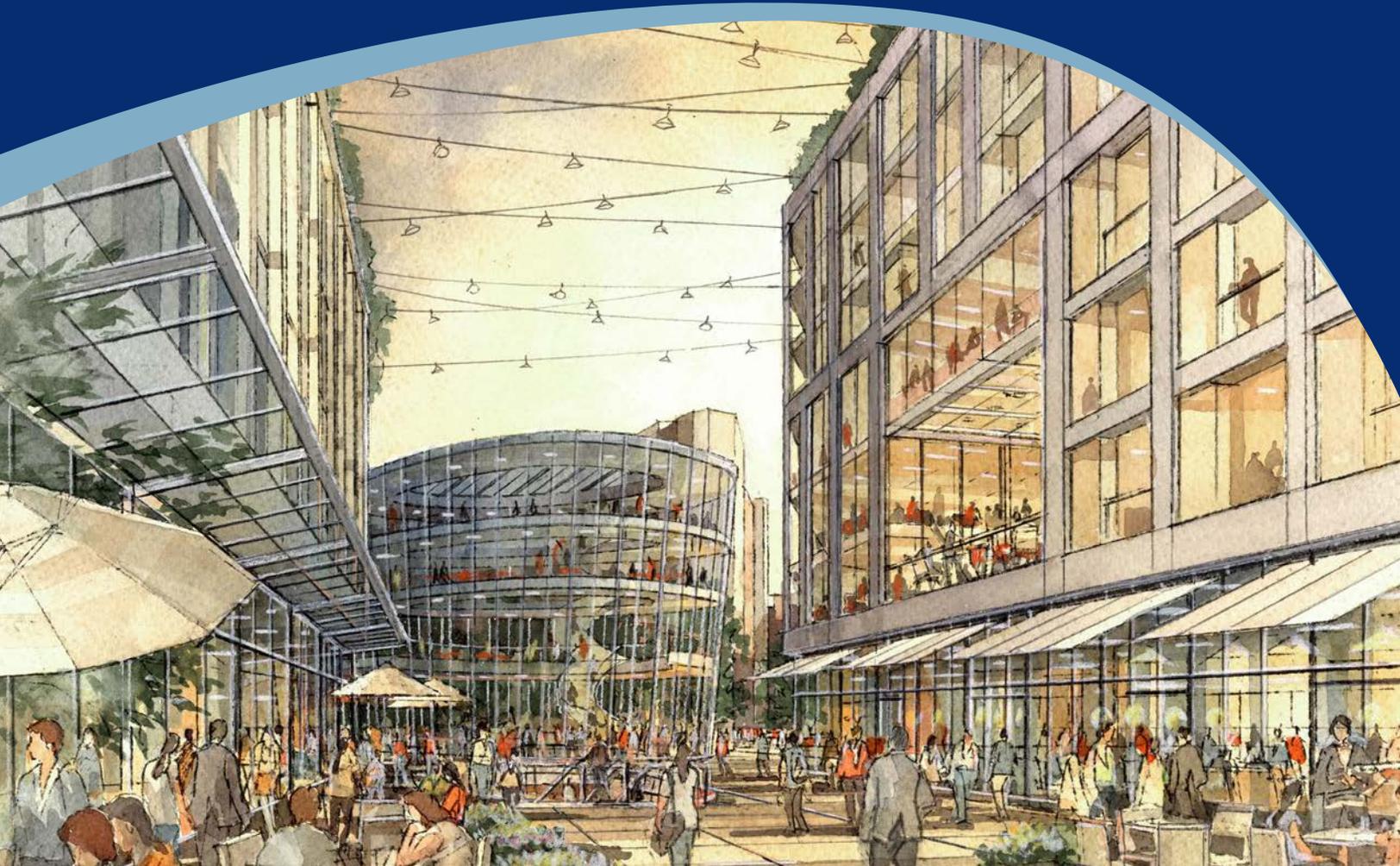


Draft Project Impact Report

Redevelopment of the Government Center Garage

Boston, Massachusetts



SUBMITTED TO
Boston Redevelopment Authority

SUBMITTED BY
The HYM Investment Group, LLC
On behalf of
Bulfinch Congress Holdings, LLC

PREPARED BY
Vanasse Hangen and Brustlin, Inc.

IN ASSOCIATION WITH
CBTarchitects
Howard/Stein-Hudson Associates, Inc.
Rubin and Rudman, LLP
ARUP
McNamara/Salvia Inc.

August 2013



August 23, 2013

Mr. Peter Meade
Director
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201

Re: **Draft Project Impact Report**
Redevelopment of the Government Center Garage
One Congress Street, Boston, Massachusetts

Dear Mr. Meade:

On behalf of Bulfinch Congress Holdings, LLC ("BCH"), the owner of the Project, The HYM Investment Group, LLC ("HYM"), collectively the proposed proponent ("the Proponent") is pleased to submit the enclosed Draft Project Impact Report (DPIR) for the Redevelopment of the Government Center Garage project located at One Congress Street in downtown Boston (the "Project"). BCH (the "Applicant")—purchased the property in 2007 with the primary goal of redeveloping the Garage. In 2010, BCH brought on HYM to operate the Project and to develop a new viable redevelopment plan on behalf of BCH. On June 5, 2013, the Proponent filed a Project Notification Form (PNF). The Scoping Determination was issued on August 9, 2013.

One of the primary development goals of the Project is to substantially revitalize a key portion of the Government Center Urban Renewal Plan Area, which had originally been developed as a 9-story 2,300-car parking garage (the "Garage"). The Garage has come to be seen as a barrier between the Bulfinch Triangle, the North End, Government Center, Beacon Hill and the West End neighborhoods. By replacing a massive unsightly barrier with two new vibrant mixed-use and appropriately scaled urban blocks, the Project will substantially contribute to improving the vitality and the urban design and architectural character of the Government Center and Bulfinch Triangle areas.

Following the PNF filing and upon receiving comments and feedback from the community and the Boston Redevelopment Authority (BRA), the Proponent has agreed to the following key changes for the Project:

- Lowered the proposed 600-foot office building on the West Parcel (WP-B2) to 528 feet, a reduction of 72 feet in height. In addition, the office building has been setback further from Bowker Street and will be further shaped as its design advances.
- Lowered the proposed 275-foot proposed hotel/condominium building (EP-B1) to 157 feet a reduction of 118 feet in height. This brings this proposed building closer to the heights of the adjacent Bulfinch Triangle, while still bringing a vibrant hotel use to the East Parcel.

- Major change in Project phasing with moving up the garage demolition from Phase 3a to Phase 2a, allowing one of the major community benefits to be achieved much earlier in the redevelopment. In addition, it will allow the construction impacts of the garage demolition to be complete prior to the majority of the proposed buildings coming online.
- Reduction of overall Project density by 122,000 square feet, which is primarily a reduction in office square footage. Also, an additional 30,000 square has been shifted from office use to residential use. The combination of which is reducing the overall impacts of the Project, particularly during the peak hours.
- Increased public open space with the redesign of the East Parcel, which increased the size of the new public plaza as well as the bus passenger waiting areas at the MBTA Haymarket bus facility.

Combined, these changes and other modifications will lessen the overall impacts of the Project, as demonstrated in this DPIR. The DPIR presents a full discussion of changes to the Project since the PNF. The Project as presented herein consists of the construction of six new buildings and reuse of a portion of the existing Garage in order to create a vibrant mix of uses that will enhance the surrounding neighborhood with new residential and retail activity, and provide for public realm improvements. The Project will introduce 812 new housing units (apartments and condominiums) and 196 new hotel rooms to the area as well as provide a total of approximately 1.15 million gross square feet of office and 82,500 gross square feet of retail. The remaining portion of the parking garage, which proposed 1,159 parking spaces which remains unchanged in this DPIR, will continue to provide sufficient commercial parking (for transient users) as well as overnight resident parking.

Overall, the Project will achieve the following key goals and benefits to the area:

1. The redevelopment project, by demolishing a substantial portion of the garage, will reconnect now-divided neighboring communities including the Bulfinch Triangle, the North End, Government Center, Beacon Hill, the West End, and would open Congress Street to daylight for the first time in almost half a century.
2. Create 18/7 activity with the introduction of 812 residential units which will add additional residents to an area that often has little activity after 5:00 pm – except for Bruins and Celtics games.
3. Create a new public plaza and pedestrian promenade, with a significant program of first floor retail, to serve as a gateway and connector between the Bulfinch Triangle (Canal Street), the Rose F. Kennedy Greenway and the emerging Market District.
4. Further transform the former site of an auto-centric above grade garage into a mixed-use transit oriented development with the construction of a new Hubway Station, new bike lanes on adjoining streets where none exist today and an enclosed secure 850-space bicycle parking center, which would be one of, if not the largest, bicycle parking center in the City of Boston.
5. Provide a unique and sustainable project through the redevelopment and reuse of a portion of the existing Garage and by utilizing the Leadership in Energy and Environmental Design (LEED) Green Building Rating System, in compliance with Article 37 of the City's Zoning Code (to target LEED Gold rating for office buildings and LEED Silver rating for residential buildings).



6. The redevelopment will create approximately 2,600 construction jobs, over \$11 million in annual tax revenue and bring over 6,000 new employees from the creative industry, technology, lifestyle and health care sectors to a part of Boston traditionally dominated by government tenants.
7. Employ a multi-phased development approach and schedule which will allow the construction of major project phases without removing the entire parking structure and insure a continued parking supply for the area, particularly for commercial parking (daily transient users/visitors) and overnight resident parking.

Requests for copies of this submittal should be directed to Lauren DeVoe at 617-924-1770 or via e-mail at ldevoe@vhb.com.

We look forward to working with you, your staff and the community in your continuing review of this project.

Very truly yours,

The HYM Investment Group, LLC

Thomas O'Brien
Managing Partner

Enclosure

Redevelopment of the Government Center Garage

Boston,
Massachusetts

Submitted to **Boston Redevelopment Authority**

Proponent **HYM Investment Group, LLC**
on behalf of Bulfinch Congress Holdings, LLC
One Congress Street
Boston, MA 02114

Prepared by **Vanasse Hangen Brustlin, Inc.**

99 High Street, 10th Floor
Boston, MA 02210

In association with:

CBTarchitects

Howard/Stein-Hudson Associates, Inc.

Rubin and Rudman, LLP

ARUP

McNamara Salvia

August 2013

Table of Contents

Chapter 1: Project Description

1.1 Introduction	1-1
1.1.1 Review Process Overview/Background	1-2
1.1.2 Public Outreach	1-2
1.1.3 Key Project Changes since the PNF	1-3
1.2 Description of the Proposed Project	1-4
1.2.1 Project Area Location and Context	1-4
1.2.2 Design Development	1-5
1.3 Project Alternatives	1-11
1.4 Summary of Public Benefits	1-11
1.4.1 Other Public Benefits	1-14
1.4.2 Implementation of Public Benefits	1-15
1.5 Public Participation/Outreach and Agency Coordination	1-15
1.5.1 Public Participation	1-15
1.5.2 Agency Coordination	1-18
1.6 DPIR Report Contents	1-19

Chapter 2: General Information and Regulatory Context

2.1 Introduction	2-1
2.2 Applicant and Project Team	2-1
2.2.1 Disclosure of Beneficial Interests	2-3
2.3 Legal Information	2-3
2.3.1 Legal Judgments or Actions Pending Concerning the Proposed Project	2-3
2.3.2 History of Tax Arrears on Property Owned in Boston by the Proponent	2-3
2.3.3 Evidence of Site Control	2-3
2.3.4 Site Control/Public Easements	2-4
2.4 Project Area Description	2-4
2.4.1 Background and History	2-4
2.4.2 Existing Site Conditions and Ownership	2-4
2.4.3.2 Ownership	2-5
2.4.4 Description of Metes and Bounds of Project Site	2-6
2.4.5 List of Nearby Property Owners	2-6
2.5 Regulatory Controls and Approvals	2-7
2.5.1 Government Center Urban Renewal Plan Area	2-8
2.5.2 Zoning – PDA Plan Approval	2-9
2.5.3 Massachusetts Environmental Policy Act Review	2-10
2.5.4 City of Boston Zoning Code Article 80B – Large Project Review	2-10

2.5.5 Boston Landmarks Commission 2-12
2.5.6 Boston Parks Department..... 2-12
2.5.7 Federal Aviation Administration Airspace Requirements..... 2-12

Chapter 3: Urban Design

3.1 Introduction 3-1
3.2 Design Development 3-2
 3.2.1 Building Height..... 3-2
 3.2.2 Massing Strategy 3-2
3.3 Architecture and Materiality 3-3
3.4 Public Realm and Open Space..... 3-4
 3.4.1 Green Roofs & Roof Gardens..... 3-5
3.5 Service Access and Loading 3-5

Chapter 4: Transportation and Parking

4.1 Introduction 4-1
 4.1.1 Project Description..... 4-1
 4.1.2 Trip Generation 4-2
 4.1.3 Parking..... 4-7
4.2 MBTA Transit Capacity..... 4-9
 4.2.1 MBTA Long-term Service Planning..... 4-9
 4.2.2 DPIR Transit Impacts..... 4-9
 4.2.3 DPIR Haymarket Design Improvements 4-10
4.3 Transportation Access Plan Agreement 4-13

Chapter 5: Environmental Protection

5.1 Introduction 5-1
 5.1.1 Overview of Impacts Studied 5-1
5.2 Wind..... 5-2
 5.2.1 Methodology 5-2
 5.2.2 Pedestrian Level Wind Findings 5-4
5.3 Shadow..... 5-5
 5.3.1 Rose F. Kennedy Greenway North End Parcels..... 5-6
 5.3.3 Charles River 5-7
 5.3.4 Boston Harbor 5-7
 5.3.5 Other major open spaces..... 5-7
 5.3.6 Daylighting of Congress Street 5-7
5.4 Daylight..... 5-8
 5.4.1 Key Findings 5-8
 5.4.2 Methodology 5-8
 5.4.3 Existing/No-Build Daylight Conditions..... 5-9
 5.4.4 Build Daylight Conditions 5-10
5.5 Air Quality 5-10

5.5.1 Summary of Key Findings.....	5-11
5.5.2 Air Quality Background and Regulatory Context	5-11
5.5.3 Mobile Source Analysis.....	5-14
5.4.4 Parking Garage Emissions Analysis	5-35
5.5.5 Stationary Sources.....	5-36
5.6 Noise.....	5-37
5.6.1 Summary of Key Findings.....	5-37
5.6.2 Noise Background.....	5-37
5.6.3 Noise Regulatory Context.....	5-39
5.6.4 Noise Assessment Methodology.....	5-41
5.6.5 Existing Noise Conditions	5-43
5.6.6 Potential Project-Related Noise Sources.....	5-43
5.6.7 Noise Assessment Findings.....	5-45
5.7 Temporary Construction Impacts.....	5-46
5.7.1 Construction Air Quality	5-47
5.7.2 Construction Noise.....	5-48
5.7.3 Construction Truck Traffic.....	5-48
5.8 Rodent Control Post-Construction	5-49
5.9 Sustainable Design/Green Building.....	5-49
5.9.1 Sustainable Design Approach Overview.....	5-49
5.9.2 Sustainability Goals, Targets, and Strategies	5-50
5.9.3 Next Steps	5-51
5.10 Historic Resources.....	5-51

Chapter 6: Infrastructure

6.1 Introduction	6-1
6.2 Sanitary Sewer	6-1
6.3 Water Supply	6-3
6.4 Stormwater Management	6-3
6.5 Utilities	6-5
6.5.1 Energy.....	6-5
6.5.2 Telecommunications.....	6-6
6.5.3 Steam.....	6-6

Chapter 7: Responses to Comments

TECHNICAL APPENDICES

Appendix A – Wind Supporting Documentation

Appendix B – Shadow Supporting Documentation

Appendix C – Air Quality Supporting Documentation

Appendix D – Noise Supporting Documentation

Appendix E – Construction Supporting Documentation

Appendix F – List of Property Owners

Appendix G – Metes and Bounds Description

Appendix H – Supplemental Graphics

List of Tables

Table	Description	Page
Table 1-1	Height and Massing Changes	1-6
Table 2-1	Ownership Information	2-6
Table 2-2	List of Anticipated Permits and Approvals.....	2-7
Table 2-3	Development Review Components Evaluated.....	2-11
Table 4-1	Land Use Summary by Parcel - Existing, PNF Program, and DPIR Program	4-2
Table 4-2	Land Use Comparison PNF Program and DPIR Program	4-2
Table 4-3	Project Vehicle Trip Generation Comparison.....	4-3
Table 4-4	Project Transit Trip Generation Comparison.....	4-4
Table 4-5	Project Pedestrian Trip Generation Comparison.....	4-6
Table 4-6	Net New DPIR Trip Generation for Project Site	4-7
Table 4-7	Project Parking Demand	4-8
Table 4-8	Project Shared Use Parking – DPIR Program.....	4-8
Table 4-9	MBTA Subway Operations – Impact during AM Peak Period	4-11
Table 5-1	Boston Redevelopment Authority Mean Wind Criteria	5-3
Table 5-2	National Ambient Air Quality Standards.....	5-13
Table 5-3	Predicted Maximum 1-Hour CO Concentrations: Morning Peak Hour	5-18
Table 5-4	Predicted Maximum 1-Hour CO Concentrations: Evening Peak Hour	5-20
Table 5-5	Predicted Maximum 8-Hour CO Concentrations: Morning Peak Hour	5-21
Table 5-6	Predicted Maximum 8-Hour CO Concentrations: Evening Peak Hour	5-23
Table 5-7	Predicted Maximum 24-Hour PM10 Concentrations: Morning Peak Hour	5-25
Table 5-8	Predicted Maximum 24-Hour PM10 Concentrations: Evening Peak Hour	5-27
Table 5-9	Predicted Maximum 24-Hour PM2.5 Concentrations: Morning Peak Hour	5-29
Table 5-10	Predicted Maximum 24-Hour PM2.5 Concentrations: Evening Peak Hour	5-31
Table 5-11	Predicted Maximum Annual PM2.5 Concentrations: Morning Peak Hour.....	5-32
Table 5-12	Predicted Maximum Annual PM2.5 Concentrations: Evening Peak Hour.....	5-34
Table 5-13	Garage Ventilation Fan Parameters.....	5-36
Table 5-14	Predicted Annual Emissions for the Garage Ventilation Fans.....	5-36

Table 5-15	Common Outdoor and Indoor Sound Levels.....	5-38
Table 5-16	City of Boston Zoning District Noise Standards	5-40
Table 5-17	Sensitive Receptor Location Sound Levels.....	5-46
Table 6-1	Net New Wastewater Generation.....	6-2

List of Figures

***Note: All figures are located at the end of each chapter.**

<u>Figure No.</u>	<u>Description</u>
1.1	Site Location Map
1.2	Site Context
1.3	Aerial Image of the Existing Garage
1.4	Existing Conditions Site Plan
1.5	Existing Site Photographs
1.6	Proposed Ground Floor Plan
1.7	Phasing Summary
1.8a	Enabling Phase (Existing Conditions)
1.8b	Phase 1 (WP-B1)
1.8c	Phase 2A (Garage Demolition)
1.8d	Phase 2B (WP-B2)
1.8e	Phase 3A (East Parcel)
1.8f	Phase 3B (WP-B3)
3.1a	Massing Changes - Height
3.1b	Massing Changes - Open Space
3.2	Greenway Guidelines
3.3	Urban Form Concept Diagrams
3.4	Aerial Rendering
3.5	Public Realm Plan
3.6	Neighborhood Plan
3.7	Land Use Diagram

5.1a	Shadow Study Historic Sites Key Map
5.1b	March 21 9:00AM Shadow Studies
5.1c	March 21 12:00PM Shadow Studies
5.1d	March 21 3:00PM Shadow Studies
5.1e	March 21 5:00PM Shadow Studies
5.1f	June 21 9:00AM Shadow Studies
5.1g	June 21 12:00PM Shadow Studies
5.1h	June 21 3:00PM Shadow Studies
5.1i	June 21 5:00PM Shadow Studies
5.1j	September 21 9:00AM Shadow Studies
5.1k	September 21 12:00PM Shadow Studies
5.1l	September 21 3:00PM Shadow Studies
5.1m	September 21 5:00PM Shadow Studies
5.1n	December 21 9:00AM Shadow Studies
5.1o	December 21 12:00PM Shadow Studies
5.1p	December 21 3:00PM Shadow Studies
5.2a	March 21 9:00AM Shadow Comparison between PNF and DPIR Scheme
5.2b	March 21 12:00PM Shadow Comparison between PNF and DPIR Scheme
5.2c	March 21 3:00PM Shadow Comparison between PNF and DPIR Scheme
5.2d	March 21 5:00PM Shadow Comparison between PNF and DPIR Scheme
5.2e	June 21 9:00AM Shadow Comparison between PNF and DPIR Scheme
5.2f	June 21 12:00PM Shadow Comparison between PNF and DPIR Scheme
5.2g	June 21 3:00PM Shadow Comparison between PNF and DPIR Scheme
5.2h	June 21 5:00PM Shadow Comparison between PNF and DPIR Scheme
5.2i	September 21 9:00AM Shadow Comparison between PNF and DPIR Scheme
5.2j	September 21 12:00PM Shadow Comparison between PNF and DPIR Scheme
5.2k	September 21 3:00PM Shadow Comparison between PNF and DPIR Scheme
5.2l	September 21 5:00PM Shadow Comparison between PNF and DPIR Scheme
5.2m	December 21 9:00AM Shadow Comparison between PNF and DPIR Scheme
5.2n	December 21 12:00PM Shadow Comparison between PNF and DPIR Scheme
5.2o	December 21 3:00PM Shadow Comparison between PNF and DPIR Scheme
5.2p	June 21 Rose Kennedy Greenway Overlapping Shadow Study
5.3a	Daylighting Analysis - Center of Bowker Street
5.3b	Daylighting Analysis - Center of New Sudbury Street
5.3c	Daylighting Analysis - Center of Surface Road
5.3d	Daylighting Analysis - Center of New Chardon Street
5.3e	Daylighting Analysis - Center of East Parcel Public Plaza
5.4	Microscale (Hot-Spot) Air Quality Analysis Intersection Locations
5.5	Noise Monitoring Locations
5.6	Timeline of Neighboring Developments
5.7a	Preliminary LEED-New Construction Scorecard for Residential Components
5.7b	Preliminary LEED-Core & Shell Scorecard for Office Components

Technical Appendix Figures

***Note: The following figures are provided electronically on CD-ROM.**

A	Pedestrian Wind Model Exhibits
B	Expanded Shadow Impact Diagrams
E.1	Proposed Construction Logistics Plans
E.2	Proposed Construction Truck Routes
H	Supplemental Graphics, including:
	Context Photos
	Elevation Plans
	Pedestrian and Vehicular Circulation Plans
	Building Sections
	Floor Plans
	View Simulations

1

Project Description

1.1 Introduction

Consistent with Article 80 of the Boston Zoning Code and Enabling Act (the “Code”), this Draft Project Impact Report (DPIR) responds to the Scoping Determination issued by the Boston Redevelopment Authority (BRA) based on the review of the Project Notification Form (PNF) submitted for the Redevelopment of the Government Center Garage project (the “Project”), pursuant to Section 80B-5.3 of the Boston Zoning Code (the “Code”).

The Project is generally located at One Congress Street between New Sudbury and New Chardon Streets in the Government Center area of Boston (the “Project Site”). Refer to Figure 1.1 for a site location map. A remnant of the urban renewal era with an outdated program and planning form, the Project Site contains an antiquated and underutilized 11-story above grade parking garage structure with failing retail. Additionally, the Government Center Garage (the “Garage”) is a physical, visual, and perceptual barrier between the surrounding neighborhoods. The prime objective of the Project is to break-up the existing 1960’s urban renewal mega-block by opening Merrimac Street (referred to herein as Congress Street)¹ to air and daylight and creating two new vibrant, mixed use, appropriately scaled urban blocks with active and pedestrian-friendly ground floors and unique public spaces that will reconnect the areas around it. The Project aims to be a leader in sustainable, transit-oriented, and integrated redevelopment that will serve as a catalyst for further redevelopment of the Government Center area. By bringing back uses, such as residential and retail (which previously existed prior to 1960’s urban renewal of the area) and introducing new office tenants from the new economy (high tech and creative industry), the Project will revitalize the area, which is currently dominated by government office use.

The Project is consistent with a number of the city’s planning goals and initiatives for redevelopment of the area, including: (i) the Greenway District Planning Study Use and Development Guidelines (specifically, the Market District and Government Center sub-district); (ii) the Crossroads Initiative; (iii) Boston Complete Streets Guidelines; (iv) the Climate Action Plan; (v) the updated Open Space Plan; (vi) Article 45, Government Center/Markets District of the Zoning Code; and (vii) Article 37, Green Buildings of the Zoning Code. Also, the Project supports many regional and state-wide planning goals and initiatives.



¹ The portion of the public way that runs under the Garage is commonly referred to as Congress Street; however, according to the City of Boston’s Street Book, it is named Merrimac Street.

This DPIR directly addresses the BRA Scoping Determination as well as comments received from city agencies and the public on the PNF that are within the framework of the criteria outlined in the Scoping Determination. This report provides an update on the Project and presents supplemental analysis of potential environmental impacts to continue to inform reviewing agencies and the community about the Project, its potential impacts, and the mitigation measures proposed to address those potential impacts.

The following chapter describes the changes to the Project since the PNF and presents an overview of the ongoing public review and participation process. A summary of public benefits and outline of subsequent sections of this report are also included.



1.1.1 Review Process Overview/Background

On June 21, 2011, in accordance with the BRA's policy on mitigation as outlined in Mayor Thomas M. Menino's Executive Order Relative to the Provision of Mitigation by Development Projects in Boston, The HYM Investment Group, LLC (the "Developer") on behalf of Bulfinch Congress Holdings, LLC (the "Applicant," or "BCH")², collectively the "Proponent", submitted a Letter of Intent (the "LOI") for the Project. The Proponent then submitted the PNF to the BRA on June 5, 2013 for agency and public review, in accordance with Article 80 of the Code. Notice of the receipt by the BRA of the PNF was published in the Boston Herald on June 6, 2013, which initiated the reconvening of the Mayorally appointed Impact Advisory Group (IAG) and a 30-day public comment period. The Proponent also agreed to an extension of the public comment period for an additional week, which was requested by the BRA and community. The Scoping Determination requires the Proponent to respond to comments received from City and State agencies, elected officials, IAG and the public. Pursuant to Section 80B-5.3 of the Code, a scoping session was held on June 19, 2013 with the City of Boston's public agencies at which time the Project was reviewed and discussed. Members of the IAG were also invited to attend the scoping session.

Written comments in response to the PNF were submitted to the BRA from elected officials and the City's public agencies as well as community organizations and the general public (i.e., local residents and business owners). On August 9, 2013, the BRA issued the Scoping Determination, which outlines additional information and/or analyses required for continued agency and public review. Copies of comments received by the BRA during the comment period and complete responses to comments within the framework of the criteria outlined in the Scoping Determination are included in Chapter 7, *Responses to Comments*.



1.1.2 Public Outreach

The Proponent has engaged in a highly public and transparent process to inform reviewing city and state agencies, elected officials, community representatives, and the general public about the Project. To date, the Proponent has held dozens of meetings with various civic organizations, elected officials, and community representatives, including, but not limited to:

- Downtown North Association



² BCH is a Delaware limited liability company, whose members are NEBF Real Estate and UKI Boston, LLC.

