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Suffolk University

DAVID GREANEY

Synergy Investment & Development

MARTHA GUERRERO MAGUIRE

West End Community Center

WILLIAM GEORGEQUI

West End Residents Association

IVY A. TURNER

Whittier Place Condominium Association

October 24, 2013

John FitzGerald, Senior Project Manager

Boston Redevelopment Authority

City Hall Plaza

Boston, MA 02201

RE: Downtown North Association Comments on the Expanded Project Notification Form

Submitted on 09.06.13 by Delaware North Companies in Partnership with Boston Properties

for the Redevelopment of the Former Boston Garden Site on Causeway Street

Dear Mr. FitzGerald,

What follows are the comments on the above-captioned matter of the Downtown North Association, which is also a member of the Impact Advisory Group (IAG) appointed for this project. Our comments are based on a review of the September 6th Expanded Project Notification Form (EPNF) itself, as well as the discussion of this proposed project in subsequent IAG and community meetings.

The more than one-hundred-twenty DNA member organizations encompass all aspects of the notably diverse and continually growing residential, recreational, commercial, institutional and professional community that is the West End of Boston. That community comprises the area of Boston from New Sudbury Street to the Charles River, between Beacon Hill and the North End; and it encompasses all of the properties that are involved directly or indirectly in this project. And Delaware North Companies has long been numbered among the valued members of DNA and the West End community.

These comments are intended to reflect a consensus DNA view, although individual DNA member organizations will undoubtedly be offering their own comments on this major project. The comments herein are not intended to replace or obviate any other comments by individual DNA members, some of whom are also IAG members. Their comments may well express somewhat different perspectives, emphases and conclusions; but we trust that we all share the same constructive spirit and motivation. In any case, other DNA Members can and will speak for themselves; and these DNA comments should not necessarily be attributed to them, either directly or indirectly, although we hope and expect that our comments herein will contribute to the civic and community dialogue about this timely and important project of which we are all a part.

PRESIDENT

LOUISE FACKERT

tel: 617-371-3000

lfackert@baycove.org

DOWNTOWN NORTH ASSOCIATION

c/o CBT Architects

110 Canal Street, Boston, MA 02114

EXECUTIVE DIRECTOR

ROBERT B. O'BRIEN

tel: 617-461-6730

email rbobrien@msn.com

With appreciation for your usual consideration of DNA views on such matters, and in anticipation of continued involvement in the refinement of the project plans and proposals now before us, we hereby respectfully submit our comments on the EPNF for the long-awaited redevelopment of the vacant parcel on Causeway Street that was the former site of the old Boston Garden.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert B. O'Brien", enclosed within a large, hand-drawn oval.

Robert B. O'Brien

Executive Director of the Downtown North Association
And Member of the IAG for the Boston Garden Project

cc: Peter Meade, David Carlson, Lauren Shurtleff & Jon Greeley of the Boston Redevelopment Authority
Thomas Tinlin and Vineet Gupta of the Boston Transportation Department
Mayor's Office of Neighborhood Services Community Liaison Nicole Leo
District City Councilors Sal LaMattina and Michael Ross
State Representatives Jay Livingstone & Aaron Michlewitz and State Senator Anthony Petrucci
Other Members of the Impact Advisory Group for Garden Garage Project
DNA President Louise Fackert of Bay Cove Human Services
Other DNA Officers, Directors and Members
Other Interested Parties

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DOWNTOWN NORTH ASSOCIATION COMMENTS ON THE EXPANDED PROJECT NOTIFICATION FORM FOR REDEVELOPMENT OF THE FORMER BOSTON GARDEN SITE AND RELATED COMMUNITY BENEFIT RECOMMENDATIONS AND REQUESTS

THE PROPOSED PROJECT: In sum, as documented in the Expanded Project Notification Form (EPNF) recently filed by the Delaware North Companies in partnership with Boston Properties, the proposed mixed-use and transit-oriented redevelopment of the 2.8 acre site of the former Boston Garden would create 1.87Msf of new retail, residential, recreational office, hotel and parking facilities on Causeway Street. These would be directly linked to TD Garden and North Station via a new retail concourse through a ground-level podium designed to reflect the character of the adjacent Bulfinch Triangle, from which new hotel, office and residential towers would emerge.

More specifically, this new complex is projected to create 190Ksf of restaurant and retail space, including an 40Ksf supermarket; almost 500 housing units and 300 hotel rooms; over 800Ksf of office space, 800 underground parking spaces; a new 25Ksf atrium hall; and a 40Ksf expansion of TD Garden. It is also expected to generate 2,000 construction and 5,000 permanent jobs, as well as new affordable housing, significant linkage funds and substantial tax revenue for both the city and the state. The project would be constructed in two phases: first the podium and hotel tower, which could begin next year, followed by the residential and office towers, for which a schedule has yet to be determined.

THE DNA POSITION: Downtown North Association (DNA) hereby urges the Boston Redevelopment Authority (BRA) Board of Directors approval of this redevelopment project as now proposed by Delaware North Companies in partnership Boston Properties, when this matter is expected to come before them sometime before year-end. We do so based on the merits of this project as described and detailed in the Expanded Project Notification Form (EPNF) that was filed on 09.06.13, and with due regard to the positive project changes that have been made since then as a result of the Impact Advisory Group (IAG) process.

We also agree in principle with the scope and purpose of the proposed 121A tax agreement, subject to BRA review and approval based on project financial information to which we are not privy. We understand that that this 121A agreement would provide the zoning framework for the project as a whole, but that its tax benefits will be restricted to the first project phase and limited to a period of no more than fifteen years. This first phase appears to be quite widely supported by the community; and it clearly provides the major share of project community benefits, including the realistic prospect of a new supermarket in a location that we consider far preferable to any other proposed or available supermarket site in our community.

While we fully understand that this initial BRA Board vote is a substantive and significant one, we have been assured that there will be a continuing and important community process after that vote. That will specifically include the design review and approval for each element of the project, pursuant to the requirements of BRA Article 80. We expect the community and the IAG to be fully involved in that process, which will address architectural and other issues and opportunities raised in the EPNF and in subsequent IAG and community meetings.

We look forward to active participation in those review and approval processes, which will likely further refine and improve the project now proposed; and what follows is intended to provide in some detail the rationale and foundation for the DNA position summarized above.

RELEVANT BACKGROUND: Before addressing some specific issues and opportunities raised by the Expanded PNF for this project, we would offer some preliminary observations by way of background:

- ❖ **This Project Has Standing in Our Community and in the Permitting Process:** As the EPNF makes clear, the origins of the development proposal now before us for review and comment date back well over two decades. The basic outlines of this redevelopment proposal have been an integral element of the West End planning discussion since well before TD Garden was built in 1995 and the old Boston Garden was demolished in 1998.

