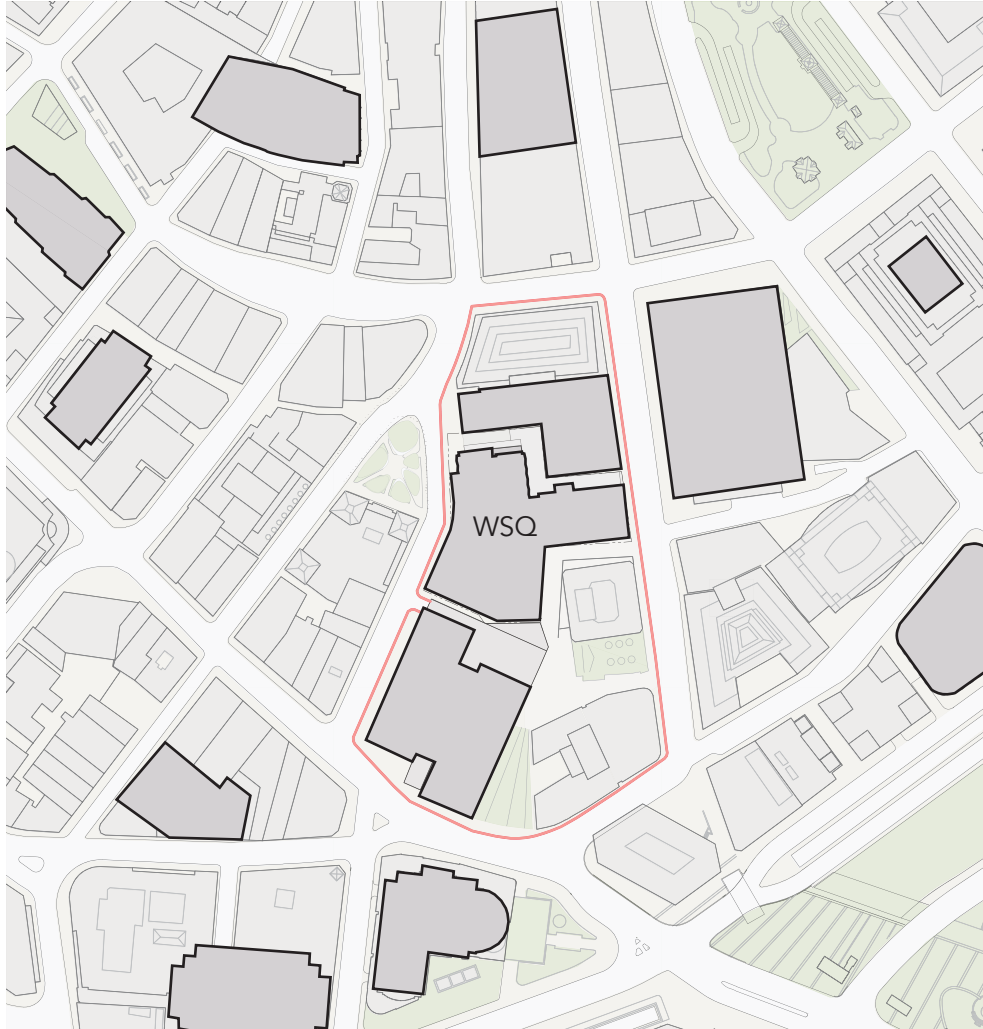
BLOCK	ADDRESS	STORIES	ADJACENCY TYPE	LOT AREA	BUILDING AREA	FAR SITE	BLOCK AREA	BLOCK BUILDING AREA	FAR BLOCK
F: Winthrop Sq (Devonshire/Franklin/Federal/High/Summer)									
	220 Devonshire			24,153	283,708	11.75			
	Milton Pl			9,995	179,910	18.00			
	2 14 High St			13,173	116,823	8.87			
	100 Summer			61,477	1,303,391	21.20			
	101 Federal			19,883	679,000	34.15			
	133 Federal			20,157	120,000	5.95			
	115 Winthrop			47,738	1,592,000	33.35			
							196,576	4,274,832	21.75