- Beacon Hill Civic Association
- West End Civic Association
- Boston Harbor Association Staff
- Save the Harbor, Save the Bay Staff
- Greenway Conservancy Staff
- Friends of the North End Park Leadership
- North End Waterfront Residents Association (NEWRA)
- Mayor Menino and Staff
- Rep. Jay Livingstone
- Councilor Michael Ross (Staff)
- Councilor Sal LaMattina
- Senator Anthony Petrucelli
- Rep. Aaron Michelwitz
- Councilor-At-Large/City Council President Stephen Murphy
- City of Boston Neighborhood Services
- David Kubiak
- Dan Wilson
- Joanne Fantasia
- Karen Cord- Taylor

In addition to the BRA public hearing held on June 19, 2013, the BRA review process included a series of Impact Advisory Group (IAG) meetings --all of which were made open to the public and were publically advertised -- to go over the Project and specific topics, as needed/requested. IAG working sessions were held on June 12, June 19, June 26, July 10, August 7, and August 23, 2013 at Boston City Hall that were made open to the public and were publicly advertised. The Proponent has also met with various city agencies/departments, various departments of the MBTA, and the Massachusetts Environmental Policy Act (MEPA) Office. The public will have the opportunity to review this DPIR report as well as future documents submitted for individual Project Components, as required.



1.1.3 Key Project Changes since the PNF

Upon receiving comments and feedback from the community and the BRA, the Proponent has agreed to lower both the height and density of the Project overall. Specifically, the Proponent has lowered the proposed 600-foot office building on the West Parcel (WP-B2) to 528 feet (representing a 12 percent reduction) and also lowered the proposed 275-foot proposed hotel/condominium building (EP-B1) to 157 feet. In addition, the overall proposed square footage of new uses has been reduced by approximately 122,000 gross square feet. Combined, these changes will lessen the overall impacts of the Project, as demonstrated in this DPIR.

The Proponent also revised the overall phasing of the Project with the goal of realizing the key public benefit of the removal of the existing garage structure over Congress Street sooner. The demolition of the eastern portion of the Garage has been moved up to Phase 2A. This change in phasing will allow the construction impacts of the garage demolition to be complete prior to the majority of the proposed buildings coming online. These changes, as well as other design improvements are discussed more fully below.

1.2 Description of the Proposed Project

Figure 1.6 shows the proposed ground floor plan. Essentially, the Project consists of the transformation of an underutilized urban renewal above-grade parking structure into a vibrant transit-oriented mixed use development with a new public plaza and pedestrian connector. Redevelopment of the Project Site includes phased demolition of approximately half of the existing garage structure and construction of new residential, hotel, retail, and office space. A key goal and public benefit of the Project is to eliminate the eastern portion of the existing garage building that spans over Congress Street and the MBTA Haymarket bus facility; thereby, creating two distinct and appropriately scaled development parcels: the “West Parcel” and “East Parcel” (named after their location with reference to re-opened Congress Street).

The following sub-sections describe the Project, including an overview of the project area, a discussion on the project changes. Chapters 2 through 6 of this DPIR provide additional detailed information on the Project and Chapter 7, *Responses to Comments* contains the responses to public and agency comments.



1.2.1 Project Area Location and Context

The Project Site is located within the 1964 Government Center Urban Renewal District, the more recently established Government Center/Markets District (Article 45 of the Code), and the Sudbury Street Restricted Growth Area. The Project Site is generally bounded by New Chardon Street to the north, the John F. Fitzgerald Surface Road (the “Surface Road”)/Interstate-93 (I-93) Ramp Parcel to the east, New Sudbury Street to the south, and Bowker Street to the west. Refer to Figures 1.2 and 1.3 for project area context.

The Project Site is immediately adjacent to the following two distinct urban neighborhoods:

- Government Center – the location of Boston City Hall, Suffolk County courthouses, and state and federal office buildings, and
- Bulfinch Triangle, which consists of sports/entertainment uses (e.g., Boston TD Garden complex), offices, retail and residential buildings.

The Project Site is also nearby and/or connected to the following additional urban neighborhoods or distinct sections of the city:

- North End, which consists of residential and neighborhood retail, including restaurants;
- Market District and the Rose F. Kennedy Greenway (also referred to herein as the “Greenway”);
- Financial District, which consists of office uses;
- West End, which consists of residential uses and, further northwest, institutional uses (e.g., hospitals/ medical offices); and
- Beacon Hill residential neighborhood.

This very mixed context offers many challenges, but also the opportunity to create a very positive intervention and reconnect the Project Site to these surrounding areas. The Project has the potential to unlock the value of various uses in close proximity.

Figure 1.4 shows the existing conditions site plan and Figure 1.5 contains photographs of the current site conditions. The existing garage site totals approximately 176,549 square feet (approximately 4.053 acres), including Congress Street, and is comprised of a single fully built out parcel bounded by New Sudbury and New Chardon Streets on the south and north, respectively. The existing garage site is bisected in a north-south direction by an extension of Congress Street forming the major vehicular spine.



1.2.2 Design Development

The evolution of the project design takes BRA, community, and other public entities feedback and comments into consideration. The project design has been improved in the following ways:

- The height of the West Parcel office building (WP-B2) has been lowered by 72 feet to 528 feet (representing a 12 percent reduction in height). In addition, WP-B2 has been set back further from Bowker Street allowing for a more generous buffer with the adjacent block to the west.
- The height of the condominium/hotel building on the East Parcel (EP-B1) has been reduced from 275 feet to 157 feet, which more closely complies with the Greenway Guidelines.
- The overall development program has been reduced by 122,800 gross square feet.
- In addition, approximately 30,000 gross square feet of office space has been shifted to residential space, which has also lowered the impact of the overall project.
- The Proponent has changed the overall phasing of the Project by moving up the demolition of the garage from Phase 3a to Phase 2a, with the goal of realizing the key public benefit of the removal of the existing garage structure over Congress Street sooner.
- The proposed public plaza on the East Parcel has been widened with the redesign of EP-B1 to enhance the quality of the space
- The depth of the MBTA Haymarket bus facility platform has been enlarged by approximately 10 feet to allow for safer pedestrian operation and better functionality
- Two (2) floors have been added to WP-B1 (Residential Building). In addition, the floor plate of WP-B1 has increased slightly to allow for an additional unit per floor.
- Two (2) floors have been added to EP-B2 (Office Building) bringing its height to approximately 152 feet which is consistent with the heights in the Bulfinch Triangle.
- The Project still provides the same number of parking spaces at 1,159.

As discussed further in Chapter 3, *Urban Design* of this DPIR, the revised Project better addresses and is more consistent with Greenway Guidelines especially on the East Parcel, per the guidance of the BRA. Combined, these changes will lessen the overall impacts of the Project, as demonstrated in other sections of this DPIR. Specifically, the project changes result in a reduction in shadows, a minor reduction in traffic as well as associated air emissions and parking demand (in particular during weekday periods freeing up additional parking for transient and commuter parking).

The Project includes approximately 2.3 million gross square feet of net new transit-oriented, mixed use phased development and remaining parking garage and office. The Project will introduce 812 new housing

units (apartments and condominiums) and 196 new hotel rooms to the area as well as provide over one million gross square feet of office and 82,500 gross square feet of retail. The Garage will continue to provide sufficient commercial parking (for transient users) as well as overnight resident parking. As previously proposed, the overall Project Site will be reconfigured into two smaller appropriately scaled urban blocks consisting of the West Parcel and the East Parcel.

Table 1-1 summarizes the project changes compared to the previously proposed project presented in the PNF.

**Table 1-1
Height and Massing Changes***

Project Component	PNF	Proposed Project/Preferred Alternative	Change
<i>West Parcel</i>			
WP-B1 (Residential – Apartments)	470 feet	480 feet	10 feet
	403 units	464 units	61 units
	492,900 gsf	543,300 gsf	50,400 gsf
WP-B2 (Office)	600 feet	528 feet	(72 feet)
	1,195,550 gsf	1,014,000 gsf	(181,550 gsf)
WP-B3 (Residential – Apartments)	275 feet	299 feet	24 feet
	248 units	291 units	43 units
	297,300 gsf	342,500 gsf	45,200 gsf
Parking Garage	1,159 spaces	1,159 spaces	No change
West Parcel Sub-Total	651 units	755 units	104 units
	1,985,750 gsf	1,899,800 gsf	(85,950 gsf)
<i>East Parcel</i>			
EPB-1 (Residential – Condominiums/Hotel)	275 feet	157 feet	(118 feet)
	120 units	57 units	(63 units)
	204 keys	196 keys	(8 keys)
	285,050 gsf	221,500 gsf	(63,550 gsf)
EP-B2 (Office)	125 feet	152 feet	27 feet
	137,100 gsf	163,800 gsf	26,700 gsf
EP-B3 (Retail)	60 feet	60 feet	No change
	25,000 gsf	25,000 gsf	No change
East Parcel Sub-Total	447,150 gsf	410,300 gsf	(36,850 gsf)
Residential	771 units	812 units	41 units
Office	1,303,300 gsf	1,147,500 gsf	(155,800 gsf)
Retail¹	82,500 gsf	82,500 gsf	No change
Hotel	204 keys	196 keys	(8 keys)
Parking	1,159 spaces	1,159 spaces	No change
TOTAL	2,432,900 gsf	2,310,100 gsf	(122,800 gsf)

1 Includes ground-floor /lower level retail integrated into each Project Component.

The following sections describe further the key project changes. Other elements of the Project, including vehicle access and circulation, parking, bicycle improvements and amenities, and pedestrian streetscape improvements of the streets surrounding the Project Site (i.e., consistent with Boston’s Complete Streets guidelines) remain largely unchanged when compared to the previously proposed project in the PNF.

1.2.2.1 Height and Massing

The Project continues to consistent with the Greenway Study Design Guidelines where the higher elements on the West Parcel are located away from and gradually scale down towards the Greenway. As proposed previously, appropriately, the West Parcel consists of the two largest buildings of the Project (apartments and office) set farthest back from the Greenway, North End, and Bulfinch Triangle. While these buildings are intended to be iconic, they will be designed as a background to the East Parcel. The West Parcel also defines the scale of New Chardon and New Sudbury Streets with a podium expression in keeping with adjacent development. WP-B2 has been set back further from Bowker Street allowing for a more generous buffer with the adjacent block to the west.

In response to the BRA, the Project now more directly complies with the Design Guidelines (which recommends heights similar to the Bulfinch Triangle along this edge of the Greenway) by reducing the EP-B1 (hotel/condominium building) by 118 feet. While EP-B2 (office building) has increased in height by 27 feet, it continues to meet the design guidelines and EP-B2 steps down to lower heights as it gets closer to the Greenway. Refer to Chapter 3, *Urban Design* of this DPIR for additional information on project design changes. Figures 3.1a and 3.1b illustrate the changes in building heights from the PNF.

1.2.2.2 Public Open Space

Removal of a portion of the Garage continues to provide a significant public benefit: the creation of a vibrant pedestrian urban square on the East Parcel. The East Parcel is at the nexus of some of the most important pedestrian desire lines connecting Canal Street and Bulfinch Triangle area, the Greenway, Washington Street, North End and the Market District. This proposed all-season open air pedestrian space continues to be anchored by a hotel/condominium building, boutique office building, and specialized retail. Design of this new public space aims to not only create a comfortable pedestrian environment, but also a great urban destination.

Figure 3.5 shows the updated public realm plan, which reflects improvements to the proposed pedestrian plaza on the East Parcel. Key improvements include widening of the plaza (by 25 feet to 85 feet at its widest point) to further enhance the quality of the space and enlarged the Haymarket MBTA bus facility platforms by 10 feet for better functionality. In addition, the Proponent has consulted the BRA’s draft Greenway Overlay District list of ground-level uses (Appendix A of Article 49A) and will aim to incorporate such uses to be consistent with the BRA’s goals for activating the ground-level spaces throughout the District. Uses include, but are not limited to:

- Appliances, repair shops or sales
- Athletic or sporting goods stores
- Artists' supply and music stores
- Bakeries or pastry shops

- Barber shops/beauty parlors
- Bicycle stores, rental
- Book or card stores
- Cafes
- Day care
- Deli Department
- Dry-cleaning establishments or laundromats
- Dry goods or fabric stores
- Florist shops
- Gift shops
- Hardware or housewares stores
- Historical exhibits
- Hotels
- Ice cream stores
- Jewelry shops
- Leather goods or luggage store
- Locksmith shops
- Luggage stores
- Photograph or printing establishments stores, picture framing stores
- Residential uses (lobby space only)
- Restaurants (not including take-out restaurant uses)
- Shoe stores, shoe repair and shoeshine shops
- Tobacco stores
- Tour operator
- Toy stores
- Travel agency, limited to 25 licenses
- Variety or convenience
- Video or motion picture
- Wallpaper store

Overall, the design and layout of the Project was envisioned from the street level up, to ensure the end result was vibrant active blocks not only at the street level but also along the floors above. As each Project Component is advanced through individual Article 80 Large Project Review, the unit mix, floor plate sizes and ground-floor uses, and any potential refinements, will be presented again to the community and the BRA.

The Project continues to incorporate a substantial amount of green roof and roof garden/deck areas as an outdoor amenity for the residents and tenants of the various buildings as well as provide an environmental benefit. On the West Parcel, the portion of the Garage to remain will be converted into a series of green roof areas and roof garden/deck areas for the two residential buildings (WP-B1 and WP-B3) and the office building (WP-B2) that will be constructed around and on top of the Garage.

The hotel/condominium building (EP-B2) on the East Parcel will continue to provide a unique roof top garden as an amenity to hotel guests and residents. All of the proposed green roofs and roof gardens, in addition to being a project amenity, will continue to allow for material reduction of heat island effect and help manage rain water.

1.2.2.3 Project Phasing

The Proponent has heard from several community groups voicing concerns over the timing of when the eastern portion of the existing garage structure would be demolished given the overall project timeframe of 15 to 20 years. Given these concerns the Proponent has agreed to the following:

1. Move up the commencement of demolition of the existing garage structure over Congress Street and the East Parcel to Phase 2A;
2. Commit to a demolition start date no later than 1st quarter of 2023 for the eastern portion of the existing garage structure;
3. Agree to be prohibited from obtaining a Certificate of Occupancy for any new proposed buildings, except for WP-B1 (the first apartment building on the West Parcel), until demolition of the eastern portion of the garage is substantially complete or well underway.

This is a material change in the project phasing, which will bring the public benefits sooner to the overall community. Also, it has the additional benefit of demolishing the garage before the majority of density is brought on-line which should further mitigate construction impacts to the area.

In summary, as shown on Figure 1.7, the revised phasing is as follows:

- Enabling Phase
- Phase 1: Construction of WP-B1 (apartment building)
- Phase 2A: Demolition of half of the existing garage structure (the portion on the East Parcel and over Congress Street)
- Phase 2Bb: Construction of WP-B2 (office building)
- Phase 3A: Redevelopment of the East Parcel, including EP-B1 (hotel/condominium building), EP-B2 (office building), and EP-B3 (retail building)
- Phase 3B: Construction of WP-B3 (apartment building)

Also, it is important to note that after Phase 2A (Garage Demolition), the remaining phases are interchangeable, and it is possible that Phase 3A (East Parcel) or Phase 3B (WP-B3 Residential Building), or both, could take place earlier or before Phase 2B (Office Building). This will in part be dependent on the market at the time when the eastern portion of the garage is being deconstructed. Figures 1.8a through 1.8e present the revised conceptual phasing diagrams.

The Project continues to be conceived and planned with a flexible mixture of complementary and mutually reinforcing uses. Project phasing is intended to provide certainty that the full build-out can be achieved over time, which is critical to the Project's feasibility. Current phasing anticipates beginning the enabling work and construction of the first Project Component in 2016, with construction completion of such Project Component scheduled for 2020. The Proponent anticipates that construction will occur in three general phases along with an enabling pre-redevelopment phase over a period of approximately 15 to 20 years

1.2.2.4 Architectural Design

The architectural expression of the Project is intended to be highly contemporary in nature. It is the intent of the development to develop individual architectural expression for each of the buildings while maintaining a holistic composition. The massing geometries of the proposed vision respond to the desire lines that are often acute from one another. The acute geometry of sites produces unique buildings that are not regularized shapes. The Project Site is organized into two blocks east and west of Congress Street. The West Parcel is

unified by the base podium on which the three buildings will sit. The scale of the buildings on the East Parcel is in keeping with the scale of Bulfinch Triangle and Blackstone Block. However, the architectural expression of the block will reflect the qualities of these districts as it attempts to reconnect multiple surrounding districts while maintaining a contemporary aesthetic.

1.2.3.5 Sustainability

The Project is inherently sustainable as it aims to: (i) utilize land efficiently through redevelopment of an obsolete above-grade parking garage with a dense mixed-use program; (ii) promote the use of alternative modes of transportation; (iii) encourage pedestrian activity; (iv) promote the use of local materials; (v) provide for a high-quality indoor environment for users; (vi) and reduce environmental impacts both locally and globally. As described in the PNF, the Proponent is committed to continued exploration of practical ideas for creating a high performance development, which contributes to urban resilience in Boston. Project design will be goal-oriented with goals generally focused on reduced environmental impact and improved occupant comfort as well as contribution to the community. The Proponent is committed to incorporating many key aspects of sustainability and high performance building design, where applicable and feasible. The following framework has been established to guide project design and future operations:

1. Positive contribution to the community and built environment
2. Model for transit oriented development
3. Ability to cope with future climate change
4. Energy Efficiency
5. Resource Efficiency (i.e., water, waste, and materials)
6. Sustainable Operations

This framework has served to further develop specific targets, goals and strategies for the Project, and will continue to guide design of each Project Components as they move forward. Goal-oriented design will be utilized throughout the process. The Project as a whole will meet and exceed the requirements of Article 37, Green Buildings as the Proponent is working towards achieving LEED certification (aiming to achieve a Gold rating under LEED for Core & Shell (CS) for the commercial components and a Silver rating LEED for New Construction (NC) for the residential components).

One innovative sustainable element to highlight is the incorporation of on-site rooftop solar panel systems on the East Parcel office building, which will offset the energy use associated with the public plaza (i.e., pedestrian area lighting) making it a zero net energy (ZNE) exterior space.

Chapter 5, *Environmental Protection* of this DPIR includes additional details on the approach to incorporating sustainability throughout the Project, including preliminary LEED Scorecards (see Figures 5.7a and 5.7b). This discussion builds on what was previously presented in the PNF as an update to the ongoing sustainability design process by introducing the development of specific targets, goals, and strategies in the form of a preliminary sustainability plan for the Project. It is intended that the sustainability plan will be used by the design team as each of the Project Components are advanced through the design process, under construction, and put into operations.

1.3 Project Alternatives

Project alternatives include the No-Build Condition, which represents the existing Garage to remain, the previously proposed program as presented in the PNF, and the revised Project or the “Preferred Alternative”. Overall, the revised Project generally results in a lesser degree of environmental impacts than the previously proposed program as presented in the PNF. While the Project may result in an increase in traffic or greater extent of shadows for periods of time compared to the existing Garage, the improved condition of the Project Site as a result of the redevelopment far outweighs the negative impacts..

1.4 Summary of Public Benefits

Project-related benefits include significant urban design and public realm improvements, increased housing opportunities, expanded retail options, job creation and additional tax revenues. By replacing a massive unsightly barrier with two new vibrant mixed-use and appropriately scaled urban blocks, the Project will substantially contribute to improving the vitality and the urban design and architectural character of the Government Center and Bulfinch Triangle areas. Each phase of construction will include some level of public benefits/amenities. Refer to Figures 1.8a through 1.8e for diagrams of each construction phase with a list of key public benefits associated with each phase.

Public Realm

- Enhance the connectivity between the Bulfinch Triangle, Government Center, West End, North End and Beacon Hill as well as the emerging Market District.
- Create 18/7 activity by bringing new residents to an area that often has little activity after 5:00 pm.
- Dramatically improve the public realm and architectural character of Congress Street.
- Introduce sky and daylight along Congress Street between New Sudbury and New Chardon Streets.
- Create multiple new vistas, including new views of the Custom House Tower and iconic downtown buildings, such as 60 State Street and the Financial District towers.
- Create a new public plaza and promenade to serve as a gateway to and connector between the Bulfinch Triangle and the Rose F. Kennedy Greenway and facilitate pedestrian movement around the Surface Road/I-93 Ramp Parcel.
- Create retail-oriented public space that will continue the Market District northward and connect to Canal Street in the Bulfinch Triangle.
- Completely enclose the existing garage structure on three sides with a dynamic ground-floor retail program and residential/office lobbies as well as apartment units on the upper floors on the West Parcel along major adjoining streets.
- Frame Congress Street as an important through-way and view corridor.
- Enhance and activate New Chardon and New Sudbury Streets with streetscape improvements and new ground-floor residential and office lobbies, and retail uses.

- Enhance the existing neglected and degraded public pedestrian mid-block connection along Bowker Street from New Sudbury Street to New Chardon Street.
- Create new urban open space opportunities at the street level on the corner of New Chardon and Congress Streets.
- Create new urban open space opportunities on building rooftops while improving water quality and reducing heat island effect through green roofs/roof gardens for use by residents, tenants, and hotel guests.

Design

- Implement an innovative phased approach to:
 - Significantly improve the market viability of the Project;
 - Allow the existing parking garage to remain operational during construction;
 - Limit construction impacts; and
 - Provide sustained construction jobs over a longer period.
- Unlock the potential of the East Parcel for the new public plaza and a dynamic and vibrant mixed use development.
- Upgrade the existing garage lobby entrance and installation of new garage elevators.
- Scale the height of the East Parcel buildings to be consistent with the Bulfinch Triangle.

Transportation

- Utilize the extensive transportation infrastructure currently serving the Project Site, including MBTA subway lines (the Orange and Green Lines), the Haymarket Bus Station, and the I-93 entrance/exit ramps.
- Improve pedestrian safety and vehicular circulation by relocating the existing New Chardon Street garage entrance/exit to the Bowker Street/Hawkins Street intersection.
- Improve traffic circulation to the regional highway system and local roadway network by allowing vehicles exiting the Garage from Bowker Street to make a right turn onto New Chardon Street and go directly to I-93 Southbound (not currently allowed).
- With the relocation of the Garage entrance to Bowker Street, significantly improve the intersection of New Chardon Street and Merrimac/Congress Street for pedestrians, bicyclists and vehicles.
- Implement Boston Complete Street Guidelines with provision of new bicycle lanes and enhanced pedestrian facilities along Congress, New Chardon, and New Sudbury Streets.
- Provide secure on-site bicycle storage facility for residents and employees, and exterior at-grade short-term bike parking for visitors and customers, including an 850-space bicycle parking/storage facility with showers and changing rooms on the West Parcel.
- Provide for bicycle sharing opportunities by adding a Hubway bike sharing station on the East Parcel at the existing MBTA Haymarket bus facility.
- Provide garage parking for displaced BPD parking (42 spaces), as shown on Figure 1.6.

- Improve efficiency of and enhance public realm surrounding the MBTA Haymarket bus facility operations.

Environmental/Sustainability

- Take advantage of existing infrastructure developed to support the density of the downtown core.
- Revitalize an underutilized urban renewal era above grade structured parking garage, use land efficiently with dense mixed-use development, promote the use of alternative modes of transportation, encourage pedestrian activity, enhance the surrounding neighborhood, promote the use of local materials, provide for a high-quality indoor environment for users, and reduce environmental impacts both locally and globally.
- Incorporate sustainability throughout by thoughtfully planning for efficient use of energy and resources through all stages of design and during operations.
- Develop a framework to develop specific targets, goals and strategies for the Project (i.e., a project sustainability plan) to be used by the design team moving forward through the design process, construction, and into operations.
- Provide a unique and sustainable project through the redevelopment and reuse of the existing Garage and by utilizing the Leadership in Energy and Environmental Design (LEED) Green Building Rating System, in compliance with Article 37 of the City's Zoning Code (to target LEED Gold rating for office buildings and LEED Silver rating for residential buildings).
- Create a "net zero energy" public space through the installation of solar panels on the East Parcel office building that will provide electricity for the plaza lighting and/or water features.
- Provide preferential parking for low-emission and clean-fuel vehicles at ten (10) Electric Vehicle (EV) charging stations.
- Provide for beneficial impacts on water quality through the process of redevelopment and updating to current stormwater management standards, including rainwater harvesting for on-site re-use, groundwater recharge and phosphorous mitigation.
- Lease and operate the buildings in a sustainable manner (i.e., following construction of each component, develop Tenant Manual/Guidelines to ensure that the sustainability efforts are implemented throughout operation).

Social and Economic

- Become a catalyst for growth and redevelopment in the Government Center and Bulfinch Triangle neighborhoods.
- Support the City's goal of promoting diversification and expansion of Boston's economy by adding hotel uses to serve both business and tourist demands, and by creating new local jobs.
- Provide 812 new housing units with approximately 106 on-site units designated as affordable, per Boston's Inclusionary Housing Ordinance.
- Encourage the diversification and expansion of Boston's economy in new areas of economic activity with the creation of a new class A office building targeted to creative industry, technology, lifestyle and health care tenants in an area traditionally dominated by government tenants

- Support the future Boston Public Market by introducing new uses to the area, which will bring new residents, customers, and employees.
- Create over 2,600 construction jobs in all trades and over 6,000 permanent jobs (full-time and part-time).
- Create a total of approximately \$11 million in new annual local tax revenue.
- Provide approximately \$12.6 million in housing and jobs linkage (Development Impact Project Exactions) over the life of the Project.



1.4.1 Other Public Benefits

1.4.1.1 Workforce Development Plan

The Proponent will work with the BRA in developing a comprehensive Workforce Development Plan which will not only ensure the implementation of the Boston Residents Construction Employment Plan, but also detail outreach efforts to ensure that communities impacted by the project will be able to participate with the Applicant and the BRA in a jobs outreach effort both for construction jobs and full-time jobs resulting from the Project. The Proponent will work with the BRA and Mayor's Office of Jobs and Community Services in formulating the plan and procedure to formalize this commitment.

1.4.1.2 Affordable Housing

The Proponent will comply with the Mayor's Executive Order which established the Inclusionary Development Policy ("IDP") where developers must provide 15% of the market rate units as affordable units, which equates to approximately 13% of the total units.

Specifically the Proponent has committed to:

- Meeting the 13 percent affordable requirement of the total units,
- Providing those affordable units on-site,
- Allocating the affordable % to each unit type (i.e. 13 percent of each unit type will be affordable),
- Distributing the affordable units throughout the building, (i.e. not congregated in one area),
- Having the same level of finishes as the typical market rate apartment unit,
- Having the same access to common amenities as the typical market rate apartment unit,
- The first apartment building will also have three bedroom units and 13 percent of these three bedroom units will be affordable.

Overall, once complete, the redevelopment of the Government Center Garage will contain more than 800 units of new housing, of which over 100 will be designated as affordable. This will be a major community benefit in a part of Boston where limited affordable housing currently exists.

1.4.1.3 Impact Fee

The Proponent is committed to pay the BRA an impact fee in addition to the enumerated public benefits which would result from the Project. The Proponent will establish a Special Project Fund to be funded by a payment equal to one (1) percent of hard construction costs for each Project Component, as certified by the Proponent to the BRA and included on the Inspectional Services Department building permit application for each Project Component.

Such Special Project Fund would be paid for each Project Component within 30 days of the issuance of final Certificate of Occupancy for the Project Component. It is estimated that the total project hard costs for all Project Components may total over \$600 million, which based upon the 1 percent Special Project Fund requirement will result in approximately \$6 million paid to the BRA. Updated hard construction cost estimates will be provided at the beginning of each Project Component and will be reconciled with the receipt of each Certificate of Occupancy.