Since the late 1980s, all West End development projects, both public and private, have been required to take this project into account in their own planning and permitting processes, specifically including the extensive transportation and development planning required for the Central Artery/Tunnel and the MBTA North Station Improvement Projects. In that important relevant regard, this project has had standing in the community and in our official planning and permitting processes, since long before most of the other public and private projects now being permitted and built were even conceived. That accords this project a somewhat special standing that should be acknowledged.

- ❖ **The Downtown North Association Support Has Long the Development of this Site:** DNA supported the initial DEIR that included, but was not limited to, redevelopment of the former Boston Garden site, when it was first published in 1989 and approved in 1990; We have likewise supported interim measures at the city and state level to preserve and facilitate the outcomes envisioned in that DEIR. And since at least 1998, when the old Boston Garden was demolished, DNA has been actively and continually inquiring as to the redevelopment status and schedule for that site.
- ❖ **The Importance of Boston Garden and the Delaware North Companies to the West End Community:** It is worth noting that before the New Boston Garden Development proposal was conceived and presented in the late 1980s, there was a very real possibility that this arena would be relocated out of our community -- and possibly out of our state, and with it the Bruins, the Celtics and all of its many other major sports and entertainment events.

The West End community was then faced with the likely loss of an institution that for sixty years had been a fundamental aspect of our popular identity as a neighborhood and as a city, not to mention an important economic engine for our past and future growth and development. Our community was losing ground; and the fear was that CAT Project would finish the process -- essentially concluding the demolition started by the West End and Government Center Urban Renewal projects.

That process was reversed by the New Boston Garden development plan that is effectively coming to fruition with the present development proposal; and we have the Delaware North Companies to thank for the planning and investment initiatives that allowed that and more to happen. And it is fair to say that in the process, we came to value Boston Garden for what it had meant and continues to mean to our community, for all of its occasional inconveniences; and we should not forget the role that Delaware North Companies played in what has transpired in the West End community since over the past twenty years.

- ❖ **Many Changes Have Occurred in Our Community Since This Development Was First Proposed:** There have been major changes both in our community and in this project since it was first envisioned more than a quarter-century ago:
 - ***There has been a Reversal of the Development Strategy and Sequence:*** When this project was first conceived, it was expected that the sale of development rights for the old Boston Garden site would fund the construction of a new arena. The real estate market frustrated those plans; nonetheless, DNC built the privately financed new arena before, rather than after, development could occur. And what is now TD Garden has remained a source and a symbol of community revitalization and strength ever since.
 - ***Two Major Transportation Infrastructure Projects Have Been Completed:*** The very disruptive CAT and MBTA North Station Modernization Projects have now been completed; and with them the elevated highway and transit viaduct that divided and blighted have now been demolished. Our multimodal transportation system network is bought and paid-for; and it is now fully operational. That was quite far from the case when this project was first conceived; and that interim infrastructure development has major and positive implications for its nature, scope and viability today.
 - ***This Project Was a Catalyst for and Its Construction Will Be a Culmination of the Ongoing Redevelopment of the West End Community:*** As a direct result of the CAT and MBTA Projects, and also due in no small part to the DNC commitment to a New Boston Garden, the West End is being substantially developed as a renewed and revitalized community. That process began with redevelopment of the transit and highway viaduct rights-of-way through the Bulfinch Triangle; and it has continued well beyond those parcels to include other sites in our community, including some sites that are unfortunate remnants of urban renewal; it was strongly reinforced by the Causeway Street Crossroads Initiative; and it would be substantially advanced by the long-awaited redevelopment of the former Boston Garden site on Causeway Street. This project has been and remains an essential element of the development trajectory of our community; and its role in that regard remains relevant and timely.

SOME CURRENT OBSERVATIONS & CONCLUSIONS: In that historical community context, the following are among the facts and findings that have informed our position on the project as currently proposed:

- ❖ **There Have Been Significant Changes in Project Height, Density and Uses Compared to What was Previously Proposed and Approved:** Since it was previously proposed and approved, and in no small part due to interim changes in the West End community itself, the density of the proposed development has been reduced significantly; the heights of the proposed buildings have been increased significantly; the ratio of uses has tilted away from office and toward residential uses; and the project may now include a new supermarket, the need for which was not even considered twenty years ago. Most of these changes have substantially reduced the transportation demands of the project on the roadway network, while also substantially increasing the community orientation and benefits of the project.

- ❖ **This Project Reflects and Reinforces Its Inherent and Important Connection With TD Garden and North Station:** The relationship between TD Garden and North Station, and between this proposed new development and both of those facilities, remains at least as strong today as it was a quarter-century ago – and likely more so. Because of its proximity to those regional transportation and entertainment venues, there is not other development site in New England, let alone in Boston or the West End, that affords either the issues or the opportunities of this crucial location. In that unique context, proposed redevelopment of the old Boston Garden site should not be considered in isolation. Rather it should be analyzed based on the dynamic interaction among those various elements, with due regard to whether and how the design and development of one aspect of this larger project could address and resolve problems the issues and opportunities created by another aspect.

From the perspective of the surrounding West End community, all of these elements – proposed redevelopment of the vacant Causeway Street parcel, improved operation of North Station, and the ongoing management of TD Garden and its underground garage – should function synergistically; and the issues and opportunities related to one component of this larger interactive complex cannot be separated from the issues and opportunities of any other and of all components of the project. That principle applies to issues of traffic and transportation, as well as to those of architecture and urban design; and it should not address optimizing the benefits as well as mitigating the burdens of this larger complex.

- ❖ **We Likely Have the Ideal Development Team:** It has taken close to a quarter of a century for a viable and credible redevelopment proposal to emerge for this site; and that was not for want of trying in the meantime. But it is difficult to imagine a more appropriate and advisable development team than the one that has now come together to redevelop this site; and it is likewise difficult to believe that a team as good as this one would come together again if the current proposal fails to gain the required permits and approvals.

Worthy of particular note in this regard:

- *The full partnership of the Delaware North Companies*, which has not only been an active and valued part of the West End community for decades, but also owns the Causeway Street development site, owns and operates the adjacent TD Garden and the Boston Bruins that are based there; now has custody and control of the former MBTA underground parking garage beneath these properties; has management/marketing responsibility for North Station; and has been responsible for planning and permitting this project from the outset.

In sum, DNC controls several elements critical to the success of the Causeway Street parcel redevelopment and to its management and maintenance over time. And their participation is evidence of their continuing commitment to the community as well as of the clear understanding of the entire project team that their full DNC involvement in this effort is essential.

- *The full partnership of Boston Properties*, which has the development expertise and experience and the range of resources required to conceive and to implement a viable development vision for this crucial site. They have obviously understand the many advantages of the site's transit-orientation and its proximity to TD Garden; and they have publicly extolled the value and virtues its location in the West End, adjacent to the vibrant and successful North End Beacon Hill neighborhoods; close to Downtown Boston and Government Center; and within easy walking distance of the City Hall, the State House and Faneuil Hall.

