



Martin J. Walsh
Mayor

Article 37 Interagency Green Building Committee

August 21, 2019

125 Lincoln Street Owner (DE) LLC
C/o Oxford Properties Group
Dean Shapiro
Mark McGowan
125 Summer Street, 12th Floor
Boston, MA 02110

Re: 125 Lincoln Street, Project Notification Form

Dear Mister Shapiro and Mister McGowan:

The Boston Interagency Green Building Committee (IGBC) has reviewed the Project Notification Form (PNF) submitted under Article 80B for compliance with Boston Zoning Code Article 37, Green Buildings. The filing indicates that the project will use the LEED v4 Building Design and Construction for Core & Shell (CS) rating system and commits to achieving a LEED gold 65 points.

The IGBC accepts the rating system selection and urges the development team to firm up the gold performance for this prominent site. Please note that LEED v4 does not use credit numbers. The LEED checklist should be amended to remove credit numbers and references to credit numbers should be replaced with credit names.

The Sustainability Narrative is light on descriptions. We look forward to a detailed and comprehensive Design Green Building Report (DGBR).

Please note that the DGBR should specify the relevant LEED credit or LEED Credit Interpretation Ruling (CIR) being used for each Innovation Credit and how the requirements will be met. If there is no existing LEED credit or CIR, the DGBR should describe the green building/environmental benefits of each proposed credit and how they will be both quantified and demonstrated.

As the City's requirements for electric vehicle charging stations have changed, the percentage will exceed that necessary for obtaining the Green Vehicles credit. Please contact Nicholas Moreno, staff to the Boston Air Pollution Control Commission, as soon as possible to discuss the pathways to compliance and report on this communication in the DGBR.

The following are specific credits that we strongly recommend that the project team give priority to achieving:

- Rainwater management, using LEED v4.1 if necessary; and
- Renewable energy production.

Please assess the feasibility of on-site battery energy storage systems for reducing peak electrical loads.

In support of the City of Boston's Resiliency and Greenhouse Gas (GHG) emissions reduction goals including Carbon Neutral Boston 2050, the IGBC requests that the project:

- Prepare a Low Carbon/Zero Carbon Building Assessment by modeling optimized building and systems load reduction strategies, potential on-site renewable energy, and necessary off-site renewable energy procurement including:
 - Enhanced Building Envelope Performance - reduced window to wall ratio; higher airtight standards; increased opaque curtain wall insulation; improved glazing U value tuning glazing for Solar Heat Gain Coefficient; and increased wall, roof, and exposed floor insulation.
 - Advanced Building Systems – smaller, more efficient and alternative heating, cooling, and hot water systems reflecting improved envelope performance.
 - All electrical building systems and appliances.
 - Installed Solar PV System(s).
 - Renewable Energy Procurement – green energy, credits, and carbon offsets.
- Assess all available utility and Mass DOER and CEC resources to maximize utility and state-funding for energy efficiency and clean/renewable energy support. We suggest engaging the utilities as soon as possible and providing in any future review filings and in your DGBR a detailed description of energy efficiency assistance and support afforded to the project.

In 2018 the City of Boston launched the Zero Waste Boston Initiative. The Zero Waste Advisory Committee is recommending strategies to make Boston a zero waste city. This means that Boston will reduce, reuse, recycle and compost at least 80 to 90 percent of its solid waste. As part of this effort, we encourage food composting as part of the comprehensive plan for the building.

The Climate Resiliency Report Summary is not adequate - "N/A" is not a suitable answer to any item on the checklist and Section E.1. is essentially incomplete. Please provide all missing information/answers in each section.

Please note that we find that passive and structural solutions for flood protection to be the most effective measures. The PNF shows a reliance upon deployables, measures that require an action at the time of anticipated flooding. We urge the project to make the most of the opportunity to protect this investment in more structural ways.

Please refer to the Boston Public Works Department Climate Resilient Design Guidelines for the appropriate use of deployables should they be part of a plan going forward.

Please file an updated Climate Resiliency Checklist within three weeks of receipt of this letter and provide the IGBC with the resulting report.

Let me know if you have questions or if I can be of any assistance.

Sincerely,

Maura T. Zlody
For the Interagency Green Building Committee

Cc: Interagency Green Building Committee
Susan Cascino



波士頓華埠商會

Boston Chinatown Business Association

6 Tyler Street #2/F, Boston, MA 02111

Tel. (617) 338-6868

Mr. Michael A. Sinatra
Boston Planning & Development Agency
Boston City Hall
Boston, MA 02201

Re: 125 Lincoln Street Proposal

Dear Mr. Sinatra:

I am writing you on behalf of the Chinatown Business Association and its members. I am encouraged by the growth and prosperity that Boston and our community have enjoyed under the Walsh Administration and current BPDA leadership. However, I write today to formally go on record in opposition to the current proposal at 125 Lincoln St.

The proponent, Oxford Properties, has proposed a project that does not fit within the character of the Leather District, or Chinatown. In fact, it threatens to wall off and separate these communities that have long enjoyed cohesion and harmony. Beyond the extremely large massing and scale of the proposal on a small lot, the project could potentially do harm to the Chinatown community by displacing needed institutions. The possibilities of losing the institutions of a neighborhood grocery and dining/banquet space that has a personal connection to generations of Chinatown residents and visitors – has caused much unrest. Chinatown has been seeing grocery stores and markets close over the past 10 years, if we lose the market at this site then the neighborhood will only have one left.

The proposed physical structure would seem massive from our Chinatown perspective - 330 feet of height, 24 stories and 625,000 gross square feet of development. The 125 Lincoln Street lot is only 27,958 square feet. The allowed FAR (floor area ratio) is 8 and this proposal violates that and beyond by proposing a 22.5 FAR.

I am also troubled that the building is strictly to be an office use. These buildings do not bring any life and vitality to a community outside of the 9 – 5 hours. This building will sit empty on nights and weekends and potentially attract trouble.

If approved, this structure would have a drastic effect on the livelihood of our community and the Leather District. Therefore, I humbly ask the BPDA and City officials to ask Oxford Properties to go back to the drawing board and come back to the community with a project more palatable for each community.

Sincerely,

A handwritten signature in black ink, consisting of a long, sweeping horizontal line that curves upwards at the end, followed by several smaller, more intricate loops and strokes below it.

Steven Chen, President
Chinatown Business Association

**Boston Water and
Sewer Commission**



980 Harrison Avenue
Boston, MA 02119-2540
617-989-7000

August 16, 2019

Mr. Michael Sinatra
Project Manager
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201

Re: 125 Lincoln Street, Central
Project Notification Form

Dear Mr. Sinatra:

The Boston Water and Sewer Commission (Commission) has reviewed the Project Notification Form (PNF) for the proposed project located at 125 Lincoln Street in the Leather District of Boston.

The proposed project is located on approximately 0.64 acres of developed land currently occupied by an approximately 115,625 square foot, 5-story parking garage, with office uses located on the upper floors and ground-floor retail. The site is bounded by Tufts Street to the north and west, Beach Street to the south, and Lincoln Street to the east. The proponent, 125 Lincoln Street Owner (DE) LLC, proposes build a new approximately 625,000 square foot office building with retail and publicly accessible ground floor uses. The project will include parking with capacity for up to 275 vehicles beneath the Building.

According to the PNF, the proposed water demand is approximately 40,719 gallons per day (gpd). The Commission owns and maintains an 18-inch Southern Low PCI water main installed in 1915 in Lincoln Street and a 12-inch Southern High DICL water main installed in 2015 in Kneeland Street.

According to the SPRA, the proposed sewage generation is 37,017 gpd. For sewage and storm drainage service, the site is served by a 72-inch and 48-inch combined sewer in Lincoln Street. The Commission owns and maintains a 48-inch by 66-inch storm drain in Kneeland Street.