1.4.2 Implementation of Public Benefits

The public benefits associated with the Project are summarized above under Section 1.4 and will be implemented as shown on Figures 1.8b through 1.8e.

1.5 Public Participation/Outreach and Agency Coordination

The Proponent is committed to maintaining an open dialogue with all interested parties. The public will have the opportunity to review this DPIR as well as future documents submitted for individual Project Components, as required. The Proponent, in coordination with the BRA, will continue to meet with the Impact Advisory Group (IAG) to review the Project and specific topics, as needed. In addition, the Proponent will continue to meet with community groups, various Boston agencies/departments, the MBTA, and the Massachusetts Environmental Policy Act (MEPA) Office as well as other stakeholder groups.



1.5.1 Public Participation

In addition to the BRA public hearing held on June 19, 2013, the Proponent conducted a series of IAG working sessions on June 12, June 19, June 26, July 10, August 7, and August 23, 2013 at Boston City Hall that were made open to the public and were publicly advertised. On June 12, 2013, the presentation focused on project overview and urban design. On June 26, 2013, the presentation focused on transportation and parking as well as potential environmental impacts and sustainability/green building. At the July 10, 2013 meeting, the presentation focused on specific responses to public comments received on the PNF. The Proponent presented the project changes in response to BRA and community concerns at the August 7, 2013 and August 23, 2013 meetings.

The Proponent also created a website, www.governmentcentergarageredevelopment.com, on which the presentations from each of the community meetings, including the community meetings that were held by the Proponent prior to the PNF submission as well as the community meetings and IAG working session meetings following the filing of the PNF, can be downloaded. The website also has links to the PNF and DPIR. The public was also notified of public meetings and Project status/updates through the use social media, including Facebook, Twitter, and Google+ postings. The IAG and the community will continue to have an opportunity to give input regarding the Project during the Article 80 review process.

1.5.1.1 Impact Advisory Group

In October 2000, Mayor Thomas M. Menino outlined the IAG process in “An Order Relative to the Provision of Mitigation by Development Projects in Boston.” The Mayor further amended the process in April 2001, in “An Order Further Regulating the Provision of Mitigation by Development Projects in Boston” in order to increase the representation of local elected officials. These Orders, adopted by the BRA Board, create a comprehensive framework to clarify the role of the BRA, the City, the developer, and the community in the determination and mitigation of the impacts of development.

The IAG may contain up to fifteen (15) members, two (2) each nominated by the state senator, state representative, and district city councilor, and the remainder by appointment of the Mayor on the recommendation of residents, businesses, and community organizations as well as at-large city councilors. The IAG advises the BRA on impact and mitigation. IAGs offer BRA staff the chance to work closely with diverse members of the community to understand local concerns, needs, and opportunities. IAG members are invited to take part in the public agency scoping sessions called for in Article 80 of the Boston Zoning Code. The IAG is also encouraged to take part in community meetings that allow for public review and discussion of proposed projects. IAG members are offered the opportunity to review for comment major submissions by a project proponent as well as the Cooperation Agreement between the developer and the BRA prior to its adoption by the BRA.

IAGs do not replace the role of the greater community in the development review process, rather they strengthen the public participation process. The IAG is an overlay to the existing process that allows for greater understanding by the BRA of local concerns and greater public insight into the thinking of the BRA and other public agencies involved in the development review process. An IAG was previously formed for this Project Site for the former redevelopment proposal. The Proponent worked with the BRA on coordinating with a reconvened IAG. Multiple meetings have been held with the IAG to solicit input on the Project and additional meetings are anticipated to review and discuss the DPIR.

In connection with a prior proposal for the development of the Government Center Garage, the BRA on November 3, 2008 solicited IAG nominations for such project. Such nominations were obtained from the local elected representatives and city councilor, as well as recommendations from the Offices of Neighborhood Services and City Councilors at Large. Nominations were also obtained from the BRA. The following are the present members of the Project IAG:

1. Ms. Deborah Connors
2. Ms. Jane Forestall
3. Ms. Francine Gannon
4. Ms. Linda Jonash

5. Ms. Martha Maquire
6. Mr. Bob O'Brien
7. Ms. Kimberly Paikos
8. Mr. David Roderick
9. Mr. Frederick (Tad) Stahl
10. Mr. Joseph McDonald

1.5.1.2 Community Outreach

Community and Non-Profit Groups

The Proponent met with the following local community groups and business associations to provide a detailed project overview and discuss community benefits and potential impacts associated with the Project as well as provide the smaller group an opportunity to ask questions and/or raise concerns:

- Downtown North Association
- Beacon Hill Civic Association
- West End Civic Association
- North End Waterfront Residents Association (NEWRA)

The Proponent met with the following non-profit to provide a detailed overview of the Project and discuss Project-related shadows and potential impacts on the Boston Harbor and/or Greenway:

- Boston Harbor Association Staff
- Save the Harbor, Save the Bay Staff
- Greenway Conservancy Staff
- Friends of the North End Park Leadership

The Proponent is also currently scheduled to meet with the North End Elected Board in September to provide a detailed project overview and discuss project benefits as well as potential impacts to North End residents as well as the opportunity to ask questions and/or raise concerns.

Elected Officials

Prior to filing the PNF and during the PNF public review process, the Proponent met with the following elected officials to provide a project overview and discussions of Project-related benefits to potential community and environmental impacts:

- Mayor Menino and Staff
- Rep. Jay Livingstone
- Councilor Michael Ross (Staff)
- Councilor Sal LaMattina
- Senator Anthony Petrucelli
- Rep. Aaron Michelwitz
- Councilor-At-Large/City Council President Stephen Murphy
- City of Boston Neighborhood Services

Other Key Community and Civic Leaders

- Nancy Caruso – North End; project overview and discussion of project benefits to neighboring communities and one-on-one Q&A about any concerns
- Bob O’Brien (Also DNA/IAG) – N. Station; project overview and discussion of project benefits to neighboring communities and one-on-one Q&A about any concerns
- Tad Stahl (Also IAG) – Beacon Hill; North End; project overview and discussion of project benefits to neighboring communities and general one-on-one Q&A about any concerns
- Jane Forrestall (Also IAG) – West End; North End; project overview and discussion of project benefits to neighboring communities and general one-on-one Q&A about any concerns
- David Kubiak (Also NEWRA) -- North End; project overview and discussion of project benefits to neighboring communities and general one-on-one Q&A about any concerns
- Dan Wilson – North End -- North End; project overview and discussion of project benefits to neighboring communities and general one-on-one Q&A about any concerns
- Joanne Fantasia – North End; North End; project overview and discussion of project benefits to neighboring communities and general one-on-one Q&A about any concerns
- Karen Cord- Taylor (Former owner/writer for Beacon Hill Times) -- North End; project overview and discussion of project benefits to neighboring communities and one-on-one Q&A about any concerns



1.5.2 Agency Coordination

City of Boston

The Proponent has held numerous meetings with BTM Staff, including a joint meeting with DPW (at their request to hold meeting jointly) to provide a project overview and to discuss how DPW and BTM can coordinate on items, such as utilities, parking, and traffic implications due to the Project.

In addition to the BRA Scoping Meeting, the Proponent held a separate meeting with the City’s environmental staff of the Boston Environmental and Energy Services department. Specifically, the group discussed the Project’s ability to achieve a high level of sustainability as well as addressing other typical environmental issues.

Massachusetts Environmental Protection Act Office

The Project will be subject to environmental review by the Secretary of the Executive Office of Energy and Environmental Affairs (EEA). On June 19, 2013, the Proponent met with MEPA officials to discuss the Project, its phasing, and update on the City’s review process and the filing of an Environmental Notification Form (ENF) to initiate state agency review of the Project. It is contemplated that the ENF will contain as an attachment, a copy of the PNF and/or DPIR submitted to the BRA. The Proponent contemplates that MEPA review will occur subsequent to Article 80 review.

Massachusetts Bay Transportation Authority

The Proponent has held numerous meetings with the MBTA and its staff. Initially, the Proponent briefed the MBTA Chief Operating Officer and Deputy Chief Operating officer on the project and scheduled the coordination meetings, as described below.

The Proponent met with Subway Operations/Light Rail Operations and all supporting departments to provide a project overview, including scope of work and schedule. The meeting included discussions with each department to answer specific questions and concerns. Coordination meetings will continue during the design and construction phases.

Multiple on-site meetings were held with the Director of Bus Operations and Deputy Director of Bus Operations to discuss design plans for the reconfiguration of the Haymarket bus facility, including MBTA-requested improvements and construction-related impacts to passengers and pedestrians.

Coordination meetings with the appropriate MBTA departments and staff will continue during the design and construction phases of the Project.

1.6 DPIR Report Contents

This report responds to the BRA Scoping Determination in that it further examines and/or addresses Project-related issues, such as urban and architectural design, sustainable and green building design, transportation, and potential environmental impacts, including wind, air quality, and noise.

Chapter 2: General Information and Regulatory Context provides general information, as required by the BRA Scoping Determination, including, but not limited to, a detailed description of the applicant and project team, legal information, and a description of regulatory controls and approvals anticipated for the Project.

Chapter 3: Urban Design provides a description of design development and addresses urban design comments, as required by the BRA Scoping Determination.

Chapter 4: Transportation and Parking presents the transportation impacts associated with the currently proposed program for the Project as presented in this DPIR as it compares to the PNF program.

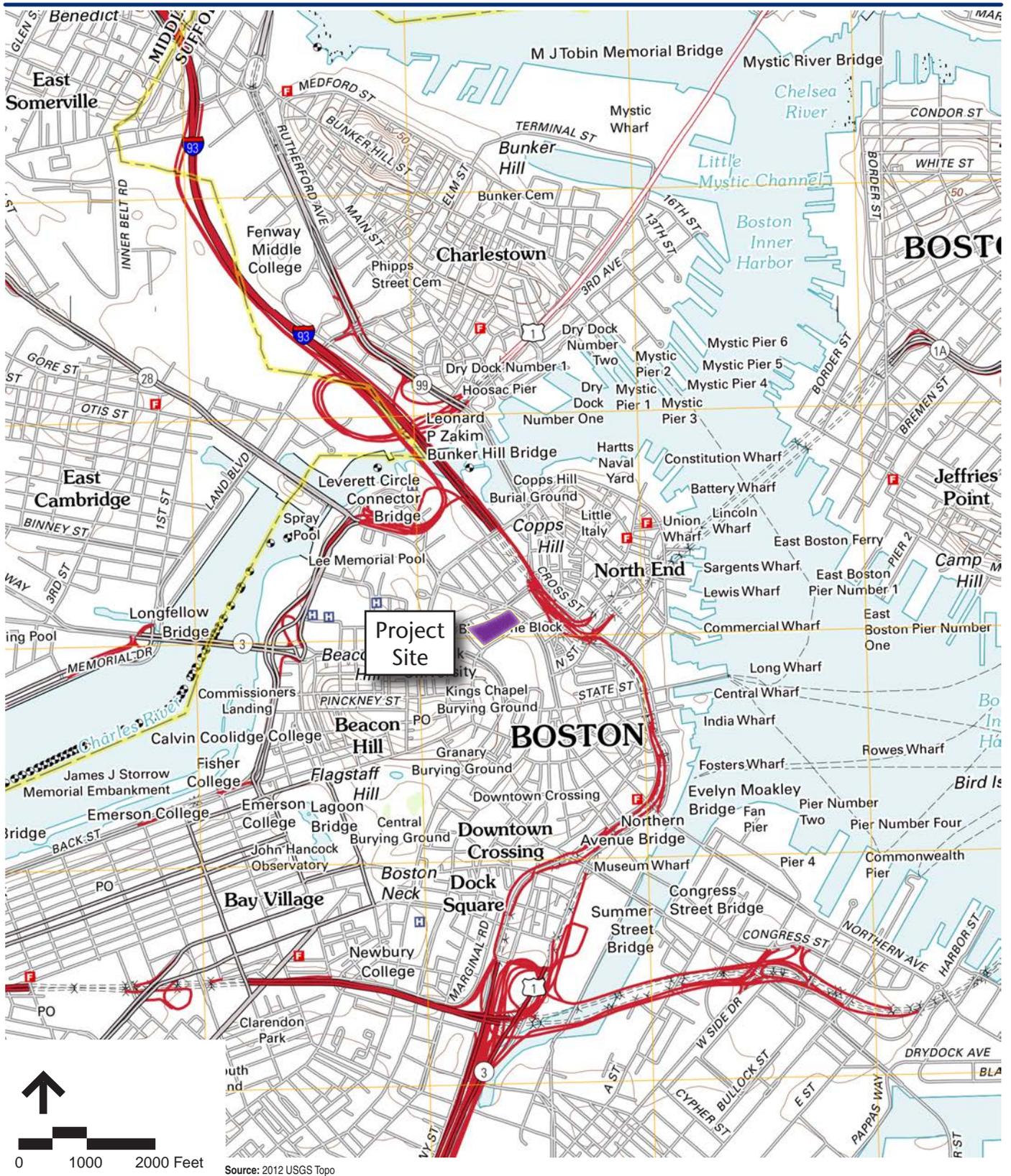
Chapter 5: Environmental Protection presents the findings from the supplemental environmental impact studies, including wind, shadows, daylight, air quality, noise and construction, and provides an update to the sustainable design approach. While all resource categories were initially considered, several were not further evaluated because the project change would not result in changes that would affect a resource category. Table 3-1 lists the impact categories and identifies if they may be affected or not affected by the program change and if impact analysis was conducted.

Chapter 6: Infrastructure provides an update to the infrastructure needs and systems that will support the Project based on the revised height and massing changes since the PNF.

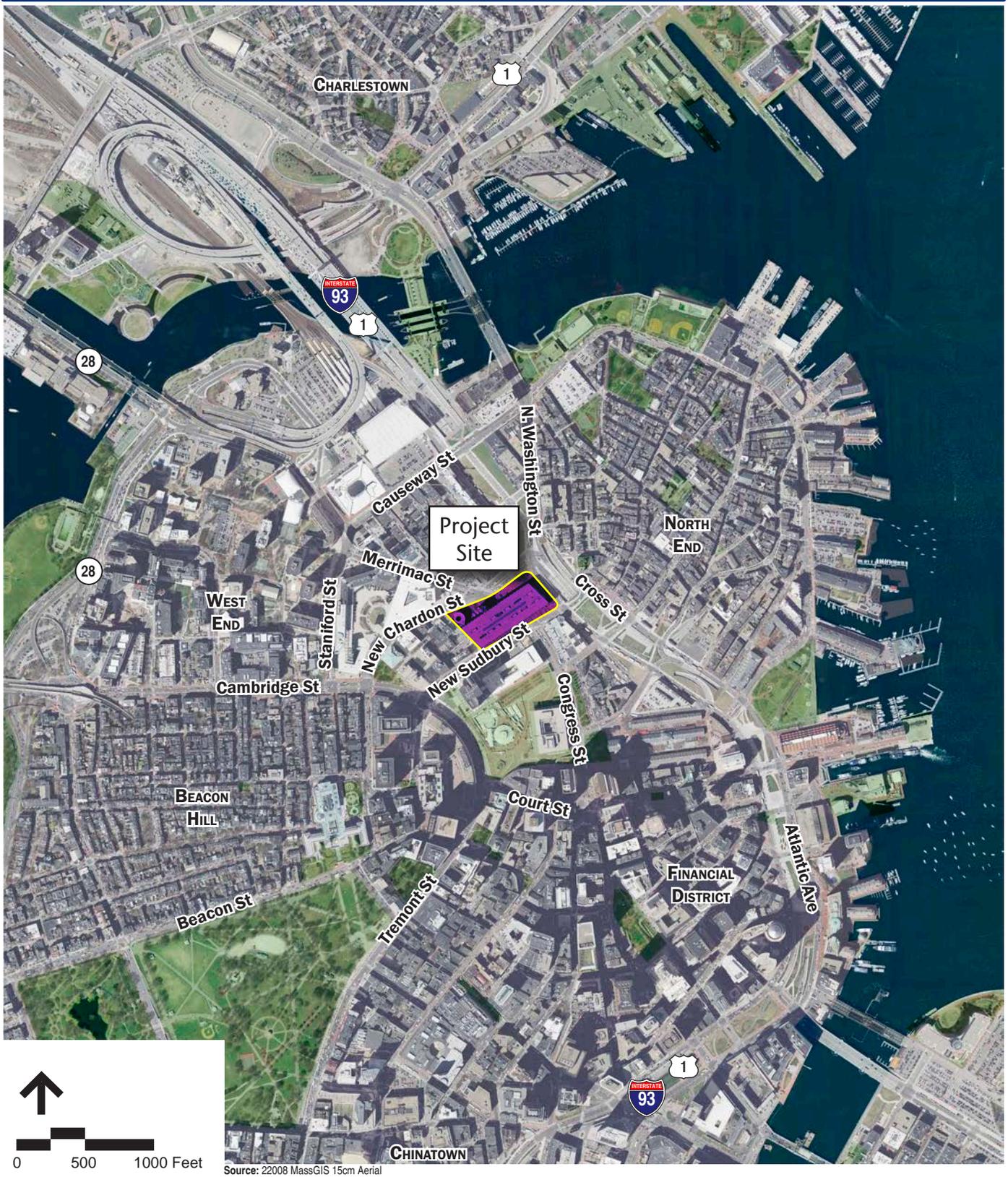
Chapter 7: Responses to Comments includes a copy of each comment letter and appearing after each comment letter is a section that provides a copy of each substantive comment with a direct narrative response. The enumerated comments/responses correlate with the code numbers that appear on the comment letters.

Supporting technical appendices and other information include:

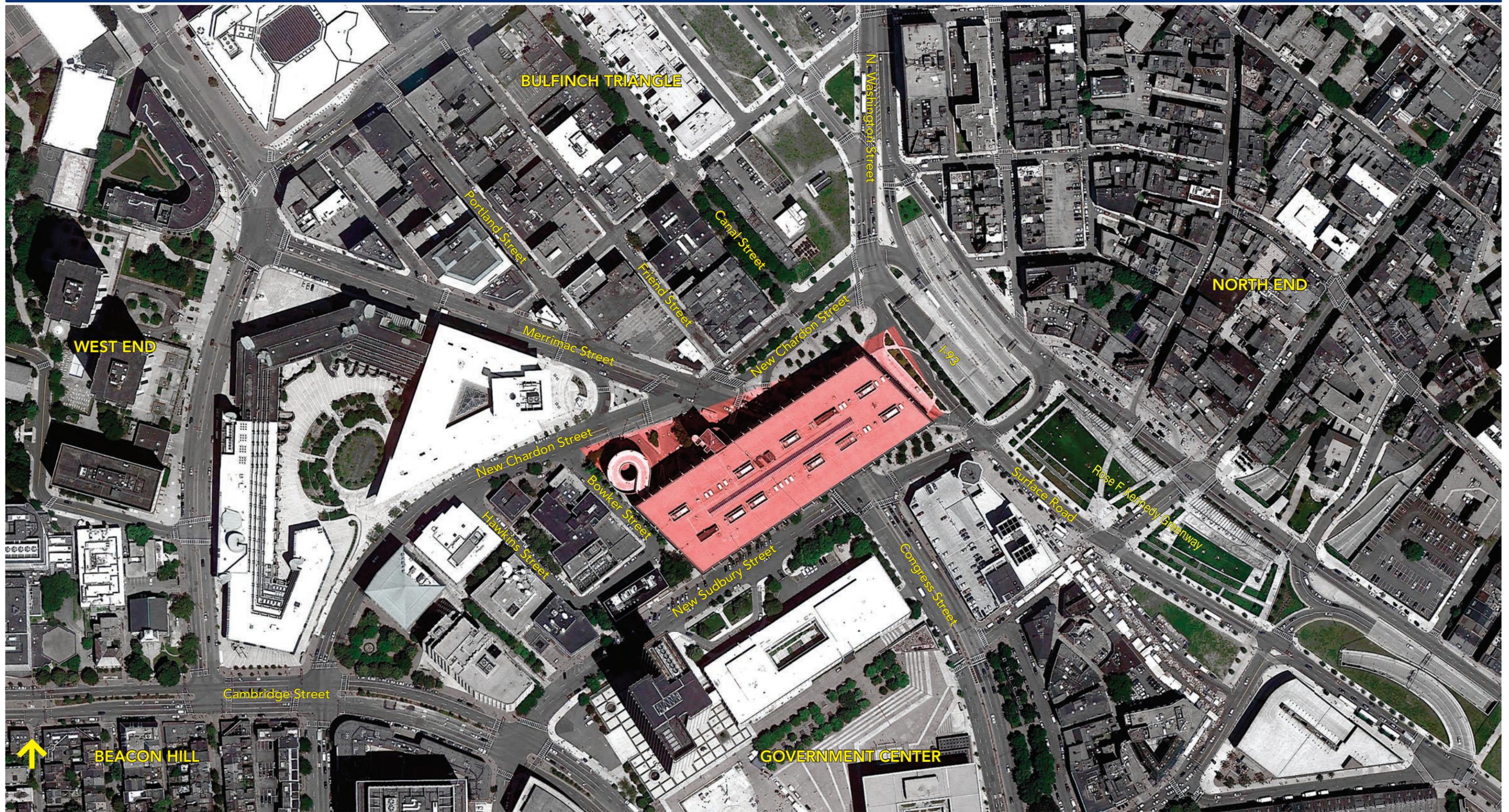
- Wind Supporting Documentation
- Shadow Supporting Documentation
- Air Quality Supporting Documentation
- Noise Supporting Documentation
- Construction Supporting Documentation
- Project Site Metes and Bounds Description
- List of Property Owners
- Supplemental Graphics



Redevelopment of Government Center Garage
Boston, MA Figure 1.1



Redevelopment of Government Center Garage | **Figure 1.2**
Boston, MA



Redevelopment of Government Center Garage
Boston, MA

Figure 1.3



Redevelopment of Government Center Garage

Boston, MA

Figure 1.4

Existing Conditions Site Plan



Aerial View



View from Congress Street



View from New Sudbury Street

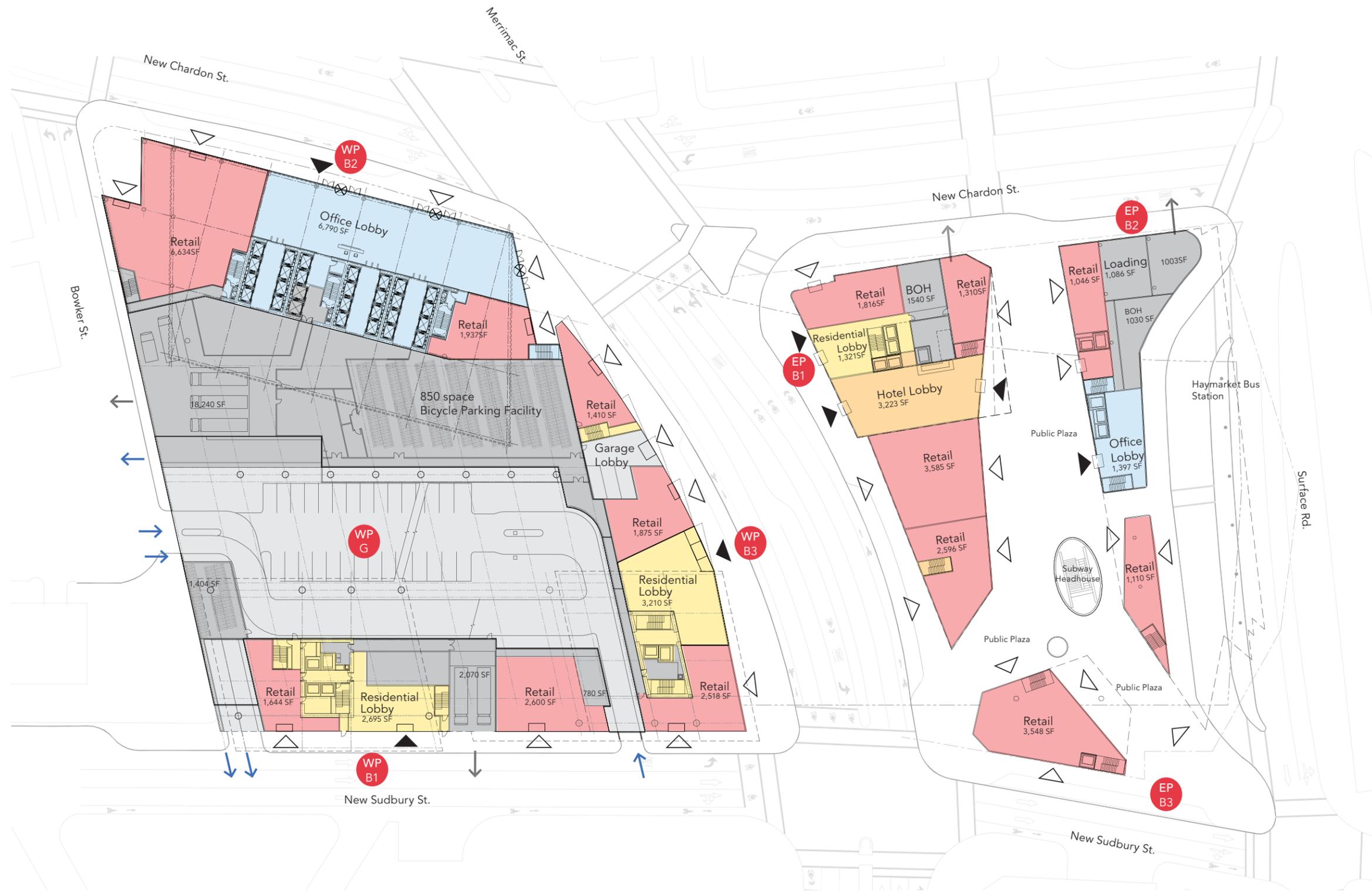


View from Canal Street extension

Redevelopment of Government Center Garage
Boston, MA

Figure 1.5

Existing Site Photographs



LEGEND

- Residential
- Hotel
- Office
- Retail
- Parking
- Back of House/Service
- Green Roof (Not Occupied)
- Landscaped Area
- Primary Pedestrian Entry
- Secondary Pedestrian Entry
- Cars Entry/Exit
- Service Vehicles Entry/Exit
- Parcel ID & Building ID (XX YY)