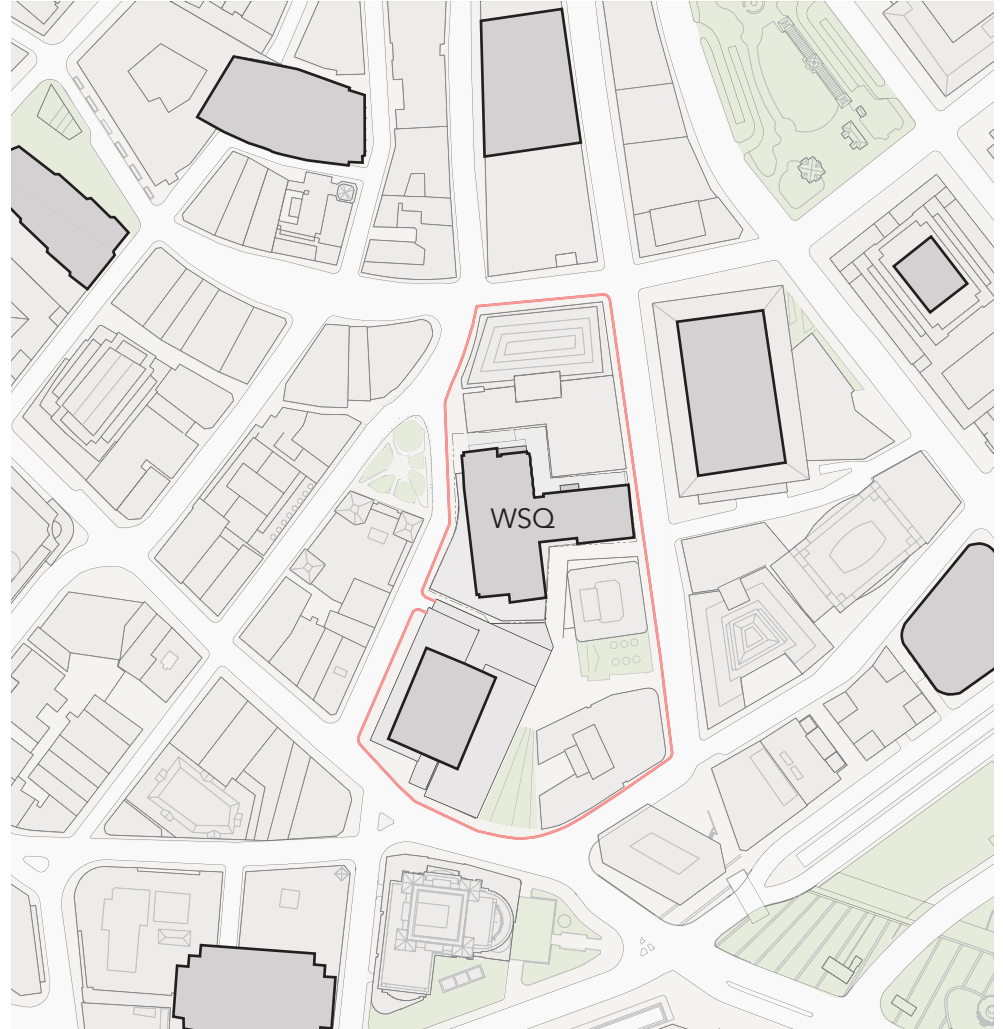
*All figures approximate
 **All areas from City of Boston assessor database

WINTHROP BLOCK

MID-RISE SEPARATION (+250) AT OFFICE LVL.



HIGH-RISE SEPARATION (+400) AT RESIDENTIAL LVL.

