

Date	First Name	Last Name	Organization	Opinion	Comments
2/22/2019	Kirsten	Hoffman		Neutral	<p>The existing Dock Square Garage is located on a prominent site on the historic Boston waterfront abutting the new Rose Kennedy Greenway. The site is literally surrounded by recognized Boston Landmarks (the U.S. Custom House, Quincy Market, Faneuil Hall, and the Blackstone Block, as well as the North Market and South Market Buildings which are pending Boston Landmarks) and borders the historic North End. This area comprises one of the most important historical areas in the country. A development project constructed on this site could have the potential to take full advantage of the historic importance of the site and become a one of a kind project, enhancing its value to the community and the City, as well as its own monetary value. The Dock Square Garage Project, as currently proposed, is not such a project. No consideration at all has been given to the historic resources that surround the project site, to the Rose Kennedy Greenway, or to the historic North End. The currently proposed project preserves the existing garage and above grade parking at a significant cost to the neighboring historic and open space resources in terms of its impacts on view sheds and its continued blocking of connections between historic resources and active areas. The project will in large part block the view of the Custom House tower from the Greenway and the North End and, because a large portion of the lower floors of the project will be garage space, will perpetuate the separation of historic landmarks and active areas from one another. The existing Dock Square Garage is a remnant of an era when the raised Central Artery closed off access to the area underneath. Since that time, the Central Artery has been removed and the beautiful and active Greenway created in its place. The Dock Square Garage as it currently exists is devoid of activity other than the parking of cars, and still serves to separate the adjacent historic resources, the Greenway, and the historic North End from one another. There is no reason why the garage structure should be preserved. Above grade parking is one of the worst uses imaginable of such an important piece of the historic Boston waterfront. If parking were eliminated or moved below grade, there would be more surface space for active uses, including open space, and much more space for valuable development (retail, residential, etc.) and there would not need to be a "block on a block", creating design potential for a unique above grade building. Active use, particularly open space, would enhance access to some of the most important historic resources in the City and improve the experience for visitors, residents, retailers and others. With a more varied, less blocky, above grade structure, height might have less of an impact on the historic fabric of the area. Examples are Rowes Wharf and Post Office Square, a couple of the most timeless developments in the City, where parking is underground allowing the surface to be fully activated with open space (Post Office Square) and almost every use imaginable, including open space (Rowes Wharf). In taking into account historic resources and designing so as to augment these resources, the Dock Square Project would have the opportunity to increase access to these resources and potentially to increase the value of the project itself in doing so. For example, street level connections through the site could be made to the historic streets of Blackstone Block and to the Greenway, allowing for increased public access to these resources. And narrower, less blocky, towers would allow for less obstruction of the view sheds of the Custom House tower in particular. Alternatives to the current project that eliminate above grade parking, open up the site surface to activity, and respect and augment the surrounding historic landmarks should be considered before any project is approved for this site.</p>

Dock Square Garage Public Comments via website form 2019-02-25

2/22/2019	Michael	Schroeder	Personal	Oppose	I am writing to oppose the Dock Square development. My primary reason is that it is too tall and it will block the wonderful view of the Custom House tower and downtown. I live on Fulton Street in the North End and walk along Cross Street and the Greenway daily. I still marvel at what a beautiful cityscape we have with the historic Custom House tower and other beautiful buildings so easily visible. I always see tourists marveling at it too and stopping in their tracks to take numerous pictures. The view is especially nice from parcels 8 and 10 where we have the wonderful parks and sitting areas. This proposed new building would block a significant portion of that view and we would never be able to get that back. This may sound silly arguing for it just because of the view, but this is very important as it provides enjoyment to countless people. I propose that they knock down the existing garage, put the garage underground and then build their same structure but starting at ground level. That is what most new developments are doing when there's an existing structure. That would cost them more money, but would allow them to build their building while also keeping the height lower to the existing level while maintaining our beautiful historic view of Boston. Thank you very much.
2/11/2019	Suzanne	Taylor	Freedom Trail Foundation	Oppose	Dear BPDA Representatives, Thank you for creating an IAG and holding community meetings for the Dock Square Garage project. Our concern is for Boston residents, our Greater Boston neighbors, and national and international visitors who require parking to enjoy spending time in our great city. The proposal to eliminate up to 200 spaces for the residents of the building/valet services/mechanical lifts clearly will have a negative impact on tourism and for residents who want to experience Boston's historic treasures. I look forward to hearing from you, Suzanne
2/8/2019	Madeline	Wharton	Beacon Health Options	Oppose	Downtown Boston faces a critical parking challenge, and the primary effect this development will have is to drive up parking prices in the area. This will challenge commuters even further, which will in turn add additional burden to the public transit system or even contribute to an inability of unskilled workers to afford to take jobs in the city. Businesses will be negatively impacted.
1/22/2019	Robert	Lauricella	none	Oppose	The donut scheme is the least destructive to Quincy Market Leave the brick on the existing garage. The new cladding looks like the way architects destroyed the scale of main street in the 1950' by covering pedestrian scale fenestration with large elements that dwarf the pedestrian. Are all the architects who remember the 50's dead. Don't young architects' read. The scheme has gotten better from the first proposals.
1/8/2019	Alex	Goldstein		Support	YES
1/8/2019	Beatrice	Nessen	Ms.	Oppose	The design and scale of this proposed project is totally out of keeping with the historic character of its neighbors. The proposed design is totally out of keeping with the abutting "Haymarket" buildings , Fanueil Hall market place, and the the Blackstone Block Protection area. Granting the site a PDA would exempt the proponent from existing zoning and give the developer free range to proceed with this design that is totally incompatible with the historic area in which it is located. Some may consider the PDA as spot zoning.



CITY OF BOSTON

THE ENVIRONMENT DEPARTMENT

Boston City Hall, Room 709 • Boston, MA 02201 • 617/635-3850 • FAX: 617/635-3435

February 22, 2018

BOSTON LANDMARKS COMMISSION

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

RE: Dock Square Garage – Planned Development Area

Dear Mr. Sinatra:

Staff and Commissioners of the Boston Landmarks Commission (BLC) have reviewed the Planned Development Area (PDA) submitted for the Dock Square Garage project referenced above and have the following comments:

Thank you for the opportunity to comment on the Dock Square Garage, a proposal to renovate an existing garage and add residential units above. Staff commends the addition of residential units downtown, which has great potential to transform an important and vibrant area of downtown Boston.