Given its local origins, Boston Properties knows our city, appreciates our communities, and values this site; and there is no learning curve involved in their understanding of of the nature and scope of the development opportunity that is at stake here. Boston Properties brings to this effort a professional record and reputation for successful real estate developments in Boston and elsewhere, as well as both corporate executives and project managers who are knowledgeable and enthusiastic about the opportunity to develop – in their own words – *not just new buildings, but a special place and an attractive destination unique in the region*; and who have never missed the chance to convey that commitment and enthusiasm in their evolving relationship with our community.

- *The involvement of an outstanding project architect* in Elkus Manfredi. In David Manfredi we have a respected and respectful professional, a creative and responsive architect, and a knowledgeable and responsive collaborator. He understands and appreciates the West End; he has demonstrated a readiness, willingness and ability to work effectively with our community; and he has done so successfully on major projects elsewhere in our neighborhood.

In concert with their other professional consultants, this group represents an exceptionally strong and credible development team, which seems particularly well suited both to the issues and opportunities at stake in the redevelopment of this specific site and to the related improvement of our community as a whole. Not a bad combination.

- ❖ **This Project Would be a Microcosm of the West End Community:** The West End as a whole is likely the most diverse mixed-use community in Boston. It is a varied and vibrant admixture of residential, professional, commercial, institutional, hospitality, entertainment, retail and civic sectors. Until recent years, those uses tended to be concentrated in separate districts within the larger West End community. That is now changing as these various uses have begun to migrate throughout community -- e.g., as the residential, medical and hotel medical uses have become established in the Bulfinch Triangle, which had historically been an exclusively commercial and entertainment district.

Not only would this project accelerate that assimilation trend, in many important respects, it would uniquely internalize and focus it. By combining several existing neighborhood uses as integral and synergistic elements of its development planning, this Causeway Street site would thereby bring together in one special place a broad range of residential, office, hotel, retail, recreational, entertainment and transportation uses in an innovative and very visible manner that will make location an active and attractive microcosm of the larger West End community. And that would be a very good outcome.

- ❖ **What Has Been Proposed is One Project with Two Phases, Not Two Separate Projects:** The project proponents have proposed and described in the EPNF a single project with at least two distinct phases:
 - *The first phase* involves the design, construction and operation of the podium element of the project, which would contain most of its proposed entertainment, restaurant and retail facilities, including the proposed new supermarket; the loft-style offices that are intended to appeal to the entrepreneurs, technologists and creatives who have long and now increasingly found our urban district attractive; and the proposed new hotel tower. This first phase seems to be widely supported by the community.
 - *The second phase*, which could be split into two phases, includes the proposed new residential and office towers, which are more problematic to some in the community, primarily because of the proposed heights of these structures.

Since this has been proposed for review and approval as a single project, it is reasonable to assume that there are fundamental economic and other connections among these various project elements, despite the differences in their construction schedules. For better or for worse, these elements are not separable or interchangeable; and it would be inappropriate to consider either phase without the other.

While it is most fortunate for the community that most of the benefits that we value most highly are incorporated into the initial phase – which is surely not typically the case -- it would be unrealistic to expect that those benefits are not being provided in anticipation of the development density and uses yet to come.

We do not, therefore, support a review and approval of the proposed first phase separate from the phase that is proposed to follow. For better or for worse, the project should be assessed in its entirety. While its phases are distinct, they are not separate; and they cannot be realistically evaluated independently.

CONSIDERATION OF THE ISSUES & OPPORTUNITIES RELATED TO THE FIRST PROJECT PHASE: These are among our findings and conclusion with regard to the first phase of the project as now proposed:

- ❖ **The First Phase of the Project as Currently Proposed Provides Major Urban Design and Other Community Benefits:** As previously noted, the first phase of this project includes development of the podium and hotel tower, with the second, and possibly third, phases to include the planned residential and office towers. The podium will include virtually all of the proposed retail, restaurant and entertainment functions, as well as loft-style offices.

It is appropriate to acknowledge and applaud the fact that the initial phase of the proposed redevelopment of this Causeway Street site provides the largest share of the expected local community benefits of this project, both urban design and otherwise. That is not typically the case in large scale and multi-phase projects, public or private, from the CAT and MBTA projects to the planned redevelopment of the Government Center Garage – although it is hereby noted that the latter project has revised its initial phasing plan to accelerate its major community benefits.

In this regard, three major community benefits that are incorporated into proposed first phase of this project are particularly worthy of mention:

- **The Realistic Possibility of a New Supermarket:** The newest and most notable of these community benefits is the possibility – hopefully probability – of a new full service and affordable supermarket as part the first phase of development. This would address and resolve a neighborhood retail need that has long been advocated by the North End/West End/Beacon Hill Supermarket Committee, of which DNA has long been an active member. In our view, this location is the most advantageous supermarket site that has yet been proposed; and that includes the Canal Street site on which there is a continuing requirement for Trinity Financial to build-out and proactively market its retail space for a supermarket -- unless and until there is a binding commitment to build a supermarket elsewhere.

As compared to Canal Street, for example, Causeway Street site offers:

- ⇒ *Size:* A 40Ksf +/- store footprint, more than double the size of the available Canal Street space.
- ⇒ *Convenience:* A central location, convenient to the North End, West End and Beacon Hill neighborhoods, as well as to thousands of event patrons and commuters.
- ⇒ *Visibility:* A prominent first-floor entryway that is fully integrated into the new combined entrance to the TD Garden and North Station as well as the recently related Champions Row retail and entertainment arcade, taking full advantage of the public access and transit advantages qualities of the site.
- ⇒ *Support:* Ready access to off-street loading and service facilities on a scale more than sufficient to accommodate the logistical needs of a supermarket.
- ⇒ *Parking:* Access to adequate and convenient customer parking, which appears to be at least a preference, and possibly a requirement, of prospective supermarket operators.
- ⇒ *Affordability:* A below-grade building envelope that makes this space both more suitable to supermarket product display and more cost-effective to the developer.
- ⇒ *Dedication:* A development team that is committed to attracting a supermarket to this location and has already documented significant, though not yet conclusive, progress toward that goal.

In sum, this site should be the location of the kind of affordable and full-service supermarket that has been lacking in the West End and surrounding downtown communities since the Stop & Shop on Cambridge Street closed in 2003.

- *A Major Expansion of Other Neighborhood Retail & Recreational Opportunities:* The retail and related benefits of this site are not limited to its supermarket potential. They also include plans for other uses that have likewise long been lacking in the community – e.g., movie theatres and bowling alleys, which are among the uses described in the EPNF for this location. These and other retail, restaurant and entertainment activities would clearly accentuate the recreational orientation of a site so directly related to TD Garden; but they would also benefit the surrounding community by providing a more varied and convenient range of recreational options than are now available, most with local as well as regional appeal.