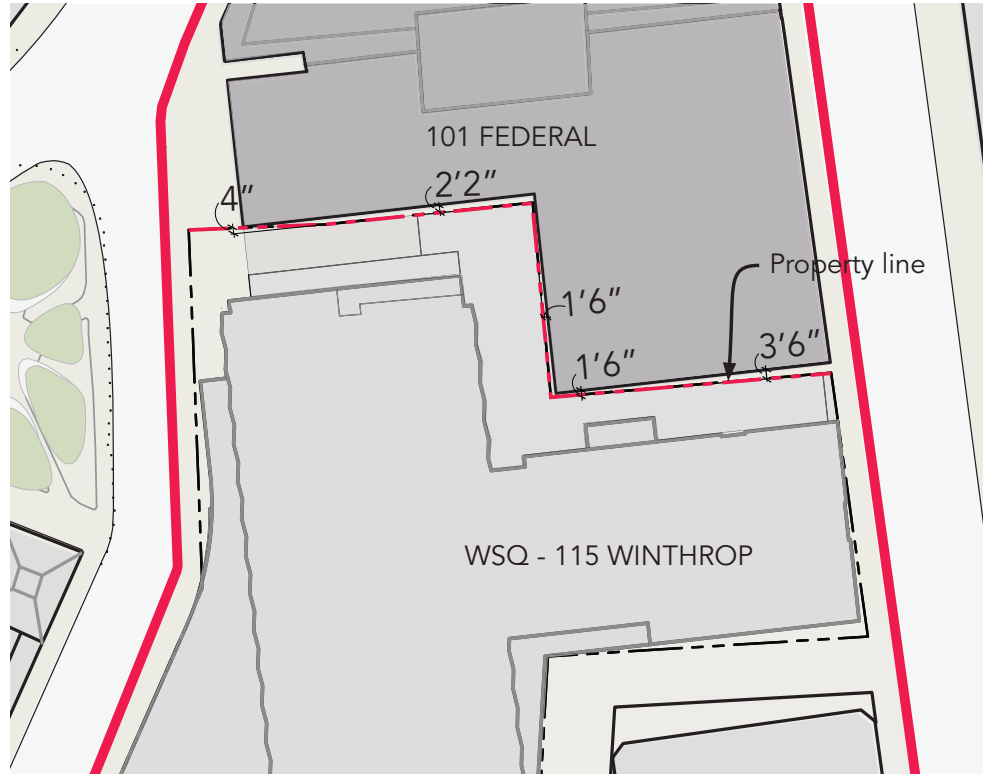


*All figures approximate

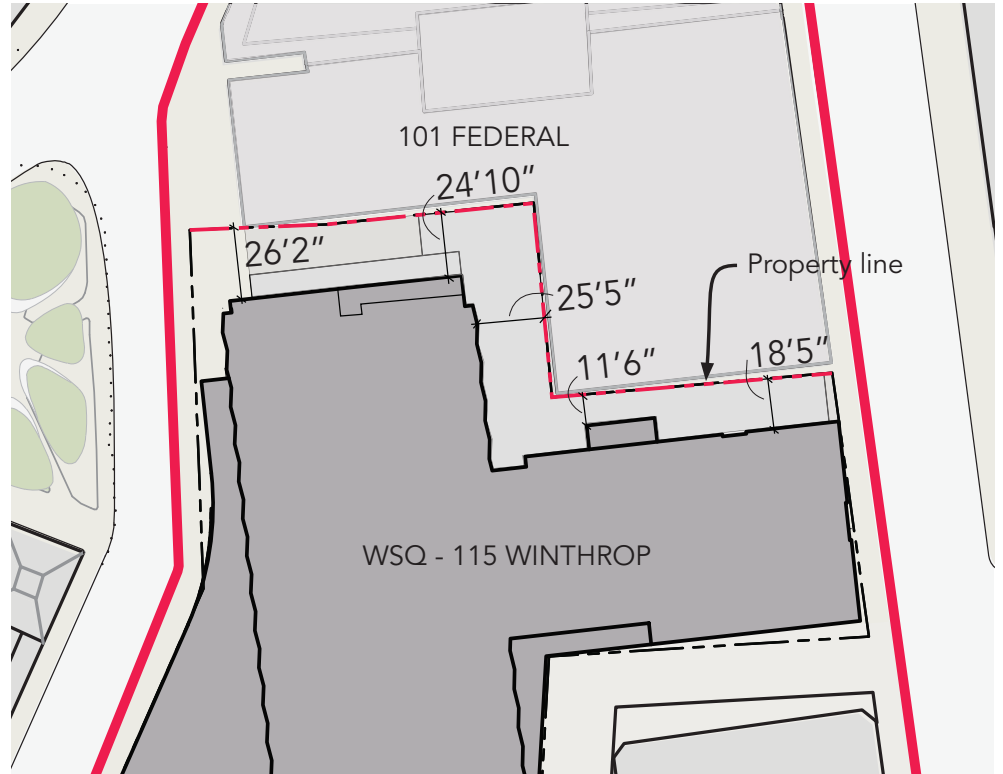
HANDEL ARCHITECTS • GROUND LANDSCAPE • D/R/E/A/M COLLABORATIVE • VHB

115 WINTHROP & 101 FEDERAL RESPECTIVE LOT LINE SETBACKS

101 FEDERAL FROM PROPERTY LINE