The existing Dock Square Garage sits on one of the most historically significant locations in the City, near the confluence of the Boston waterfront, the Rose Kennedy Greenway, and the North End neighborhood. The site is also surrounded by recognized Boston Landmarks, including the U.S. Custom House, Quincy Market, Faneuil Hall, and the Blackstone Block, as well as the North and South Market Buildings, which are pending Boston Landmarks.

The current proposal for the Dock Square garage preserves the existing garage, which is a remnant of the bygone Central Artery, since supplanted by a beautiful, active park. The current and proposed Dock Square Garage, which offers the public nothing more than parking spaces, separates the adjacent historic resources, the Greenway, and the North End neighborhood, and it blocks connections and views among these cultural resources. The stacking of an additional structure on top of the garage will further block views of the Custom House tower from the Greenway and North End.

Staff recommends the demolition of the existing garage. There is no valid reason it should be preserved. Above-grade parking is a poor use of this significant parcel. Staff recommends necessary parking be moved below-grade, which would free surface space for active uses, including open space, retail, residential, hotel, and office development. The development proponent would then have increased flexibility to create a unique, dense, vibrant, mixed-use structure on this important site without the adverse impact on heritage resources.

Rowes Wharf and Post Office Square offer a couple local development examples in which parking is strategically located below grade to facilitate open, mixed-use, vibrant active spaces above grade. Active use, particularly open space, would enhance access to the important cultural resources surrounding Dock Square Garage site and enhance the heritage and recreational experience for visitors, residents, retailers, and others.

The Dock Square Garage PDA has the potential to facilitate access, connections, and views of its significant, historic, and popular surroundings. Staff and Commissioners of the Boston Landmarks Commission strongly recommend alternative development schemes that eliminate above-grade parking, open up the site to active uses, and honor the surrounding historic landmarks.

Please do not hesitate to contact BLC staff at (617) 635-3850 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Todd Satter', with a long horizontal stroke extending to the right.

Todd Satter
Staff Architect



Michael Sinatra <michael.a.sinatra@boston.gov>

Dock Square Garage

1 message

Ben Butcher

Sat, Mar 9, 2019 at 5:03 PM

To: "michael.a.sinatra@boston.gov" <michael.a.sinatra@boston.gov>

Dear Mr. Sinatra

I have only recently been made aware that your organization was soliciting comments on the proposed renovation/expansion of the Dock Square Garage. In reviewing the web site for the project, I note that I may have missed the deadline for such comments. My hope is that this email will nonetheless, be considered as a part of the public commentary on the project.

I both live and work in the City of Boston - my wife and I reside on Union Wharf and my company is headquartered at One Federal Street. My daily walk to and from work takes me by the Dock Square Garage twice a day.

Given this familiarity with the Garage, I recognize two important facts:

The Garage's parking spaces are an essential feature in serving both residents of and visitors to our City. The current structure is a relic of a by-gone era when the elevated expressway largely hid it from view.

My business career has been spent almost entirely in the field of real estate. More importantly, my favorite form of artistic expression is architecture. The architecture found in Boston ranges from the outstanding (the Hancock, the Public Library) to the forgettable (the 'Brutalism' of City Hall).

The existing Garage unfortunately tends towards the latter end of the spectrum. With the removal of the elevated I-93 and the beautiful development of the Rose Kennedy Greenway, this has become all too evident.

The proposed redevelopment will provide another element of beauty along the Greenway, while maintaining the vital parking spaces.

Sounds like a win-win to me.

Sincerely,

Ben Butcher
CEO
STAG Industrial

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Michael Sinatra <michael.a.sinatra@boston.gov>

Fwd: Dock Square Garage

1 message

Jeffrey Moore

Tue, Mar 5, 2019 at 10:44 AM

To: "michael.a.sinatra@boston.gov" <michael.a.sinatra@boston.gov>

Michael,

I am writing to you today in support of the redevelopment of the Dock Square Garage. The garage serves as a meaningful purpose to a city in which parking is limited, however being along the Rose Kennedy Greenway and at the entry point to one of the City's most visited areas it is time for this utilitarian parking garage to be redeveloped and enlivened for the betterment of the city, its residents and those that visit.

Additionally with being a resident of the North End for 14 years and with three young children, I appreciate the effort in the design process of the building to protect against shadows on the North End parks and along much of the Greenway.

In closing this is a much needed redevelopment of a monstrous brick structure that currently only serves as a parking structure. The addition of residents, keeping men and women of Boston's trades at work, addition of retail and the activation of this area is the reason why I urge you to support this proposal.

Sincerely,

Jeffrey C. Moore

61 Prince Street – 4B
Boston, MA 02113



Michael Sinatra
Project Manager
Boston Planning and Development Agency
1 City Hall Square
Boston, MA 02201

Re: Dock Square Comment Letter Response

Dear Mr. Sinatra,

We received and reviewed the comments related to the proposed redevelopment of the Dock Square Garage and wanted to respond to the letters sent by the Boston Landmarks Commission and the Boston Preservation Alliance (BPA).

We appreciate the time the Landmarks Commission and BPA took to review our proposal and participate in the process by sending thoughtful letters related to our project. We, too, believe the project will vastly improve the vitality of the area, especially along the Rose Kennedy Greenway. We also agree that the Dock Square Garage is significantly located, close to Faneuil Hall, the Greenway and the North End neighborhood.

While the garage has no historic significance and is not in an area governed by Landmarks, we would like to respond and explain the need to maintain the parking structure and our desire to vastly improve the existing garage with the redevelopment project, as proposed.

The proposed redevelopment of Dock Square has participated in a rigorous community process, with numerous meetings held with our direct abutters, including the merchants and General Manager of Faneuil Hall Marketplace, among other neighbors and community organizations. While Faneuil Hall is a worldwide tourist destination and historic resource, it is also a regional one. Therefore, the number one concern of the merchants that operate daily, is the uninterrupted access to parking at Dock Square Garage for their visitors. Garage operation and statistics support that the majority of users are unique on a daily basis, which confirms the fact that the garage is a regional draw for people coming to explore the area's various resources including Faneuil Hall, The Freedom Trail and The Rose Kennedy Greenway. Further, we received extensive feedback from North End residents that the garage is an important neighborhood resource, especially during snow storms or special events. Overwhelmingly, we heard from the Faneuil Hall merchants that the closing of the garage would be catastrophic and we heard from the community that the parking needs to stay. We think they would disagree with the sentiment that the need for uninterrupted parking is "short-sighted."