Such opportunities have been difficult to realize elsewhere in the community – e.g., in the adjacent Bulfinch Triangle, where both space and competitive constraints have limited the range of retail, restaurant and recreational options; whereas the scale of this project, its proximity to TD Garden and North Station, and the development resources and experiences of the development team, all create an economic critical mass of which the local community can also be the beneficiary, among many others.

- ***The Long-Awaited Completion of Causeway Street:*** In addition to redeveloping what is now the largest surface parking lot in the West End community, this project will restore the street fabric and complete the streetscape for Causeway Street as a whole. By filling in a large and central gap in the street wall, the Lowell Square and Keany Square ends of the Causeway would finally be integrated into a street and sidewalk that reads as single roadway and district, all elements of which relate to one another. This is a goal that was long been precluded by our highway and transit viaducts; and it can now be realized under the aegis of the Causeway Street Crossroads Initiative, into which this project would breathe new life and infuse new imagination.

That effort would also encompass Lomasney Way and parts of Staniford and North Washington Streets and it will provide more safe and secure pedestrian connections within the West End community and between the West End and our North End and Beacon Hill neighbors. The latter will become increasingly important when the new public elementary on Commercial Street in the North End is fully operational, for which Causeway Street via Keany Square will provide direct pedestrian access from both the West End and Beacon Hill.

- ***An Improved Connection and a Better Distinction Between North Station and TD Garden:*** Since the construction of the new arena, the patterns of access/egress for North Station and TD Garden have been combined and often confused, with much competition between commuters and event patrons for limited circulation space. That situation was significantly improved with the recent renovation and expansion of the North Station terminal; and it would be fully and finally resolved by the circulation patterns, escalator systems and sightlines being designed into the podium entryway and arcade.

This will allow the movements of event patrons to be effectively triaged in ways that will reduce conflict, improve efficiency and highlight the distinct and important role of each of these various facilities. And that prospect has now been greatly enhanced by the proposed widening and reconfiguration of the concourse, which has been outlined for the IAG in the discussions that followed the EPNF plan. This new design strategy would more fully integrate North Station into the proposed retail/restaurant complex in ways that are increasing typical and successful in such transportation terminals.

- ***A New Nexus for the West End Community as a Whole:*** Because of its critical location, this new development has the potential to effectively connect the currently somewhat separate and distinct elements the West End neighborhood into a more integrated and legible community. This goal is consistent with a larger understanding of the scope and context of this project that was evolved and endorsed by the project proponents in the IAG process; and this would involve the following type of connections:
 - ⇒ *With existing and planned developments north of Causeway Street – i.e., Lovejoy Wharf, the Causeway/Strada building, and Portal Park to the east and with the O’Neill Federal Building, Nashua Street Residences, and planned redevelopment of the Garden Garage to the west.*
 - ⇒ *North Station and TD Garden with the nearby Lovejoy Wharf water transportation facilities, which could activate the now little-used pedestrian link under the Zakim Bridge along the waterfront directly to Lovejoy Wharf, to the pedestrian pathway across the Charles River Dam and to the new shoreline parks on both sides of the river. This route would link water, transit and rail transportation modes in an especially efficient and effective manner; and it would also provide a direct and traffic-free connection to the North End recreational complex and the new public elementary school via an existing pathway under North Washington Street bridge.*
 - ⇒ *Causeway Street with Nashua Street, Lomasney Way, Thoreau Path -- and thereby with the Charles River Park residential community and to medical district beyond.*
 - ⇒ *Causeway Street to the Nashua Street Quadrant and to the Charles River, Nashua Meadows Park and the Esplanade in the West End, which includes attractive green-space, as well as waterfront swimming pools and athletic fields.*
- ***A Restored Connection to and through the Bulfinch Triangle Historical District:*** By design, this new Causeway Street development would also reinforce the connection to the adjacent Bulfinch Triangle in three important ways:
 - ⇒ *Architecture:* The design and massing of the Causeway Street podium responds directly to the distinctive and historic design and massing of the Bulfinch Triangle, complementing but not competing with it. This approach provides an important degree of architectural consistency between the two sides of Causeway Street; and it also assures a compatible pedestrian experience on both sides of the street.
 - ⇒ *Axis:* The location of the proposed podium concourse is on the Canal Street axis, restoring that thoroughfare to the prominence that Charles Bulfinch had originally intended by the triangular street layout that he laid out centuries ago.

⇒ *Continuity*: It links via Canal Street with the planned new development of the East Parcel of the Government Center Garage project, which will effectively extend the that connection through to the Rose Kennedy Greenway, the Market District and Government Center beyond. Canal will be reestablished as the major pedestrian thoroughfare between the West End and Downtown Boston.

CONSIDERATION OF ISSUES & OPPORTUNITIES RELATED TO FUTURE PROJECT

PHASES: The future phases of the project involve a different set of issues and opportunities:

- ❖ **Discussion of Height, Massing and Density:** It is clear from the IAG discussions and otherwise that the increased height of the project is a source of real concern, primarily to residents of the surrounding residential communities. The presumption is that the height has been increased primarily for economic reasons that benefit the project proponents, but may not be appropriate or beneficial to the community – primarily due to wind, shadow and view corridor effects that could be minimized or mitigated if proposed building height were reduced. These are understandable concerns that merit our serious consideration:
- **The Relationship Between Height, Massing and Density:** Although project height, density and massing are all interrelated variables, they are also distinct issues. And it is important to again note that while the project proponents have increased the height of the tallest proposed building by 50% from what had previously been proposed and approved -- from 400 feet to 600 feet, they also reduced the density of the project by more than 20% -- from 2.3Msf to 1.8Msf.

From our perspective, density – i.e., the overall size of the project -- is primarily an economic consideration, while height and massing are primarily urban design and architectural considerations. Although the logic is not necessarily so linear, once a certain amount of density has been determined to be required for the value and viability of the project to be assured, then the issue becomes how that density is optimally organized – i.e., what should be the height and massing of a project given the required density on this site. And it does not seem reasonable to conclude that the project proponents have increased height for economic benefit, when they have also reduced density to an opposite and likely greater economic effect. In the end, they are proposing a smaller project; and in combination with proposed change in uses, that has actually had some favorable and some unfavorable environmental effects when compared to what was previously proposed.