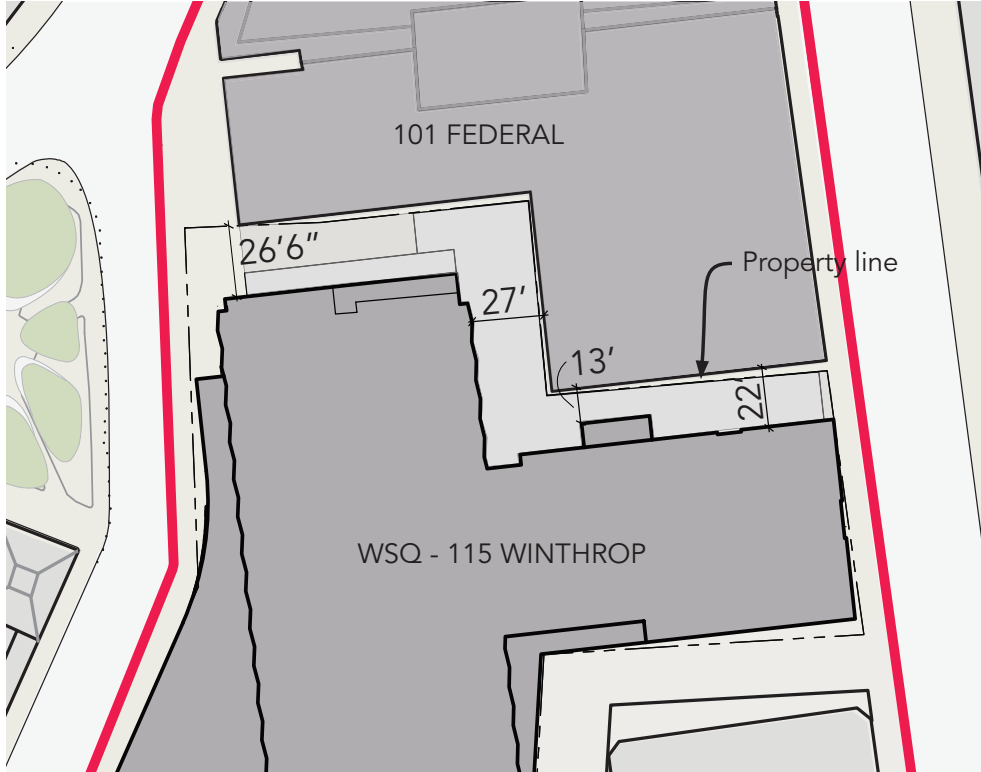
115 WINTHROP FROM PROPERTY LINE



*All figures approximate

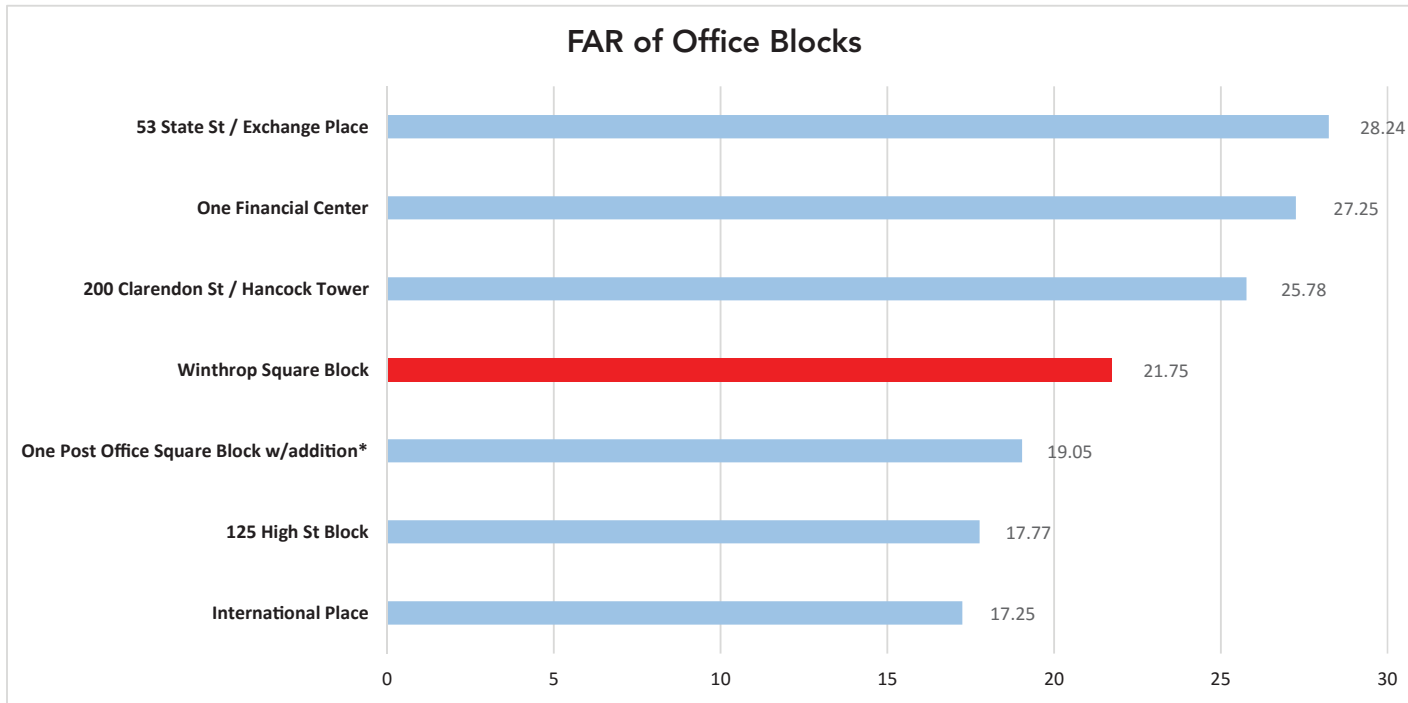
115 WINTHROP & 101 FEDERAL RESPECTIVE LOT LINE SETBACKS

PROPOSED DISTANCE BETWEEN 101 FEDERAL AND 115 WINTHROP



*All figures approximate