We do not agree with the Boston Preservation Alliance that the current garage building is "innocuous" and would encourage a walk around the garage at night, where all sides present a stark, uninviting and potential dangerous situation for pedestrians. Our goal to activate the site, while protecting the parking, will be achieved with new retail along the Greenway (as recommended by various community members), dramatically improved streetscape, landscape and

sidewalks and most significantly, over 200 new residents to energize the area. The thoughtful design on the re-cladding of the garage will certainly improve the existing brick monstrosity and the iconic addition above will add to, not take away from, Boston's diverse skyline.

Based on feedback and suggestions from various organizations and agencies through the process, we have adjusted our design to accommodate a potential carless future and are able to convert the existing garage floors to commercial use. The proposed redevelopment will meet or exceed the sustainability standards of Boston and the US Green Building Council.

We would also be remiss not to mention the new housing this project will create, helping the city realize the housing goal, with the addition of 33 affordable units. This project is in line with the vision outlined in the Greenway District Planning Study Guidelines, appropriately activating the Greenway with new residents and new retail, and improved streetscape to make the Surface Road more inviting to pedestrians. This project will create 250 construction jobs and 20 new permanent jobs and will increase the tax revenue to the city. Also, this project has committed to fund the Greenway Arts Program to bring new art installations to the Greenway, especially on the portion of the park closest to this project, which is a currently underutilized and difficult parcel to activate. Our team plans to be in Boston for the long haul and looks forward to continuing to improve and activate our City for all to enjoy.

A city, even one as old as ours, is a dynamic, constantly evolving place. We appreciate the efforts to protect Boston's historic resources, and this proposed redevelopment does not threaten the historic character of our city. In fact, we believe this project will vastly improve the overall experience in and around one of Boston's most treasured destinations.

Sincerely,



Jonathan Landau
Fortis Development

Jared Alves
Master of Civic Design and Urban Planner
222 North Street #1
Boston, MA 02113

February 19, 2018

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

RE: Dock Square Garage – January 2019 submission

Dear Mr. Sinatra,

Last April, I criticized the proposal to redevelop the Dock Square Garage. At the time, the project presented little benefit for the public realm while retaining the lion's share of the existing parking spaces. I still want the owners to tear down the garage and restore the 35 buildings and 3 streets that once existed at the site. Yet, such a project is unlikely because driving is cheap, and revenue from the garage is high. So, I called on the City to make the project more palatable by requiring three changes:

- Mandate a redesign that provides significant ground floor retail/restaurant coverage;
- Stipulate a long-term development plan to convert the parking levels into habitable space; and
- Reject the plans to retain the wide garage entrance and bisect the pedestrian plaza with a new car drop-off lane.

During the January 2019 public meeting, the proponent revealed that they had incorporated my recommendations. They added 3,500 sq. ft. of ground floor commercial space facing Surface Road, confirmed that the construction methods will ensure that the parking decks could become habitable space in the future, and showed plans without a slip lane. While the developer should still make the garage entrance safer for pedestrians, **I now support this project.**

At the meeting, I heard from a couple neighbors who remain opposed. They argue that (1) dedicating existing parking spaces to new homes will be a hardship on the Faneuil Hall Marketplace, (2) the new homes will be “luxury” apartments and will not help to solve Boston’s housing crisis, and (3) at 160 feet, the building will block the Custom House Tower and is too tall. I will respond to each of these arguments in turn.

First, Faneuil Hall Marketplace is awash in alternatives to driving. The site has direct connections to the T at the State, Haymarket, Aquarium, and Government Center stations. South Station and North Station are also within a reasonable walking distance. Close by is a major bus hub at Haymarket Station and the commuter ferries at Long Wharf. Three BlueBikes stations surround the Marketplace, with a fourth station coming soon.

This rich array of alternatives ignores one basic point. So long as Faneuil Hall Marketplace has restaurants and stores worth visiting, people will make the trip. Having a Uniqlo, Gap, Clarks, etc. is great for people who live nearby, but we’re walking—not driving—from the North End to shop in them. Visitors come to see Faneuil Hall, eat at local restaurants, and experience the things they can’t find at home. A few dozen parking

spaces will not change that calculation. They already priced in the difficulty of parking in Boston when deciding to drive.

Second, “luxury” is a term without meaning. Every builder will tout their project as “luxury” because that’s the term of choice today. No developer who advertises “decent” or “adequate” projects would be in business for long. Luxury or otherwise, new market rate homes in Downtown Boston are likely to be expensive.¹ We do not expect a new car to cost less than a used one, and the same dynamic plays here. Like a new car, these homes will have all the hot features and amenities. We should not oppose them because they are new. We need all the new housing we can get.

Boston is growing and demand for housing in transit-accessible neighborhoods is particularly high. Without new construction, wealthier people will bid up rents and the sale prices of existing homes—no matter their condition—to live in popular neighborhoods. If demand warranted it, my landlord would gut my apartment—with its baseboard electric heating, scuffed floors, and fixtures dating to a 90s renovation—to match the tastes of people who can pay more for the privilege of living close to downtown. Building these 175 or so new homes cannot alone prevent this renovation, but not building them would hasten the change. Despite opposing claims, adding new homes actually lowers rents in gentrifying neighborhoods.²

Third, while the Custom House Tower is one of my favorite buildings, the skyline of a thriving City is ever-changing. The Tower embodies that process. The federal government erected the 430-ft. tower atop a modest custom house because trade was booming and the feds could ignore Boston’s 125-ft. height limit. Nevertheless, the cityscape changed even when Boston was not growing. The Harbor Towers opened in 1971 and they blocked some views of the Custom House from the water. In 1975, The City tore down the Mercantile Market buildings to create a new park and new views.

Many other contemporary views would not exist had the State not razed half of the North End to build the Central Artery. For that reason, today’s views from Hanover and Salem are not historic. They are also not especially beautiful. The Tower is spectacular, but the garage, highway signs, and traffic lights mar the foreground. Still, the views that I am most concerned about are those seen from a pedestrian walking around the garage today.

In the attached photos from North Street and Surface Road, the garage dominates and only the tiniest glimpse of the tower is visible. Adding any number of floors to the top of the garage would not obstruct this nonexistent view. However, the project would replace the wall of brick-clad concrete and bunker-like window slits. Instead, pedestrians would see shops, larger windows, and six new entrances. These changes would result in more eyes on the street and a far more positive pedestrian experience than the status quo.