- **The Height and Massing that Has Actually Been Proposed:** In this case, the project proponents and their architects proposed a height and massing strategy that involves a street-level podium, divided by a retail concourse. Three tall buildings of various heights emerge from this podium, which are in varying degrees also set back from the street. The lowest of these three buildings is the most central one, a hotel of 320 feet in

height; and with the podium itself, the hotel building is expected to part of the first phase of this project. The other two taller buildings – a 600-foot residential tower and a 425-foot office tower – are expected to be part of a future phase. Some preliminary observations/conclusions:

- ⇒ *Mixed Community Reactions:* All indications thus far are that while most on the IAG and in the community like the podium, many do not like the towers. The concern about height is by no means universal, with the Boston Civic Design Commission among others, supporting even greater height for a combination of aesthetic and environmental reasons – many consider taller buildings more energy efficient and environmentally appropriate in an urban context.
- ⇒ *Likely Connections:* It also seems clear that the relationship between the height of the towers and the design character of the podium is not a coincidental one. Given the density that needs to be accommodated, the height and character of the towers allows for the height and character of the podium. This hybrid approach involves a trade-off between community context on the one hand and contemporary design on the other – a trade-off that has been successfully made elsewhere in Boston. That is to say, within limits, one cannot have the podium without the towers.
- ⇒ *Other Options:* This is obviously not the only design approach that could have been selected. The original proposal called for two towers of lesser height but larger footprint, which directly fronted the street. At the time that was proposed, those towers were much taller than any other West End buildings that had been built or proposed, with the singular exception of the two Longfellow Place towers on Staniford Street. When they were approved, the two 400-foot towers previously proposed were arguably more out of character with the West End community than is a 600-foot tower today. But they were accepted at the time because the density that they represented was considered to be the required means to the desired end of the redevelopment of this critical site.
- ⇒ *The Actual Choice:* The choice that was made in this case was on a spectrum of options that ranged from the height and massing of a tall, elegant and iconic structure with a relatively small footprint like the John Hancock building on the one hand, to a shorter and more bulky building with a larger footprint, like the Copley Place complex. Neither of those ends of the architectural spectrum seems to be an attractive or appropriate alternative for the West End; and what is now being proposed appears to be designed to provide both contextual and contemporary elements, rather than one or the other.

⇒ *Local Precedents:* This is by no means the first time that project height has been increased for various practical reasons. In the Bulfinch Triangle, for example, where underground construction was precluded, heights substantially above as-of-right zoning allowances of 75 feet – up to 100 feet with BRA design review – were encouraged and approved by the community. For the Causeway/Strada development, an additional six new residential floors were added to the project to permit the renovation of the long vacant Stop & Shop bakery building primarily as office and retail space. In that case, both zoning and municipal harbor plan relief was required, both of which were done with community support, providing the increased height framework for the adjacent Lovejoy Wharf complex.

Although the height increases in those situations were measurably less than the height increases proposed for this project, as a percentage of prior zoning allowances, they are likely greater. In any event, significantly increased height made for more viable and successful projects; and most would agree, that these structures are also more attractive and functional as a result.

➤ **The Advantages and Disadvantages of Increased Building Height:** Among the potential advantages of greater building height are smaller building footprints, more slender building profiles and the ability to design iconic structures that are elegant, beautiful and make a positive and visible contribution to the urban skyline. Among its potential disadvantages are its shadow and wind effects, its view corridor impacts, and possible inconsistency with the architectural character of the surrounding community. All of those advantages and disadvantages apply in this case; but it can be concluded that the disadvantages of height have been minimized and its advantages enhanced by the urban design and architectural strategy that is now proposed for this site, for the following reasons:

⇒ *Shadow Issues:* As demonstrated in the shadow studies referenced in the EPNF and discussed with the IAG, the location of this site means that shadows from these buildings predominantly fall on uninhabited parcels, including the railroad yards behind TD Garden and the nearby Zakim Bridge. The notable exception are the shadows cast on Lovejoy Wharf and the adjacent new development, which is still a work in progress, and to a lesser and less frequent extent on Portal Park and the 226 Causeway/Strada 234 building. In term of minimizing this otherwise negative effect of additional height, that is a distinct advantage of this site.

⇒ *Wind Issues:* As demonstrated in the wind studies referenced in the EPNF and discussed with the IAG, the adverse wind impacts of this project as shown in the EPNF are primarily concentrated the area east of the project, in the vicinity of Portal Park and the 226 Causeway/Strada 234 building and on the other side of Causeway Street in this vicinity.

In these sectors, several wind conditions were projected to be uncomfortable; and that is especially problematic because such wind conditions would exacerbate the shadow effects noted above, and because these specific areas are expected to involve outdoor activities. Those would likely include sidewalk seating for existing and planned restaurant and residential uses.

It is worthy of note, however, that adverse these wind effects could be minimized by changes in the design and massing of the proposed structures, which had been proposed to the IAG since the EPNF was published; and they could be further mitigated by appropriate sidewalk tree planting, to which the project proponents are also committed. This suggests that even further progress could and should be made as the siting and massing of these structures and the design of the streetscape are both further refined and as final design proceeds.

- ⇒ *Contextual Issues:* One of the urban design advantages of the proposed podium is that it mitigates and mediates the effect of contemporary towers coming to ground. That problem is simply avoided because the towers do not come to the ground, rather they emerge from a podium that reflects and reinforces the existing streetscape context. This hybrid approach is obviously not completely seamless; but it is largely effective in distinguishing the contextual and the contemporary experiences, in integrating some of the better elements of both, and in for the most part minimizing our experience of a conflict between them.

- ⇒ *View Corridor Issues:* One of the many advantages of the podium strategy is that it minimizes the visual impact of the proposed towers on most of the surrounding streetscape, particularly the local perspective from south of the site, while not interfering with the skyline/gateway perspective provided from the north. The height and siting of the podium screens our street-level view of the towers from much of Causeway Street and the Bulfinch Triangle. And as intended, the podium itself will read to pedestrians as an extension of the Bulfinch Triangle massing and architecture, with the towers essentially out-of-sight and out-of-mind from much of the local community streets and sidewalks.

This is also true from much of the local residential community west of the project in Charles River Park, whose view of the towers will be obscured in whole or in part by some existing buildings as well as the taller buildings planned for Nashua Street and Lomasney Way. It is clearly not true, however, from the perspective of the residential buildings east of the project – e.g., the Lovejoy Wharf properties and the 226 Causeway Street/Strada building -- and to a lesser extent from some of the streetscape and residences west of the site – e.g., from a portion of the streetscapes and structures of West End and Longfellow Places.

From those eastern and western viewpoints, the towers will be clearly be a new element of their view corridors, though they are not likely to block their existing views of other important and iconic structures – e.g., the Custom House or Old North Church – which has been a problematic result of height on other sites.

⇒ *Related Design and Massing Issues:* Although the height and massing diagrams utilized in the EPNF are reasonably well detailed and articulated, they by no means represent the final design and architecture of the three proposed towers, or even of the podium. They are still conceptual and suggestive in nature; and at this preliminary massing stage, the disadvantages of additional height tend to be somewhat more obvious than its advantages.

But even at this stage, the height and massing illustrations in the EPNF certainly demonstrate the design opportunities available in terms of the kind of elegant, slender and iconic structures that would define this site from afar. They would emphasize what has long been true but has never been visualized -- that this West End site is the northern gateway of Boston, the location of one of the two major transportation terminals in the region, and the home of the premier athletic and event venue in New England. That convergence deserves to be demarcated; and these towers would do that. And in so doing, they would also celebrate the West End community that surrounds it.