The Commission has the following comments regarding the PNF:



General

1. Prior to the initial phase of the site plan development, 125 Lincoln Street Owner (DE) LLC should meet with the Commission's Design and Engineering Customer Services to review water main, sewer and storm drainage system availability and potential upgrades that could impact the development.
2. Prior to demolition of any buildings, all water, sewer and storm drain connections to the buildings must be cut and capped at the main pipe in accordance with the Commission's requirements. The proponent must complete a Cut and Cap General Services Application, available from the Commission.
3. All new or relocated water mains, sewers and storm drains must be designed and constructed at 125 Lincoln Street Owner (DE) LLC's expense. They must be designed and constructed in conformance with the Commission's design standards, Water Distribution System and Sewer Use regulations, and Requirements for Site Plans. The site plan should include the locations of new, relocated and existing water mains, sewers and drains which serve the site, proposed service connections, water meter locations, as well as back flow prevention devices in the facilities that will require inspection. A General Service Application must also be submitted to the Commission with the site plan.
4. The Department of Environmental Protection (DEP), in cooperation with the Massachusetts Water Resources Authority and its member communities, is implementing a coordinated approach to flow control in the MWRA regional wastewater system, particularly the removal of extraneous clean water (e.g., infiltration/inflow (I/I)) in the system. In April of 2014, the Massachusetts DEP promulgated new regulations regarding wastewater. The Commission has a National Pollutant Discharge Elimination System (NPDES) Permit for its combined sewer overflows and is subject to these new regulations [314 CMR 12.00, section 12.04(2)(d)]. This section requires all new sewer connections with design flows exceeding 15,000 gpd to mitigate the impacts of the development by removing four gallons of infiltration and inflow (I/I) for each new gallon of wastewater flow. In this regard, any new connection or expansion of an existing connection that exceeds 15,000 gallons per day of wastewater shall assist in the I/I reduction effort to ensure that the additional wastewater flows are offset by the removal of I/I. Currently, a minimum ratio of 4:1 for I/I removal to new wastewater flow added is used. The Commission supports the policy, and will require proponent to develop a consistent inflow reduction plan. The 4:1 requirement should be addressed at least 90 days



prior to activation of water service and will be based on the estimated sewage generation provided on the project site plan.

5. The design of the project should comply with the City of Boston's Complete Streets Initiative, which requires incorporation of "green infrastructure" into street designs. Green infrastructure includes greenscapes, such as trees, shrubs, grasses and other landscape plantings, as well as rain gardens and vegetative swales, infiltration basins, and paving materials and permeable surfaces. The proponent must develop a maintenance plan for the proposed green infrastructure. For more information on the Complete Streets Initiative see the City's website at <http://bostoncompletestreets.org/>
6. For any proposed masonry repair and cleaning 125 Lincoln Street Owner (DE) LLC will be required to obtain from the Boston Air Pollution Control Commission a permit for Abrasive Blasting or Chemical Cleaning. In accordance with this permit 125 Lincoln Street Owner (DE) LLC will be required to provide a detailed description as to how chemical mist and run-off will be contained and either treated before discharge to the sewer or drainage system or collected and disposed of lawfully off site. A copy of the description and any related site plans must be provided to the Commission's Engineering Customer Service Department for review before masonry repair and cleaning commences. 125 Lincoln Street Owner (DE) LLC is advised that the Commission may impose additional conditions and requirements before permitting the discharge of the treated wash water to enter the sewer or drainage system.
7. 125 Lincoln Street Owner (DE) LLC should be aware that the US Environmental Protection Agency issued the Remediation General Permit (RGP) for Groundwater Remediation, Contaminated Construction Dewatering, and Miscellaneous Surface Water Discharges. If groundwater contaminated with petroleum products, for example, is encountered, 125 Lincoln Street Owner (DE) LLC will be required to apply for a RGP to cover these discharges.
8. 125 Lincoln Street Owner (DE) LLC is advised that the Commission will not allow buildings to be constructed over any of its water lines. Also, any plans to build over Commission sewer facilities are subject to review and approval by the Commission. The project must be designed so that access, including vehicular access, to the Commission's water and sewer lines for the purpose of operation and maintenance is not inhibited.
9. It is 125 Lincoln Street Owner (DE) LLC responsibility to evaluate the capacity of the water, sewer and storm drain systems serving the project site to determine if the systems are adequate to meet future project demands. With the site plan, 125



Lincoln Street Owner (DE) LLC must include a detailed capacity analysis for the water, sewer and storm drain systems serving the project site, as well as an analysis of the impacts the proposed project will have on the Commission's water, sewer and storm drainage systems.

Water

1. 125 Lincoln Street Owner (DE) LLC must provide separate estimates of peak and continuous maximum water demand for residential, commercial, industrial, irrigation of landscaped areas, and air-conditioning make-up water for the project with the site plan. Estimates should be based on full-site build-out of the proposed project. 125 Lincoln Street Owner (DE) LLC should also provide the methodology used to estimate water demand for the proposed project.
2. 125 Lincoln Street Owner (DE) LLC should explore opportunities for implementing water conservation measures in addition to those required by the State Plumbing Code. In particular, 125 Lincoln Street Owner (DE) LLC should consider outdoor landscaping which requires minimal use of water to maintain. If 125 Lincoln Street Owner (DE) LLC plans to install in-ground sprinkler systems, the Commission recommends that timers, soil moisture indicators and rainfall sensors be installed. The use of sensor-operated faucets and toilets in common areas of buildings should be considered.
3. 125 Lincoln Street Owner (DE) LLC is required to obtain a Hydrant Permit for use of any hydrant during the construction phase of this project. The water used from the hydrant must be metered. 125 Lincoln Street Owner (DE) LLC should contact the Commission's Meter Department for information on and to obtain a Hydrant Permit.
4. The Commission is utilizing a Fixed Radio Meter Reading System to obtain water meter readings. For new water meters, the Commission will provide a Meter Transmitter Unit (MTU) and connect the device to the meter. For information regarding the installation of MTUs, 125 Lincoln Street Owner (DE) LLC should contact the Commission's Meter Department.

Sewage / Drainage

1. In conjunction with the Site Plan and the General Service Application 125 Lincoln Street Owner (DE) LLC will be required to submit a Stormwater Pollution Prevention Plan. The plan must:



- Identify specific best management measures for controlling erosion and preventing the discharge of sediment, contaminated stormwater or construction debris to the Commission's drainage system when construction is underway.
 - Include a site map which shows, at a minimum, existing drainage patterns and areas used for storage or treatment of contaminated soils, groundwater or stormwater, and the location of major control structures or treatment structures to be utilized during the construction.
 - Specifically identify how the project will comply with the Department of Environmental Protection's Performance Standards for Stormwater Management both during construction and after construction is complete.
2. The Commission encourages 125 Lincoln Street Owner (DE) LLC to explore additional opportunities for protecting stormwater quality on site by minimizing sanding and the use of deicing chemicals, pesticides, and fertilizers.
 3. The discharge of dewatering drainage to a sanitary sewer is prohibited by the Commission. 125 Lincoln Street Owner (DE) LLC is advised that the discharge of any dewatering drainage to the storm drainage system requires a Drainage Discharge Permit from the Commission. If the dewatering drainage is contaminated with petroleum products, 125 Lincoln Street Owner (DE) LLC will be required to obtain a Remediation General Permit from the Environmental Protection Agency (EPA) for the discharge.
 4. 125 Lincoln Street Owner (DE) LLC must fully investigate methods for retaining stormwater on-site before the Commission will consider a request to discharge stormwater to the Commission's system. The site plan should indicate how storm drainage from roof drains will be handled and the feasibility of retaining their stormwater discharge on-site. All projects at or above 100,000 square feet of floor area are to retain, on site, a volume of runoff equal to 1.25 inches of rainfall times the impervious area. Under no circumstances will stormwater be allowed to discharge to a sanitary sewer.
 5. The Massachusetts Department of Environmental Protection (MassDEP) established Stormwater Management Standards. The standards address water quality, water quantity and recharge. In addition to Commission standards, 125 Lincoln Street Owner (DE) LLC will be required to meet MassDEP Stormwater Management Standards.



6. Sanitary sewage must be kept separate from stormwater and separate sanitary sewer and storm drain service connections must be provided. The Commission requires that existing stormwater and sanitary sewer service connections, which are to be re-used by the proposed project, be dye tested to confirm they are connected to the appropriate system.
7. The Commission requests that 125 Lincoln Street Owner (DE) LLC install a permanent casting stating “Don’t Dump: Drains to Boston Harbor” next to any catch basin created or modified as part of this project. 125 Lincoln Street Owner (DE) LLC should contact the Commission’s Operations Division for information regarding the purchase of the castings.
8. If a cafeteria or food service facility is built as part of this project, grease traps will be required in accordance with the Commission’s Sewer Use Regulations. 125 Lincoln Street Owner (DE) LLC is advised to consult with the Commission’s Operations Department with regards to grease traps.
9. The enclosed floors of a parking garage must drain through oil separators into the sewer system in accordance with the Commission’s Sewer Use Regulations. The Commission’s Requirements for Site Plans, available by contacting the Engineering Services Department, include requirements for separators.

Thank you for the opportunity to comment on this project.