I wish this project could restore the fine urban grain that predated the 1950s highway construction. However, the developer cannot warp time, command the state to make driving more expensive, or halt the demand for new homes in Downtown Boston. Given these limits, the City should follow the recommendation of the Impact Advisory Group and approve this project, as revised.

Sincerely,

Jared Alves

¹ Per Boston’s Inclusionary Development Policy, 13 percent of the homes will be income-restricted.

² Asquith B.A., Mast E., Reed D. *Does Luxury Housing Construction Increase Nearby Rents?* November 2018.

Attachment: photos of the Dock Square Garage in February 2019 from North Street and Surface Road



BOSTON PRESERVATION ALLIANCE

February 22, 2019

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bostonpreservation.org

Mr. Michael Sinatra
Boston Planning and Development Agency
Boston City Hall
Via email: michael.a.sinatra@boston.gov
Re: Dock Square Garage

Dear Mr. Sinatra,

The Boston Preservation Alliance is Boston's primary, non-profit advocacy organization that protects and promotes the use of historic buildings and landscapes in all of the city's neighborhoods. With 40 Organizational Members, 125 Corporate Members, and a reach of 35,000 friends and supporters we represent a diverse constituency advocating for the thoughtful evolution of the city and celebration of its unique character. We appreciate the opportunity to offer comments on projects that impact the historic character of the city.

The Alliance has participated in a number of design review and public meetings as this proposal has evolved. We have provided feedback at those meetings and we submitted formal comments to the BPDA last April strongly opposing the project. We see little in the revised proposal that addresses our previously stated concerns. Though the proposal has been changed, we feel it remains an inappropriate and unacceptable intrusion into this most historically significant area. Indicative of how our organization feels is the fact that when the most recent renderings were shown to our Board of Directors there was a collective gasp and unanimous shaking of heads, even from many architects highly active in new construction in the city. It's inconceivable how such an egregious affront to the central and character-defining historic assets of this city could even be considered by the BPDA.

Let me be clear, we are not advocating to protect a 1970s parking garage. No one particularly likes the garage, but it is relatively innocuous in its historic context -- certainly not contributing to the urban environment but its negative aspects are relatively contained. And down the road, if many predictions hold true and parking demands are less, it can go away and be replaced with something fitting in scale and massing for its historic environment. This proposal, on the other hand, expands a blemish to an outright neighborhood-wide plague, visible from throughout one of the most touristed and photographed areas of the city. It mars iconic views to and from Faneuil Hall and Quincy Market, the North End, the Custom House Tower, the Greenway, and looms over the highly preserved Blackstone Block. And for what gain? What is the public benefit? The debatable, minor enhancements this may make to the public realm over the existing garage are no match for the negative attributes of the

proposal. Additionally, by placing high end housing atop the garage and encasing the garage in screens and new glass, the proponent would effectively remove an opportunity to do something wonderful in this space when the garage reaches the end of its lifespan. We will entomb effectively forever the volume of that garage plus a conspicuous addition – new and old both grossly inappropriate for this location.

At a time when the City of Boston has claimed a commendable new vision for a future that reduces carbon emissions by encouraging walking, bicycling, and mass transit, this proposal is diametrically opposed to the City's broader messaging. Rejecting this proposal is the right thing to do for the Boston's history and environment. If there is insistence of new construction at this location, this garage should be razed, like others around the city, and a new building designed in deference to this historic context, perhaps with parking below. The short-sighted need for uninterrupted parking today should not drive a poor solution Boston will live with for a century, particularly when such a strategy violates the City's own goals of carbon-neutrality and "contextually sensitive development... to affirm each neighborhood's distinct identity", as stated in the *Imagine Boston 2030* document.

The argument that a project of such out-of-place scale and massing is the only proposal that makes economic sense is a false construct that is used to justify far too many projects that negatively impact the unique aspects of the city. What that often really means is that a project of this scale is necessary to support an erroneous assumption by a purchaser of what could be constructed. However it isn't the city's role to facilitate what may have been a poor business decision. It is not the city's responsibility to rectify what may be a financial loss predicated on approval before such approval was given, especially at the expense of some of the city's most valuable historic resources.

While Boston must continue to evolve and grow, abandonment of the city's identity and duty to steward the most central aspects of what makes Boston unique by allowing this project to forward will be a sure sign that we have lost our way. It will be a sign not just to Boston but to the nation. America looks to Boston as a steward of some of the nation's earliest history. This project will indicate our focus is short-sighted and favors the interests of one developer over the good of the city, its residents and visitors, and future Bostonians.

The BPDA has a responsibility to not simply usher projects through to approval but to reject proposals that fail to benefit the greater good. The tower proposal for One Bromfield, for example, was rejected because it was inappropriate for the context of its surroundings. Similarly inappropriate, the Dock Square Garage proposal does not forward the City's environmental goals, adhere to the zoning guidelines, provide substantial affordable housing, or protect one of Boston's most valuable assets- its historic character. If any proposal moves forward at this sensitive site it should be one that can be supported by residents, advocates like the Alliance, and BCDC. This proposal does not have that support.

We strongly urge the BPDA to reject this proposal.

Thank you,



Greg Galer
Executive Director

CC:

Mayor Martin Walsh, City of Boston
Andrea Campbell, Boston City Council
Annissa Essaibi George, Boston City Council
Michael Flaherty, Boston City Council
Althea Garrison, Boston City Council
Michelle Wu, Boston City Council
Lydia Edwards, Boston City Council
Ed Flynn, Boston City Council
Lynn Smiledge, Boston Landmarks Commission
Rosanne Foley, Boston Landmarks Commission
Elizabeth Stifel, Boston Civic Design Commission
Brona Simon, Massachusetts Historical Commission
Victor Brogna, North End/Waterfront Residents' Association

VICTOR BROGNA
P.O. BOX 130371
BOSTON, MA 02113-0007

February 25, 2019

Michael A. Sinatra, Project Manager
Boston Planning & Development Agency
One City Hall Square, 9th Floor
Boston, MA 02201
michael.a.sinatra@boston.gov

Re: Comments on the Proposed Dock Square Garage Redevelopment in the
Downtown Waterfront – Faneuil Hall Urban Renewal Area

Dear Mr. Sinatra:

Thank you for the opportunity to present my comments on the current proposal for redevelopment at the Dock Square Garage site. After having attended numerous public meetings regarding the initial proposal and later revisions, I firmly oppose the proposal in its current form based upon the irreparable harm it will cause to our physical and cultural environment. I follow my discussion of that harm with a suggestion for a new look at what I and the North End/Waterfront community might support. My reasons for opposing, and my suggestion for an alternate approach, are the following:

1. *The height and massing of the building as now proposed presents a direct and overwhelming negative impact on view sheds from the North End and its Greenway parks.*

The views shown by the attached Exhibit 1 vividly display the massive blocking of view sheds to the Custom House Tower and the downtown skyline which the proposal in its present form would cause. A 'before' and 'after' scenario is presented.