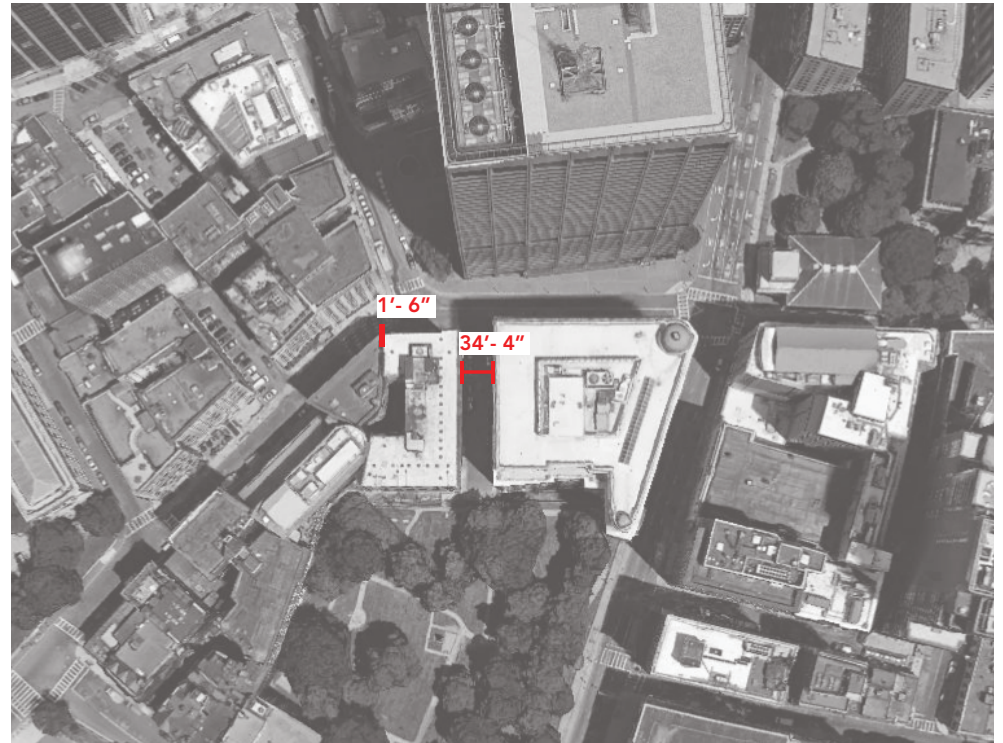
FAR OF OFFICE BLOCKS



*estimated

*All figures approximate
**All areas from City of Boston assessor database
***All dimensions from BPDA city cad plan

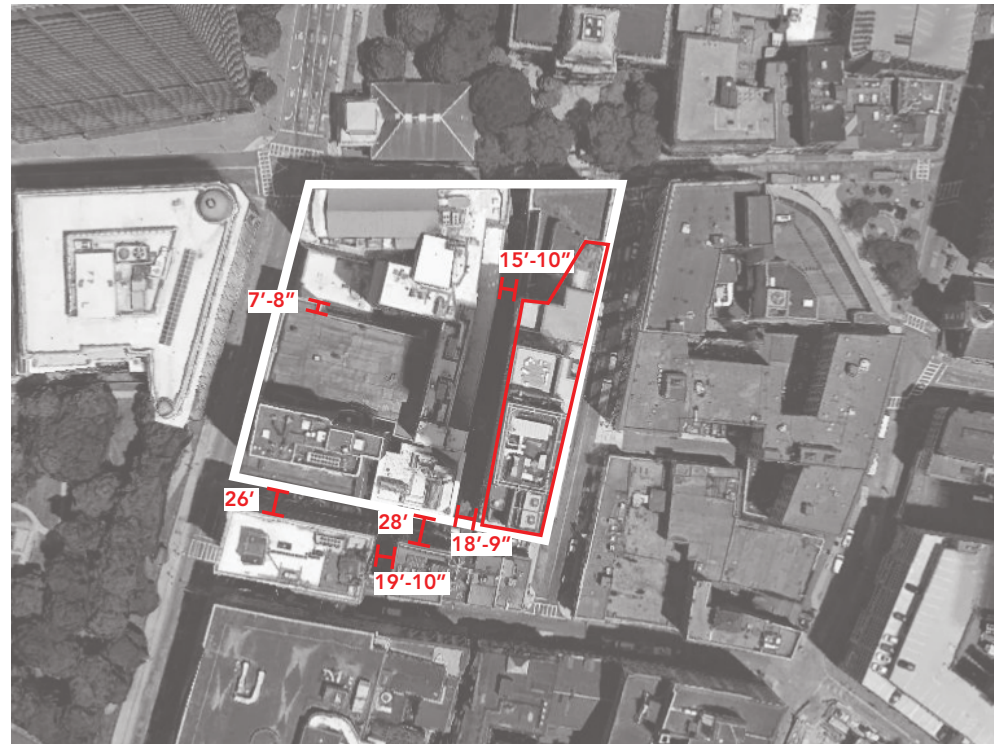
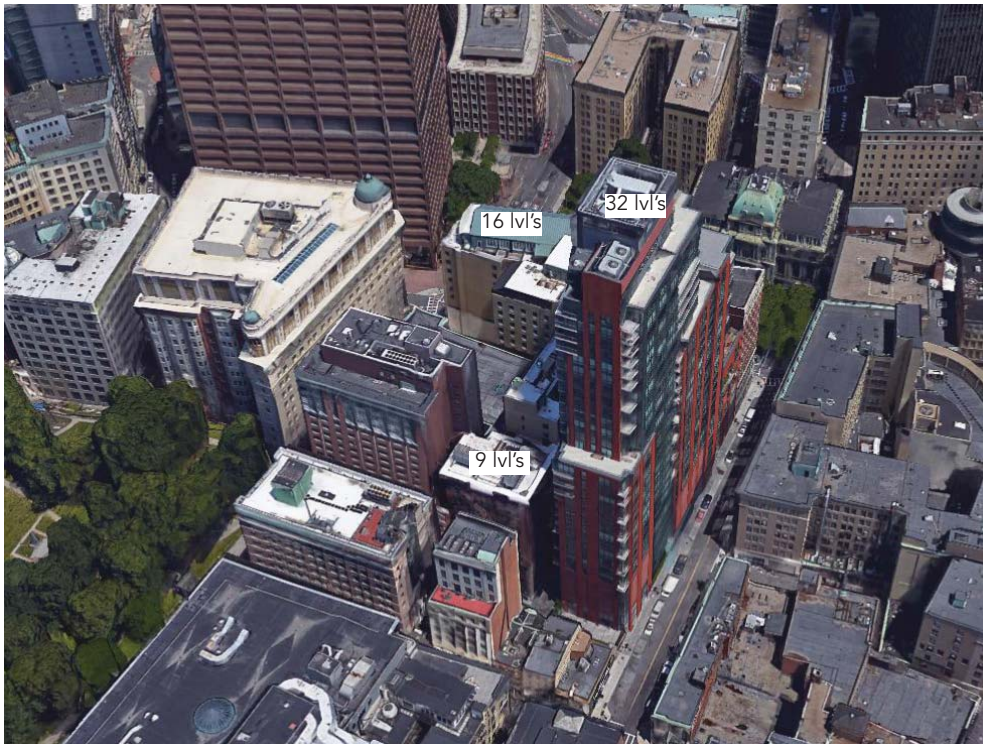
6 - 8 Beacon Street