But at this conceptual design phase, we do not yet know what these buildings will actually look like, whether they will be beautiful and engaging and whether they will block our view or become a compelling part of it. But we do have some major assurances: the IAG and the community will be an integral part of the final design review process; the project developers understand both the unique potential and well as the competing demands on this site and have addressed such challenges in the past; and that the project architects who share in that understanding, who design beautiful buildings and who know what it takes to optimally resolve the design issues and opportunities involved.

Beyond those assurances, we have the evidence of the substantive design, height and massing changes that have already been made in and through the IAG process – e.g., the configuration of the concourse and the height of the hotel tower. While those changes have not included a reduction in the height of the tallest structure, as some have suggested, they are clearly indicative of the kinds of improvements that could and should be made as the final design continues past the initial project review and approval stage in which we are now involved.

⇒ *What is Proposed vs. What was Approved:* A final relevant point is that many of the effects of additional height, for better or for worse, also resulted from the height and massing of the larger project previously proposed and approved. As already noted, that proposal involved two 400-foot towers with larger building footprints that bordered the Causeway Street property line. Although that prior proposal was never fully designed or subjected to the shadow and wind studies to which the current proposal has been subjected, it certainly had significant shadow, wind and view corridor effects of its own. Arguably, the podium-and-towers strategy now proposed would enhance many of the benefits of height and reduce many of its burdens as compared to what was previously proposed. But whatever the perceived adverse effects of the current proposal, they should be measured against the comparable effects of the previous proposal, rather than existing conditions, which is what many who support the merits of the previous proposal tend to do.

CONSIDERATION OF TRAFFIC AND TRANSPORTATION ISSUES & OPPORTUNITIES:

As previously noted, this project in one form or another has been an integral element of the transportation planning for our community for more than twenty years; and it has been incorporated into the traffic analyses of public and private development projects since that time. Indeed, it is likely that traffic conditions in our area have been among the most fully and intensively analyzed of any community in Boston and possibly the country. We are, therefore, confident that the traffic effects of this project are accurately reflected in those prior studies and in the EPNF, especially since the current proposal involves substantially less density and less traffic-intensive uses than had heretofore had been proposed and approved for this site.

That is not to suggest that we can be sanguine about the traffic circulation problems that have been identified in those analyses. But is it to suggest that such problems have been identified and have not been ignored; and there is no reason that the sort of unexpected traffic confusion and congestion that is now evident in the Seaport District, for example will be repeated here. Nonetheless, we are concerned that here are two aspects of the traffic situation in our community that are not adequately addressed in the EPNF:

- ❖ **Event-Related Traffic at TD Garden:** Most of the traffic analysis in the EPNF addresses peak commuter traffic circulation, as is required in the review of all development projects in Boston. But for West End residents in particular, the effect of daily commuter traffic pales by comparison to the effects of event traffic, which occurs almost as frequently and can be even more disruptive because it occurs on evenings and weekends when most residents are home.

One of the great advantages of DNC involvement as a full partner in the development team for the Causeway site is that TD Garden traffic management could/should be considered an integral and important part of the solution to existing conditions. And in that context, there were significant discussions between the development team and the IAG about the

- *Reconstruction of the Bulfinch Triangle* streets and sidewalks west of Canal Street.
- *North Washington Bridge reconstruction*, including related Rutherford Avenue and Sullivan Square roadway reconfiguration and reconstruction in Charlestown.
- *The Green Line Extension*, including related station relocation and improvements at Lechmere Square in Cambridge and beyond.
- *Government Center T Station* closure and reconstruction.

Together, these public and private projects represent an exceptional confluence and variety of construction activity over the next decade; and effective projection and monitoring of their changing traffic and transportation implications over time is clearly well beyond the purview, let alone control, of any single project proponent. Even if it were not, requiring each project proponent to address these matters individually would involve an enormous and unnecessary duplication of effort; and any failure of coordination or communication is likely to have immediate and far-reaching economic and environmental consequences. For that reason, a case can well be made that not only does construction-period traffic management and mitigation policy and practice need to be coordinated, it may have to be consolidated, under the ultimate purview of the Boston Transportation Department (BTD). Beyond the relevant lessons of the CAT Project, the ongoing redevelopment of the major MassDOT parcels in the Bulfinch Triangle provides an even more recent and local example of such an approach.

In that case, given the complexity and the schedule for multiple parcel developments, it was agreed by all concerned that it was appropriate and advisable for the traffic planning for these various projects to be closely coordinated with each other and with the planned reconstruction of Causeway Street. For that reason, a single traffic-engineering firm was retained to handle construction traffic management and mitigation functions for each project, as well as for Causeway Street and for the Bulfinch Triangle district as a whole. The cost of that collaborative effort was shared by the project developers; and those efforts were guided and monitored by BTD. The result has been an integrated and comprehensive construction strategy to address traffic issues and opportunities, which has proved to be notably successful to date.

Given that success, and in light of the greater urgency and complexity of the issues that are likely to confront our community and our developers in the next decade, we would urge BRA, in consultation with BTD and others, to definitively address the complicated issues of construction-period traffic management and mitigation for this and other relevant projects. That would require public leadership as well as communication and coordination with, and possibly the consolidation of, the efforts of public and private contractors and developers – as is being done in the Bulfinch Triangle.

CONSIDERATION OF AFFORDABLE HOUSING ISSUES & OPPORTUNITIES: The project proponents make clear in the EPNF that it will comply with the affordable housing requirements that apply to any residential development in Boston. But they did not indicate there or since whether those affordable units will be provided on-site or off-site. That decision has apparently not yet been made.

In that context, we would take the opportunity to reiterate here the strong and consistent preference of the West End community that affordable units should be provided on-site and as an integral element of the proposed project. While we understand the economic rationale for providing some or all of the affordable units off-site, there is neither a BRA requirement nor a developer commitment that any such off-site affordable units would be created elsewhere in the West End community. That means that acceptance of any off-site units is very likely to come at the sacrifice of additional affordable units in our community, where rent and price levels continue to increase significantly and affordability is becoming an increasing problem, particularly for longtime residents.

In sum, on-site affordable units would clearly benefit the West End neighborhood; and off-site affordable units may well not. That is not a choice that community advocates should be forced to make; and it could be completely avoided if all affordable housing funds were developed on-site, which has been the case in other recent development which were not grandfathered for one reason or another. At a minimum, we would recommend and request that the BRA and the developer commit to develop any off-site units elsewhere in the West End and/or in our neighboring North End and Beacon Hill communities. Otherwise DNA would only support affordable units on-site, which should be reiterated as a major community priority that is directly related to the nature, scope and economic effects of new residential development in our neighborhood.