The 'before' is a photograph showing the incomparable view which the North End/Waterfront community and others, including tourists, now enjoy from Greenway Parcel 8, located adjacent to the intersection of Hanover and Cross Streets.

The 'after' is a rendering posted by the developer showing the substantial blocking of those views, also from a Hanover and Cross Street location, by the construction now proposed.

Members of the North End/Waterfront community will tell you to a person how frequently they see delighted tourists taking photos of the Custom House Tower and the downtown skyline from Cross Street, on their way back to the Marriott Hotel or other downtown locations. The delight is not limited to tourists. The North End/Waterfront is the residential community situated closest to the Dock Square Garage site. We share the delight that those views now provide.

The before and after contrast presented by Exhibit 1 tells the story dramatically enough that little else need be said. I add only a quote from the explanation of 'public realm' which appears in Section 1 of Article 28 of the Boston Zoning Code:

"The principle of public realm rests on the belief that the public has a historic, necessary and abiding interest in the way the city develops and changes because cities by their nature and function are public places as well as clusters of private property."

I, together with the North End/Waterfront Residents' Association (NEWRA) seek to assert that historic, necessary and abiding interest which we share in the public realm, by our opposition to the project as proposed. Please be advised that NEWRA, at its monthly meeting on February 14, 2019, voted overwhelmingly to oppose the project in its present form. Comments prior to the vote amply showed that the unacceptable height, massing and resultant view-blocking constituted a major factor in the vote to oppose.

2. *The project as now proposed fails to meet the design requirements of the Greenway District Planning Document and the Greenway District Building Design Guidelines.*

I quote from page 26 of the Greenway District Planning Document of August 2010, where design standards at the Dock Square Garage are specifically addressed:

“The scale and architecture of the existing neighborhood and adjacent landmarks, including Quincy Market, must be respected. This and the desire to preserve and enhance views of the Custom House Tower and to the harbor from City Hall Plaza will dictate massing on this site.”

Clearly, neither the scale nor the architecture of the closest adjacent landmark, Faneuil Hall Marketplace, are respected by the present design. Equally clearly, views of the Custom House Tower are neither preserved nor enhanced.

I was present at a meeting of the Design Review Committee of the Boston Civic Design Commission where the BPDA told the committee that the Guidelines were only guidelines, and need not be observed. One is justifiably left in wonderment with the question why the BRA/BPDA went to the trouble of creating design guidelines in the first place, if they were not intended to be observed. Being less than 10 years old, the guidelines cannot be said now to be out of date.

Just as troubling is the uncertainty as to whom the guidelines will be applied versus who will be exempted from compliance. On what undisclosed basis will the distinction be made? Why should there be any exemption at all? The standards requiring a contextual design, respectful of its historic neighbors, should apply equally to all proponents and their projects. The project as presently proposed should be rejected for failure to meet the design standards.

3. *The proposed project has received a negative evaluation by the Design Review Committee of the Boston Civic Design Commission.*

A consensus was expressed at the December 18, 2018 meeting of the Design Review Committee of the Boston Civic Design Commission, disapproving the current design of the project.

The basis of the disapproval was that the increased height and massing as proposed will create a wall of separation between what is now a continuous historic area from Blackstone Street through to Faneuil Hall Marketplace. One could also add Marshall Street and the area surrounding the Union Oyster House as the beginning of that historic area.

The preservation of building heights in the area has been protected for decades, and should continue to be protected now. In the original Downtown Waterfront – Faneuil Hall Urban Renewal Plan, the maximum building height allowed at the site was 60 feet. The maximum floor area ratio was 6. (Parcel E-8, p. 21 of the Plan.) The current proposal calls for a building height of 160 feet and a floor area ratio (FAR) of 10.2. (Developer's Fact Sheet, para. 6, p. 2.)

An increase in the 60 foot height was allowed when the garage was built, but only to the present 76 feet. Since then, building heights in the area have been carefully restricted, with the result that they do not exceed the modest height set by the garage. The height of the nearby Millennium Bostonian Hotel was held to approximately 74 feet. The height of the Haymarket Hotel on Central Artery/Tunnel Parcel 9 was brought down from 103 feet to 55-60 feet through the successful efforts of the Massachusetts Historical Commission, joined by the Federal Highway Administration.

The entire area is not only of special significance to Boston, it represents an area of significant historical importance to the nation as well. It should continue to be protected by the disallowance of the project presently proposed, where the height is more than 2½ times the original height planned for the parcel, with a consequent increase in FAR from 6 to 10.2.

Current BPDA planners and economic development officers should recognize the soundness of their predecessors' thinking with respect to the preservation of this critically important historic area. We should all be thankful for the restricted heights we now see and enjoy, and we should protect and maintain them to be seen, enjoyed and appreciated by future Bostonians.

3. Underground parking at the garage site should be studied before further action is taken to build on top of the garage.

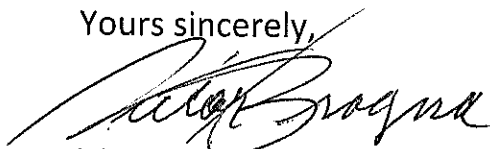
The numerous meetings on the developer's proposal thus far have revealed no detailed investigation of the feasibility of installing underground parking at the site. Underground parking has been successfully installed at numerous other locations in Boston, including in the downtown area. It should be seriously investigated here.

Underground parking would provide the opportunity to remodel the garage structure, or demolish and build a new structure, in either case maintaining a height that preserves views and respects the heights of its neighbors. By following this route, a project might be designed that I and the North End/Waterfront community could support.

In the meanwhile, no further action beyond rejection should be taken on the project. Please recall that at a recent meeting the person presenting on behalf of the developer agreed that the Dock Square Garage was among the highest in the city in terms of the per-parking-space revenue being produced. He did not disagree that, as a result, a no-build alternative would be "feasible." Therefore, no harm will result to the property owner while further proceedings are held in abeyance.

Thank you for considering the issues I have raised, and for your acceptance of this comment letter today.