*All figures approximate
**All areas from City of Boston assessor database
***All dimensions from BPDA city cad plan

45 Province / Omni Parker Block

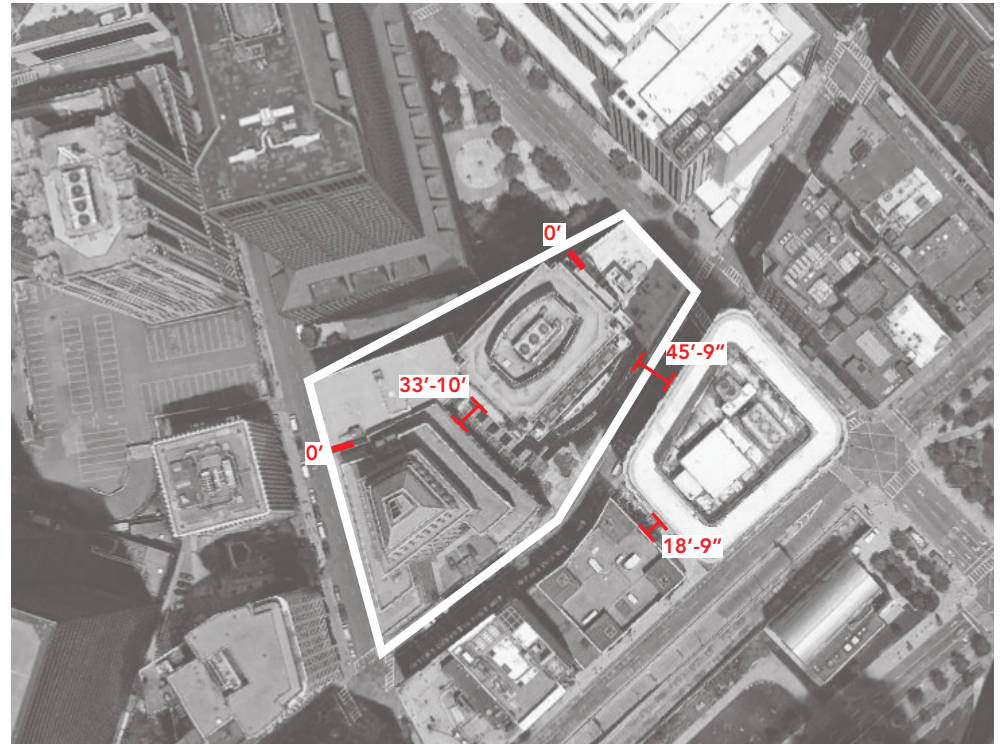
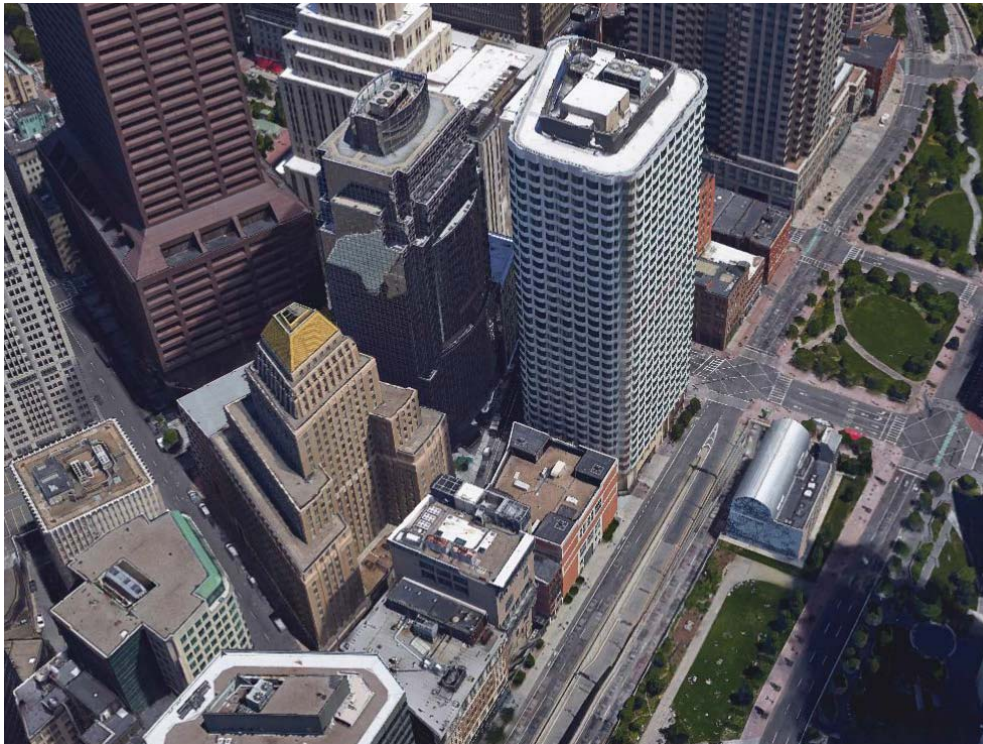
BLOCK	ADDRESS	STORIES	ADJACENCY TYPE	LOT AREA	BUILDING AREA	FAR SITE	BLOCK AREA	BLOCK BUILDING AREA	FAR BLOCK
45 Province / Omni Parker Block									
	60-70 Tremont St - Omni Parker			26,852	282,625	10.53			
	88-78 Tremont St			12,948	88,969	6.87			
	90 Tremont St			6,972	129,200	18.53			
	45 Province St	32		13,881	274,849	19.80			
	42-52 School St			5,605	54,924	9.80			
							66,258	830,567	12.54