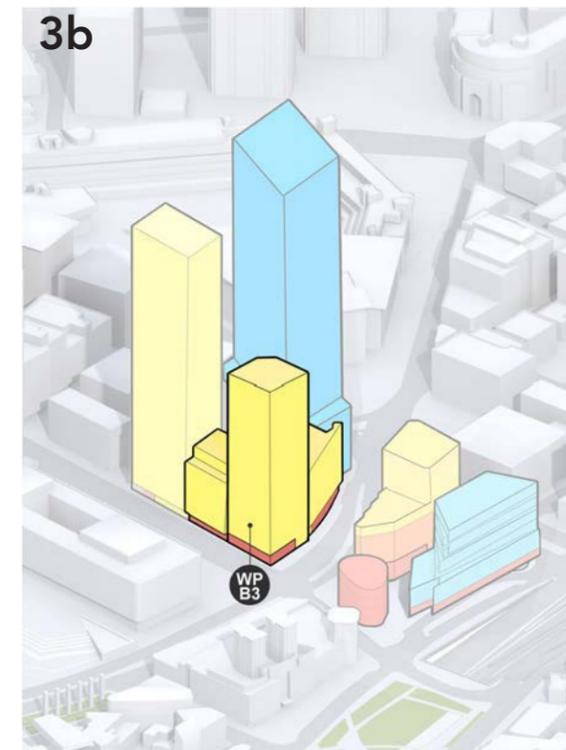
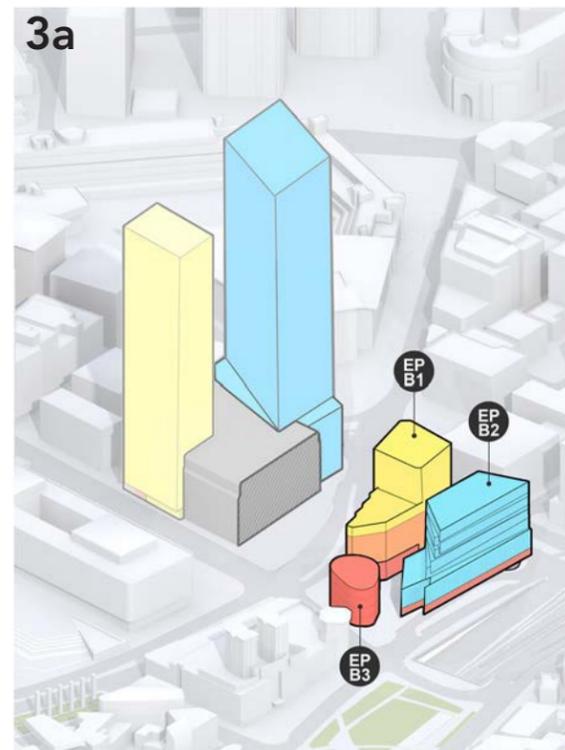
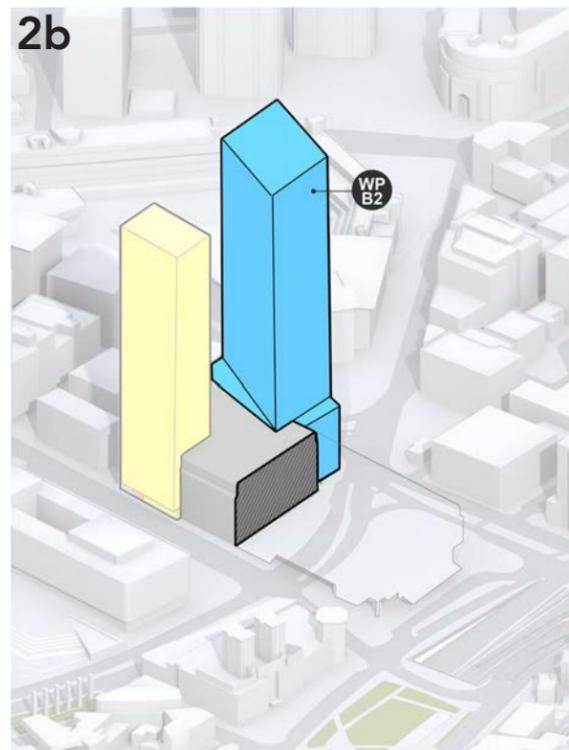
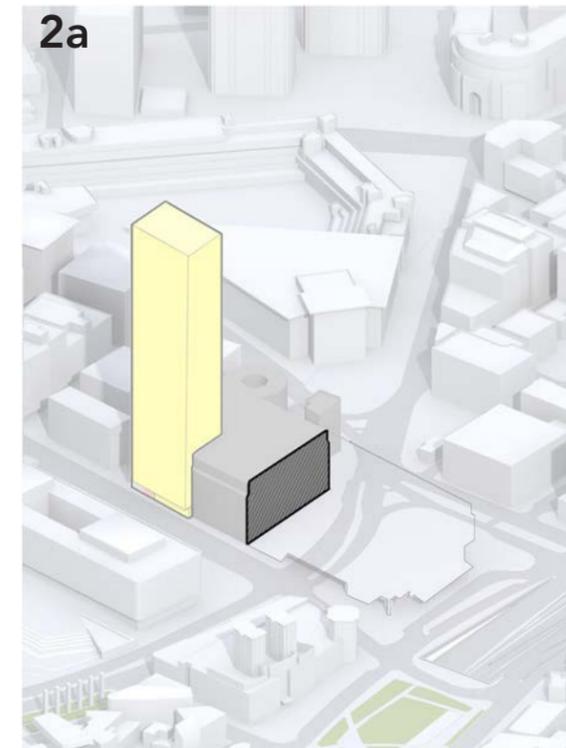
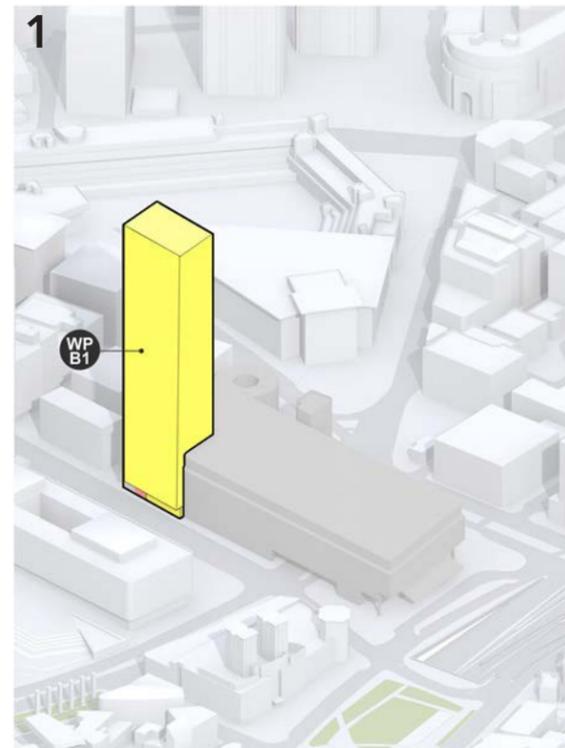
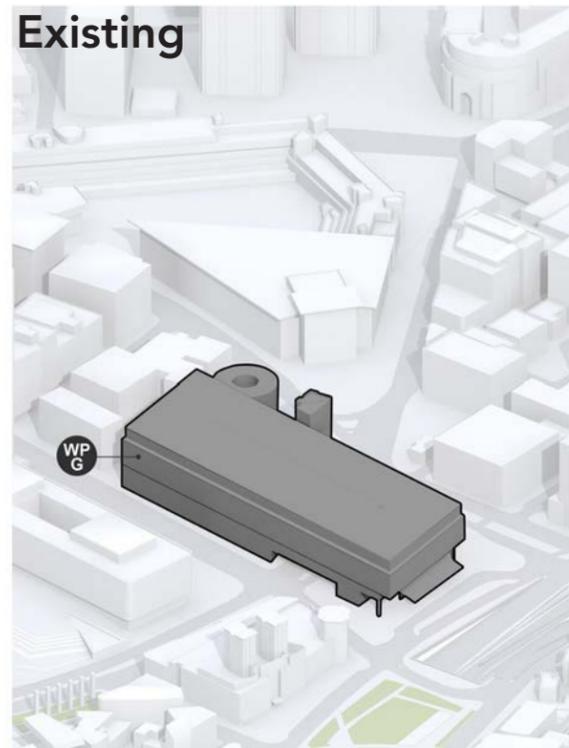
Scale: 0 10' 20' 50' 100'

Redevelopment of Government Center Garage
Boston, MA

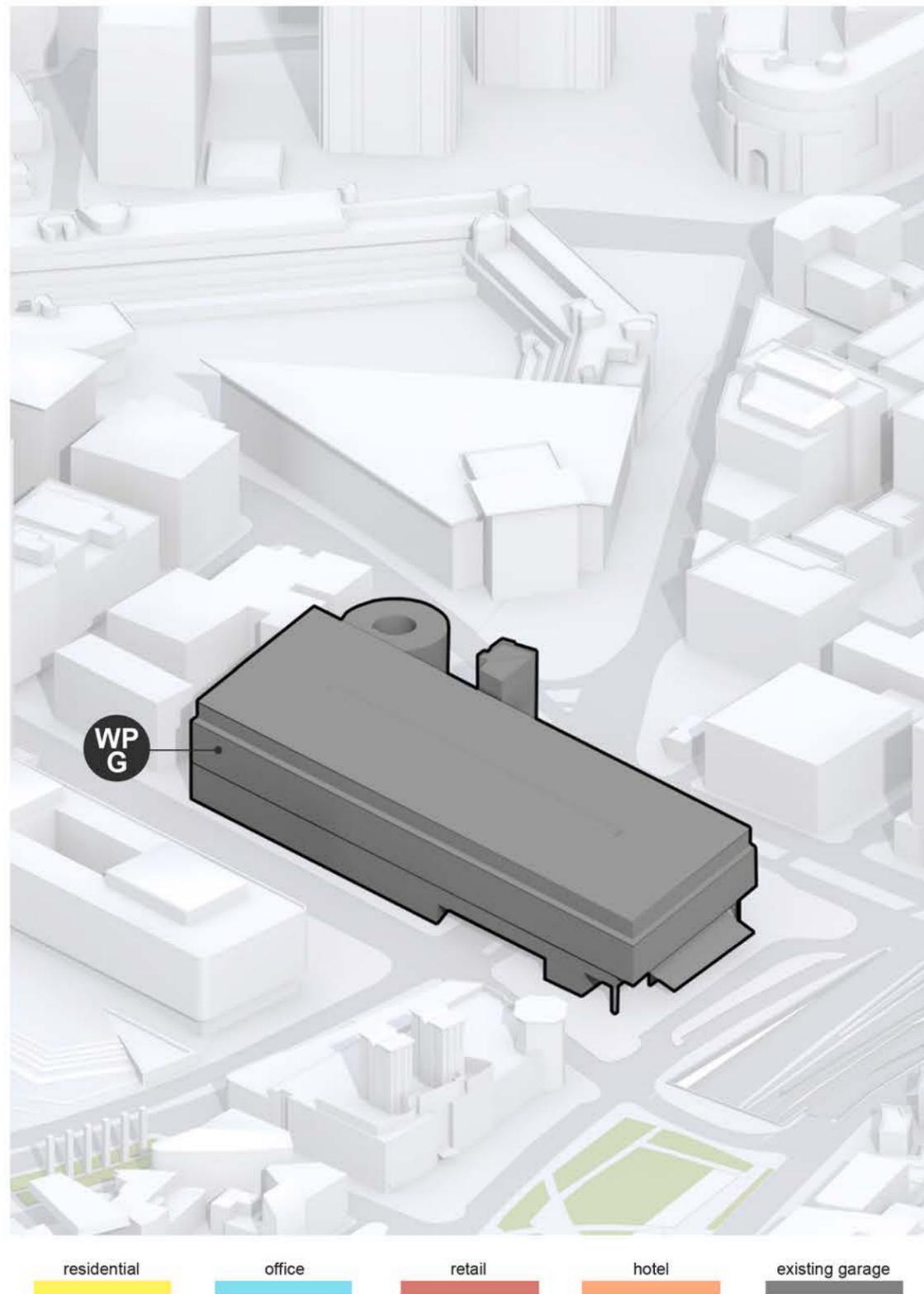
Figure 1.6



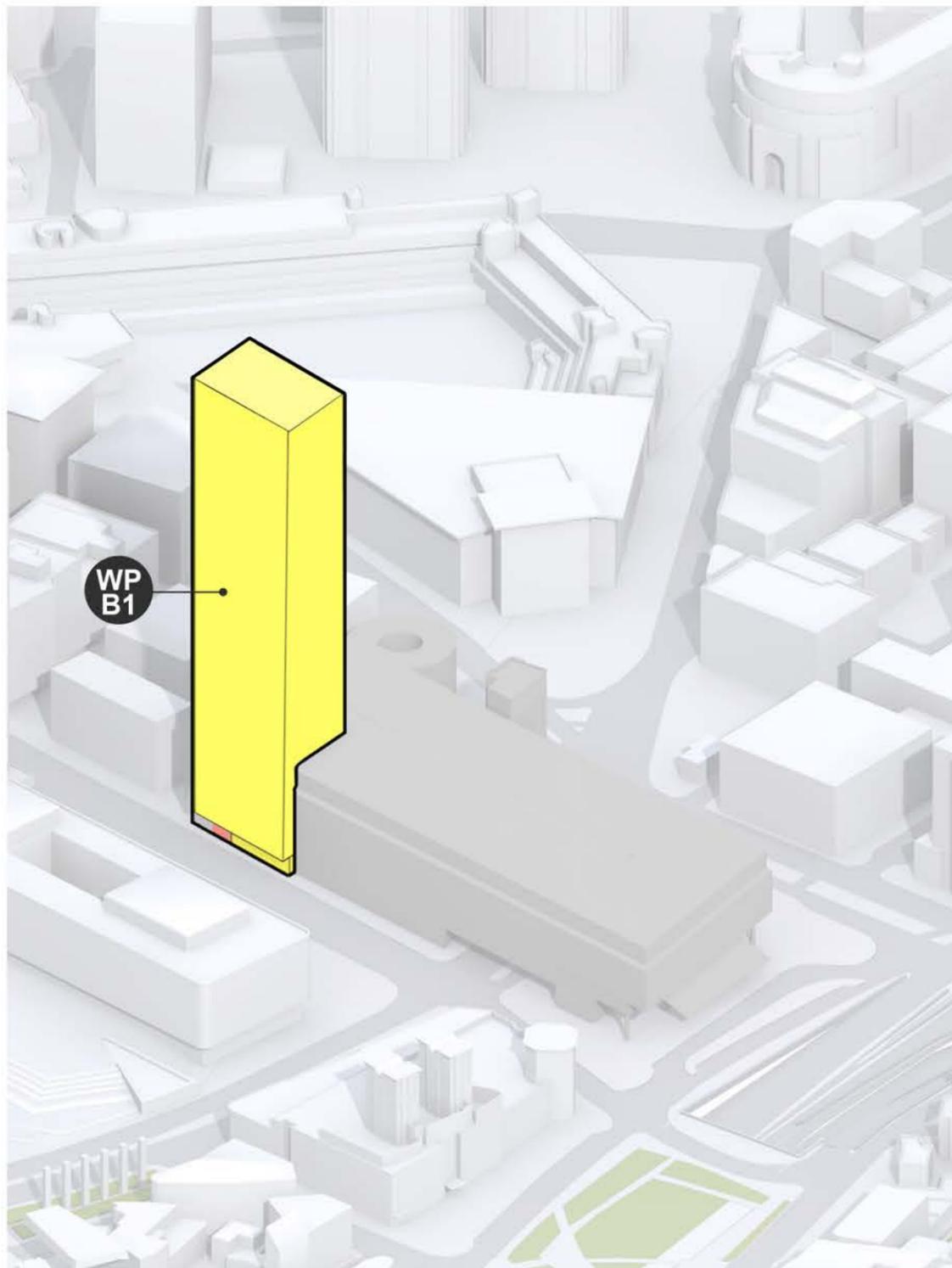
Plan - Floor 02



residential office retail hotel existing garage



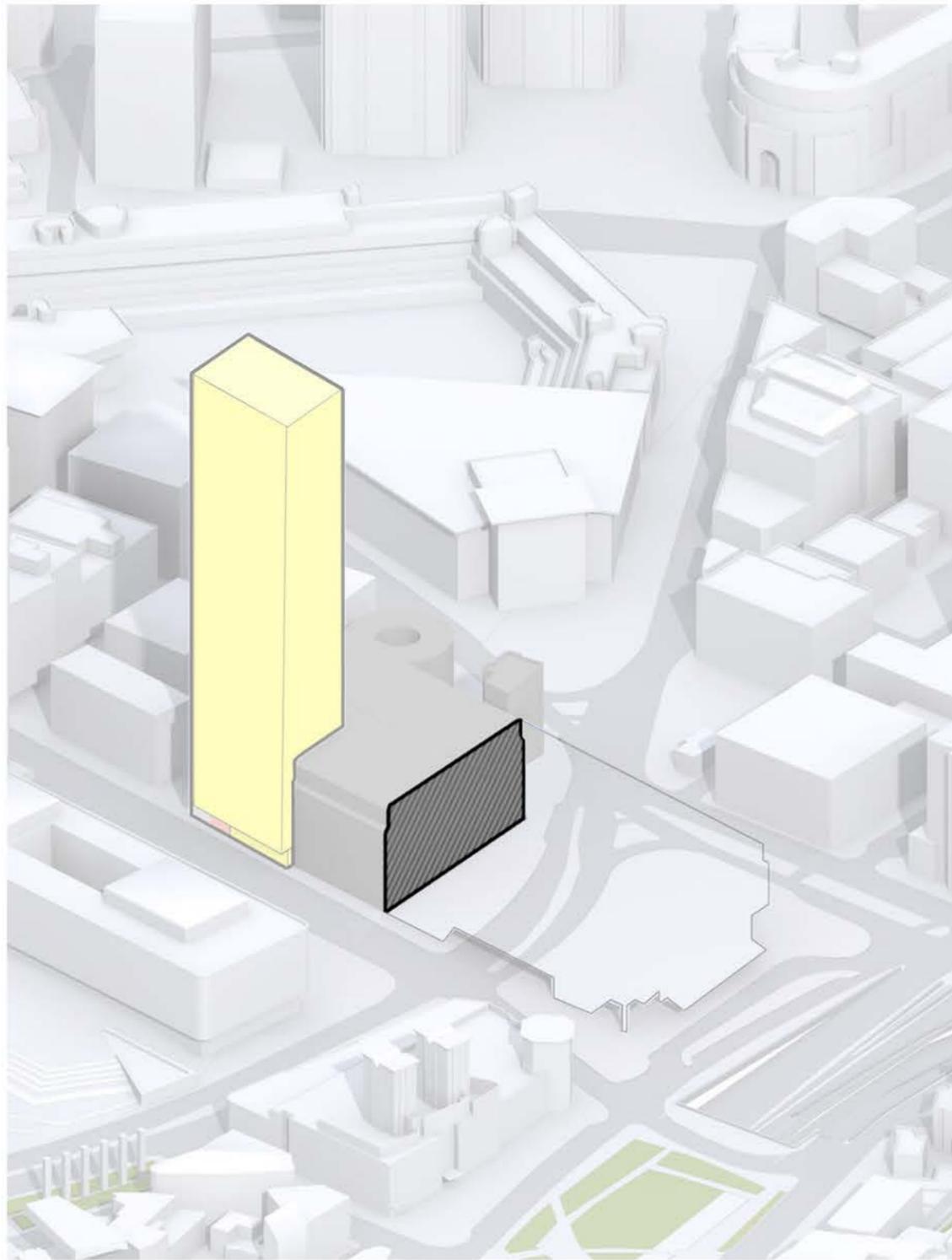
residential office retail hotel existing garage



residential office retail hotel existing garage

COMMUNITY BENEFITS

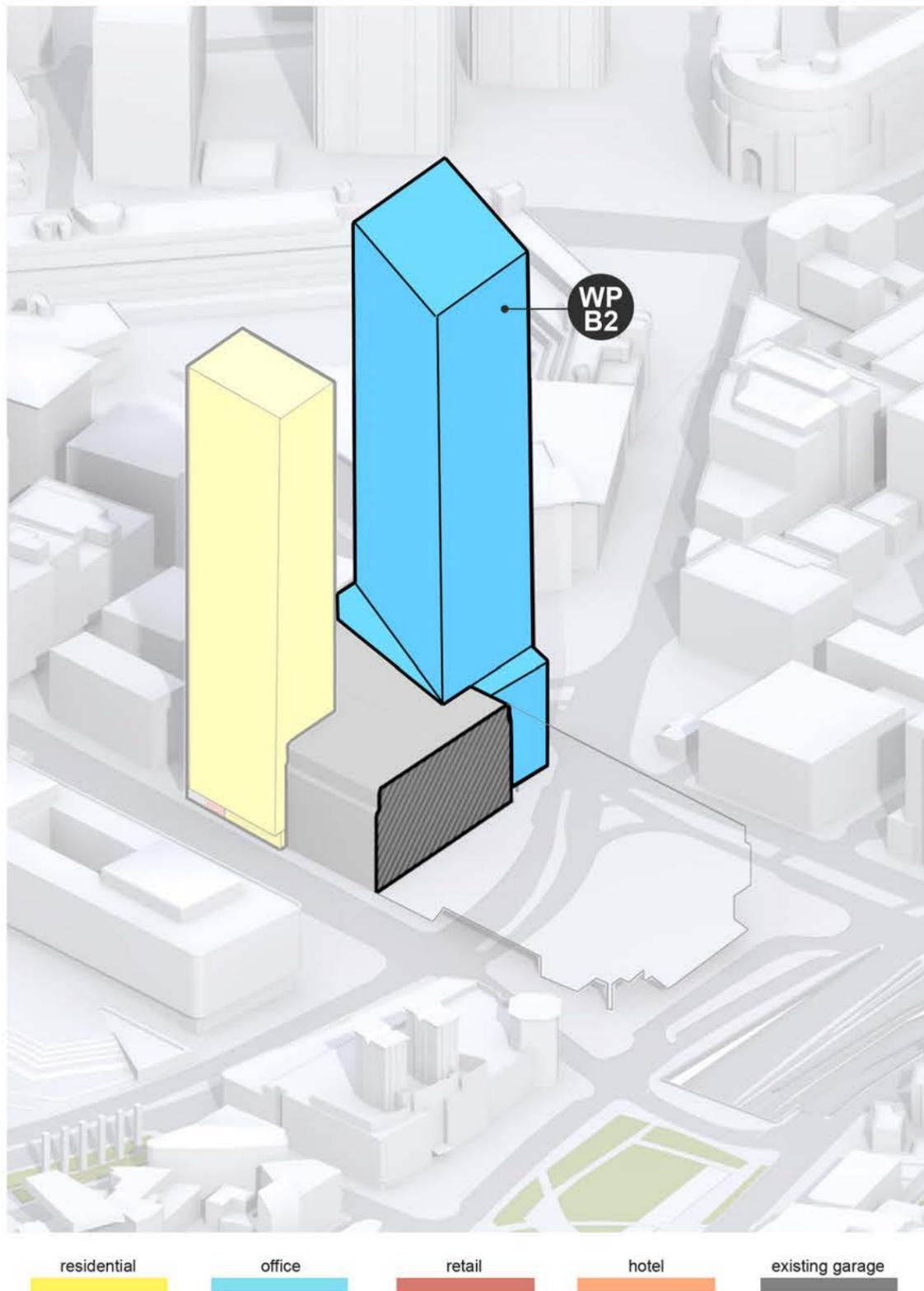
- Enhance and activate New Sudbury Street along West Parcel with streetscape improvements and new ground-floor residential lobby and retail
- Implement Boston Complete Street Guidelines with provisions of a new bicycle lane and enhanced pedestrian facilities along New Sudbury Street
- Enhance the existing neglected and degraded public pedestrian mid-block connection from New Sudbury Street to Bowker Street
- Provide on-site bicycle storage facility for residents and exterior at-grade short-term bike parking for visitors and customers
- Add a new Hubway bike share station on the East Parcel at the existing MBTA Haymarket bus facility
- Provide garage parking for displaced BPD (42 spaces)
- Add five (5) electric car charging stations to the existing garage and provide preferred parking area for fuel-efficient vehicles
- Provide 464 new housing units with approximately 60 units designated as affordable per Boston's Inclusionary Housing Ordinance
- Create over 500 construction jobs in all trades
- Create approximately \$1.5 million in new local real estate tax revenue



residential office retail hotel existing garage

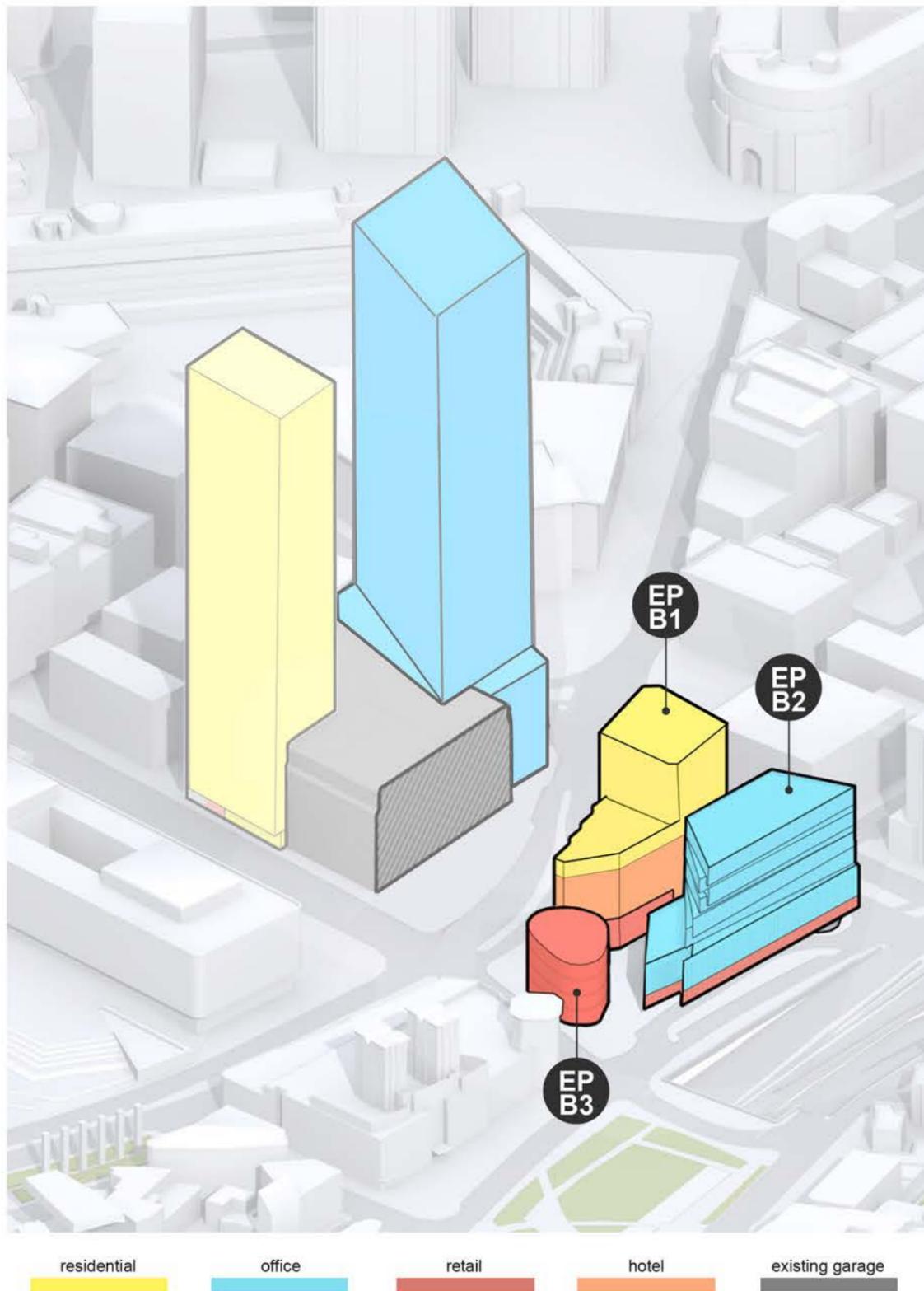
COMMUNITY BENEFITS

- Introduce sky and daylight along Congress Street between New Sudbury and New Chardon Streets
- Visually connect Bulfinch Triangle, North End, and Market District
- Create multiple new vistas, including new views of the Custom House Tower and iconic downtown buildings, such as 60 State Street and the Financial District towers