Yours sincerely,



Victor Brogna

cc:

Mayor Martin J. Walsh, City of Boston
Andrea Campbell, Boston City Council
Annisssa Essaibi George, Boston City Council
Michael Flaherty, Boston City Council
Althea Garrison, Boston City Council
Michelle Wu, Boston City Council
Ed Flynn, Boston City Council
Lydia Edwards, Boston City Council
Andrea Leers, AIA, Chair, Boston Civic Design Commission
Jonathan Greeley, BPDA
Lynn Smiledge, Boston Landmarks Commission
Rosanne Foley, Boston Landmarks Commission
Elizabeth Stifel, Boston Civic Design Commission
Brona Simon, Massachusetts Historical Commission
Geg Galer, Boston Preservation Alliance
Alison Frazee, Boston Preservation Alliance
Senator Joseph Boncore
Representative Aaron Michlewitz

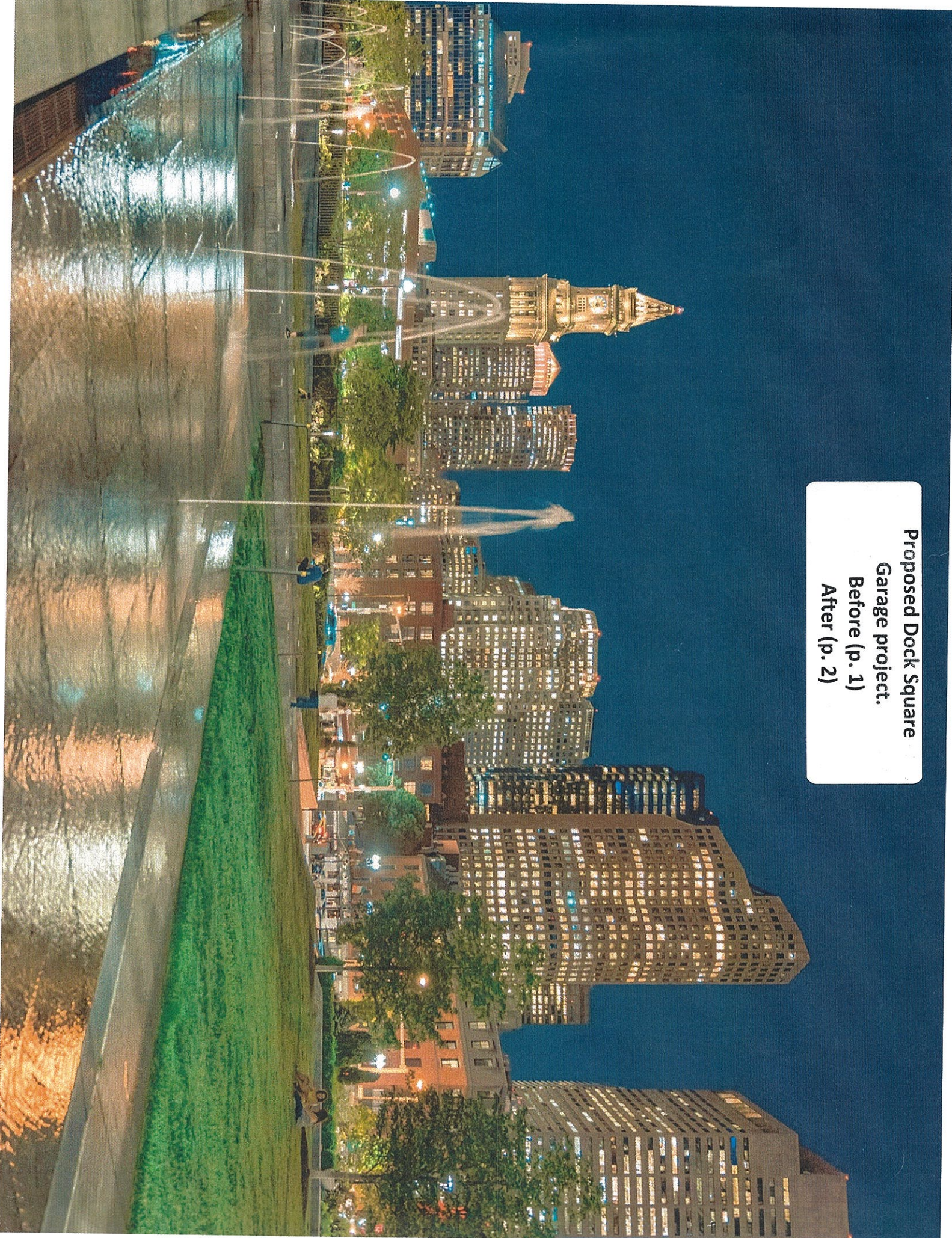
EXHIBIT 1

Blocking of views from Hanover and Cross Street

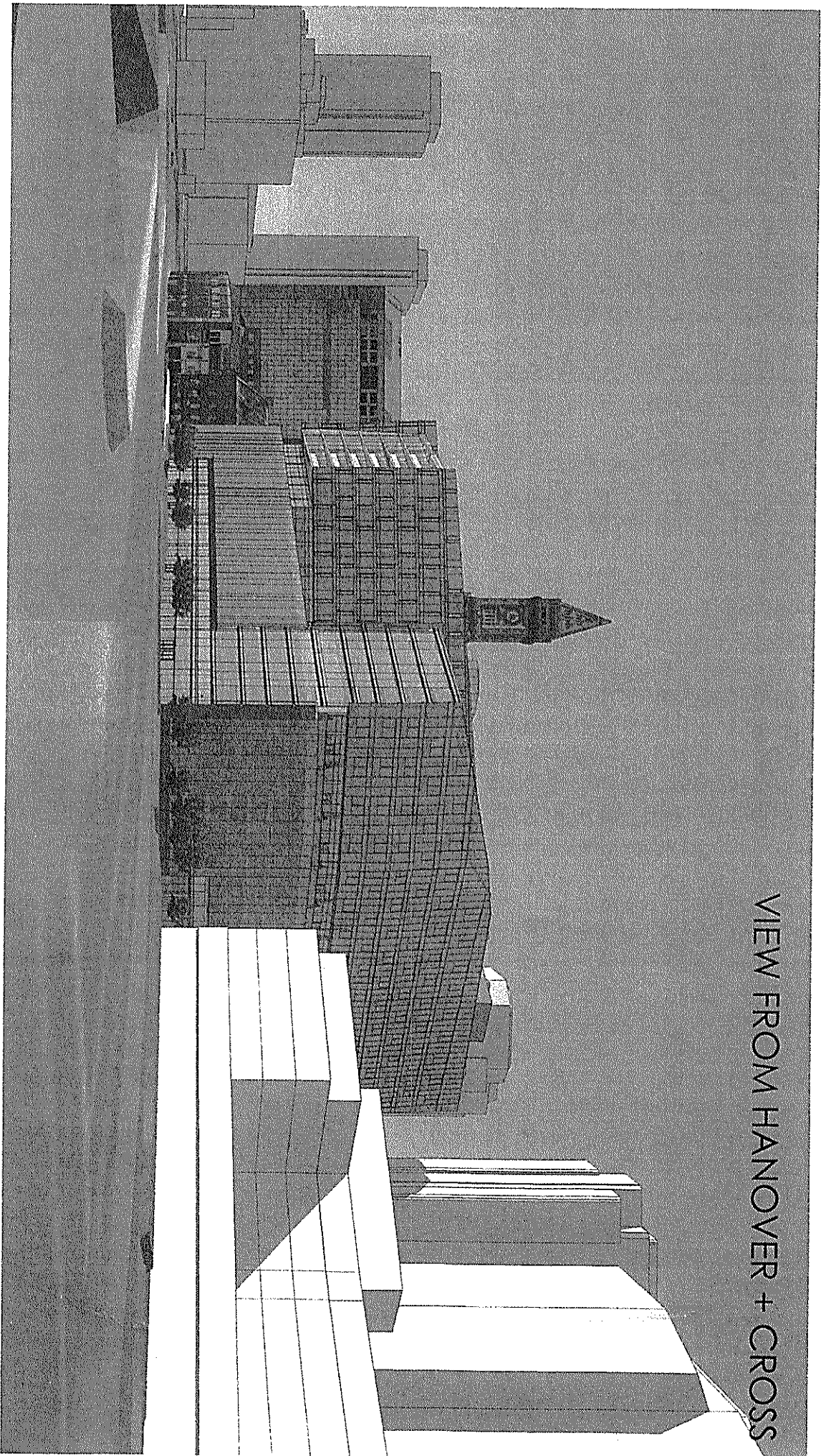
Before – p. 1 (clear views)

After – p. 2 (blocked views)

**Proposed Dock Square
Garage project.
Before (p. 1)
After (p. 2)**



VIEW FROM HANOVER + CROSS



**Boston Water and
Sewer Commission**



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

February 11, 2019

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

Re: Dock Square Garage, Downtown
Planned Development Area

Dear Mr. Sinatra:

The Boston Water and Sewer Commission (Commission) has reviewed the Planned Development Area (PDA) for the proposed Dock Square Garage project located at 20 Clinton Street in the Downtown neighborhood.

The proposed project is located on an approximately 51,027 square feet (sf) site. The site currently contains a seven-story parking structure known as the Dock Square Garage, with 698 parking spaces and 15,000 sf of ground floor restaurant space. The proponent, FPG DS Owner One, LLC and FBG DS Owner Two, LLC (FBG DS Owner, LLC), proposes to build an approximately 220,000 sf, seven-story vertical addition and add approximately 30,000 sf of residential space to the existing floors by a combination of horizontal expansion and conversion of parking area. The project will contain up to 250 multifamily residential units and reduce the parking spaces to up to 650 spaces. The ground floor restaurant space will be reconfigured to 11,500 sf. The site is bounded by Clinton Street to the south, North Street to the northwest and the John F. Fitzgerald Surface Road to the northeast.

The Commission owns and maintains an 8-inch Southern Low PCI water main installed in 1915, a 12-inch Southern High DICL water main installed in 1972, and a 16-inch HPFS DI water main in Clinton Street, a 12-inch Southern Low DICL water main installed in 1976, a 12-inch Southern High DICL water main installed in 1972, a 12-inch Southern High DICL water main installed in 2004 and a 16-inch HPFS DI water main in North Street, and a 16-inch Southern Low DICL water main, a 16-inch HPFS DI water main and a 24-inch Southern High DICL water main, all installed in 1995 in John F. Fitzgerald Surface Road.