Yours truly,

John P. Sullivan, P.E.
Chief Engineer

JPS/fd

cc: 125 Lincoln Street Owner (DE) LLC
K. Ronan, MWRA via e-mail
M. Zlody, BED via e-mail
P. Larocque, BWSC via e-mail



Lawrence A. Chan FAIA
116 Lincoln Street
Suite 2B
Boston MA 02111

3 August 2019

Mr. Michael A. Sinatra, Project Manager
Boston Planning & Development Agency
Via email: michael.a.sinatra@boston.gov

Cc: Mayor Martin J. Walsh, mayor@boston.gov

City Councilor Ed Flynn, ed.flynn@boston.gov

City Councilor Michelle Wu, michelle.wu@boston.gov

BCDC Chair Andrea Leers FAIA, apleers@lwa-architects.com

BCDC Executive Director Elizabeth A. Stifel, elizabeth.a.stifel@boston.gov

Mayor's Liaison for Chinatown & Leather District Danchen Xu, danchen.xu@boston.gov

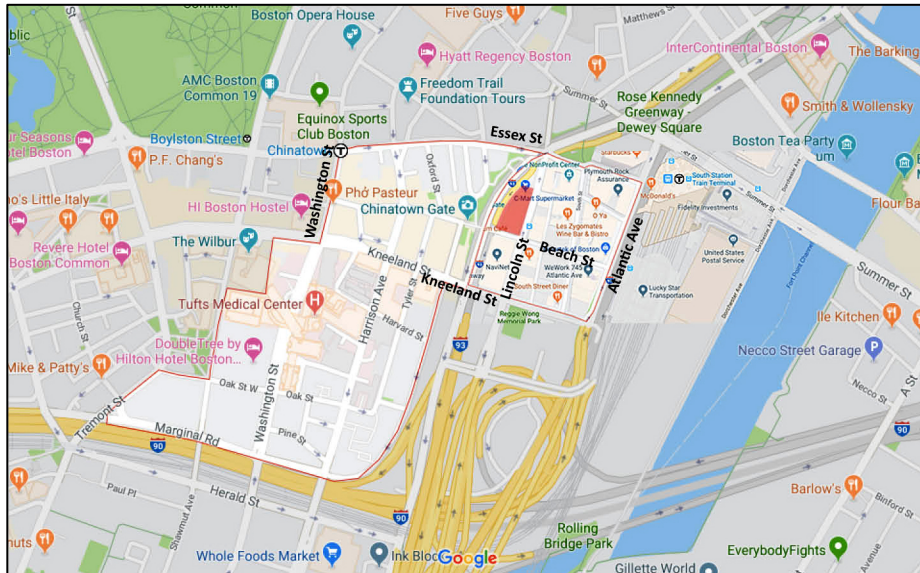
RE: Public Comment – Oxford Property Proposal for 125 Lincoln Street

Dear Mr. Sinatra:

I live and work across the street from the above-referenced project and have been participating in Leather District Neighborhood Association (LDNA) meetings with Oxford Property and Gensler Architects that have garnered substantial opposition from the LDNA. My comments below are not only as a concerned and impacted owner-occupied resident but also from the viewpoint of an architect/urban designer, and former co-founder of **Chan Krieger & Associates**, with 40+ years of professional experience, much of it designing and planning in, around, and for the City of Boston.

The Site

The project site lies at the center of the combined historic precincts of the Leather District and the northern third of Chinatown—the heart of Old Chinatown—bounded by Essex St on the north, Kneeland Street on the south, Washington Street on the west, and Atlantic Avenue on the east.



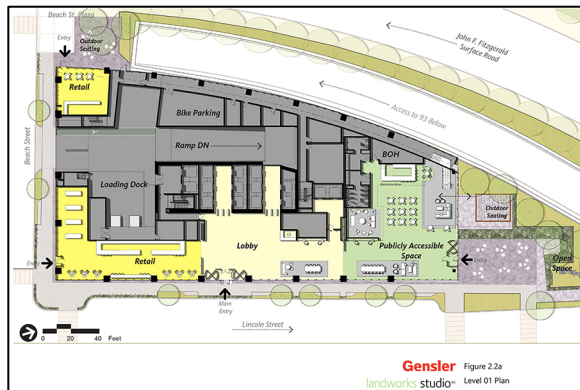
Google Maps

The current predominant uses include: a large C-Mart Chinese supermarket; Hei La Moon, a renowned 600+seat 2-level restaurant and banquet hall; a store selling Chinese BBQ; and a 250-car garage—each vital and indispensable parts serving the Leather District and Chinatown, economically supporting the community, its businesses, daily and weekend visitors, and abundant tourists.

The Crossroads

There are two major crossroads bordering the project site: Lincoln Street on the east, and Beach Street on the south. Lincoln Street is a major gateway to the city from I-93, and Beach Street is a major gateway to Chinatown, especially between the South Station Transportation Center main entrance and the Chinatown Gate. The historic urban districts of Chinatown and the Leather District are currently successful in part because their gateways are more than mere architectural hyperbole, and the combined districts values and characteristics should be enhanced, not diminished.

As the acclaimed urbanist Jane Jacobs noted in her seminal book, *The Death and Life of Great American Cities*, the vitality of a city is best when its streets integrate a strong pedestrian presence with extensive commercial activity—particularly throughout the day, not just during peak work hours in the morning and early evening. To imagine an unsuccessful gateway, one needs to look no further than the segment of Lincoln Street between the Surface Road and Summer Street to see how lifeless the street is when flanked by office buildings and little retail uses—especially dismal and uncomfortable at night. The Oxford Property proposal shows minimum activity at the ground level to engage pedestrians, and insufficient width, scale, and public amenities along the building's edges for pedestrian life and comfort. Lincoln and Beach Streets need more of what is currently there—not less.



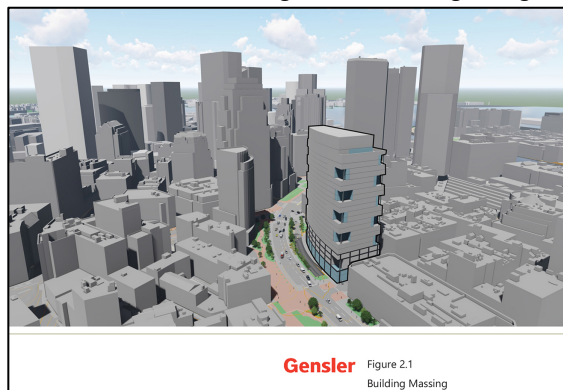
125 Lincoln Street Project Notification Form, June 2019, page 48



125 Lincoln Street Project Notification Form, June 2019, page 59

The Massing

At 370 feet tall—far exceeding the current allowable 100-foot height—and filling the entire buildable site, the Oxford office building is a massive building relative to its immediate surroundings, including the much smaller and most recently completed tall Radian Apartment Building across from 125 Lincoln on the Surface Road—in direct conflict with the Leather District Zoning Article 44.1 regarding compatible scale to existing buildings.



125 Lincoln Street Project Notification Form, June 2019, page 47

It would be unimaginable to see a comparably tall and massive project built close to the Washington Square Arch in New York City or the Arc de Triomphe in Paris. Certainly, the humble community of Chinatown should have equivalent consideration for its Gate as the French prolétariat and the Greenwich Village gentry.

The above illustration from Oxford Property's Project Notification Form June 2019 submission of the proposed building in the center dramatically shows the disparity of scale between the proposed building in comparison to Chinatown on the left and the Leather District on the right. If allowed to proceed, in combination with the eventual development of the US Post Office site and south of Kneeland Street, the Leather District will be essentially surrounded

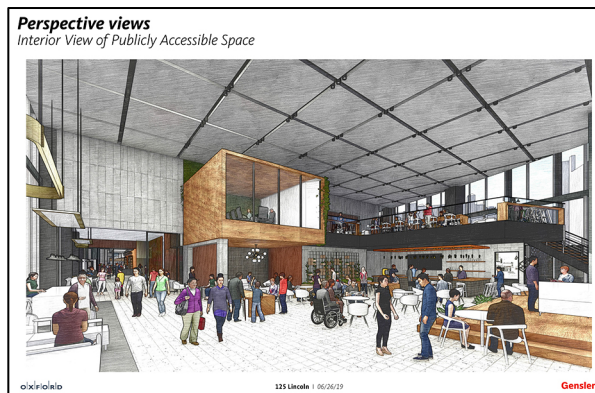
and dwarfed by a wall of building mass and, in effect, isolated and segregated from Chinatown, and the Leather District’s essence as a residential neighborhood, in the spirit described by Jane Jacobs, will be eroded and lost.