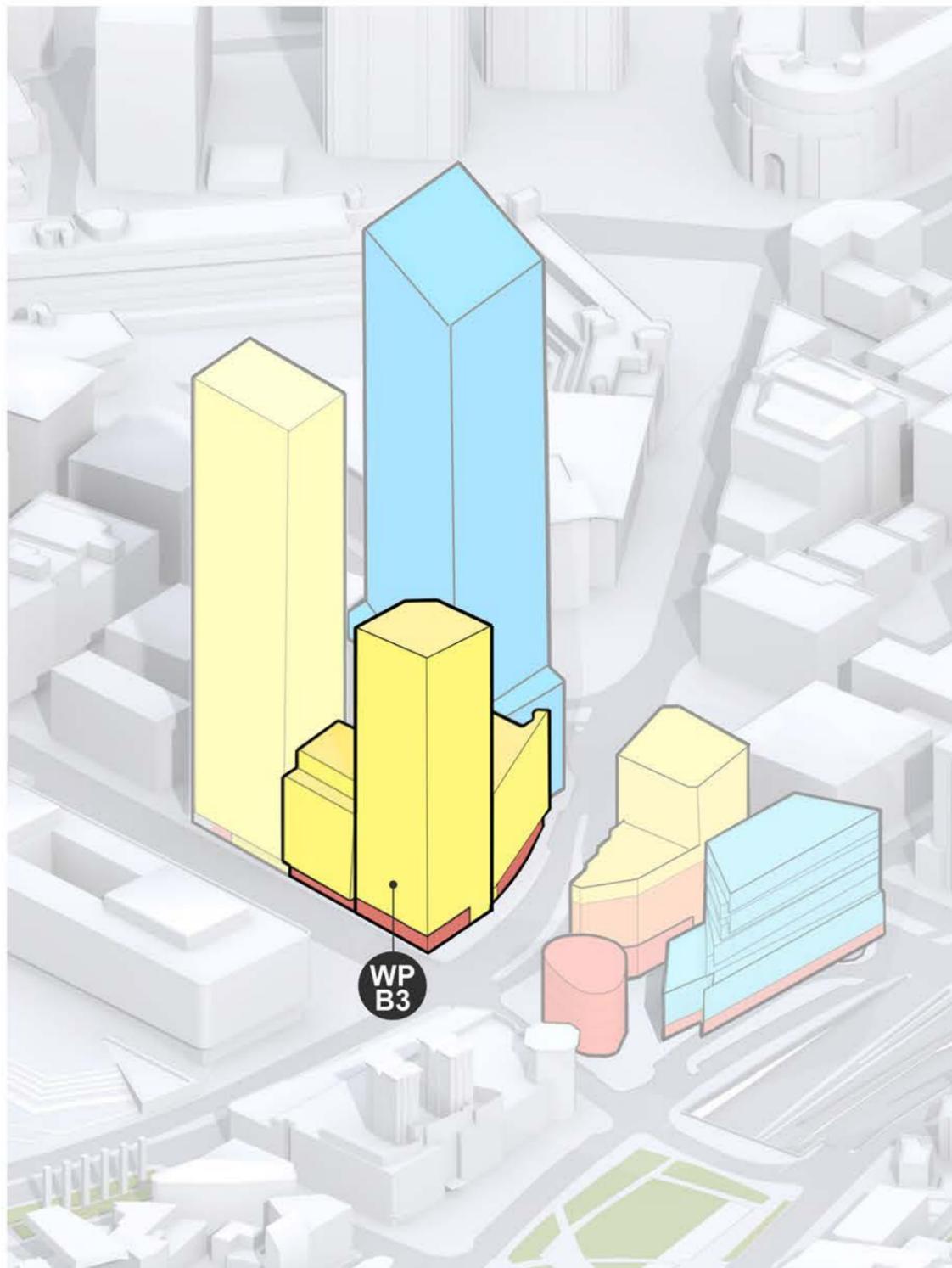
COMMUNITY BENEFITS

- Create new urban open space opportunities at the ground-floor (corner of New Chardon and Merrimac Streets)
- Improve water quality and reducing heat island effect through green roofs/roof garden for use by residents and office tenants
- Implement Boston Complete Street Guidelines with provisions of new bicycle lanes and enhanced pedestrian facilities along New Chardon Street
- Improve pedestrian safety and vehicular circulation by relocating the existing New Chardon Street garage entrance/exit to the Bowker Street/Hawkins Street intersection
- Improve traffic circulation to the regional highway system and local roadway network by allowing vehicles exiting the Garage from Bowker Street to make a right turn onto New Chardon Street and go directly to I-93 Southbound (not currently allowed)
- With the relocation of the Garage entrance to Bowker Street, significantly improve the intersection of Merrimac, Congress, and New Chardon Streets for pedestrians, bicyclists and vehicles
- Provide a new 850-space bicycle storage facility with showers and changing rooms for employees of the new office building
- Provide five (5) additional electric car charging stations in the existing garage and provide additional preferred parking area for electric vehicles
- Encourage the diversification and expansion of Boston's economy in new areas of economic activity with the creation of a new class A office building targeted to creative industry, technology, lifestyle and health care tenants in an area traditionally dominated by government tenants
- Provide exterior at-grade short-term bicycle parking adjacent to the office lobby and new retail stores for visitors and customers
- Create over 1,000 construction jobs in all trades and bring 4,000-5,000 new economy jobs to the site
- Create approximately \$6.5 million in new annual local real estate tax revenue.



COMMUNITY BENEFITS

- Create a new public plaza and promenade to serve as a gateway to and connector between the Bulfinch Triangle and the Rose F. Kennedy Greenway and facilitate pedestrian movement around the Surface Road/I-93 Ramp Parcel
- Create retail-oriented public space that will continue the Market District northward and connect to Canal Street in the Bulfinch Triangle
- Scale the height of the East Parcel buildings to be consistent with the Bulfinch Triangle
- Improve efficiency of and enhance public realm surrounding the MBTA Haymarket bus facility operations
- Provide for bicycle sharing opportunities by continuing to maintain and expand, as necessary, the Hubway bike share station provided in Phase 1
- Create a “net zero energy” public space through the installation of a solar panel system on the East Parcel office building that will provide electricity for the plaza lighting and/or water features
- Support the city’s goal of promoting diversification and expansion of Boston’s economy by adding hotel uses to serve both business and tourist demands, and by creating new local jobs
- Bring additional residents with the inclusion of 57 condominium units above the hotel of which approximately 8 will be designated as affordable per Boston’s Inclusionary Housing Ordinance
- Create 600-700 construction jobs in all trades and 750 new permanent jobs (hotel, retail, and office jobs)
- Create approximately \$2 million in new annual local real estate tax revenue



residential office retail hotel existing garage

COMMUNITY BENEFITS

- Dramatically improve the public realm and architectural character of Congress Street
- Completely enclose the existing garage structure with new active uses, including ground-floor retail and building lobbies as well as apartment units on the upper floors
- Implement Boston Complete Street Guidelines with provisions of a new bicycle lane and enhanced pedestrian facilities along Congress Street
- Upgrade existing garage lobby entrance and installation of new garage elevators
- Provide 291 new housing units with approximately 38 units designated as affordable per Boston's Inclusionary Housing Ordinance
- Expand the on-site bicycle storage center, as needed, and provide exterior at-grade short-term bicycle parking adjacent to the new apartment building lobby and new retail
- Create 350-400 construction jobs in all trades and bring 800-900 employees to the East Parcel (Hotel, Retail and Office)
- Create \$1.0 million new annual local real estate tax revenue

2

General Information and Regulatory Context

2.1 Introduction

The following chapter provides general information, as required by the BRA Scoping Determination, including, but not limited to, a detailed description of the applicant and project team, legal information, and a description of regulatory controls and approvals anticipated for the Project.

2.2 Applicant and Project Team

The Applicant, Bulfinch Congress Holdings, LLC (or BCH), the owner of the Project, is a joint venture of the National Electrical Benefit Fund (“NEBF”) and the Lewis Trust Group. BCH purchased the property in 2007 with the primary goal of redeveloping the Garage; however, the recent recession brought on changed circumstances with all new development essentially stopping as the financial markets went into retreat. Through this time, BCH remained committed to the Project despite the on-site office component becoming 100 percent vacant when the U.S. Environmental Protection Agency (EPA) vacated the property. The recession also caused material drops in parking activity at the Garage. In 2009, BCH brought on HYM, the Developer, to operate the Project and to develop a new viable redevelopment plan on behalf of BCH. BCH and HYM are collectively the Proponent for the Project.

HYM is a Boston based real estate company focused on the acquisition, development and management of complicated urban mixed-use projects. For over 35 years, HYM’s principals have been working on real estate ventures in the Boston, New York and Washington DC corridor. HYM develops, invests, owns and manages real estate assets for its own portfolio and on behalf of major institutional and private investors. HYM is committed to making a positive impact on the communities it works within. In addition to the Project, HYM is currently undertaking the NorthPoint project in Cambridge and Waterside Place in the Seaport District of Boston. The following lists the key members of the development team for the Project:

Developer

The HYM Investment Group, LLC on behalf of
Bulfinch Congress Holdings, LLC
One Congress Street, 10th Floor
Boston, MA 02114
(617) 248-8905
Contact: Thomas N. O'Brien, Managing Director
Douglas J. Manz, Director of Development

Legal Counsel

Rubin and Rudman, LLP
50 Rowes Wharf
Boston, MA 02110
(617) 330-7000
Contact: James Greene, Attorney

Traffic Engineer

Howard/Stein-Hudson Associates, Inc.
38 Chauncy Street, 9th Floor
Boston, MA 02111
(617) 348-3314
Contact: Guy Busa, Jr., Principal

Structural Engineer

McNamara/Salvia, Inc.
160 Federal Street, #5
Boston, MA 02110
(617) 737-0040
Contact: Adam McCarthy

Parking Consultant

Walker Parking
20 Park Plaza
Boston, MA 02116
617-371-4514
Contact: Art Stadig, Vice President

Construction Manager

Tishman Construction Corporation, New England
Region
An AECOM Company
66 Long Wharf, 2nd Floor, Boston, MA 02110

Architect/Sustainability

CBTarchitects
110 Canal Street
Boston, MA 02114
(617) 262-4354
Contact: David Hancock, Principal
Kishore Varanasi, Principal/Director of Urban
Design

Civil Engineering, Permitting, Historic Advisor

Vanasse Hangen Brustlin, Inc./VHB
99 High Street, 10th Floor
Boston, MA 02210
(617) 728-7777
Contact: Howard Moshier, P.E., LEED AP, Senior Project
Manager
Lauren DeVoe, AICP, LEED AP-BD+C,
Senior Environmental Planner

Sustainability Consultant

ARUP
955 Massachusetts Avenue
Cambridge, MA 02139
(617) 864 2987
Contact: Rebecca Hatchadorian, Sustainability
Consultant

Wind Consultant

Rowan Williams Davies and Irwin Inc. (RWDI)
650 Woodlawn Road West
Guelph, Ontario, Canada N1K 1B8
(519) 823-1311
Contact: Jordan Gilmour, Project Manager

Mechanical/Electrical Engineer

WSP Flack+Kurtz
88 Black Falcon Avenue Boston, MA 02210
617-371-4514
Contact: Allan Montpellier

Construction Manager (con't)

617-371-4514
Contact: Thomas A. Erickson, Executive Vice President



2.2.1 Disclosure of Beneficial Interests

A completed disclosure or beneficial interest form in accordance with Section 80B-8 of the Code will be filed by the Proponent. Such form will disclose the beneficial ownership of the Applicant and list the names and addresses of all firms and professional corporations employed as attorneys, real estate brokers, architects, engineers, planners, or surveyors and all other agents who have acted on behalf of the Applicant. This form will be filed with the Secretary of the Authority, the Secretary of the Boston Zoning Commission, and the Boston City Clerk.

2.3 Legal Information



2.3.1 Legal Judgments or Actions Pending Concerning the Proposed Project

There are no legal judgments or suits which would affect the ability of either NEBF or the Lewis Trust Group to proceed with the Project.



2.3.2 History of Tax Arrears on Property Owned in Boston by the Proponent

The property is identified as 50 New Sudbury Street, Ward 3, Parcel 2700. According to the Assessor's records, the Fiscal Year 2011 assessed valuation is \$112,768,000, and the Fiscal Year 2012 first quarter estimated taxes of \$875,079.68 (representing one quarter of the Fiscal Year 2011 taxes) have been paid. Therefore, there are no outstanding real estate taxes owed on the property.



2.3.3 Evidence of Site Control

The Project parcel is owned by BCH, pursuant to a Deed dated February 28, 2007 recorded with the Suffolk County Registry of Deeds in Book 41381, Page 316 and noted on Certificate of Title No. 124328 (the "Property"). The Deed specifically references that the Property includes the fee interest to the centerlines of North Washington Street, (New) Sudbury Street, Bowker Street and New Chardon Street, subject to the rights of the public in these areas. The Property also includes certain overhead and subsurface areas that have been discontinued by the Public Improvement Commission in Merrimac Street, (New) Sudbury Street, Bowker Street and New Chardon Street. The Property is also subject to an easement for the public in Merrimac Street and an MBTA easement on North Washington Street.



2.3.4 Site Control/Public Easements

The Applicant acquired the property at 50 New Sudbury Street by deed dated February 28, 2007 and recorded with Suffolk County Registry of Deeds in Book 41381, Page 316 on March 1, 2007. The property is subject to easement to the MBTA, a Maintenance Agreement with the City of Boston Public Improvements Commission (PIC), and an easement for structural supports from the BRA.

2.4 Project Area Description



2.4.1 Background and History

The existing garage structure was built in the late 1960's as part of an urban renewal project – the Government Center Urban Renewal District, which mandated the clearance of numerous residential and commercial buildings for the construction of local, state, and federal government offices and other related facilities (residential uses were prohibited). This resulted in the construction of a mega-block parking garage, which visually and physically divided and disrupted the urban neighborhoods and districts around it. Conceived at a time when auto-centric policy dominated, the existing underutilized 2,300-space parking garage adds little to the vitality of the area around it and in many ways detracts from the vibrancy of this section of downtown Boston.

The Garage was initially constructed to serve short-term parkers with a capacity of 1,865 commercial public parking spaces. In 1990, approximately 256,532 square feet of office space was added in two levels above the existing ninth floor of the Garage. At that time, 445 new parking spaces were added through reconfiguration and restriping in order to support the new office space, increasing the Garage capacity to approximately 2,300 spaces. Approximately 37,602 square feet of retail space is also part of the existing Garage, mostly along Congress Street, which has historically been heavily underutilized.



2.4.2 Existing Site Conditions and Ownership

The Project Site, as defined herein, consists of 209,949 square feet, or 4.82 acres, exclusive of Congress Street, is composed of the existing garage site, adjacent roadway areas owned in fee by the Applicant, and a small 5,885-square foot area to be acquired. The area of Congress Street has been excluded from this calculation in order to show the area of the Project Site at the completion of the Project.

Congress Street is a two-way arterial street connecting northward to Storrow Drive and Cambridge via the Science Park Bridge, and southward to I-93 at South Station. Bowker Street to the west of the Project Site is a local street running from New Chardon to Hawkins Street. The Surface Road southbound on the east, adjacent to the Greenway, carries local traffic and is a continuous extension of Washington Street from the Charlestown Bridge to Chinatown. New Chardon Street on the north is a two-way arterial street accessing I-93 south and connecting Washington Street to the east and Cambridge Street to the west. New Sudbury

Street is a one-way local street connecting from Cambridge Street and Beacon Hill to I-93 northbound and the North End at Surface Road/Washington Street northbound.

The existing garage structure spans Congress Street and occupies the parcels on both the east and west sides of the street (Figure 1.4). Specifically, the current uses of the Project Site include:

- A 9-story, 2,300-space parking garage with an average daily demand of about 1,050 spaces;
- Approximately 256,000 square feet of office space on two floors built above the Garage;
- Approximately 37,000 square feet of retail space at grade and on the second floor along Congress Street;
- MBTA Haymarket bus facility serving several local and regional bus routes; and
- MBTA Haymarket Transit Station with access to the Green and Orange subway lines.

Enterprise Rent-a-Car operates from a kiosk in the ground-floor garage lobby on the west side of Congress Street and Zipcar maintains eight cars (including two Zipvans) in the Garage. Adjacent to the garage lobby entrance (and under the garage structure) is approximately 4,000 square feet of vacant retail storefront (Figure 1.4). The existing office space above the Garage is not fully occupied. Current tenants include state offices, PUMA, and technology company SCVNGR. Several small businesses currently operate on the east side of Congress Street, including a convenience store and a Dunkin' Donuts. Kaplan Learning Center previously occupied approximately 17,000 square feet of retail space, but recently vacated to a new location in the Kenmore Square area of Boston.

The main entrance to the Garage is off New Chardon Street and the main exit is onto New Sudbury Street. There is a secondary garage entrance is on New Sudbury Street closer to Congress Street. No garage driveways are located on the portion of the Project Site east of Congress Street. Tenants and visitors to the office space use the elevator lobby located at the corner of New Chardon Street and Merrimac/Congress Street. Loading for the existing office space is via an exterior loading dock located on this same corner.

2.4.3.2 Ownership

In response to the Scoping Determination, site ownership is recorded as a single parcel of land from the center lines of Bowker, New Chardon, and New Sudbury Streets to the state highway property line. Various easements exist on, over, and under the parcel, which allow access for public streets and utilities, and for surface and underground construction and operation of MBTA bus and subway systems.

The Project Site may be subdivided into multiple parcels or split into separate building "condominium" parcels in the future as each phase of the Project goes forward. The specific boundaries of these parcels/"condominium" parcels, which will likely have separate owners, have not yet been defined in detail. However, specific information on the current owner of the overall parcel is outlined in Table 2-1 below.

Table 2-1
Ownership Information

Assessing Parcel #:	02700-000
Address (Existing):	50 New Sudbury Street (Legal) One Congress Street (Secondary)
Ownership:	Bulfinch Congress Holdings, LLC
Lot Size:	209,949 square feet (4.8 acres) See Section 2.4.2 for additional detail
Gross Building Area:	Existing: 1,335,000 SF Proposed: See Table 1-1
Occupancies/Tenancies:	Existing: 256,532 SF Office, 37,602 Retail and 2,300 parking spaces Proposed: See Table 1-1

The Project will include the assemblage of various sliver parcels, which are shown the site plans provided in Appendix G. These parcels consist of surface, subsurface and above-grade areas, which will require the conveyance to the Applicant by the BRA and/or the City of Boston through the implementation of a Demonstration Project Plan in accordance with Chapter 121B, Section 46F of the General Laws. It is contemplated that such acquisition and/or discontinuance will occur during the BRA’s review of the specific Article 80 filings for each Project Component.



2.4.4 Description of Metes and Bounds of Project Site

The total Project Site area (including to the center line of the street) at full build-out will contain 209,949 square feet (4.8 acres) and will consist of the West Parcel containing 129,744 square feet and the East Parcel containing 80,205 square feet, which includes areas to be acquired, as described herein. The Project Site is shown on a plan entitled: “Parcel Area Plan of Land in Boston, Massachusetts”, prepared by Vanesse Hangen Brustlin, Inc., scale 1’ = 40’ , dated May 1, 2013 (“Parcel Area Plan”) in Appendix G. As shown on the Parcel Area Plan, there is an area of the existing Congress/Merrimac Street, which contains 40,939 square feet, and which is not included in the total Project Site area of 209,949 square feet. This area of Congress/Merrimac Street, which is now owned by the Applicant, is to be conveyed to the City of Boston upon the demolition of the Garage. A detailed description of the metes and bounds of the Project Site is provided in Appendix G.



2.4.5 List of Nearby Property Owners

As required by the Scoping Determination, list of property owners with addresses located within 500 feet of the boundaries of the Project Site is listed on Appendix F. This list was been provided by the Boston Assessing Department.

2.5 Regulatory Controls and Approvals

Table 2-2 below provides a comprehensive list of what approvals and/or permits are anticipated to be applicable to the Project or the individual Project Components. Generally, this list summarizes the more extensive reviews/approvals that will be required.

**Table 2-2
List of Anticipated Permits and Approvals**

Agency/Department	Permit/Approval/Action
Federal	
Federal Aviation Administration	▪ Determination of No Air Hazard to Air Navigation
U.S. Environmental Protection Agency	▪ NPDES General Permit
Commonwealth of Massachusetts	
Department of Transportation (MassDOT)	▪ Vehicle Access Permit (if required)
Department of Environmental Protection (DEP), Division of Water Pollution Control	▪ Sewer Connection and Extension Permit ▪ Groundwater Discharge Permit (if required)
Department of Environmental Protection (DEP), Environmental Results Program	▪ Permits related to fossil fuel burning building equipment, such as heating boilers and emergency generators
DEP Division of Air Quality Control	▪ Pre-construction notice
Executive Office of Energy and Environmental Affairs (MEPA Office)	▪ Certificate of adequacy from the Secretary ▪ Public Benefits Determination
Massachusetts Bay Transportation Authority	▪ Approval of alterations to MBTA Haymarket bus facility ▪ Amend Easement (if required)
Commonwealth of Massachusetts (continued)	
Massachusetts Historical Commission	▪ Determination of No Adverse Effect or Memorandum of Agreement
Massachusetts Water Resources Authority	▪ Construction Dewatering Permit (if required)
City of Boston	
Boston Air Pollution Control Commission	▪ Parking Freeze Permit Modification for reduction of parking spaces
Boston Civic Design Commission	▪ Review and approval pursuant to Article 28 of the Boston Zoning Code
Boston Committee on Licenses	▪ Parking Garage Permit ▪ License for Storage of Inflammables
Boston Fire Department	▪ Fuel storage permit
Boston Inspectional Services Department	▪ Building Permit (Long Form) ▪ Demolition Permit ▪ Certificate of Occupancy
Boston Landmarks Commission	▪ Review pursuant to Article 85 of the Boston Zoning Code for demolition of the Garage
Boston Parks and Recreation Commission	▪ Commission approval, in accordance with City Ordinance 7-4.11 ¹
Boston Public Improvement Commission/ Department of Public Works	▪ License for installation of groundwater monitoring well ▪ Specific Repair Plan ▪ Street and Sidewalk Occupation Permits ▪ Tieback/Earth Retention Permit ▪ Air Rights Discontinuance (if required)

Agency/Department	Permit/Approval/Action
Boston Redevelopment Authority	<ul style="list-style-type: none"> ▪ Review under Article 80, including Large Project Review, as required pursuant to Article 80B of the Zoning Code and PDA Review, as required pursuant to Article 80C of the Zoning Code ▪ Review pursuant to Article 37, Green Buildings of the Boston Zoning Code ▪ Development Impact Project Agreement pursuant to Article 80B-7 of the Boston Zoning Code
Boston Transportation Department	<ul style="list-style-type: none"> ▪ Transportation Access Plan Agreement ▪ Review and approval of a Construction Management Plan
Boston Water and Sewer Commission	<ul style="list-style-type: none"> ▪ Sewer Extension/Connection Permit ▪ Sewer Use Discharge Permit ▪ Site Plan Approval ▪ Construction Dewatering Permit
Boston Zoning Commission	<ul style="list-style-type: none"> ▪ Zoning Approval subject to BRA recommendation and approval under Article 80C of the Zoning Code, including PDA Approval
Mayor of the City of Boston	<ul style="list-style-type: none"> ▪ Zoning Approval subject to BRA recommendation and approval under Article 80C of the Zoning Code, including PDA Approval
Boston Zoning Board of Appeal	<ul style="list-style-type: none"> ▪ Zoning and Building Code variance(s) (if required)
Boston Employment Commission	<ul style="list-style-type: none"> ▪ Boston Residents Jobs Policy compliance
Boston Departments & Agencies	<ul style="list-style-type: none"> ▪ Comments for Article 80B review ▪ General Operational Permits, Licenses (if required)

NPDES National Pollutant Discharge Elimination System

MEPA Massachusetts Environmental Policy Act

PDA Planned Development Area

1 Because the Project Site is located within 100 feet of the North End park portion of the Rose F. Kennedy Greenway

2.5.1 Government Center Urban Renewal Plan Area

The Project Site is located within the Government Center Urban Renewal Plan Area, Parcel 4, and was subject to the Government Center Urban Renewal Plan (“Plan”). The Plan imposed specific use and dimensional requirements with respect to Parcel 4, which provided for the development and construction of the original garage by the City of Boston in 1967. Subsequent to the development of the garage in 1967, the garage was conveyed in 1983 for further redevelopment as a parking garage with office and retail space. The redevelopment of the property in 1983 was in accordance with the modifications of the Plan as approved by the BRA on November 19, 1983, and also in accordance with and pursuant to the agreements, as noted below. The Plan is governed by agreements entered into by the BRA with a redeveloper. In the case of the Property, the BRA, initially as a redevelopment agency and then on behalf of the City of Boston, had entered into agreements for two major redevelopment proposals for the Property. These agreements were: (i) the LDA and the BRA Deed which were the agreements with the City of Boston which provided for the construction of the garage in 1967, and (ii) the Sale and Construction Agreement and the City Deed which were the agreements with a private developer which provided for the redevelopment of the garage with the additional space for office and retail uses. The provisions of the LDA, the BRA Deed and the Sale and Construction Agreement expired on May 25, 2004. Although the Plan has been amended by the BRA in connection with an extension of the term of the Plan until 2015, the use and dimensional controls or restrictions of the Plan are no longer applicable to the Project Site.



2.5.2 Zoning – PDA Plan Approval

The Project Site is situated within the Government Center/Markets District (the "District"), as established by Article 45 of the Code ("Article 45"), and is located within the Sudbury Street Restricted Growth Area. The Project Site is also situated in a Restricted Parking Overlay District. Prior to the adoption of Article 45 and Map 1H, the Project Site had been situated within a B-8-U, General Business, Special Purpose Overlay District Urban Renewal (URO) district. The general proposed uses: residential hotel; office; and retail, except for the parking garage, are allowed in the District. Pursuant to Section 45-14.4 of the Code, a parking garage and take-out restaurant are uses permitted conditionally in the District. Although accessory parking use in the District is listed in Section 45-14.3 of the Code as an Allowed Use, it remains subject to the restrictions of the Restricted Parking Overlay District and would require approval from the Zoning Board of Appeal (ZBA). In addition to the off-street parking provisions of the Code, the parking garage is also subject to the regulations of the Boston Air Pollution Control Commission.

Article 45, Section 45-6.1 of the Code imposes the following dimensional requirements upon the Project Site: a maximum floor area ratio (FAR) of 6.0, and a maximum height of 80 feet. Such limitations with respect to FAR and height may be modified to allow for an increase of maximum FAR to 7.0 and a height of 100 feet provided that a proposed project is subject to or has elected to comply with Large Project Review under Section 80B of the Code and has received a Certification of Compliance from the Director of the BRA pursuant to Section 80B-6 of the Code. The former district (B-8-U) imposed an FAR limitation of 8.0 for the current building and uses, and exempted the Project Site from all other dimensional requirements of the Code.

As noted above, the Project Site had been located within a URO district, which had been adopted pursuant to Section 3-1 of the Code and provided for certain zoning relief to allow the construction and use of the existing garage and office/retail structure. With the adoption of Article 45 on April 1, 1991, the URO was eliminated.

Zoning relief will be required for the Project's uses and dimensions, such as height, FAR and setbacks. Due to the elimination of the URO district, zoning relief would require a BRA recommendation and approval either from the Boston ZBA or the Boston Zoning Commission. Such approvals would depend on the adoption by the BRA of the appropriate permitting and approval procedure necessary to ensure continued controls on the development of the Project and to ensure the provision of Project benefits and mitigation.