DISCUSSION OF THE PROPOSED 121A AGREEMENT: Although the details of the proposed 121A have yet to be negotiated and revealed to the community, it is our understanding that the basic scope, schedule and purpose is as follows:

- ❖ **Zoning Framework:** It provides the zoning framework for the project as a whole, specifically including approval of heights not to exceed those shown in the EPNF.
- ❖ **Tax Relief:** It provides tax relief for the first phase of the project, which includes the largest share of the community benefits of the project as a whole, including but not limited to the real prospect of a new supermarket.
- ❖ **Limited Focus:** Such tax relief is restricted to the first phase of the project; and no tax relief will be provided for the residential and office towers that will follow in any future phase of the project.

- ❖ **Limited Timeframe:** Relief will extend for no more than fifteen years to twenty years; and it will take the form of a negotiated and predictable schedule of payments to the City of Boston in lieu of the property taxes. Such payments will be well in excess of the current annual tax payments for this property.

It has been represented to the community by the project proponents that the proposed 121A is critical to the scope and schedule of the proposed first phase of the development, which appears to have quite widespread support in the community. Since we are not privy to the details of this agreement or to the pro forma financial projections for this project, we rely on the BRA to review and confirm that representation.

Given the redevelopment history of this site – or more properly, the lack thereof -- there is reason to believe that this might be the case. For all of the current assessment of the obvious development value and potential of this site, no one has stepped-up to the plate in the almost ten years since the old Boston Garden was demolished. And that was not for lack of trying by Delaware North Company and the community. To suggest that starting a project that is front-loaded with community benefits may require some degree of tax predictability and even concession, is neither an implausible conclusion nor necessarily a bad civic investment for a substantial city and community benefit in the longer run.

That determination will have to be made by the BRA; but if it were, DNA would support in principle the limited course of action described above. And we would do so in the expectation the details of the 121A agreement will be made known to the community and other interested parties at the earliest practical date.

A SUGGESTED SERIES OF ADDITIONAL COMMUNITY BEBEBFITS: In addition to the community benefits that are inherent in the project, we would recommend and request the following related initiatives that would expand and enhance its community benefits:

- ❖ **A New Supermarket – Make it Happen:** A new supermarket has been an integral element of the first development phase of this project since it was publicly announced some months ago. Supermarket space has been identified and a proactive effort to recruit a supermarket operator is underway; but this far, that effort has not been successful. This is continuing source of concern to the community in the West End, North End and Beacon Hill, who have been without an affordable supermarket since the Stop & Shop on Cambridge Street was closed in 2003. And while we firmly believe that this is the preferred supermarket location for the many reasons suggested above, community concern is heightened by our understanding that a supermarket is not a requirement of the development of this site, as it is for another less suitable site elsewhere in the community.

For that reason, the community must rely on the goodwill and continued commitment of this development team to pursue a supermarket to a successful conclusion even, when it is not required and likely beyond the initial approval of this project. There is no reason to doubt that commitment – quite the contrary; and for that the project proponents should be commended. If and when this goal is realized on this site, it will obviously accrue to the benefit of all concerned – the developer and the BRA as well as the community. But until that happens, it is essential that the developer not relent in any way in its pursuit of this objective and communicate with the community as to what progress is or is not being made. Until it happens, a concerted, collaborative and continuing process that involves the community is itself a community benefit that we hereby recommend and request. In sum, make it happen, sooner rather than later; and if it is not happening, let us know why and what we can do to help.

- ❖ **Building Height – Make it Public, Not Just a Private, Amenity:** DNA has also suggested in other high-rise developments, this project should explore ways in which the proposed building height can be devoted to some more public and community purposes. One of the problems with significant height in a community context is that the burdens of height tend to be borne by the community, whereas the benefits of height are essentially restricted to project residents and tenants. That imbalance of benefits and burdens could be remedied to some extent by providing more community more access to and use in the upper floors of the taller buildings.

In this case, for example, that could involve public access to at least some of the rooftop green space and others amenities that might be planned for the podium in conjunction with the new hotel and the residential and office towers. The podium rooftop would provide a welcome vista on the comings and goings of a revitalized Causeway Street and Bulfinch Triangle; and it also provide community access to the recreational and fitness facilities that a hotel might involve. As for the towers themselves, viewing pavilions at or near the top of these taller buildings, and/or shared meeting spaces for community organizations and activities, are becoming increasingly common features of new high-rise buildings in Boston and elsewhere. They would be equally beneficial to project residents and tenants as well as the larger community; thereby making the advantages of building height a public value as well as a private benefit.

- ❖ **The Causeway Street Crossroads – Make it Better, Make It Sooner, Make It Broader:** As previously noted, the Causeway Street Crossroads Initiative involves the complete redesign and reconstruction of Causeway Street and streetscape. It has now been in the planning stages since 2005; and the reasons for its delay include the disarray in the real estate and financing markets that had postponed projects in the Bulfinch Triangle and vicinity. But in important respects, its completion was also awaiting a more definitive plan for the former Boston Garden site, which was always expected to have a major influence on the nature and scope of the Causeway Street and its environs.

Now that the plans for the old Boston Garden site have now reached that stage, it is time for that influence to be exerted. In IAG discussions, plans for the Causeway Street forecourt of this development have been illustrated; and this design sense needs to be integrated in our larger streetscape vision. Delaware North Companies, Boston Properties and Elkus Manfredi could and should play a leadership role in making that happen. That would include working:

- *With the BRA and the community* in integrating the streetscape vision for this development into the vision for Causeway Street as a whole.
- *With the developers and architects of other projects in the vicinity* – e.g., Nashua Street Residences, the Garden Garage, West End Place, Lovejoy Wharf, 226 Causeway/Strada 234 and the new developments in the Bulfinch Triangle – to reflect and reinforce that vision in their own planning, design, marketing and management.
- *The General Services Administration* to assure that that vision informs a much more streetscape-friendly approach to the design and function of the critical perimeters of the O'Neill Federal Building.

Given its expertise and experience, the proponents of this project are in a position to improve and integrate Causeway Street Crossroads Initiative process, to accelerate the completion of its design and construction, and to extend its effects into the surrounding community. And we recommend and request that they make a public commitment to do so as part of the community benefits of this project.

- ❖ **The Bulfinch Triangle Streetscape Improvements Program – Assure Its Continued Funding:** In the period from 2005 through 2010, in full partnership with the BRA and utilizing surplus funds from the 2005 Democratic National Convention at the Garden, the Downtown North Association planned and implemented a streetscape improvement program for the Bulfinch Triangle district. It included daily sidewalk cleaning, the design and installation of streetlight banners and hanging planters, and seasonal flower planting in those hanging planters and on roadway medians around the district. DNA member Community Work Services on Portland Street provided the staff for this effort at no cost; and CWS also provided program equipment, supervision and administration at their cost.