Although adding some housing in Chinatown is a good thing, it should be done as a separate offering and not as a conditional offset for this large office building. The latter is a foreign and divisive element, both physically and use-wise, that will separate Chinatown from the Leather District—two vibrant and integrated mixed-use residential neighborhoods that are officially perceived, if not defined, as united by no less of an authority than the City of Boston (See: <https://www.boston.gov/neighborhood/chinatown-leather-district>). It would be equally unimaginable to consider a large office building in the vicinity of Beacon and Arlington Streets where there is an in-kind association and connection between the Beacon Hill and Back Bay neighborhoods.

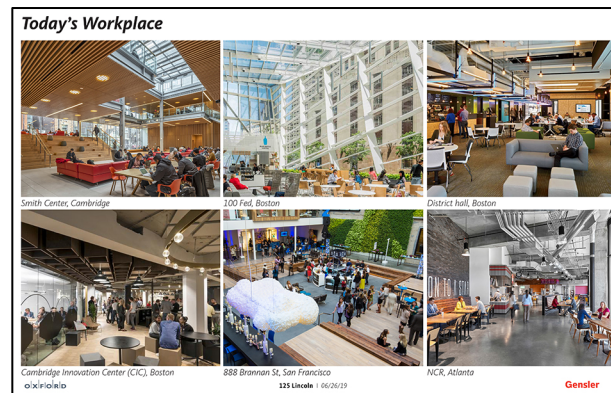
Contrasting uses and large-scale developments, such as 125 Lincoln Street that are disparate to existing neighborhoods, are best located at the edges—not in the center—of the district, especially two unique and joined historic precincts that we have here. In addition, this area is where the Rose Kennedy Greenway narrows and where the 80- to 100-foot-wide view corridor provides a sweeping panorama towards the Downtown should be maintained, especially along the Greenway’s eastern edge, rather than erecting a large horse blind hugging the Greenway and exacerbating the existing open space and ramp as a physical barrier or moat for the proposed building.

Public Space

The retail activities and public amenities proposed by the Oxford Property office building are disingenuous. The illustrations and offered precedents of such spaces suggest that they are only “public” in name only and do not reflect the ethos of the current community—especially citizens from Chinatown—that have long frequented the current uses and businesses at the 125 Lincoln Street site.



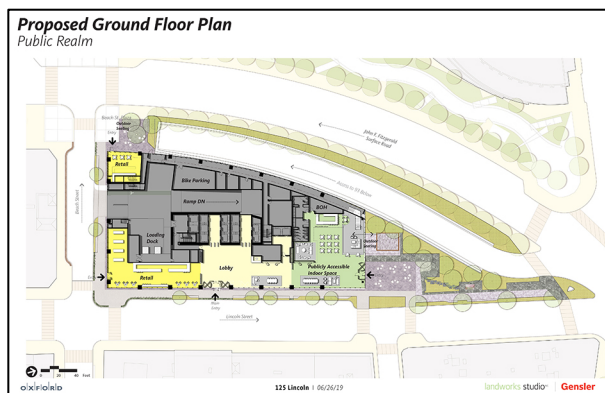
125 Lincoln Public Meeting Presentation, 6/26/19, Slide 30



125 Lincoln Public Meeting Presentation, 6/26/19, Slide 15

Despite the moniker of “Publicly Accessible Space”, such interior spaces are essentially private and subject to private governance and regulations, and would most likely be used exclusively by the building’s office workers as shown in Oxford Property’s Slide #15 above.

The amount of offered exterior space is also deceptive by combining a redesign of an existing 6-car parking lot at the end of Tufts Street with a portion of the Rose Kennedy Greenway open space at the intersection of Essex Street at the site’s north end, and co-opting as its own the existing Rose Kennedy Greenway public open space at the intersection of Beach Street and Surface Road at the site’s southwest end.



125 Lincoln Public Meeting Presentation, 6/26/19, Slide 22

Close

At the June 5, 2019 LDNA public meeting, Oxford Property informed the attendees that it had not yet presented their proposal to the BPDA. In less than two months since that meeting, in the middle of the summer while many people are away, some of us have learned that Boston Civic Design Commission will review the project on August 6th which suggests that the project's submission/approval process with the BPDA was either significantly advanced or fast tracked before further discussion with the LDNA, and without follow-through meetings with answers to address the many questions and concerns expressed by LDNA attendees from previous meetings.

The lack of transparency, not responding to issues raised by the community, and offering no sincerely considered alternative studies—such as a mixed-use development scheme with primarily residential use, variable heights and massing, and replacement retail and parking equal to what will be displaced—suggest that Oxford is not interested in neighborhood concerns. This is directly contrary to Oxford Property's 125 Lincoln Public Meeting Presentation Slide #6 that includes the Principle: "Community Oriented."

I strongly oppose Oxford Property's proposal for 125 Lincoln Street and ask that the Boston Planning and Development Agency and the City of Boston to reject the project per the points made above.

Respectfully,

A handwritten signature in black ink that reads "Lawrence A. Chan". The signature is fluid and cursive, with the first name being the most prominent.

Lawrence A. Chan FAIA

Principal

Chan Architecture & Urban Design

波士頓安良工商會

ON LEONG

Chinese Merchants Association of Massachusetts

20 Hudson Street Boston, MA. 20111

Tel. ; Fax.)

Mr. Michael A. Sinatra
Boston Planning & development Agency
Boston City Hall
Boston, MA 02201

Re: 125 Lincoln Street Proposal

Dear Mr. Sinatra:

I am writing as a long standing organization of Boston's Chinatown neighborhood. I am encouraged by the growth and prosperity that Boston and our community have enjoyed under the Walsh Administration and current BPDA leadership. However, I write today to formally go on record in opposition to the current proposal at 125 Lincoln St.

The proponent, Oxford Properties, has proposed a project that does not fit within the character of the Leather District, or Chinatown. In fact, it threatens to wall off and separate these communities that have long enjoyed cohesion and harmony. Beyond the extremely large massing and

scale of the proposal on a small lot, the project could potentially do harm to the Chinatown community by displacing needed institutions. The possibilities of losing the institutions of a neighborhood grocer and dining/banquet space that has a personal connection to generations of Chinatown residents and visitors – has caused much unrest. Chinatown has been seeing grocery stores and markets close over the past 10 years, if we lose the market at this site then the neighborhood will only have one left.

The proposed physical structure would seem massive from our Chinatown perspective - 330 feet of height, 24 stories and 625,000 gross square feet of development. The 125 Lincoln Street lot is only 27,958 square feet. The allowed FAR (floor area ration) is 8 and this proposal violates that and beyond by proposing a 22.5 FAR.

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If approved, this structure would have a drastic effect on the livelihood of our community and the Leather District. Therefore, I humbly ask the BPDA and City officials to ask Oxford Properties to go back to the drawing board and come back to the community with a project more palatable for each community.

Sincerely,

A handwritten signature in black ink, appearing to read 'Frank Wong', written in a cursive style.

Frank Wong, Chairman

Chinese Merchants Association
20 Hudson St.
Boston, MA. 02111



Boston City Council

ED FLYNN

Councilor - District 2

August 22, 2019

Dear Mr. Sinatra:

I'm writing to express my concerns regarding the proposed development at 125 Lincoln Street, located next to both Chinatown and the Leather District. As the District 2 City Councilor that represents the area, I've heard from many residents, community members, civic and advocacy groups who are concerned about the proposed building's mass, usage, and impact on the neighborhood. After reviewing the project and comments, I would also like to voice my opposition to the proposed building at 125 Lincoln Street.

The site of the proposed development currently houses a Chinese supermarket, a banquet hall, as well as other small businesses that are vital to the Chinatown neighborhood and Chinese community. The proposed project would likely displace C-Mart, one of the few affordable Asian supermarkets within the neighborhood, and Hei La Moon, one of the few restaurants big enough to host banquets and events that bring the community together. The project also does not address the need for affordable housing in Chinatown, where more and more longtime residents are being forced out of their neighborhood due to rising housing prices. The proposed development does not sufficiently take into account the needs of the community, and the proponents should make sure that C-Mart and Hei La Moon can continue to operate in Chinatown, and incorporate ways to address the housing crisis in this community.

Moreover, the current proposal far exceeds the height and mass set forth in zoning code, and is much taller than the typical buildings in Chinatown and the Leather District. The additional office space would also create more traffic, in an area that is already disproportionately affected by traffic pollution. In fact, according to a recent Union of Concerned Scientists report, Chinatown is the most disproportionately affected neighborhood in terms of air pollution due to its proximity to major roadways and traffic, and a project like this would only exacerbate traffic and air quality for our residents. I have concerns about the size and the negative impacts that this project can bring to our neighborhood, and I hope that the proponent can reconsider the scale of this project to allow it to be more suitable to the area.