As noted by many commentators during the PNF comment period, the size of the Site and scope of the Project lends itself to a Planned Development Area ("PDA") designation. In order to proceed with such PDA designation, the Proponent intends to work with the BRA to finalize a PDA zoning overlay district. At this time, the BRA has adopted the Greenway District Overlay zoning, which includes the Project Site. Such overlay zoning was adopted by the Boston Zoning Commission on August 14, 2013. In connection with such overlay zoning, the BRA has proposed the adoption of zoning controls for certain areas within the Greenway, including the Town Cove Area or Wharf Street Restrictive Growth Area, as well as the Government Center Garage Site. Upon recommendation by the BRA to the Zoning Commission for the designation of the Project Site as a PDA eligible area, the Proponent would then file a draft development plan for public review and comment in accordance with Article 80C of the Code.



2.5.3 Massachusetts Environmental Policy Act Review

The Project is subject to environmental review by the Secretary of the Executive Office of Energy and Environmental Affairs (EEA) pursuant to the Massachusetts Environmental Policy Act (MEPA) because the Project will involve a land transfer between the Proponent and the City of Boston and Commonwealth of Massachusetts. The Project also exceeds the MEPA review thresholds for wastewater generation for an Environmental Notification Form (ENF) and the transportation review threshold for a Mandatory Environmental Impact Report (EIR) based on unadjusted trip generation (calculated using the Institute of Transportation Engineer's trip generation rates). It is anticipated that the sewer generation would trigger the need for a Sewer Extension/Connection Permit from DEP and, due to the Project's proximity to state highway, it will likely require an Indirect Access Permit from MassDOT. The Proponent plans to file an ENF with the MEPA Office following the City's review of this DPIR in order to initiate MEPA review.



2.5.4 City of Boston Zoning Code Article 80B – Large Project Review

The Proponent has commenced Large Project Review under Article 80 of the Code with the filing of a Letter of Intent with the BRA on June 21, 2011, that indicated the Proponent's intent to file a PNF in connection with the Project (i.e., for approval of the conceptual master plan). A copy of this letter is provided as Attachment A of the PNF submitted on June 5, 2013. The PNF presented details about the Project and provided information and/or preliminary analysis of transportation, environmental protection, infrastructure, and other components of the Project, in order to inform the City agencies and neighborhood residents about the Project and its potential impacts and proposed mitigation. Following review of public and agency comments on the PNF, more detailed analysis and information addressing public comments are presented this DPIR, in accordance with the Scoping Determination issued by the BRA on August 9, 2013, pursuant to the Article 80B process.

It is anticipated that each of the Project Components will be subject to Large Project Review under Section 80B of the Zoning Code because they exceed the threshold of 50,000 square feet of gross square footage of development. Because the Project is phased, for which design development will proceed sequentially, it is anticipated that any required Article 80B, Large Project Review will occur at different times for separate Project Components. The intent of these filings will be to update, as needed (i.e., due to changes in design), the analyses conducted as part of the June 2013 PNF and/or this DPIR as individual Project Components are designed in more detail and submitted for BRA review and approval as part of future Article 80, Large Project Review. These documents will include more specific measures intended to mitigate, limit, or minimize impacts, where appropriate, as required by local, state, and federal regulation. This process is illustrated graphically in Table 2-3 below.

**Table 2-3
Development Review Components Evaluated**

Development Review Component	Analysis Included in PNF (Yes/No)	Analysis Included in DPIR (Yes/No)	Analysis Included in Future Article 80, Large Project Review (Yes/No/Explanation)
Urban Design	Yes	Yes	Yes, based on more final project design
Transportation	Yes	Yes	Yes, with 5-year background traffic update, as needed
Parking	Yes	Yes	Yes, to update for each phase, as needed
Wind	Yes (qualitative only)	Yes	Yes, with updated wind tunnel study, as needed, based on more final building design (i.e., to test mitigation options)
Shadow	Yes	Yes	Yes, to update, as needed for major changes in building height and/or massing
Daylight	No	Yes	Yes, to update, as needed for major changes in building height and/or massing
Solar Glare	Yes (qualitative only)	No	Yes, based on more final design of building skin and exterior materials
Air Quality	No	Yes	Update if material changes are made from the DPIR analyses
Water Quality	Yes	No	Yes, based on more final drainage system design
Flood Hazard	Yes	No	No*
Groundwater/Geo-technical	Yes	No	To address as needed under Construction
Solid and Hazardous Waste	Yes	No	To address as needed under Construction
Noise	No	Yes	Yes, to update, as needed for major changes in building system or service/loading design
Temporary Construction Impacts	Yes (qualitative only)	Yes	Yes, detailed CMPs to be developed
Rodent Control Post-Construction	No	Yes	The Project will implement a post-construction rodent control program.
Sustainability/Green Building	Yes	Yes	Yes, based on more final project design; Draft LEED Scorecards for individual Project Component
Infrastructure Systems	Yes	Yes	Yes, based on more final project design, connection needs and demand loads
Historical, Architectural, Archaeological and Cultural Resources	Yes	Yes	Yes, as needed, for major changes in height/massing (i.e., wind/shadow impacts)

* However, Proponent will continue to address climate change/adaptation measures under Sustainable Design/Green Building.

2.5.4.1 Development Impact Project

The Project is a Development Impact Project, as defined in Article 80B-7 of the Code, because it requires Zoning Relief and will “substantially rehabilitate a structure or structures having, or to have after rehabilitation, a gross floor area of more than 100,000 square feet.”



2.5.5 Boston Landmarks Commission

The Boston Landmarks Commission (BLC) will review the proposed demolition of the Government Center Garage structure through the Article 85 Demolition Delay Review (Article 85 review) and the Project through the Chapter 254 review (review by the Massachusetts Historical Commission [MCH]).

Every building in Downtown Boston that is proposed for demolition is subject to the Article 85 review, which seeks to provide a predictable process for reviewing requests to demolish buildings. The Proponent will follow the requirements of the Article 85 review when project planning and timing requires the submission of an Article 85 application to the BLC.

The Proponent will consult with the Massachusetts Historical Commission (MHC) and the Boston Landmarks Commission (BLC) if there is state or federal involvement in the Project.



2.5.6 Boston Parks Department

The Project is situated adjacent to the Rose Kennedy Greenway and, pursuant to Chapter 306 of the Acts of 2008, the Rose Fitzgerald Kennedy Greenway Conservancy, Inc. has the power to review in a manner consistent with the City of Boston Ordinances and to advise the City's Parks and Recreation Commission with respect to the construction or alteration of any building or structure within 100 feet of the Greenway or other open space parcels. This section further details that this consultation does not alter or diminish the City's authority over the development of any building or structure on development parcels or within 100 feet of the Greenway. By this reference in Chapter 306 of the Acts of 2008, the Parks Department has asserted Parks Department review over the construction of projects along the Greenway, and such review is deemed to be in accordance with City of Boston Ordinance 7-4.11. The Proponent will submit a Parks Commission Application Form describing the Project, together with plans and illustrations for review by the Commission, and looks forward to making a presentation before the Commission.



2.5.7 Federal Aviation Administration Airspace Requirements

The Project is within the height limits, as defined on Massport's Logan Airspace Map and, therefore, will not pose a hazard to air navigation or encroach into any airspace surfaces. Each Project Component exceeding 200 feet in height, including construction cranes will be required to receive a determination of no impact from the Federal Aviation Administration (FAA). As the FAA determinations expire, the Proponent will file with the FAA on a phase-by-phase basis as the design of each Project Component progresses. These submittals will also outline the lighting proposed to comply with FAA requirements.

3

Urban Design

3.1 Introduction

This chapter provides a description of design development and addresses the key urban design comments of the BRA Scoping Determination. Appendix H of this DPIR provides supplemental urban design graphics. The revised Project, as described in Chapter 1, *Project Description*, continues to provide the opportunity to remake a portion of the City of Boston by pursuing a wide range of strategies to create both a highly nuanced and yet a highly transformative development. The prime objective continues to be to break the existing mega-block by opening Congress Street to air and daylight, creating two new vibrant mixed-use appropriately scaled urban blocks with active and pedestrian-friendly ground floors and public spaces. The project design continues the goal of creating truly Boston buildings, where the collective composition of buildings transcends local scale and context to create a built form that is of a global metropolitan scale, and decidedly, of the 21st Century. The following goals and objectives continue to guide the project design:

1. Daylight Congress Street and provide new views/vistas by breaking the mega-block into two appropriately scaled urban blocks.
2. Create a vibrant urban environment through the introduction of new/different uses (e.g., residential, hotel, office and retail tenant mix).
3. Design a viable phased redevelopment strategy that provides community benefits with manageable construction impacts.
4. Enhance pedestrian connections through and around the Project Site.
5. Activate the public realm with new public open space and streetscape improvements.
6. Be a leader for sustainability.

The revised Project represents an evolution of the project design that considers and incorporates BRA, community, and other public entities feedback and comments received on the PNF.

3.2 Design Development



3.2.1 Building Height

Section 1.4.2 of Chapter 1, *Project Description* provides a detailed summary of the project changes. The proposed changes, specifically changes in building heights further make the Project consistent with the intent of the Greenway Design Guidelines and in some cases are lower than the requirements. For example, on the East Parcel the Greenway Guidelines allow buildings of heights up to 125 feet and 150 feet where the Project proposes lower heights of 65 feet and, as part of the project changes, lowers the tallest portion of the East Parcel redevelopment (EP-B1) to 157 feet from 275 feet (Table 1-1). Further, the Guidelines allow for up to 600 feet in building height on the West Parcel whereas the currently proposed scheme's highest element measures only 528 feet (Table 1-1). The mixture of the different massing of the proposed buildings on the eastern and western portions of the Property, the removal of the portion of the existing garage that currently is over Congress Street, the introduction of residential, hotel and greater retail uses, and the improvement of the streetscape and pedestrian realms will all foster a greater sense of neighborhood and major connection for the Downtown, Bulfinch Triangle and North End areas – all goals of the Greenway Planning Study. Refer to Figures 3.1a and 3.1b illustrate the building height changes. Refer to Figure 3.2 for Greenway District Guidelines Comparison.



3.2.2 Massing Strategy

The Project Site is a unique location in the City with its nodal character between multiple neighborhoods and access to a major transportation network. The focus of this development would be to become a best practice example for transit oriented development with great public spaces and high quality architecture.

The redevelopment of the Garage will provide a presence both near and far. The existing 11-story monolithic super block is clearly out of context in the surrounding neighborhoods. A project of this nature, which is surrounded by districts of varying scales and character with shifting urban grids and historic layers, requires a resolution at multiple scales. In addition, given the scale of the Project itself, the massing should consider its presence on the skyline of Boston from various perspectives. The project design aims to mediate these scales very carefully while delivering a visionary project for Boston.

Across the development the project allows for the idea of multiple buildings organized as a composition while still allowing for the buildings to have appropriate spacing in between. This is achieved through the usage of smaller floor plate residential typologies or point towers and shaping of the individual buildings to allow for views past each other. Refer to Figure 3.3 for an illustration of the urban form concept.

It is vital that such a project be highly elegant and transformative while still allowing for urban vistas from a distance. The Downtown, Government Center and West End developments are a fabric of towers on the skyline; additional towers are proposed at North Station and Martha Road. The visual presence of the Project has been studied in depth for its appearance on both the existing and the emerging Boston skyline as well as from various distant view points and neighborhoods such as the Greenway, North End, West End, Bulfinch Triangle and Beacon Hill. The proposed composition and scale of the overall Project is fitting to such a

lynchpin location in the City. The composition of the project and the tower elements is designed to gradually step up away from the Greenway. A strategy of height variation for towers, particularly the ones on the West Parcel, has been an important aspect of the design.

The architectural expression of the project is intended to be highly contemporary in nature. The Project will create six individual buildings in addition to the remaining portion of the Garage. In keeping with the general context of the surrounding neighborhood each building will have its own address, identity and direct pedestrian entrance from the street. It is the intent of the Proponent to develop individual architectural expression for each of the buildings while maintaining a holistic composition. The massing geometries of the proposed vision respond to the desire lines that are often acute from one another. The acute geometry of sites produces unique buildings in Boston that are not regularized shapes. The site is organized into two blocks – east and west.

The scale of the buildings on the East parcel is in keeping with the scale of Bulfinch Triangle and Blackstone Block. However, the architectural expression of the block as it attempts to reconnect multiple districts will reflect the qualities of these districts while maintaining a contemporary aesthetic.

West Parcel is unified by the base podium on which the three buildings sit. The architectural expression of the buildings assumes the three important portions of base, middle and top. It is however, the design intent to unify these three where the towers comedown and integrate with podiums while still creating a comfortable pedestrian scale.

3.3 Architecture and Materiality

Figure 3.4 shows an aerial rendering of the revised Project. WP-B1 will have an entrance and address on New Sudbury Street. This building is currently designed as a “point block” building that is a residential floor plate composed of apartments surrounding a central elevator core (as opposed to a corridor building with apartments down both sides of a central hallway). It will be a relatively slender upper massing with a floor plate which is a departure from typical bigger floor plates that are quite common in Boston. The exterior building façade treatment, or “skin,” will be carefully articulated precast concrete with some elements of glass curtain wall and metal panel infill. WP-B1 will have operable windows giving its facades a readable scale. The lower levels of this apartment building pass through and in front of the Garage. One set of structural columns will pass within an existing interstitial space in the existing Garage and a second set of columns will land just outside the Garage. This set of columns just outside the Garage will allow the addition of single-loaded apartment units which will wrap and hide the Garage from view in this area. At the ground level, the apartment building will have a residential lobby and new adjacent retail activating the street level and also hiding the Garage from view in this area.

The proposed office building (WP-B2) will have an address and lobby entrance on New Chardon Street. It will be a glass and aluminum curtain wall clad building. It is generally intended to be a highly efficient, modern, multi-tenant downtown office building; but it will have a modest degree of elegant rooftop articulation and a broad canopy and a small street front public plaza marking its entrance. The office building will not have operable windows, but the pattern and texture of mullions and non-transparent materials will provide a scale-giving texture. Adjacent to the office lobby will be new street front retail spaces, completing

the conversion of the former garage entrance and helix area into a vibrant street front with very active pedestrian and street front uses

The West Parcel (WP-B3) apartment building will, on the lower levels, be a corridor building with single-loaded units that wrap the Garage on Congress and New Sudbury Streets. Once the building is above the existing garage height, it will transition into a point block building footprint at the corner of New Sudbury and Congress Streets. The design of WP-B3 will be a combination of pre-cast/metal panel and curtain wall system

The proposed hotel/condominium building (EP-B1) will be a corridor building as it follows Congress Street and forms one side of the new pedestrian plaza. This building will have a dynamic architectural quality resolving the acute corners formed by the urban grid of Boston through unique resolutions of building geometry.

A smaller office building is located on the East Parcel (EP-B2) along the Greenway. This trapezoidal shape building is uniquely formed by the public desire lines of the new public plaza that connects Washington Street, Canal Street and the Greenway. This unique form also steps down from the Bulfinch Triangle towards the Greenway to respond carefully to the context. This building will play a threshold role by responding to two scales – a bottom portion that responds to the more solid historic nature of the Blackstone Block while the upper portion begins to transition to a more transparent idiom consistent with rest of the development.

Lastly, the retail building in East Parcel (EP-B3) is intended to be iconic, transparent and glowing while providing a great terminus to Canal Street, but also celebrating the intersection of Congress Street, the Greenway, and Canal Street with shared presence on all three streets.

3.4 Public Realm and Open Space

Removal of a portion of the existing garage structure offers the opportunity to more seamlessly connect surrounding neighborhoods with active ground floor uses, attractive sidewalk and streetscapes and appropriately scaled massing. One of the biggest public benefits of the Project continues to be the creation of a vibrant new pedestrian plaza on the East Parcel. The East Parcel is at the nexus of some of the most important pedestrian desire lines connecting Canal Street and Bulfinch Triangle area, the Greenway, Congress Street, Washington Street, North End and the Market District. This proposed all-season and open air pedestrian space, surrounded by retail and with one of the entrances to the MBTA Haymarket Station, would not only create a comfortable pedestrian environment but also a great urban destination. The key to creating a vibrant and successful public space on the East Parcel will depend on ground-floor uses that would complement the Market District and Bulfinch Triangle. The Project includes active publicly accessible ground-floors on all surrounding roadways as well as in the new public plaza that aim to attract visitors to this area of the City. Refer to Chapter 1, *Project Description* for a list of potential ground-floor uses, in accordance with the BRA's draft Greenway Overlay District list of ground-level uses (Appendix A of Article 49A).

Figure 3.5 shows the updated public realm plan, which reflects improvements to the proposed pedestrian plaza on the East Parcel. Key improvements include widening of the plaza (by 25 feet to 85 feet at its widest point) to further enhance the quality of the space and enlarged Haymarket MBTA bus facility platforms for better functionality. Envisioned as a gathering place for commuters, tourists, and residents alike, the plaza at

the East Parcel and balances multiple needs of pedestrian movement, desire to create a destination and maintain the operations of public transit. The plaza will feature contemporary lighting, seating areas, and special pavements. Together, these materials are intended to create a modern, urban space that references the history of the Haymarket hub while providing a new pedestrian hub for the North End, the Sports/Entertainment District to the North, and the city centers to the South. Connections to Canal Street will be emphasized through an improved pedestrian crossing and lines of trees that echo the canopy of Canal's streetscape. Innovative and energy-efficient lighting will echo the seasonal festivals of the North End and create a new visual beacon for this part of the city. The plaza will be surrounded by active ground and second floor retail uses that engage and activate the space 18x7. Café terraces will provide a rich and varied plazascape for the daily commuters moving to and from the space, while also creating new destinations for the less-trafficked times of day. Figure 3.7 illustrates the mix of land uses.



3.4.1 Green Roofs & Roof Gardens

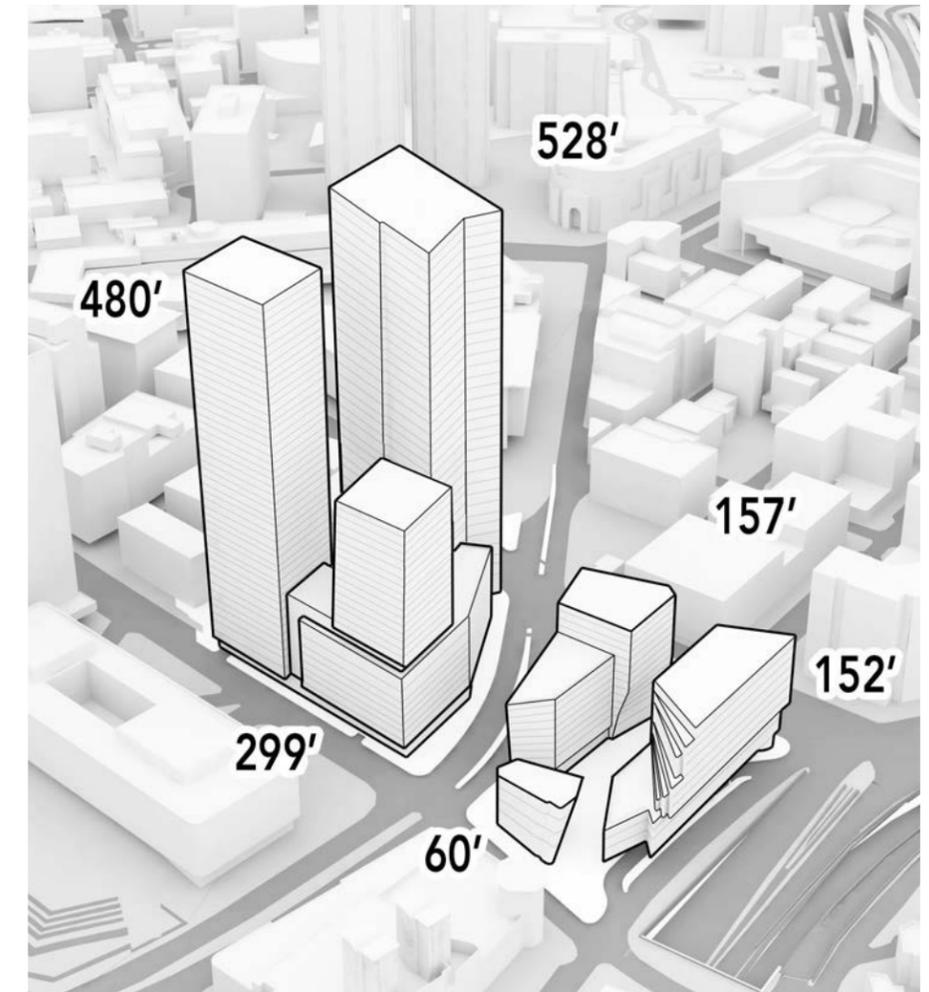
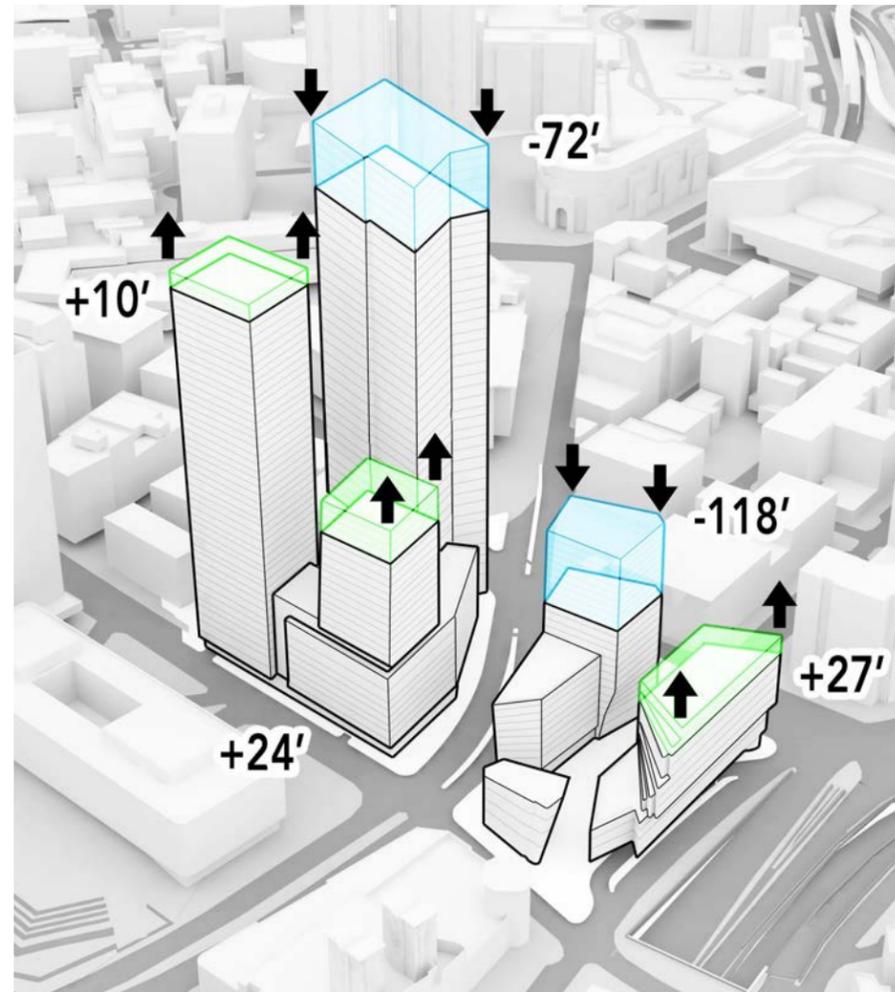
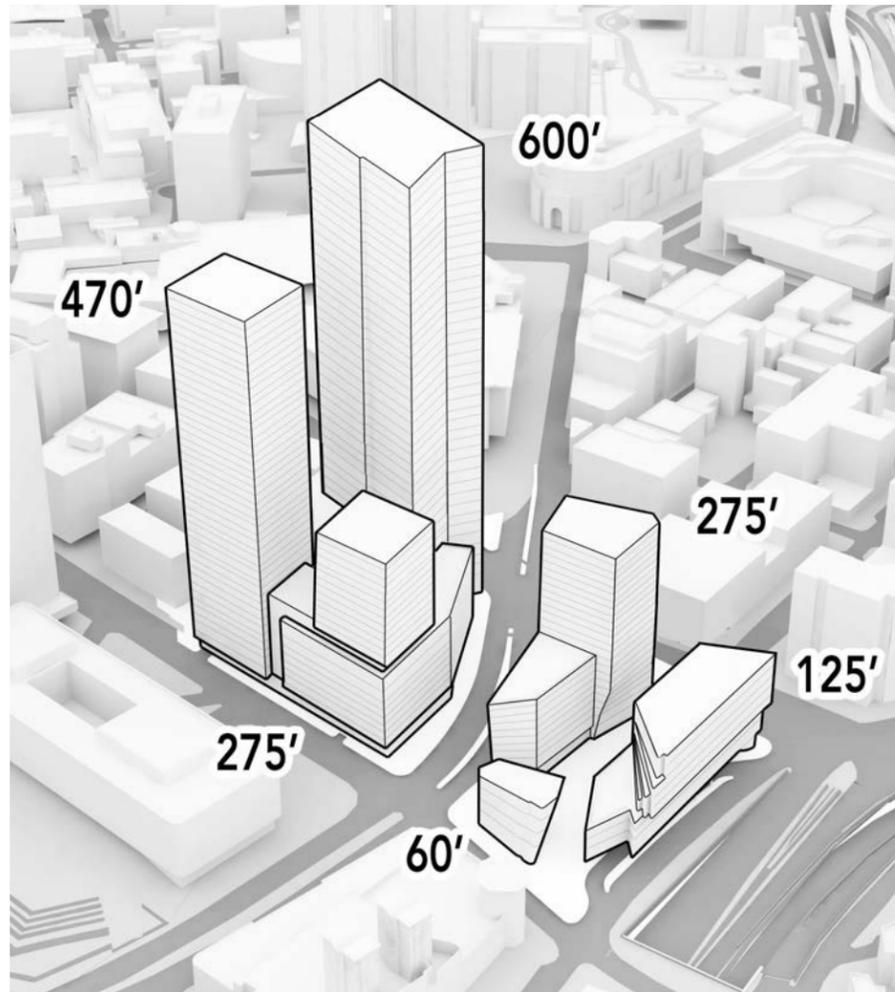
Figure 3.6 illustrates the conceptual roof plan of the proposed green roofs and roof gardens. The revised Project enhances the opportunity to incorporate a substantial amount of green roof and roof garden/deck areas as an outdoor amenity for the residents and tenants as well as a sustainable measure for the various buildings. With the proposed changes to the West Parcel podium, including the elimination of office space on the 11th floor in the middle of the block and the shift of WP-B2 away from Bowker Street the opportunity for green roof and/or usable open space increases.

The East Parcel will continue to incorporate green roofs and/or roof gardens / decks, as previously proposed in the PNF. Combined, the Project will introduce approximately 30,000 square feet of green roof and roof garden/decks combined. All of the proposed green roofs and roof gardens, in addition to being an amenity for the redevelopment, will allow for material reduction of heat island effect and help manage the rain water.