For sewage and storm drainage service, the site is served by a 15-inch sanitary sewer that increases to an 18-inch sanitary sewer and a 66-inch storm drain in Clinton Street, a 15-inch



sanitary sewer and a 30-inch by 36-inch and a 42-inch storm drain in North Street, and a 42-inch sanitary sewer and a 66-inch storm drain in John F. Fitzgerald Surface Road.

Water demand and sewage generation estimates were not provided in the PDA.

The Commission has the following comments regarding the PDA:

General

1. Prior to the initial phase of the site plan development, FBG DS Owner, 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. All new or relocated water mains, sewers and storm drains must be designed and constructed at FBG DS Owner, 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.
3. 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.

4. 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/>
5. The water use and sewage generation estimates were not provided with the PDA. The Commission requires that these values be calculated and submitted with the Site Plan. FBG DS Owner, LLC should provide separate estimates of peak and continuous maximum water demand for residential, irrigation and air-conditioning make-up water for the project. Estimates should be based on full-site build-out of the proposed project. FBG DS Owner, LLC should also provide the methodology used to estimate water demand for the proposed project.
6. For any proposed masonry repair and cleaning FBG DS Owner, 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 FBG DS Owner, 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. FBG DS Owner, 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. FBG DS Owner, 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, FBG DS Owner, LLC will be required to apply for a RGP to cover these discharges.
8. FBG DS Owner, 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 FBG DS Owner, LLC's 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, FBG DS Owner, 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. FBG DS Owner, 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. FBG DS Owner, LLC should also provide the methodology used to estimate water demand for the proposed project.
2. FBG DS Owner, LLC should explore opportunities for implementing water conservation measures in addition to those required by the State Plumbing Code. In particular, FBG DS Owner, LLC should consider outdoor landscaping which requires minimal use of water to maintain. If FBG DS Owner, 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. FBG DS Owner, 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. FBG DS Owner, 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, FBG DS Owner, LLC should contact the Commission's Meter Department.