Given these concerns, I oppose the project as it is currently proposed. If you have any questions, please reach out to me at 617-635-3203, or at Ed.Flynn@Boston.gov.

Sincerely,

Ed Flynn

City Councilor, District 2



MAYOR'S COMMISSION FOR PERSONS WITH DISABILITIES

Martin J. Walsh, Mayor

August 1, 2019

RE: 125 Lincoln Street, Boston, MA 02111
Project Notification Form
Boston Planning and Development Agency

The Disability Commission has reviewed the Project Notification Form that was submitted for 125 Lincoln Street, in Boston, MA. Since the proposed project is planned to be a vibrant destination area for transit-oriented office and retail, I would like to encourage a scheme that allows full and equal participation of persons with disabilities through *ideal design which meets as well as exceeds compliance* with accessibility building code requirements. It is crucial that the site layout, buildings, open spaces, parking, and circulation routes be developed with access in mind.

Therefore, in order for my Commission to give its full support to this project, I would like to ask that the following accessibility issues be considered and/or explained:

▪ **ACCESSIBLE BUILDING AMENITIES:**

- Per 521 CMR Section 20.2: *Accessible Route – Location*, we would support an integrated and accessible route to the raised and mezzanine seating areas, from the publicly accessible indoor space / “Winter Garden.”
- The Commission encourages the Proponent to work with the potential office and retail tenants to incorporate the Universal Design principles in the tenant-fit-out design, as well as operations.
 - We would support the inclusion of a single stall accessible family/companion bathroom in the lobby of the building, even if not required by 248 CMR Section 10.00: *Uniform State Plumbing Code*.
 - We would support universal design principles be incorporated to the design and layout of service counters. For example, when multiple accessible service counters are provided, the tenant is able avoid operational issues, in the future.
- Please consider the use of automatic sliding doors at entrances, in lieu of revolving doors, to ensure that entering and exiting the building will be accessible and straightforward to all users.
- Per 521 CMR Section 35: *Tables and Seating*, we support the inclusion of wheelchair accessible furniture in all common and outdoor patio spaces.



▪ **ACCESSIBLE PARKING AND VEHICULAR TRANSPORTATION:**

- Please provide the number of existing accessible parking spaces in the garage, as well as the number of proposed accessible parking spaces, the location and accessible route to vertical circulation.
- We would encourage the Proponent to consider addressing the building off of the same street as the location of TNC pick-up / drop-off area, as a consistent on-street location is more intuitive for users who have low vision or are blind to orient themselves when they get to their destination. Please confirm that these locations will be wheelchair accessible.
- Please confirm that the sidewalks adjacent to the all driveway curb cuts will be flush, to provide a safe and enjoyable pedestrian experience across the entire length of the site.

▪ **ACCESSIBLE ROUTE AND SIDEWALKS:**

- Renderings and landscape plans show the use of “stepping stone”-like paving on private property. Per 521 CMR Section 20.10: *Accessible Route – Changes in Levels*, we support a paving surface that is smooth and continuous to provide equitable access to the courtyard areas of the development.
- We support the use of cast-in-place concrete, in pedestrian areas, to ensure that the surface texture is smooth and continuous (minimize joints) and for the ease of maintenance.
- Updated plans should reflect bringing all reciprocal pedestrian ramps into City of Boston reconstruction standards.
- We would support ensuring that building setbacks allow for the installation of sidewalks that meet or exceed the design standards put forth by Boston Complete Streets Design Guidelines as well as other desired sidewalk uses (retail space, bus shelters or sidewalk cafes), so the site is accessible and functional for residents as well as visitors.
 - Should the Proponent have an interest in sponsoring a BlueBikes Station, please ensure that proposed locations are taken into consideration when determining streetscape dimensions. For sidewalk-level bike share locations, typically a minimum of 7ft of clear path of travel is recommended to minimize bike and pedestrian conflicts.
 - We support the granting of a pedestrian easement where required to bring the proposed sidewalk into compliance with Boston Complete Streets Design Guidelines.
- The project site is located in the Boston Groundwater Conservation Overlay District; If the recharge wells are proposed for sidewalk, we would support their location to be in the furnishing zone.

▪ **COMMUNITY BENEFITS**

- Have you considered providing funding for accessibility improvements to South Station MBTA Station, Chinatown MBTA Station and bus stops adjacent to the project?
- Accessibility extends past compliance through building code requirements. For example, by providing employment and other opportunities for persons with disabilities, the development becomes an asset to the surrounding community. What opportunities (ex. employment, community support, social) will the development provide for persons with disabilities?

▪ **WAYFINDING**

- Given that the bottom level of the building will be a uniform curtainwall-like system, please consider differentiating the canopy over the entrances of the building to signal to pedestrians and patrons where the entrances are located.
- Do you have a Wayfinding Package to better understand wayfinding strategies within the scope of the proposed project?

▪ **VARIANCES**

- Do you anticipate filing for any variances with the Massachusetts Architectural Access Board? If so, please identify and explain.

▪ **CONSTRUCTION**

- Should any City of Boston on-street HP-DV parking spaces be relocated due to construction activities, relocated areas will require approval from the Commissioner. Additionally, the Commission shall be notified two weeks before construction starts.
- Modifications to public transit infrastructure including but not limited to, bus shelter locations and operations during and post-construction should be considered and coordinated with the MBTA, before implementation.

COMMISSION'S GENERAL STATEMENT ON ACCESS:

The Mayor's Commission for Persons with Disabilities supports *ideal design for accessibility and inclusion*, which meets as well as exceeds compliance with local, state, and federal building codes, including the Boston Complete Streets Guidelines , Massachusetts Architectural Access Board 521 CMR, and the Americans with Disabilities Act.

Our priorities for accessibility other than building design and construction include: maintenance of accessible features; signage for way-finding; utilizing compliant barricades throughout construction; designating appropriate location and amount of accessible parking spaces; and removing barriers in existing buildings wherever "readily achievable" ("*easily accomplishable and able to be carried out without much difficulty or expense*").

The Commission is available for technical assistance and design review to help ensure that all buildings, sidewalks, parks, and open spaces are usable and welcoming to all of Boston's diverse residents, including those with physical, sensory, intellectual, and communication disabilities.

Thank You.



Kristen McCosh, Commissioner
Mayor's Commission for Persons with Disabilities
kristen.mccosh@boston.gov

REVIEWED BY:

Patricia Mendez AIA
Architectural Access Specialist
patricia.mendez@boston.gov
617-635-2529

Sarah Leung
Architectural Access Project Coordinator
sarah.leung@boston.gov
617-635-3746



Rose Kennedy Greenway Conservancy
185 Kneeland St, 2nd Floor
Boston, MA 02111

Michael Sinatra, MPA, Project Manager
Boston Planning & Development Agency
One City Hall Square, 9th Floor
Boston, MA 02201

Re: Oxford Properties Proposed Project at 125 Lincoln Street

July 30th, 2019

Mr. Sinatra,

The Rose Kennedy Greenway Conservancy appreciates participating in the Boston Planning and Development Agency's Impact Advisory Group (IAG) for Oxford Properties' proposed 125 Lincoln Street development, adjacent to The Greenway's Chin Park and the Lincoln Street Triangle. The Conservancy has worked collaboratively with Oxford through the Greenway BID and at 125 Summer where they significantly improved and activated the streetfront retail and the parklet.

There has been much conversation to date surrounding the height of the building, the proposed building use, and the vibrant retail that currently exists on this site. We look forward to continued community process that will evoke thoughtful ways of addressing these concerns.

The Conservancy is interested in a project at 125 Lincoln that will replace an unsafe garage with a building that encourages an active, engaging street front for 16 hours a day; meets the needs of the adjacent communities; and provides adequate and appropriate public benefits. The project's design and the ongoing operations plan must assure that safety is paramount, given the illegal activities that have occurred in and around the existing garage. We look forward to working with the design team and the IAG to ensure the creation of an inclusive pedestrian experience.