3.5 Service Access and Loading

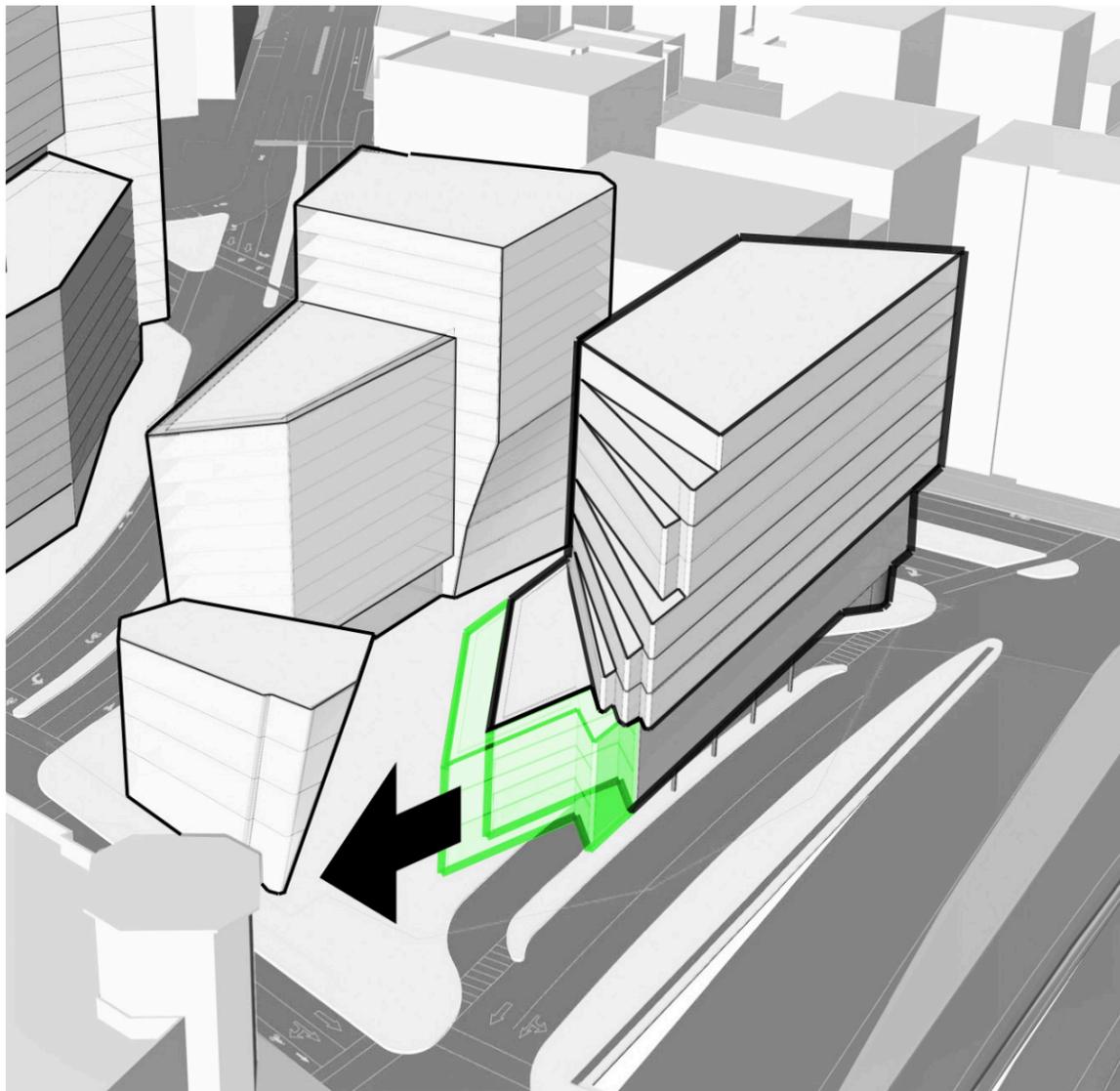
The above-grade garage will be fully faced by West Parcel building uses on New Sudbury, Congress Street and New Chardon Streets. The façade on Bowker Street will not be covered but streetscape improvements will be implemented on Bowker Street.

Major service and parking entries are located on Bowker Street. Where service functions are provided on other locations, the aperture of such areas is minimized and architecturally treated. The condition of Bowker Street will be improved by the creation of retail at the base of the office building, streetscape improvements (street lighting, landscape) and landscape improvements at the pedestrian connection between Bowker Street and New Sudbury Street. Refer to Appendix H for pedestrian and vehicular circulation plans.

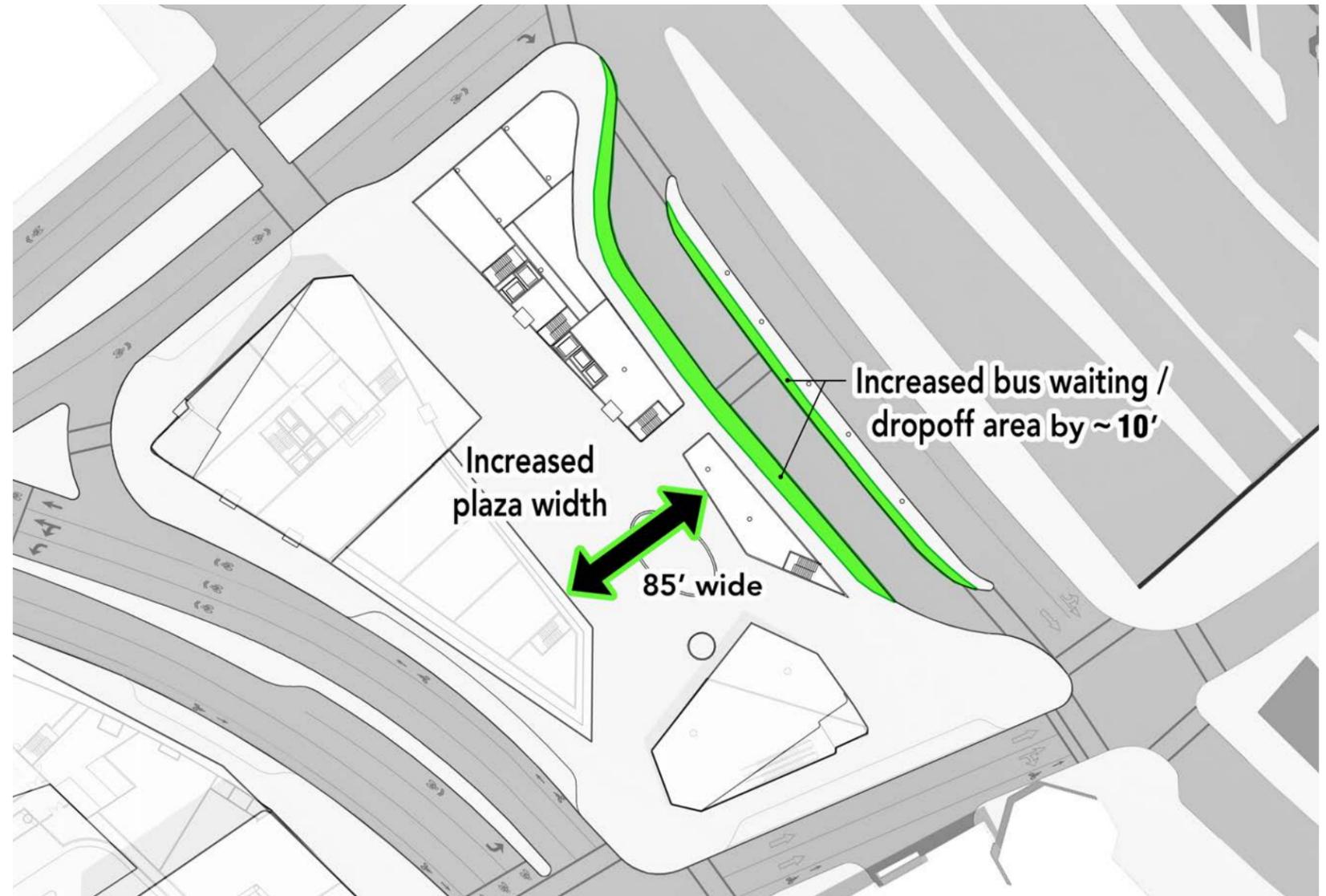


PNF Heights

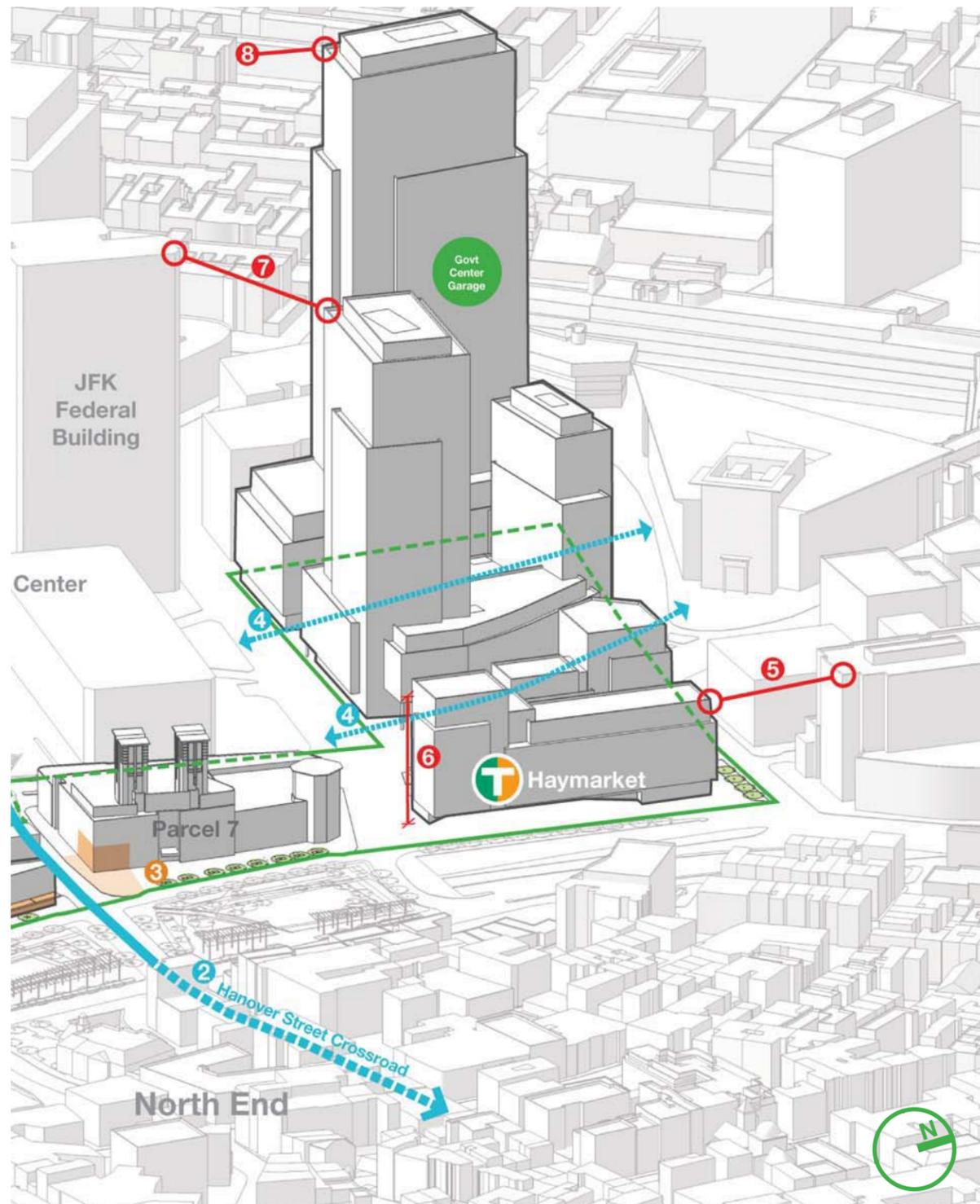
DPIR Heights



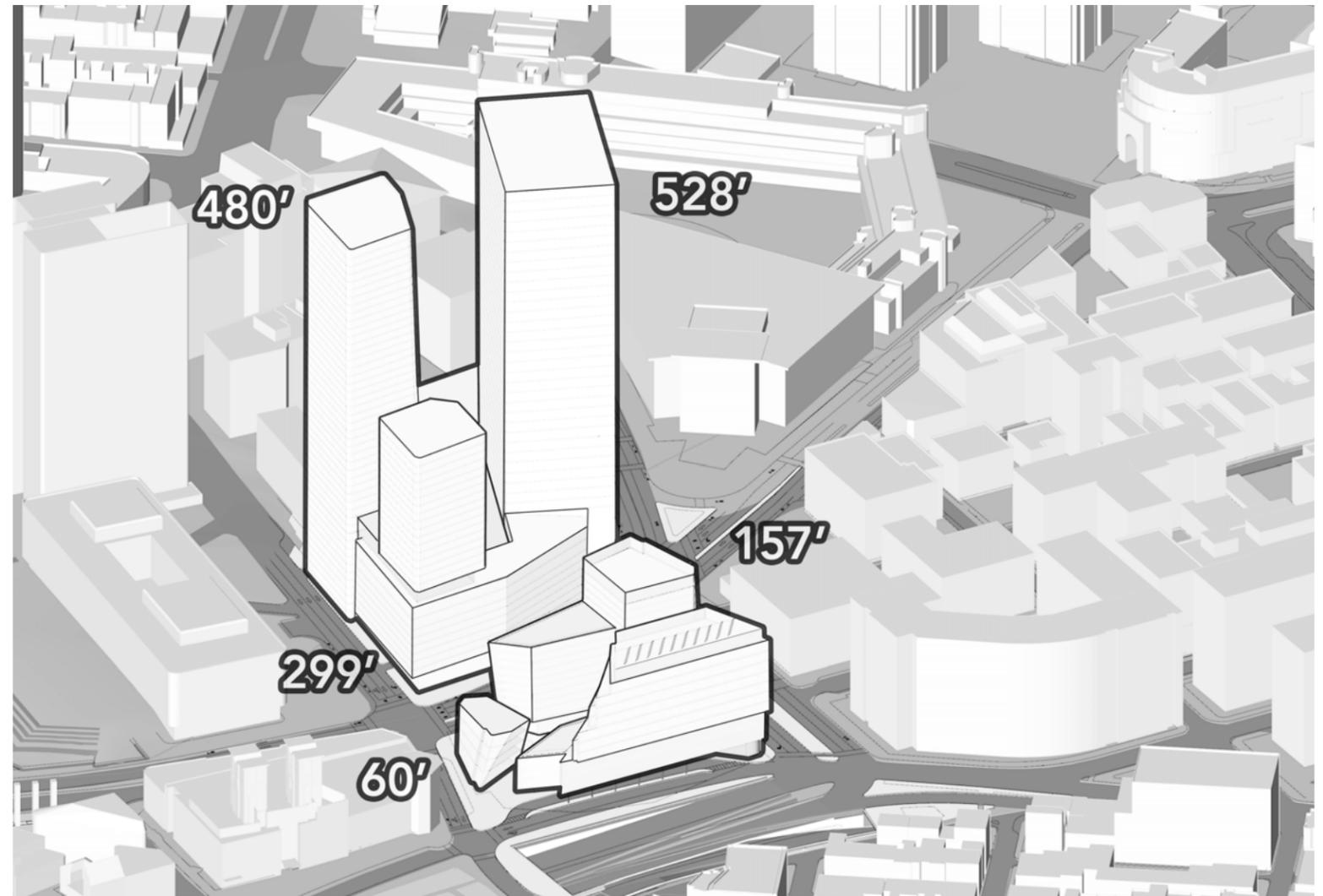
EPB2 shifted to cover bus waiting area & re-align pedestrian access



Open space modifications to East Parcel



BRA Greenway Study & Guidelines

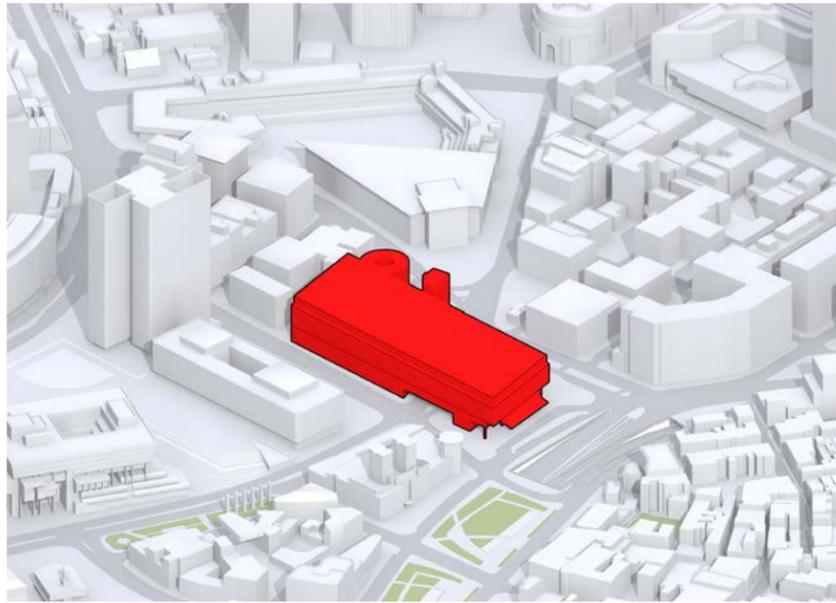


Dimensional Criteria

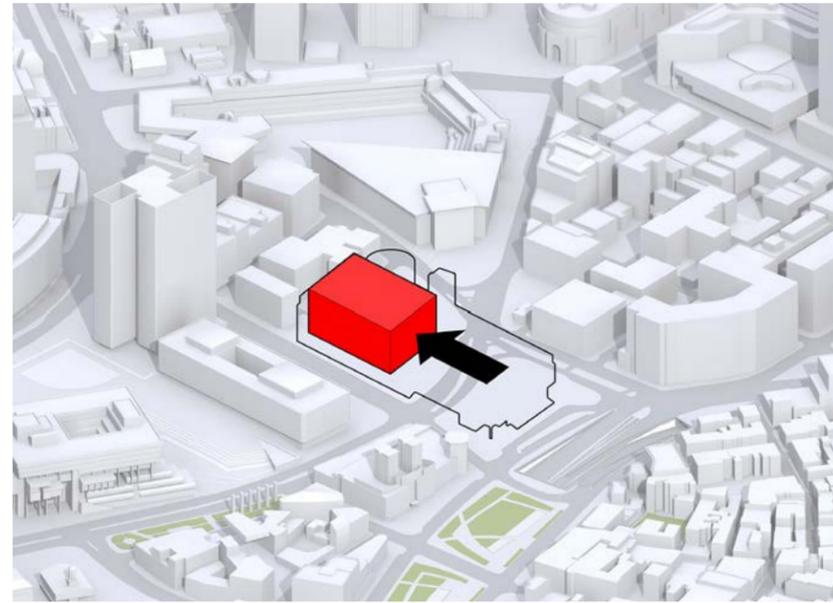
- 5 125' to correspond with the heights in the Bulfinch Triangle.
- 6 150' at the New Sudbury Street corner of the existing Government Center Garage.
- 7 400' or approximately aligned with the taller portion of the JFK Federal Building.
- 8 400-600' matching the tallest buildings in the Downtown.

Connectivity

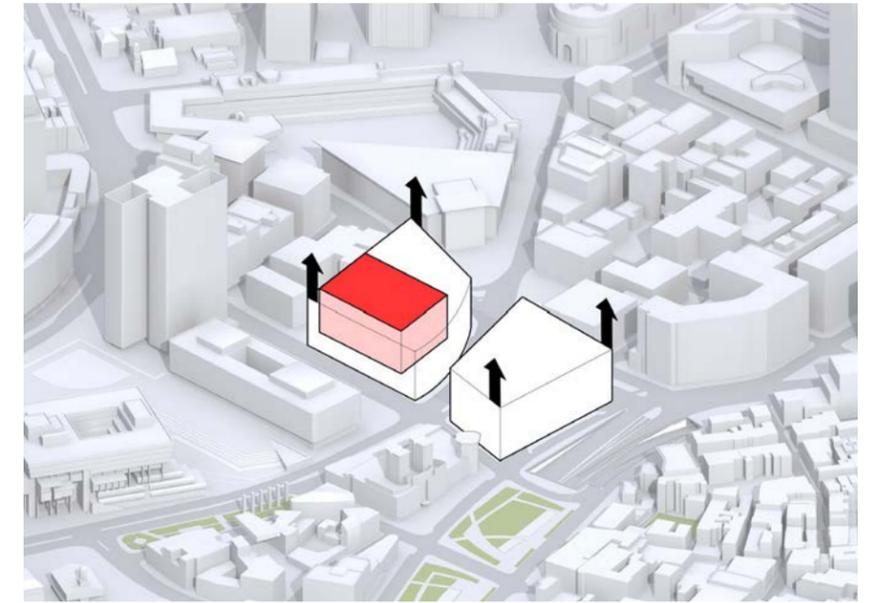
- 4 North-South connections between the Government Center Garage site and the Bulfinch Triangle will link the Market District to this important mixed-use and entertainment zone, and to the critical transportation hubs at Haymarket and North Station.



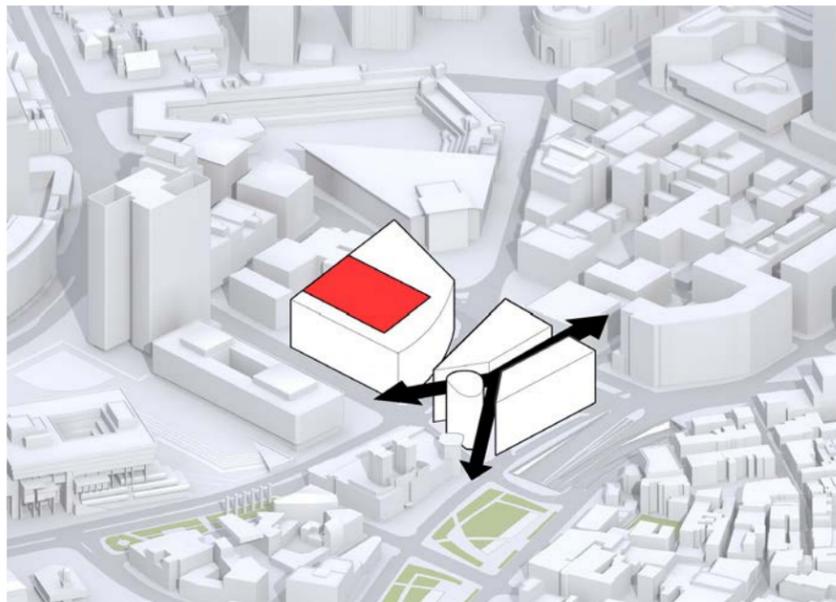
1. Existing garage



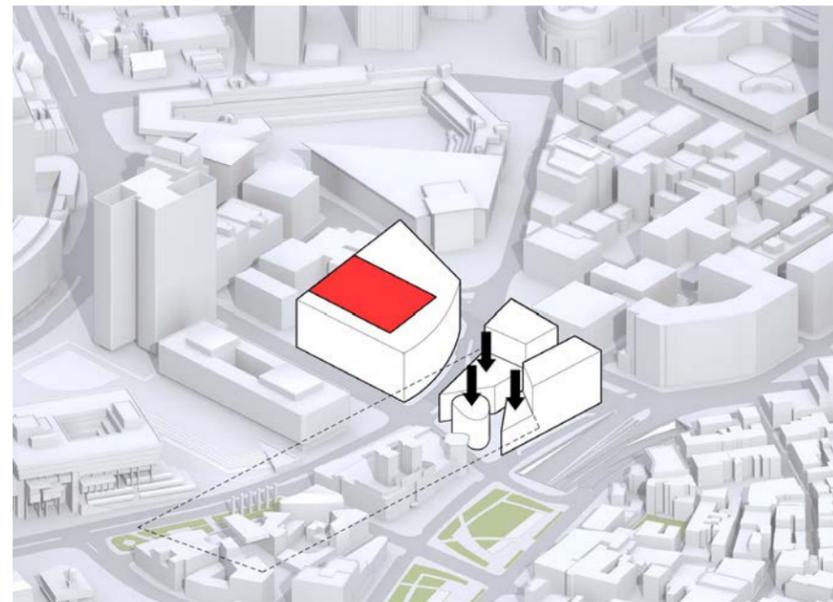
2. Garage to remain



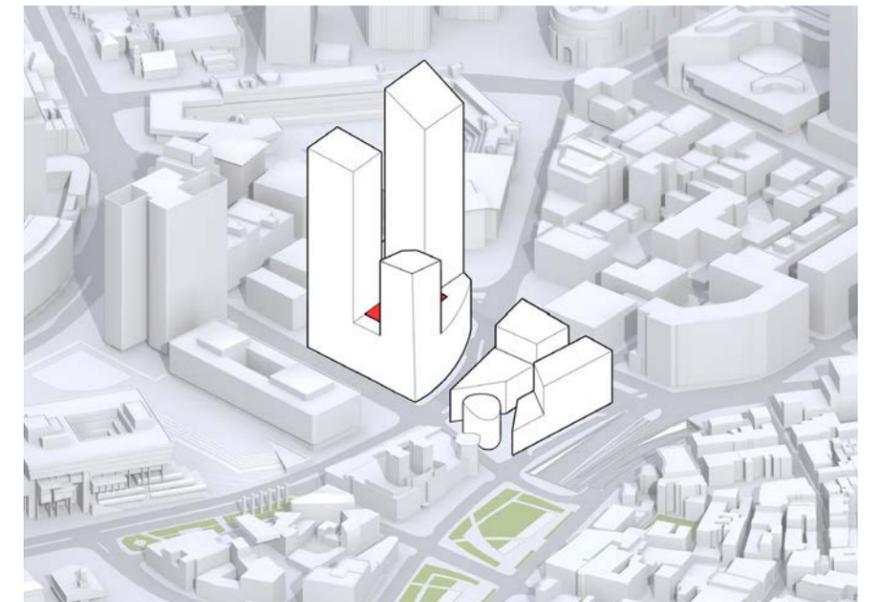
3. Wrap garage with active program matching the scale of Bulfinch Triangle