Sewage / Drainage

1. In conjunction with the Site Plan and the General Service Application FBG DS Owner, 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. Developers of projects involving disturbances of land of one acre or more will be required to obtain an NPDES General Permit for Construction from the Environmental Protection Agency and the Massachusetts Department of Environmental Protection. FBG DS Owner, LLC is responsible for determining if such a permit is required and for obtaining the permit. If such a permit is required, it is required that a copy of the permit and any pollution prevention plan prepared pursuant to the permit be provided to the Commission's Engineering Services Department, prior to the commencement of construction. The pollution prevention plan submitted pursuant to a NPDES Permit may be submitted in place of the pollution prevention plan required by the Commission provided the Plan addresses the same components identified in item 1 above.
3. The Commission encourages FBG DS Owner, LLC to explore additional opportunities for protecting stormwater quality on site by minimizing sanding and the use of deicing chemicals, pesticides, and fertilizers.
4. The discharge of dewatering drainage to a sanitary sewer is prohibited by the Commission. FBG DS Owner, 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, FBG DS Owner, LLC will be required to obtain a Remediation General Permit from the Environmental Protection Agency (EPA) for the discharge.



5. FBG DS Owner, 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.
6. 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, FBG DS Owner, LLC will be required to meet MassDEP Stormwater Management Standards.
7. 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.
8. The Commission requests that FBG DS Owner, 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. FBG DS Owner, LLC should contact the Commission's Operations Division for information regarding the purchase of the castings.
9. 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. FBG DS Owner, LLC is advised to consult with the Commission's Operations Department with regards to grease traps.
10. 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/afh

cc: Jonathan Landau, FPG DS Owner One, LLC and FRG DS Owner Two, LLC
K. Ronan, MWRA via e-mail
M. Zlody, BED via e-mail
P. Larocque, BWSC via e-mail



CITY OF BOSTON

THE ENVIRONMENT DEPARTMENT

Boston City Hall, Room 709 • Boston, MA 02201 • 617/635-3850 • FAX: 617/635-3435

February 22, 2018

BOSTON LANDMARKS COMMISSION

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

RE: Dock Square Garage – Planned Development Area

Dear Mr. Sinatra:

Staff and Commissioners of the Boston Landmarks Commission (BLC) have reviewed the Planned Development Area (PDA) submitted for the Dock Square Garage project referenced above and have the following comments:

Thank you for the opportunity to comment on the Dock Square Garage, a proposal to renovate an existing garage and add residential units above. Staff commends the addition of residential units downtown, which has great potential to transform an important and vibrant area of downtown Boston.

The existing Dock Square Garage sits on one of the most historically significant locations in the City, near the confluence of the Boston waterfront, the Rose Kennedy Greenway, and the North End neighborhood. The site is also surrounded by recognized Boston Landmarks, including the U.S. Custom House, Quincy Market, Faneuil Hall, and the Blackstone Block, as well as the North and South Market Buildings, which are pending Boston Landmarks.

The current proposal for the Dock Square garage preserves the existing garage, which is a remnant of the bygone Central Artery, since supplanted by a beautiful, active park. The current and proposed Dock Square Garage, which offers the public nothing more than parking spaces, separates the adjacent historic resources, the Greenway, and the North End neighborhood, and it blocks connections and views among these cultural resources. The stacking of an additional structure on top of the garage will further block views of the Custom House tower from the Greenway and North End.

Staff recommends the demolition of the existing garage. There is no valid reason it should be preserved. Above-grade parking is a poor use of this significant parcel. Staff recommends necessary parking be moved below-grade, which would free surface space for active uses, including open space, retail, residential, hotel, and office development. The development proponent would then have increased flexibility to create a unique, dense, vibrant, mixed-use structure on this important site without the adverse impact on heritage resources.

Rowes Wharf and Post Office Square offer a couple local development examples in which parking is strategically located below grade to facilitate open, mixed-use, vibrant active spaces above grade. Active use, particularly open space, would enhance access to the important cultural resources surrounding Dock Square Garage site and enhance the heritage and recreational experience for visitors, residents, retailers, and others.

The Dock Square Garage PDA has the potential to facilitate access, connections, and views of its significant, historic, and popular surroundings. Staff and Commissioners of the Boston Landmarks Commission strongly recommend alternative development schemes that eliminate above-grade parking, open up the site to active uses, and honor the surrounding historic landmarks.

Please do not hesitate to contact BLC staff at (617) 635-3850 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Todd Satter', with a long horizontal stroke extending to the right.

Todd Satter
Staff Architect



February 25, 2019

Michael A. Sinatra, project manager
Boston Planning & Development Agency
One City Hall Square, 9th Floor
Boston, MA 02201
Via Email: michael.a.sinatra@boston.gov

Re: NEWRA comment letter in opposition to the proposed Dock Square Project

Dear Mr. Sinatra,

I am writing on behalf of the North End/Waterfront Residents' Association (NEWRA) regarding the proposed redevelopment of the Dock Square Garage. At NEWRA's February 14, 2019 monthly meeting the membership voted to oppose the project as now proposed. Prior to the vote, the following points in opposition were raised:

- The height and massing of the proposed building, as shown on the attached 'before' and 'after' photo and rendering, will obstruct views of the Custom House Tower and the downtown skyline, making the structure unacceptable.
- The Greenway District Planning document and Greenway District Building Design Guidelines were discussed and the project's failure to meet the design standards required by those documents was noted with disapproval.
- NEWRA agreed with the Design Review Committee of the Boston Civic Design Commission's disapproval of the project, because the height and massing of the proposed building had the undesirable effect of breaking apart the low-rise historic area that now extends from Blackstone Street to Faneuil Hall Marketplace, thereby creating two separate districts.
- The developers intention of building up to 250 luxury condominiums in the downtown area adjacent to the North End/Waterfront community does nothing to address the lack of affordable housing in the area and was deemed unacceptable and of paramount importance.

During the discussion a NEWRA member who attended the Dock Square Project meeting on February 6 noted that he had asked about the possibility of including underground parking as part of this project. It was noted that parking adjacent to Faneuil Hall is required to serve the needs of the merchants. If parking were put underground, as has been done in several other downtown redevelopment projects, the existing garage might be substantially altered or demolished and replaced by a new low-rise building of more attractive design and acceptable use. His suggestion was summarily dismissed as being too expensive, with no further details given.

NEWRA requests that the developer be asked to pursue an engineering survey and report on the feasibility of underground parking as part of the development plan. We respectfully request that the redevelopment of the Dock Square Garage be put on hold until an underground parking assessment report is complete and reviewed with the community.

Thank you for your attention to community concerns and for agreeing to Victor Brogna's request to file our letter today.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl Delgreco", with a long, sweeping horizontal line extending to the right.

Cheryl Delgreco, president
North End/Waterfront Residents' Association