*All figures approximate
 **All areas from City of Boston assessor database
 ***All dimensions from BPDA city cad plan

160 Federal / 100 High Block

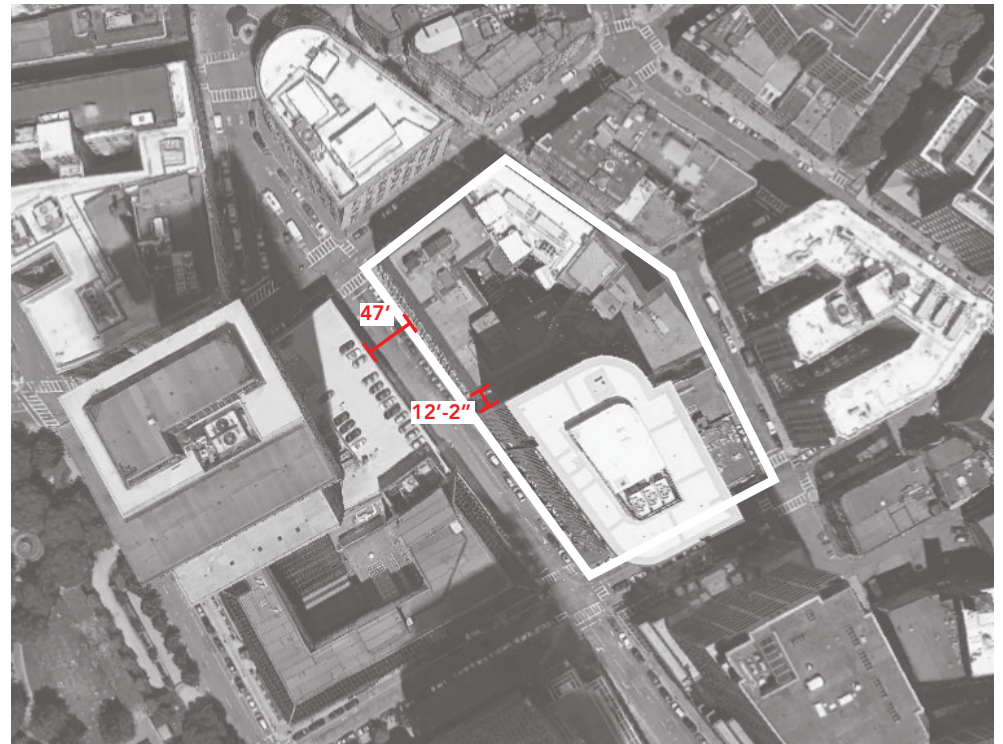
BLOCK	ADDRESS	STORIES	ADJACENCY TYPE	LOT AREA	BUILDING AREA	FAR SITE	BLOCK AREA	BLOCK BUILDING AREA	FAR BLOCK
160 Federal / 100 High Block									
	160 Federal St			29,169	320,580	10.99			
	150 Federal St			39,077	551,954	14.12			
	209-217 Congress			7,192	78,881	10.97			
							75,438	951,415	12.61



*All figures approximate
 **All areas from City of Boston assessor database
 ***All dimensions from BPDA city cad plan