This project should prompt comprehensive thinking about how to help the community with significantly improved open spaces. The 125 Lincoln project, as proposed, would have meaningful shadow impact on Chin Park, the largest park space for the Chinatown and Leather District communities; how to minimize or mitigate these effects must be an important topic. Additionally, the project proposes a welcome expansion and redesign of Lincoln Street Triangle (the park north of the building that is managed by the Greenway



RoseKennedyGreenway.org

Rose Kennedy Greenway Conservancy
185 Kneeland St, 2nd Floor
Boston, MA 02111

Conservancy), although the narrow site poses challenges to delivering a lush, welcoming park. Moreover, the proposed construction staging on the Lincoln Street Triangle park necessitates a discussion of mitigation. Two other nearby open spaces--the simple Greenway lawn panel adjacent to 125 Summer and the bleak state-owned plaza north of the Leather District--need improvement. Oxford, with its 125 Lincoln development and 125 Summer building anchoring the complex Lincoln St-Essex St-Surface Rd intersection, can help the community plan for and improve these open spaces in an integrated way.

We look forward to the continued discussions and appreciate Oxford's continued engagement with the Conservancy, community stakeholders, and the IAG.

Best,

A handwritten signature in black ink, appearing to read 'Jesse Brackenbury'. The signature is fluid and cursive, with a large initial 'J' and a long, sweeping tail.

Jesse Brackenbury
Executive Director
Rose Kennedy Greenway Conservancy

July 26, 2019

Michael Sinatra, Project Manager
Boston Planning and Development Agency
One City Hall Sq., 9th Floor
Boston, MA 02201

Dear Mr. Sinatra,

As a Boston resident, I write in support of the proposed project at 125 Lincoln Street. The project offers a tremendous opportunity to transform the site from an outdated, open air parking garage to a well-designed office building with ground floor retail and significant programmable public space.

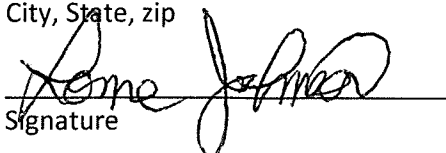
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Additionally, the project will create new affordable housing, expand and enhance connections to the Rose Kennedy Greenway, and improve the public realm. This proposal provides a significant economic opportunity for the city.

LOPNE JOHNSON
Name

316 WARREN STREET
Address

ROXBURY MA 02119
City, State, zip


Signature

July 26, 2019

Michael Sinatra, Project Manager
Boston Planning and Development Agency
One City Hall Sq., 9th Floor
Boston, MA 02201

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Sheldon Jackson JR

Name

44 Ellison Ave

Address

Boston MA 0224

City, State, zip

Sheldon Jackson JR

Signature

July 26, 2019

Michael Sinatra, Project Manager
Boston Planning and Development Agency
One City Hall Sq., 9th Floor
Boston, MA 02201

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SEAN GAUGHAN

Name

1495 HYDE PARK AVE

Address

H.P. MA 02136

City, State, zip

Sean Gaughan

Signature

July 26, 2019

Michael Sinatra, Project Manager
Boston Planning and Development Agency
One City Hall Sq., 9th Floor
Boston, MA 02201

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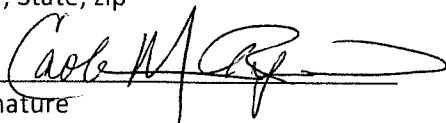
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CAOLAN RYAN
Name

1825 COLUMBIA RD
Address

BOSTON, MA 02127
City, State, zip


Signature

July 26, 2019

Michael Sinatra, Project Manager
Boston Planning and Development Agency
One City Hall Sq., 9th Floor
Boston, MA 02201

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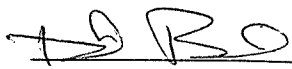
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Daniel Bullard
Name

65 Dix St Apt #1
Address

Dorchester 02124
City, State, zip


Signature

Boston Planning & Development Agency MEMORANDUM

TO: Michael Sinatra

FROM: Katie Pedersen

DATE: July 5, 2019

RE: 125 Lincoln Street
Boston, Massachusetts
Project Notification Form

I have reviewed the Project Notification Form (the “PNF”) dated June 2019 and submit the following comments for the Environmental Protection component. 125 Lincoln Street Owner (DE) LLC (the “Proponent”) is proposing the construction of an approximately 625,000 square foot, 24 story office building containing retail, restaurant, and other commercial uses on the ground floor, below-grade (the “Proposed Project”).

Wind

The Proposed Project is designed to be up to 340 feet in height, thus a quantitative (wind tunnel) analysis for both existing (No-Build) and Build conditions was required to be performed. The analysis examined potential pedestrian level winds adjacent to and in the vicinity of the Proposed Project site and identified areas where wind velocities are expected to exceed acceptable levels, including the Boston Planning & Development Agency (“BPDA”) guideline of an effective gust velocity of 31 miles per hour (mph) not to be exceeded more than 1% of the time. The analysis determined the suitability of particular locations for various activities (e.g., walking, sitting, eating) as appropriate. Particular attention was given to public and other areas of pedestrian use, including but, not limited to, entrances to the Proposed Project and adjacent buildings, sidewalks adjacent to and in the vicinity of the Proposed Project and parks, plazas, and other open spaces and pedestrian areas near the Proposed Project. For areas where wind speeds are projected to be “uncomfortable”, mitigation measures designed to reduce wind speeds and to mitigate adverse impacts shall be identified and included.

The Proponent shall be required to provide a list of buildings recently completed, under construction and planned within 1,500-2,000 feet of the Proposed Project site that were included in both the No-Build and Build conditions.

Shadow

The Proponent was required to conduct a shadow analysis for both existing (No-Build) and Build conditions for the hours of 9:00 a.m., 12:00 noon, 3:00 p.m. for the vernal equinox (March 21), summer solstice (June 21), autumnal equinox (September 21), and winter solstice (December 21) and 6:00 p.m. in the summer and the fall.

Results of the shadow analysis indicate that on March 21st new shadow will be cast on the Surface Road Park and a portion of the Chinatown Park at 12:00 pm. On September 21st, at 12:00 pm a portion of the Chinatown Park will be in shadow. On December 21st at 12:00 pm, shadow will be cast on a portion of the Chinatown Park. However, the results also demonstrate that the majority of the new shadow will be cast on the streets and sidewalks adjacent to the Proposed Project.

The shadow analysis was conducted for the No Build Condition but, it is not clear which future/planned developments or background projects surrounding the Proposed Project site were included in the analysis. Accordingly, the Proponent shall be required to submit both a description of the No Build Condition and a list of the developments and/or projects that were included in the analysis.

Daylight

(Please refer to Urban Design's comments)

Solar Glare

The Proponent conducted an analysis of the solar glare on potentially affected streets and public open spaces and pedestrian areas to determine the potential for visual impairment or discomfort due to reflective spot glare. However, the Proponent did not include a list of the future/planned developments, or background projects, surrounding the Proposed Project site that were included in the analysis. Accordingly, the Proponent shall be required to provide a list of the future/planned or background projects included in the analysis.

The Proponent has stated that results indicate that some reflections have the potential for high visual impact. In particular, results indicate that impacts are expected to alter a driver's experience, as the glare occurs at times when the sun would not ordinarily be within the driver's field of view and specifically when traveling south along Kingston Street from September until March as well as when traveling northeast along Lincoln Street in the morning.

Air Quality

The Proponent conducted a microscale analysis predicting localized carbon monoxide concentrations, an analysis which included the identification of any locations predicted to exceed the National or Massachusetts Ambient Air Quality Standards ("NAAQS"), as Proposed Project traffic is anticipated to impact intersections or roadway links currently operating at Level of Service ("LOS") D, E, or F or would cause LOS to decline to D, E, or F under Build conditions.

The results of the microscale analysis demonstrate that there are minimal to no increases for 1-hour and 8-hour CO concentrations between the 2025 No-Build and Build conditions due to minor traffic volume increase and minimal intersection delays

experienced at the study intersections. Thus the results demonstrate that the 2025 No-Build and Build CO concentrations for the Proposed Project are anticipated to be below the NAAQS.

Noise

The Proponent analyzed the potential noise impacts from the Proposed Project, including rooftop mechanical equipment and other noise sources (e.g., emergency generators) and a determination made of compliance with City of Boston noise regulations and applicable state and federal regulations and guidelines.

Sustainable Design/Green Buildings

(Please see the Interagency Green Building Committee (IGBC) Article 37 Comment Letter)

July 26, 2019

Michael Sinatra, Project Manager
Boston Planning and Development Agency
One City Hall Sq., 9th Floor
Boston, MA 02201

Dear Mr. Sinatra,

As a Boston resident, I write in support of the proposed project at 125 Lincoln Street. The project offers a tremendous opportunity to transform the site from an outdated, open air parking garage to a well-designed office building with ground floor retail and significant programmable public space.