With periodic interruptions to accommodate the disruptive Boston Water & Sewer project in the Bulfinch Triangle, the BTSIP program continued successfully until 2010, when the convention surplus that funded the BRA share was exhausted. Since then the program has continued in large part based on the continued generosity of CWS and contributions from other DNA members; and during this time, DNA has worked with the BRA to provide a reliable and sustainable source of funding for this effort.

Delaware North Companies has taken the lead in that effort; and this project affords the timely opportunity to assure program funding for the future. We, therefore, recommend and request that the project proponents commit to assure the continuation of funding for the BTSIP, which can now be extended throughout the Bulfinch Triangle and on both sides of Causeway Street. With the leadership of the BP/DNC project team and the participation of other area organizations and institutions, that this program can and should even be extended to other sectors of the West End community – e.g., Lomasney Way, Martha Road, Thoreau Path, Staniford, Blossom and Cambridge Streets.

Such a commitment would also be most consistent with view that the redevelopment of their Causeway Street site is fundamentally linked to the attractiveness and appearance of the Bulfinch Triangle and the community as a whole.

- ❖ **West End Community Center – Give It Space:** The West End Community Center is volunteer group best known for its Annual West End Children’s Festival, a remarkable event that highlights both the increasing numbers of young families with children in the West End, as well the notable diversity of our younger population. But WECC also sponsors cultural and recreational programs for adults in the community that are fast becoming an important part of our social life as a neighborhood.

Their efforts received a major boost when Avalon Bay Communities pledged significant financial support over the next five years as part of the community benefits of the Nashua Street Residences project, which will allow them to hire some staff; and also when HYM Investment Group made available to them the free use of space on the first floor of the Government Center Garage, unless and until that structure is demolished as part the redevelopment of that site. What the WECC needs now is a permanent location for its office and meeting facilities in an appropriate and convenient location in the West End community. The Causeway Street location of this project would certainly qualify; and space in podium would provide a more than suitable setting for a facility of no more than 2Ksf. We would, therefore, recommend and request that the project proponents commit to accommodating the space needs of WECC within the podium development planned for the first phase of this project.

- ❖ **The West End Museum – Support It, Reflect It:** The West End museum is located only a short distance from this development site; and it offers a continuing reminder and illustration of the remarkable, and often ignored or misunderstood, history of a community that has been a major Boston presence from colonial times. That more complex narrative frequently gets lost or simplified in the popular enthusiasm for the exploits of the Bruins and Celtics; but it includes social, cultural, civic, economic and transportation dimensions, not to mention a human element – all of which the West End museum is committed to preserving and illuminating.

To continue to do that well, this community-based institution needs the support of the development projects in our community; and we request and recommend that the West End Museum should be a beneficiary of financial support from and through the BP/DNC team – as it was a recipient of financial support from the Nashua Street Residences Project. But equally important, we urge the project proponents to work with the West End Museum staff to incorporate the history of our community into the fabric of their development and into the management and marketing of the project. This strategy could/should extend to any and all elements of the larger project, beyond the podium, to include North Station and TD Garden as well; and it should include attention to the history that has been written beyond these destinations. This seems most consistent with the expressed commitment of the project team to create a sense of place that is uniquely adapted to its West End home; and we urge the developers to follow through on the implications of that commitment.

- ❖ **The Impact Advisory Group – Keep it Going:** The IAG process for this project has been an expedited one, but it has nonetheless been informative, collaborative and constructive, candid – and generally useful and productive for all concerned. It precipitated positive changes to the design and function of the project as initially conceived, including changes to the height and massing of some of the proposed buildings. It also fostered a more complete understanding of the interconnectedness of the various elements of the on-site project and the potential benefits of those connections.

We have recommended and requested that the changes that have emerged from the IAG process thus far should be documented for the IAG and the community in a concise update of the project since the EPNF was filed – and before the planned BRA vote on this project in November or December. An additional IAG meeting is scheduled after the close of the public comment period and before the related BRA meeting; but even thereafter, there will be a continuing public process involving the final design of each project element and its actual implementation. That process will also require community participation; and the IAG should be continued for those purposes. And we hereby recommend and request that the BRA and the project proponents commit to a continued consultation and collaboration with the IAG throughout these processes and beyond, as need be.

CONCLUSION: Based on the findings and conclusions detailed above, DNA continues to support the long-awaited redevelopment of the former Boston Garden site on Causeway Street; and we specifically support the current proposal to do so, as recently submitted by Delaware North Companies in partnership with Boston Properties. They are a particularly suitable and very resourceful development team, which has put forth a proposal that combines contextual and contemporary design elements that reflect and reinforce the traditional architecture of the Bulfinch Triangle with taller structures that appropriately mark this site as Boston’s northern gateway.

Project density has been substantially reduced from previous proposals; and the development program now proposed involves a significant shift from office to residential uses as compared to earlier plans. On both counts, its projected traffic impacts have been correspondingly reduced, which is a most welcome change.

A new ground-level podium and concourse integrates the new development with TD Garden and North Station and provides a range of new retail, restaurant and recreational options for the local community as well as its regional patrons, including the realistic prospect of a new supermarket, which has long been a community priority in the West End, North End and Beacon Hill. The podium mediates and minimizes the ground-level effects of the proposed new hotel, office and residential towers that emerge from it, largely preserving the quality and character of the pedestrian experience without diluting their skyline impact from afar. It also reflects and reinforces both the design and function of the surrounding community, particularly the adjacent Bulfinch Triangle Historic District, in which Canal Street is on axis with the new concourse as well as the public plaza planned for immediately south of the Government Garage, thereby creating a continuous pedestrian link between the West End and Downtown Boston.

Many of the major community benefits of this project come in its first phase, which appears to have widespread community support, with the second phase involving the tallest of the tower structures, for which many local residents are notably less enthusiastic. But project architects and proponents have made every effort to minimize the adverse effects of building height for those concerned about its potential adverse effects on their quality of life, while also enhancing the advantages of tall and elegant structures in this setting. The proposed approach is a hybrid one, which involves trade-offs designed to achieve an optimized development and community result, which we believe they have largely accomplished, though others may disagree. In any case, we are confident that beyond the initial BRA Board vote, there will be further substantive opportunities for the community to refine and improve this project through the final design of each of its elements – a process that has already begun with design and other changes to the initial EPNF already made through the IAG process.

In sum, we believe that this is a worthy project that has been a very long time in coming; and we fear that if it does not receive the requested and required BRA approvals at this stage in the process, it may also be a long time coming back. Now is the time to proceed with a crucial redevelopment project, which would greatly benefit the West End community that would also be greatly burdened if it is not realized soon. It is not at all likely that there will be a better development team or a more balanced and thoughtful development proposal than what is now before us. And for that reason, we reiterate DNA support for BRA approval of the proposed redevelopment of the former Boston Garden site on Causeway Street, in the heart of the West End community; and beyond that point, we look forward to continuing to work with the project proponents and the BRA to make this worthy and timely project the best that it can be.