260 Franklin Block

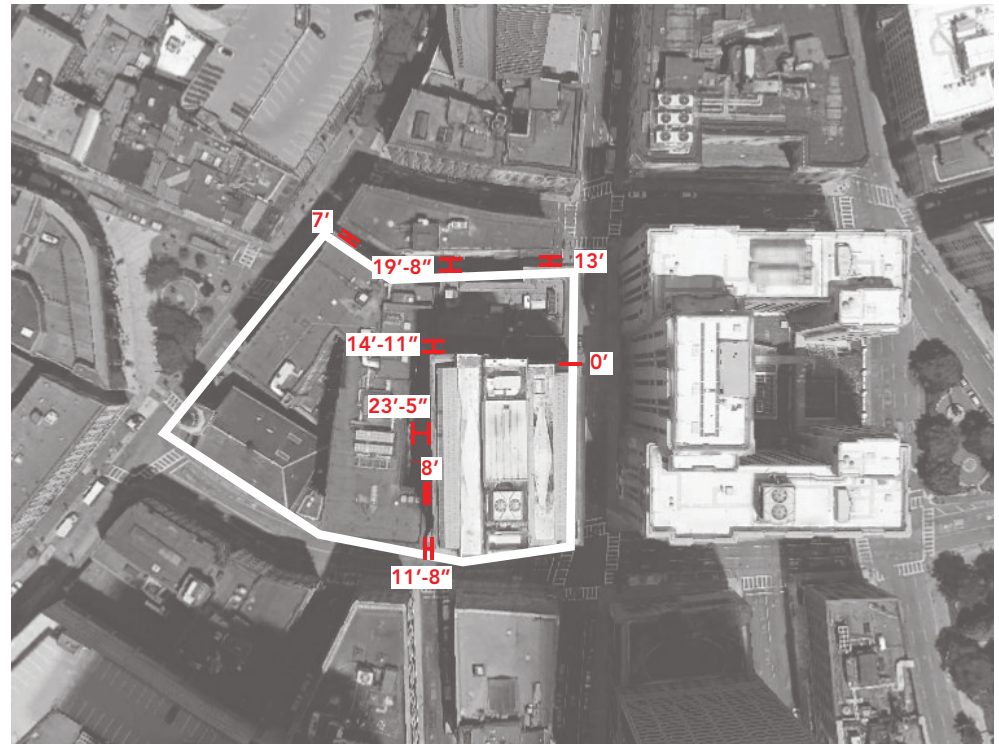
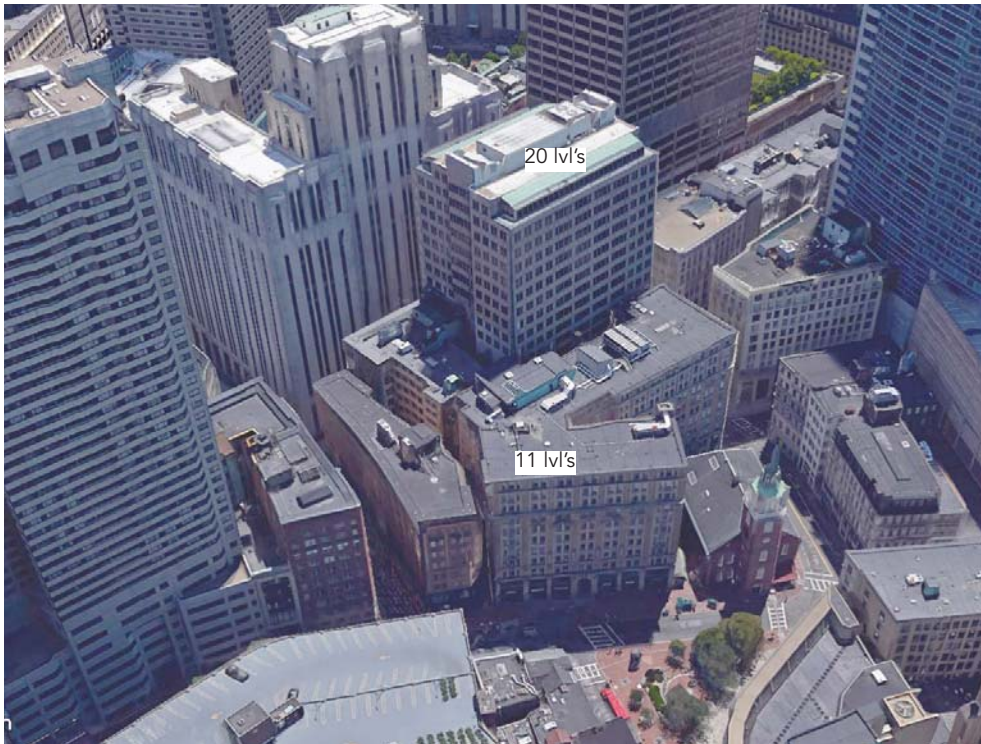
BLOCK	ADDRESS	STORIES	ADJACENCY TYPE	LOT AREA	BUILDING AREA	FAR SITE	BLOCK AREA	BLOCK BUILDING AREA	FAR BLOCK
260 Franklin Block									
	147-149 Milk St			5,398	51,630	9.56			
	6-10 Oliver St	11 lvs		25,476	233,763	9.18			
	260 Franklin St	22 lvs		17,812	413,650	23.22			
	67 Battery March			3,502	20,592	5.88			
	55-61 Battery March			2,931	17,208	5.87			
							55,119	736,843	13.37



*All figures approximate
 **All areas from City of Boston assessor database
 ***All dimensions from BPDA city cad plan

50 Milk / 294 Washington Block

BLOCK	ADDRESS	STORIES	ADJACENCY TYPE	LOT AREA	BUILDING AREA	FAR SITE	BLOCK AREA	BLOCK BUILDING AREA	FAR BLOCK
50 Milk / 294 Washington Block									
	2 Milk St			8,329	6,715	0.81			
	50 Milk St	20 lvl's		18,575	282,200	15.19			
	105-111 Devonshire St			7,016	65,340	9.31			
	280-300 Washington St	11 lvl's		24,700	225,294	9.12			
							58,620	579,549	9.89



*All figures approximate
 **All areas from City of Boston assessor database
 ***All dimensions from BPDA city cad plan