There is a strong demand for office space in Boston and a limited amount of new construction in our downtown core. This site represents one of the few remaining properties that can support a new office tower in Downtown Boston. Its proximity to South Station, a city and regional transit hub, along with access to MBTA train and bus lines and connection to major highways makes this location ideal for job creation.

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Ken Quaff
Name

16 Beald St
Address

Worcester MA
City, State, zip

02124
Signature

July 26, 2019

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Boston Planning and Development Agency
One City Hall Sq., 9th Floor
Boston, MA 02201

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Don Tran
Name

42 Ashland Street
Address

Dorchester MA 02122
City, State, zip


Signature

July 26, 2019

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Boston Planning and Development Agency
One City Hall Sq., 9th Floor
Boston, MA 02201

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Wm Hong
Name

1996 Dorchester St
Address

Dorchester MA 02122
City, State, zip

[Signature]
Signature

July 26, 2019

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Boston Planning and Development Agency
One City Hall Sq., 9th Floor
Boston, MA 02201

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Sam Byrne
Name

39 Sheffer Street
Address

Dorchester MA 02124
City, State, zip

Sam
Signature

July 26, 2019

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Boston Planning and Development Agency
One City Hall Sq., 9th Floor
Boston, MA 02201

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Jai Nguyen
Name

61 Ashland Street
Address

Dorchester MA 02122
City, State, zip

Jai Nguyen
Signature

July 26, 2019

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Boston Planning and Development Agency
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HOWE - M - TANU

Name

10 FINETS HEET 412

Address

DORCHESTER - MA 02122

City, State, zip

Signature



July 26, 2019

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Boston Planning and Development Agency
One City Hall Sq., 9th Floor
Boston, MA 02201

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THOMAS T LYNN THARP


Name

20 THORNBURY ST #1

Address

DORCHESTER MA 02125

City, State, zip



Signature

July 26, 2019

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Boston Planning and Development Agency
One City Hall Sq., 9th Floor
Boston, MA 02201

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TAI TRAM

Name

20 THORNEY ST #1

Address

DORCHESTER, MA 02125

City, State, zip



Signature

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One City Hall Sq., 9th Floor
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Thung Nguyen
Name

20 THORNTON ST #3
Address

Boston 02125
City, State, zip


Signature

July 26, 2019

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Boston Planning and Development Agency
One City Hall Sq., 9th Floor
Boston, MA 02201

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Tim Huynh

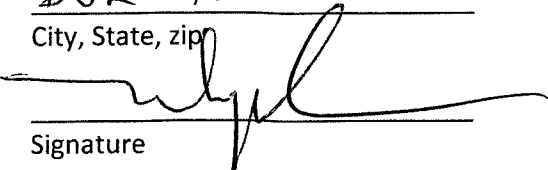
Name

10 High St

Address

Dorchester MA 02122

City, State, zip


Signature

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Hoang My
Name

255 HANCOCK ST
Address

Boston MA 02125
City, State, zip

My
Signature

July 26, 2019

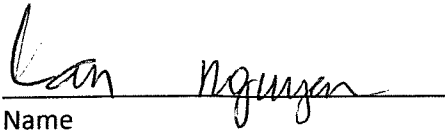
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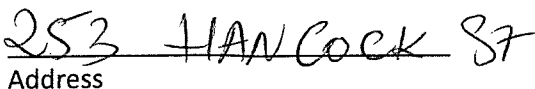
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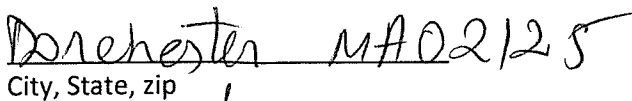
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Name


Address


City, State, zip


Signature

July 26, 2019

Michael Sinatra, Project Manager
Boston Planning and Development Agency
One City Hall Sq., 9th Floor
Boston, MA 02201

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253 HANCOCK ST
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Boston MA 02125
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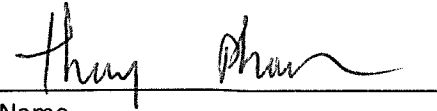
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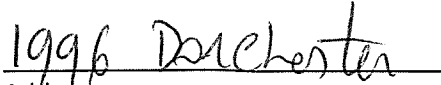
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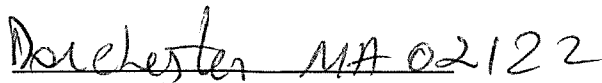
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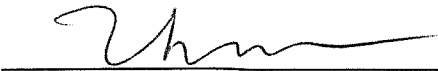
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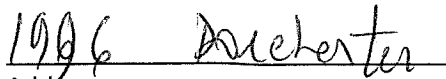
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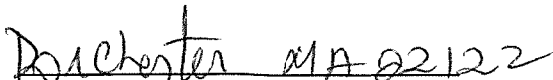
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39 SHPETON ST
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DORCHESTER 02124
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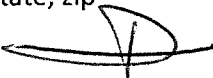
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Stephanie Dorsey
Name

49 Rockland St
Address

Boston Ma 02119
City, State, zip

Stephanie Dorsey
Signature

Boston Transportation Department

Comments for 125 Lincoln St Project Proposal

The Transportation & Infrastructure Planning Department of the Boston Planning and Development Agency (BPDA) and the Boston Transportation Department (BTD) have jointly reviewed the Lincoln 125 project proposal. BTD supports the comments prepared by BPDA and would like to reinforce or add the following comments:

Transportation

- **Motor Vehicle Parking:**

- We are concerned over the number of motor vehicle parking provided. The city's district-based parking ratios indicate 250 as the maximum number of spaces for a non-residential project of this square footage. This project is in one of the most transit-rich locations of the entire city. It is roughly a five-minute walk from both South Station—with service from the Red Line, Silver Line, eight MBTA Commuter Rail Lines, Amtrak, and regional bus service—and Chinatown Station with Orange Line service. Additionally, there is a bus stop with service from seven regional express MBTA bus lines immediately adjacent to the development on Lincoln St as well as two local bus lines (7 & 11) with stops a short walk from the development. Given this excellent transit proximity, we strongly encourage the Proponent to lower the parking provision below the maximum this maximum of 250.

- **Motor Vehicle Access:**

- We are not in favor of the current motor vehicle entrance off of Beach St and would prefer motor vehicle access via Lincoln/Tufts St. Beach street is a vital pedestrian connection between South Station and Chinatown and maintaining a continual sidewalk and a continually active façade on Beach should be priority.

- **Bicycle Parking**

- As noted by the BPDA, the current provision of off-street bicycle parking (100 spaces) is too low for a project of this size. Per the City of Boston's Off-Street Bicycle Parking Guidelines (0.3 spaces/1000 sq ft), this project should include a minimum of 188 secure bicycle parking spaces.
- As noted by the BPDA, the City's bicycle parking guidelines also require a shower/changing facility for the first 40,000 sf plus any additional 80,000 sf. As a result, the Proponent should provide 8 shower/changing facilities.

- **Bluebikes**

- We are pleased that the proponent will provide funding for the installation of a new on-site Bluebikes station. Please ensure that its location is considered as the design moves forward.

- **Transportation Demand Management:**

- Echoing BPDA's comments, please maintain or expand Zipcar on-site and provide a real-time transit information display in the lobby.

- **Analysis:**
 - As requested by BPDA:
 - Please add Atlantic Avenue/Essex Street and Atlantic Avenue/East Street to the study area.
 - Please perform a safety analysis of study area intersections, as well as the intersection of Atlantic Avenue and Essex Street, using City of Boston Vision Zero crash data from January 1, 2015, to the most recently available date. Several study area intersections have poor safety records, especially for people walking and biking, who are the most vulnerable roadway users.
 - Please provide a motor vehicle speed study of Lincoln Street from Kneeland to Surface Road/Essex Street. Speeding is a noted concern along Lincoln Street, especially outside of the morning peak period when volumes are lower. Pedestrian volumes are significant already, and all new transit trips ultimately become pedestrian trips at the project site. Given the proximity to commuter rail, pedestrian platooning is likely to bring waves of pedestrians to and by the project site.

MEMORANDUM

TO: Michael Sinatra, Project Manager
FROM: BPDA Transportation Planning Staff
DATE: August 19th, 2019
SUBJECT: 125 Lincoln Street
Scoping
Transportation Comments

The Transportation & Infrastructure Planning Department of the Boston Planning and Development Agency (BPDA) and the Boston Transportation Department (BTD) have jointly reviewed the project proposal for 125 Lincoln Street in the Leather District. While comments below have been prepared by BPDA staff, they are consistent with and support comments prepared by BTD in a separate letter.

Context

Go Boston 2030, the City of Boston's long-term transportation action plan, envisions a city where all residents have better and more equitable travel choices, where efficient transportation networks foster economic opportunity, and where the City has taken steps to prepare for climate change. Whether traveling by transit, on foot, on a bike, or by car, Bostonians will be able to access all parts of the city safely and reliably. This vision was created with the help of thousands of Bostonians through a significant public engagement process.

This vision establishes foundational priorities for all transportation projects in the City, including development proposals as they impact transportation networks and the public realm. Go Boston 2030's primary goals—expanding access, improving safety, and ensuring reliability—help us hold all projects accountable to this vision. Its aspirational targets clearly establish a yardstick for measuring success.

In short, when reviewing proposals we must ask ourselves: does the project bring the City closer to achieving its transportation vision, goals, and targets?

- **Expanding Access:**
 - *Goal:* Make Boston's neighborhoods interconnected for all modes of travel.
 - *Aspirational Target:* Every home in Boston will be within a 10-minute walk of a rail station or key bus route stop, and Bluebikes station, and carshare.
- **Improving Safety:**
 - *Goal:* Substantially reduce collisions on every street through education, enforcement, and designs that reallocate street space to prioritize moving people safely rather than faster.
 - *Aspirational Target:* Eliminate traffic fatalities and severe injuries in Boston.
- **Ensuring Reliability:**

- *Goal:* Prioritize making travel predictable on Boston's transit and roadway networks.
- *Aspirational Target:* Bostonians' average commute to work time will decrease by 10%

Site Design and Access

- **Provide and compare building-to-building cross-sections of existing and proposed streetscapes along Beach Street and Lincoln Street.** Cross sections should include dimensions and any proposed streetscape should align with *Boston Complete Streets Design Guidelines*. Beach Street and Lincoln Street should be considered "Downtown Mixed-Use" street types when designing the streetscape.
- **Explore a site plan alternative that consolidates motor vehicle access at the Tufts Street/Lincoln Street intersection.** Beach Street is a vital pedestrian corridor for the Leather District and Chinatown, and a key regional gateway for pedestrians to and from the South Station Bus Terminal. Providing vehicle access mid-block on Beach Street breaks what could be a continuous ground-floor activation of the building edge (as envisioned in the *Greenway District Planning Study Use and Development Guidelines*). Operationally, there is only enough queue storage space on Beach Street between Surface Road and the proposed driveway for approximately six vehicles. It is highly likely that there will be backups into the site during the PM peak period given 174 anticipated vehicles exiting the building. As this is a mid-block driveway, backups would result in drivers stopping on the sidewalk, blocking the pedestrian path of travel and deteriorating the pedestrian experience.
 - In any driveway scenario, strive to minimize garage access to 20' maximum for two-way traffic and ensure that a garage door is provided to mitigate the impact to the public realm.
- **Reduce the proposed motor vehicle parking supply.** The 275 proposed parking spaces exceeds the City's maximum district-based parking goals for non-residential use in the Leather District (0.4 spaces per 1,000 sf). At 625,000 SF, the project should have no greater than 250 parking spaces and, given its location adjacent to South Station, we strongly encourage the Proponent to reduce parking capacity below this maximum. The project site is within a 2-3-block walk from the all south-side Commuter Rail routes, Amtrak, intercity buses, Red Line, Orange Line, Green Line, Silver Line, many local and express bus routes, and Bluebikes stations.
- **Clarify the proposed motor vehicle parking program.** How many internal spaces are anticipated to be publicly available? How many for commercial tenants? Are there any satellite parking agreements in place for the existing garage that will be

maintained? How many on-street spaces are proposed to be changed or removed on Beach Street and Lincoln Street?

- **Increase the proposed off-street bicycle parking supply.** Boston's Off-Street Bicycle Parking Guidelines require at least 0.3 bicycle parking spaces per 1,000 SF of non-residential development. At 625,000 SF, the Proponent should provide parking capacity for at least 188 bicycles. However, only 100 off-street secured spaces are proposed. These guidelines also require a shower/changing facility for the first 40,000 SF plus any additional 80,000 SF. Using this formula, the Proponent should provide a minimum of 8 shower/changing facilities.
- **Provide additional detail of proposed off-street bicycle parking.**
 - Clarify room dimensions, rack layouts, rack types, and key dimensions such as access aisle widths and offsets to walls and between racks for any proposed bike storage room.
 - Highlight the route(s) to and from proposed bicycle storage rooms and building access points as well as the lobby. Include relevant passageway and doorway dimensions. Strive to limit routes to and from bicycle storage to destinations (e.g., lobby, building entrance) to no more than two doors. We recommend that these doors have the capability to be automatically opened with a pushbutton or key fob.
 - Dedicated access to bicycle storage rooms from the street helps increase the convenience of biking. Please ensure that any such location is visible, well-lit, and maintainable to ensure that dedicated access is safe and feels safe.
 - Some bike parking is proposed for the garage. Relying on the garage ramp structure will be uncomfortable, stressful, and difficult for people biking, especially when exiting and during commercial vehicle loading activity. We encourage the Proponent to explore alternative access for bicyclists using P1 parking, for example allowing bicyclists to access garage bicycle parking via lobby elevators.
 - The PNF notes how bicycle storage can be expanded to meet future demand. Please clarify how and where such storage would be accommodated.
- **Ensure Bluebikes can fit on site.** We are pleased to see the Proponent acknowledging funding of a new Bluebikes station. Please note that the location (and size) of this new station will be determined by BTM and may include the Proponent's site.

Analysis

- **Update the study area include the following intersections:** Atlantic Avenue/Essex Street and Atlantic Avenue/East Street.
- **Collect and incorporate 11-hour weekday count data for the following study area intersections:** Lincoln Street/Essex Street/Surface Road, Lincoln Street/Tufts Street, Lincoln Street/Beach Street, and Beach Street/Surface Road.
- **Maintain Beach Street as a one-way street in all analyses.** The PNF proposes to convert a portion of Beach Street to two-way operation. We feel strongly that a partial two-way conversion would be confusing, complicate intersection operations at Lincoln and Beach, and, given pedestrian volumes in the area, be unsafe. Please ensure that Beach Street remains one-way, including in all analyses.
- **Incorporate the most recent Census Transportation Planning Products (CTPP) data into the analyses.** The PNF assumes mode splits using 2006-2010 CTPP data whereas data is available for the 2012-2016 period.
- **Analyze the safety of study area intersections.** This analysis should use City of Boston Vision Zero crash data from January 1, 2015, to the most recently available date, as well as Safety Concerns data. Several study area streets are on the high crash network, including Atlantic Avenue (for pedestrian crashes) and Kneeland Street (for pedestrian and bicycle crashes). The project will increase the volumes of people walking and biking in the area.
- **Study motor vehicle speeds on Lincoln Street between Kneeland Street to Surface Road/Essex Street during and outside of peak periods.** Speeding is a noted concern along Lincoln Street, especially outside of the morning peak period when volumes are lower. Pedestrian volumes are significant already, all new transit trips ultimately become pedestrian trips approaching and leaving the project site. Pedestrians are particularly vulnerable to speeding.
- **Work with BPDA and BTD to study pedestrian, bicyclist, and transit priority opportunities at the Lincoln Street/Essex Street/Surface Road intersection and approaches.** For example, this study should identify opportunities to slow vehicles, reduce crossing distances, reduce delay for all users, protect bicyclists, prioritize transit, and increase the public realm by reducing the overall intersection footprint. Most notably, this intersection is missing a north-south crosswalk, creating a significant pedestrian barrier in an otherwise highly walkable area. Please incorporate 11-hour weekday counts into this analysis to account for conditions outside of peak periods as well (see prior comment).
- **Clarify the proposed traffic signal phasing and timing changes at the four locations noted in the PNF.** Do these proposed changes include extending cycle

lengths, modifying phasing, or both? If so, how do these proposed changes impact transit and pedestrian delay? Are changes proposed for peak periods only?

Transportation Demand Management

The BPDA is encouraged by the Proponent's outline for a Transportation Demand Management (TDM) program. Given the proposed project's location in arguably the most transit-rich location in New England, we encourage the Proponent to more firmly commit to strategies known to incentivize non-automobile commutes.

In addition to TDM strategies outlined in the PNF, we recommend that the project:

- **Require tenants to make free or deeply subsidize monthly MBTA passes and annual Bluebikes memberships;**
- **Require tenants to offer carsharing service for employee use;**
- **Maintain or expand carsharing capacity on-site; and**
- **Unbundle motor vehicle parking from tenant leases.**