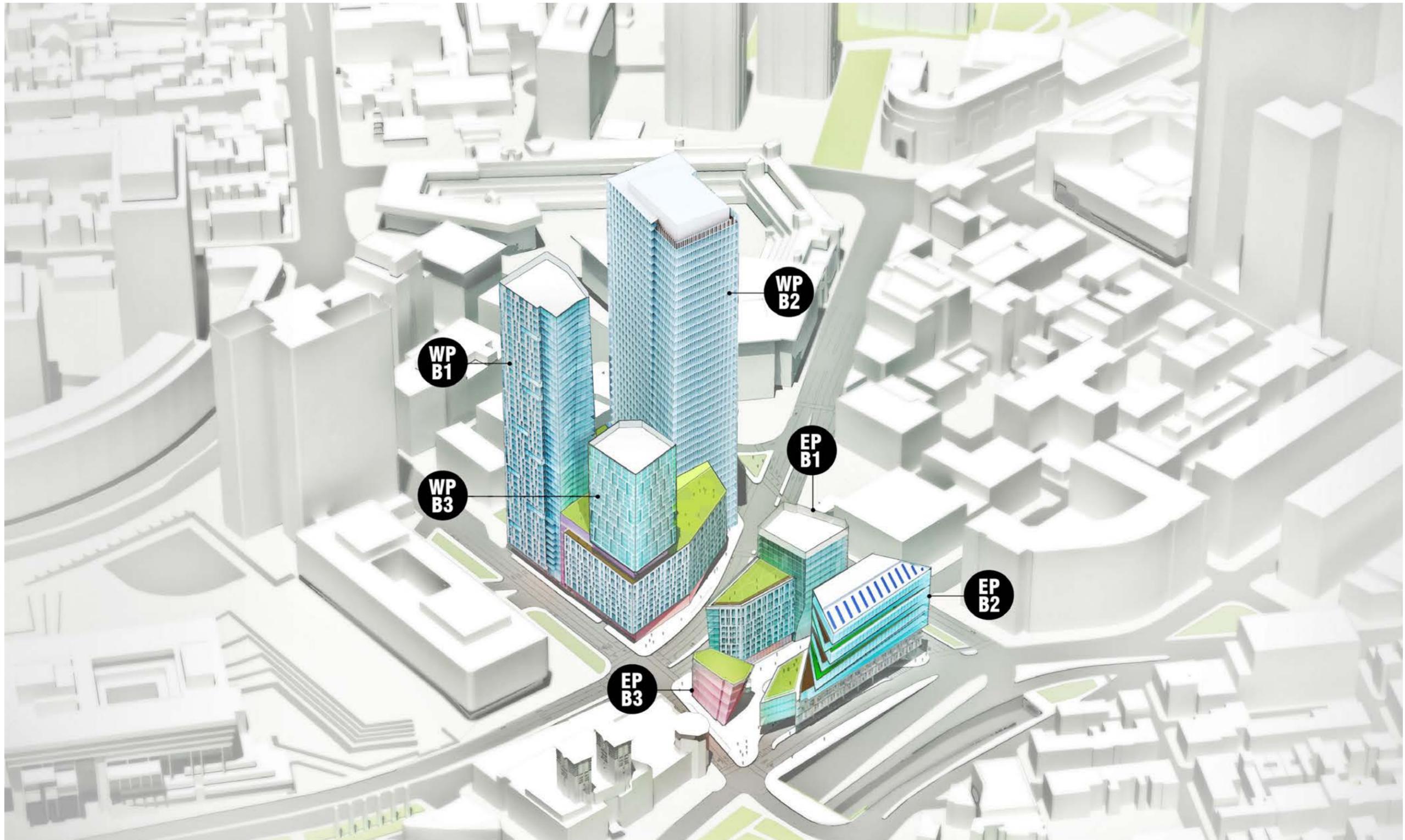
4. Connect Canal Street, Congress Street, and Greenway



5. Step down towards Greenway and Blackstone block

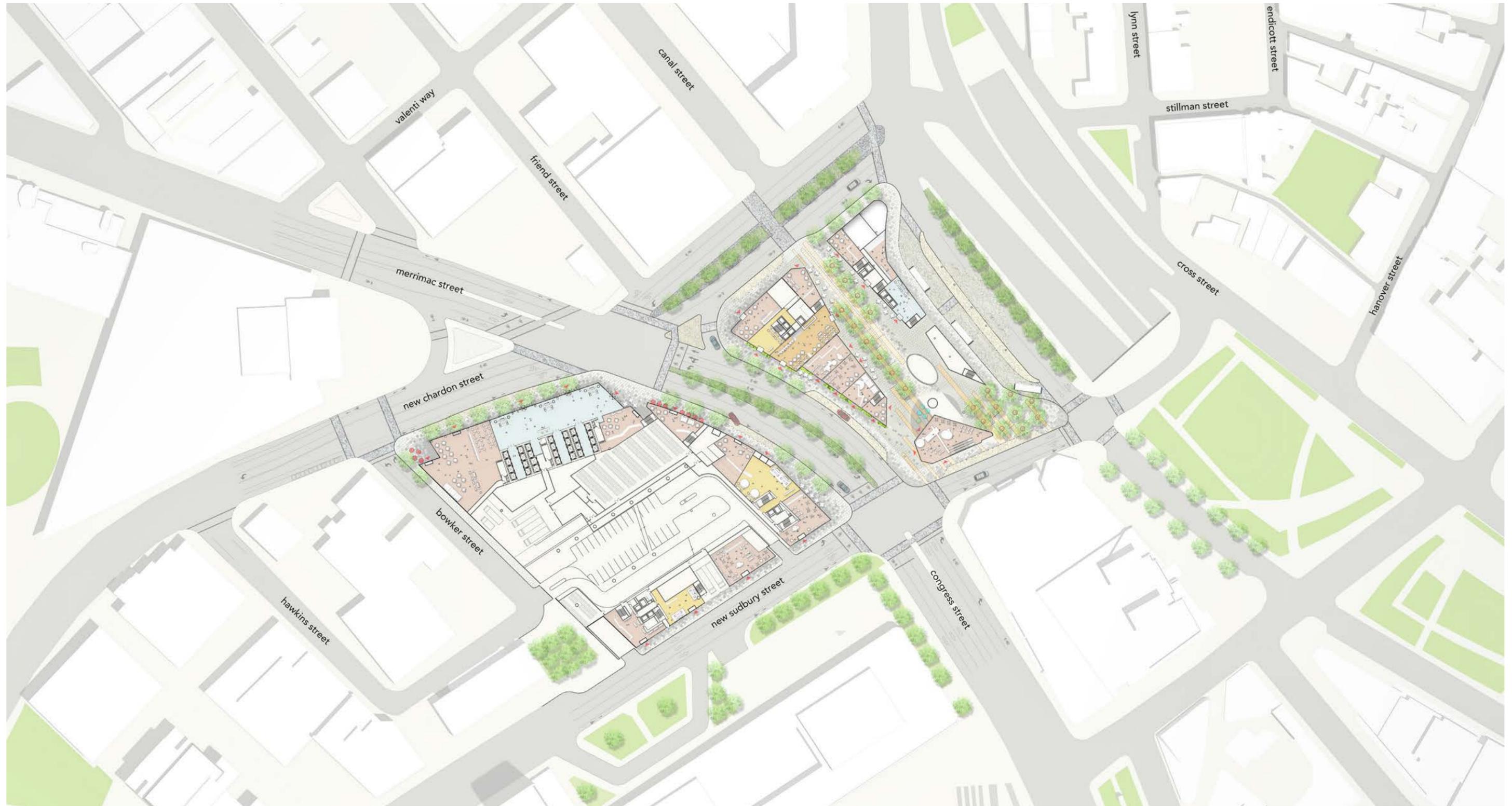


6. Add mixed use program to West parcel



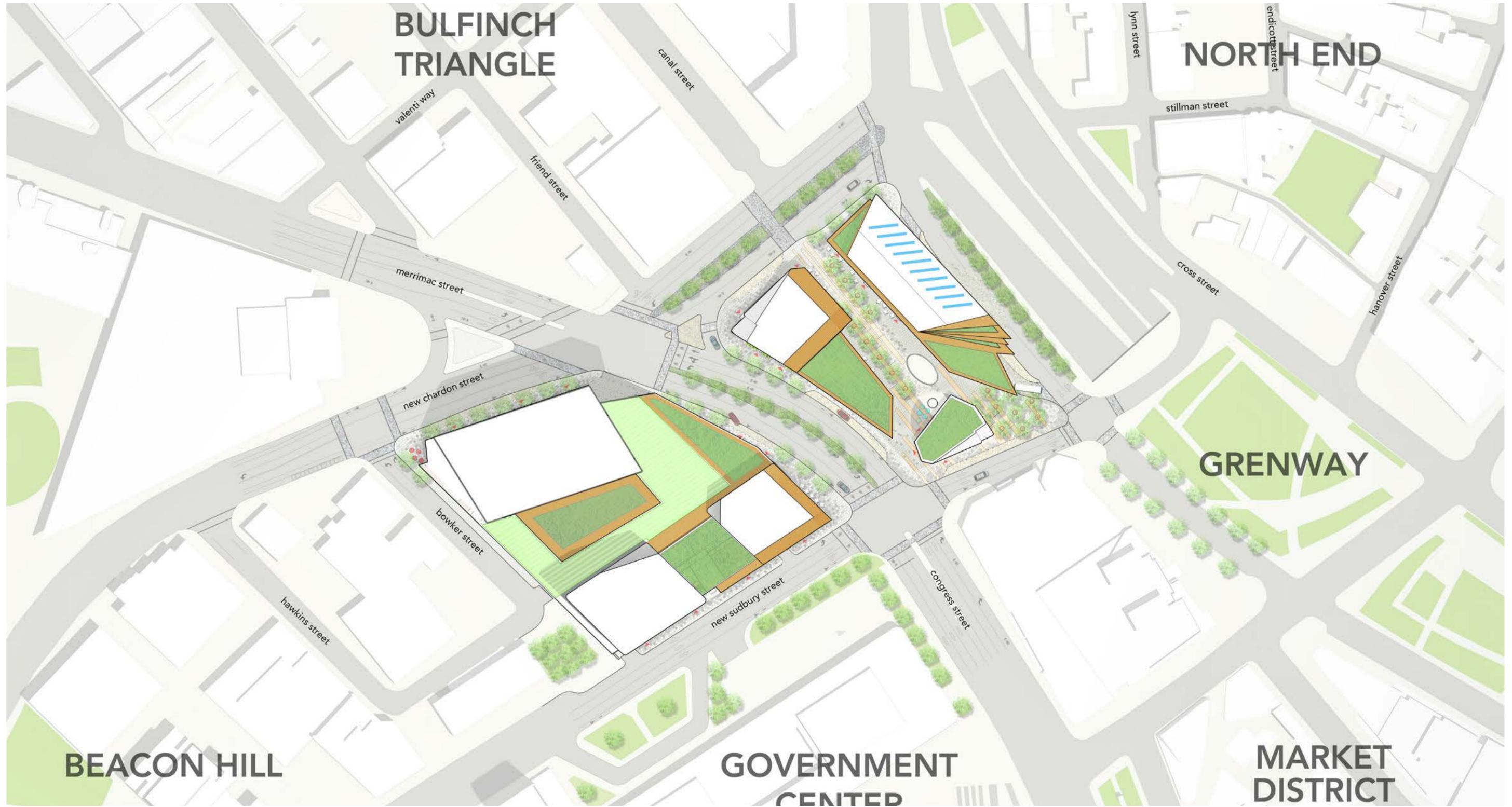
Redevelopment of Government Center Garage
Boston, MA

Figure 3.(



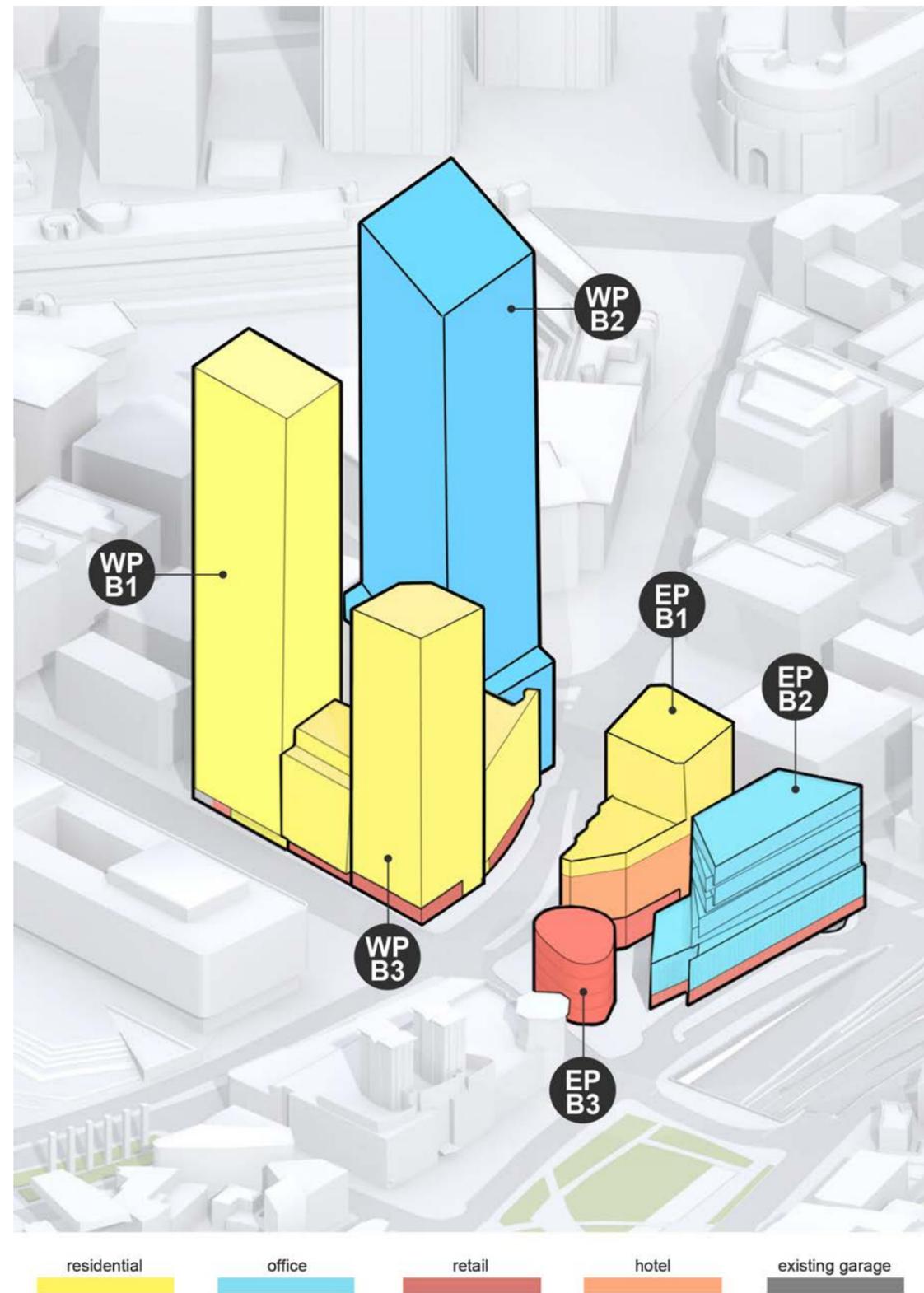
Redevelopment of Government Center Garage
Boston, MA

Figure 3.)



Redevelopment of Government Center Garage
Boston, MA

Figure 3.*



4

Transportation and Parking

4.1 Introduction

This chapter presents the transportation impacts associated with the currently proposed program for the Project as presented in this DPIR. With the changes to the Project and the reduction of square footage under the DPIR program, the transportation impacts will be slightly reduced from those described in the PNF.

- Traffic impacts will decrease slightly from that analyzed in the PNF.
- Peak hour vehicle trips will be reduced by between 6% and 7% due to the reduction in office space.
- Parking demand by the Project will decrease, particularly during the weekday periods, freeing up additional parking for transient and commuter parking.
- Parking demand for nights and weekends remains consistent with the demand presented in the PNF.
- Transit impacts will decrease slightly and remain within transit demand forecasts expected by MBTA long-term service planning.



4.1.1 Project Description

While the Project's land use categories are the same in the DPIR as proposed in the PNF, the quantities have changed reflecting updates to design and responding to comments and concerns from the BRA and the community.

Table 4-1 presents the existing land use on the Project site and the development proposals, by parcel, under the PNF and DPIR programs. Table 4-2 shows the comparison of the PNF and DPIR programs and the quantitative difference between the two programs. With the DPIR program, residential apartments will increase by 104 units, while the residential condominiums will decrease by 63 units. Hotel rooms will decrease by eight rooms and retail/restaurant space will not change. The largest change from the PNF program, particularly in terms of transportation, is the reduction in office spaces by approximately 155,000 sf. The proposed number of parking spaces in the garage remains unchanged in the DPIR program at 1,159 spaces.

**Table 4-1
Land Use Summary by Parcel - Existing, PNF Program, and DPIR Program**

Land Use	Existing	PNF Program		DPIR Program	
		West Parcel	East Parcel	West Parcel	East Parcel
Residential Apartments (units)	-	651		755	
Residential Condominiums (units)	-		120		57
Hotel Rooms (units)	-	--	204		196
Retail/Restaurant (sf)	37,602	19,800	62,700	19,100	63,400
Office (sf)	256,532	1,186,500 ¹⁾	116,800	1,004,950 ¹⁾	142,550
Garage Parking (spaces)	2,310		1,159 ²⁾		1,159 ²⁾

1) Includes 35,000 sf of retained existing office space.

2) Includes 42 parking spaces reserved for the Area A-1 Boston Police station.

**Table 4-2
Land Use Comparison PNF Program and DPIR Program**

Land Use	A	B	C = B minus A
	PNF Program	DPIR Program	Comparison
Residential Apartments (units)	651	755	+104
Residential Condominiums (units)	120	57	-63
Hotel Rooms (units)	204	196	-8
Retail/Restaurant (sf)	82,500	82,500	0
Office (sf)	1,303,300	1,147,500	-155,800
Garage Parking Spaces	1,159	1,159	0



4.1.2 Trip Generation

Following standard traffic engineering procedures, trip generation estimates are derived from the Institute of Transportation Engineers' (ITE) Trip Generation (9th edition, 2012) trip rates. Travel mode share percentages, as available from the Boston Transportation Department (BTD), are applied to the trip rates for each land use to estimate vehicle trips, transit trips, and walk/bicycle trips.

The overall trip generation estimated for the DPIR Program is slightly lower than the PNF Program, primarily due to the decrease in office space.

4.1.2.1 Vehicle Trips

The number of associated vehicle trips will be lower with the DPIR building program than projected under the PNF building program. Since the DPIR program includes less office space and office trip activity is higher

during commuter periods, the peak hour vehicle trips will decrease more than the overall daily trips. Table 4-3 shows the Project vehicle trip generation comparison for daily and peak hour time periods by land use.

**Table 4-3
Project Vehicle Trip Generation Comparison**

Land Use	Trip Direction	A	B	C = B minus A
		PNF Program	DPIR Program	Comparison
Daily				
Residential Apartments	In	336	391	+55
	Out	336	391	+55
Residential Condominiums	In	87	58	-29
	Out	87	58	-29
Hotel	In	93	88	-5
	Out	93	88	-5
Retail/Restaurant	In	359	359	-
	Out	359	359	-
Office	In	1,313	1,208	-105
	Out	1,313	1,208	-105
Commercial Parking	In	900	900	-
	Out	900	900	-
Totals	In	3,088	3,004	-84
	Out	3,088	3,004	-84
AM Peak Hour				
Residential Apartments	In	21	24	+3
	Out	47	54	+7
Residential Condominiums	In	5	4	-1
	Out	17	12	-5
Hotel	In	18	17	-1
	Out	9	9	-
Retail/Restaurant	In	48	48	-
	Out	29	29	-
Office	In	466	427	-39
	Out	111	102	-9
Commercial Parking	In	74	74	-
	Out	69	69	-
Total	In	632	594	-38
	Out	282	275	-7
PM Peak Hour				
Residential Apartments	In	39	45	+6
	Out	31	36	+5
Residential Condominiums	In	11	7	-4
	Out	9	6	-3
Hotel	In	12	12	-
	Out	15	14	-1
Retail/Restaurant	In	49	49	-
	Out	52	52	-
Office	In	153	136	-17
	Out	439	391	-48

Commercial Parking	In	30	30	-
	Out	88	88	-
Total	In	294	279	-15
	Out	634	587	-47

Over the course of the day, vehicle trips will decrease by about 3%. Vehicle trips during the AM and PM peak hours will decrease by about 5% and 7%, respectively. Because the number of new vehicle trips under the DPIR program is lower than estimated for the PNF program, level of service analysis for the study intersections was not reevaluated.

4.1.2.2 Transit Trips

Similar to the vehicle trips, the resulting transit trips will decrease under the DPIR program compared to the PNF program. As shown in Table 4-4, the transit trips during the AM and PM peak hours will decrease by about 7 percent and 9 percent, respectively.

**Table 4-4
Project Transit Trip Generation Comparison**

Land Use	Trip Direction	A	B	C = B minus A
		PNF Program	DPIR Program	Comparison
Daily				
Residential Apartments	In	417	486	+69
	Out	417	486	+69
Residential Condominiums	In	108	73	-35
	Out	108	73	-35
Hotel	In	159	151	-8
	Out	159	151	-8
Retail/Restaurant	In	616	616	-
	Out	616	616	-
Office	In	2,520	2,318	-202
	Out	2,520	2,318	-202
Commercial Parking	In	0	0	-
	Out	0	0	-
Totals	In	3,820	3,644	-176
	Out	3,820	3,644	-176
AM Peak Hour				
Residential Apartments	In	30	35	+5
	Out	32	37	+5
Residential Condominiums	In	8	5	-3
	Out	11	8	-3
Hotel	In	36	35	-1
	Out	5	5	-
Retail/Restaurant	In	99	99	-
	Out	16	16	-
Office	In	1,065	975	-90
	Out	41	38	-3

Redevelopment of the Government Center Garage

Commercial Parking	In	0	0	-
	Out	0	0	-
Total	In	1,238	1,149	-89
	Out	105	104	-1
PM Peak Hour				
Residential Apartments	In	26	30	+4
	Out	45	53	+8
Residential Condominiums	In	8	5	-3
	Out	13	8	-5
Hotel	In	7	7	-
	Out	30	29	-1
Retail/Restaurant	In	27	27	-
	Out	108	108	-
Office	In	57	51	-6
	Out	1,003	893	-110
Commercial Parking	In	0	0	-
	Out	0	0	-
Total	In	125	120	-5
	Out	1,199	1,091	-108

4.1.2.3 Pedestrian Trips

Similar to the vehicle trips, the resulting pedestrian trips will decrease under the DPIR program as compared to the PNF program. As shown in Table 4-5, transit trips during the AM and PM peak hours will decrease by about 1% and 2%, respectively.

**Table 4-5
Project Pedestrian Trip Generation Comparison**

Land Use	Trip Direction	A	B	C = B minus A
		PNF Program	DPIR Program	Comparison
Daily				
Residential Apartments	In	584	680	+96
	Out	584	680	+96
Residential Condominiums	In	151	102	-49
	Out	151	102	-49
Hotel	In	468	446	-22
	Out	468	446	-22
Retail/Restaurant	In	1,817	1,817	-
	Out	1,817	1,817	-
Office	In	1,817	1,671	-146
	Out	1,817	1,671	-146
Commercial Parking	In	1,620	1,620	-
	Out	1,620	1,620	-
Totals	In	6,457	6,336	-121
	Out	6,457	6,336	-121
AM Peak Hour				
Residential Apartments	In	4	5	+1
	Out	90	104	+14
Residential Condominiums	In	1	1	-
	Out	32	23	-9
Hotel	In	11	11	-
	Out	29	28	-1
Retail/Restaurant	In	30	30	-
	Out	95	95	-
Office	In	85	77	-8
	Out	60	55	-5
Commercial Parking	In	124	124	-
	Out	133	133	-
Total	In	255	248	-7
	Out	439	438	-1
PM Peak Hour				
Residential Apartments	In	74	86	+12
	Out	6	7	+1
Residential Condominiums	In	21	13	-8
	Out	2	1	-1
Hotel	In	39	38	-1
	Out	9	9	-
Retail/Restaurant	In	158	158	-
	Out	33	33	-
Office	In	82	73	-9
	Out	80	71	-9
Commercial Parking	In	158	158	-
	Out	54	54	-
Total	In	532	526	-6
	Out	184	175	-9

4.1.2.4 Net New Trips

Subtracting both the existing trip generation and the expected trip generation from on-site vacant space (as presented in the PNF) from the DPIR program trip generation yields the net new Project trips. The net new trips by travel mode are summarized in Table 4-6.

Estimated daily vehicle trips to and from the site are expected to increase by 2,102 vehicle trips. During the AM peak hour, an estimated 412 net new vehicle trips in and 129 net new vehicle trips out will occur, while during the PM peak hour, 202 net new vehicle trips in and 374 net new vehicle trips out will occur.

Table 4-6
Net New DPIR Trip Generation for Project Site

Time Period		Walk/Bike Trips	Transit Trips	Vehicle Trips
Daily	In	2,291	2,341	1,051
	Out	2,291	2,341	1,051
AM Peak Hour	In	40	786	412
	Out	216	88	129
PM Peak Hour	In	188	86	202
	Out	51	708	374



4.1.3 Parking

The number of parking spaces under the DPIR program will be the same as under the PNF Program, at 1,159 spaces. With the DPIR program, however, the distribution of parking demand among land uses will change as shown in Table 4-7. Overall, the parking demand under the DPIR program is for 853 spaces, 41 spaces less than the PNF program.

**Table 4-7
Project Parking Demand**

Land Use	Parking Ratios		Project Parking Demand (spaces)		
			A	B	C = B minus A
	Maximum BTG Guidelines	Project	PNF Program	DPIR Program	Comparison
Residential Apartments	0.50 – 1.0 per unit	0.50 per unit	326	378	+52
Residential Condominiums	0.50 –1.0 per unit	0.70 per unit	84	40	-44
Hotel Room	0.40 per key	0.25 per key	51	49	-2
Retail/Restaurant	0.40 per 1,000 sf	use public parking	0	0	0
Office	0.40 per 1,000 sf	0.30 per 1,000 sf	391	344	-47
Replacement Police Parking	NA	NA	42	42	0
Total Project Parking Demand			894	853	-41

4.1.3.1 Shared Parking

As under the PNF, the Project will incorporate a shared parking strategy to maximize the use of all parking spaces in the Project. Table 4-8 presents a summary of shared use parking demand for the Project and identifies the ability to provide public commercial parking for approximately 605 vehicles during the weekday, about 570 spaces on weeknights, and about 733 spaces on weekend days. Because the parking supply available for commercial parking is above that currently exhibited by transient use at the garage, it is expected that these parking spaces would ultimately be used by both transient parkers and some monthly parkers. These are the same conclusions presented in the PNF.

**Table 4-8
Project Shared Use Parking – DPIR Program**

Land Use	Project Parking Supply	Occupied Shared Parking					
		Weekday		Weeknight		Weekend Day	
		percent	spaces	percent	Spaces	percent	spaces
Residential Apartments	378	45%	170	100%	378	60%	227
Residential Condominiums Reserved	40	na	40	na	40	na	40
Hotel Rooms	49	35%	17	100%	49	60%	37
Retail/Restaurant ¹	0	na	na	na	Na	na	na
Office Shared	294	80%	235	10%	30	10%	30
Office Reserved	50	- ²	50	na	50	na	50

Replacement Police Parking	42	na	42	na	42	na	42
Total Project Shared Parking Demand			554		589		426
Total Project Parking Supply			1,159		1,159		1,159
Available for Public Parking			605		570		733

1 Retail parkers are assumed to use available public parking.

2 Included under 'Office Shared'

4.2 MBTA Transit Capacity

In the scoping determination, the City has requested additional information related to the future capacity of the MBTA and the ability of the system to serve the transit demand generated by the Project.

4.2.1 MBTA Long-term Service Planning

The Proponent has met with the MBTA to present and discuss Project impacts to the transit system, and in particular at Haymarket Station, which will be the most impacted station. Specifically, the Proponent has held on-site meetings with Director of Bus Operations and Deputy Director of Bus Operations to discuss design plans for the reconfiguration of the bus way including MBTA requested improvements and construction related impacts to passengers and pedestrians. In addition, the Proponent has met with Subway Operations / Light Rail Operations and all supporting departments to provide a project overview including scope of work and schedule. This meeting included discussions with each department to answer specific questions and concerns.

Also, it should be noted that long term service planning is undertaken by the Central Transportation Planning Staff (CTPS) whose ridership forecast models include all potential development in the downtown core. These transit ridership forecasts include the Bulfinch Triangle/North Station area development projects that are either recently completed, currently under construction, or in the permitting and planning stages, including the redevelopment of the Government Center Garage.

4.2.2 DPIR Transit Impacts

Following the methodology presented in the PNF, the peak load point for each line and direction was identified and ridership established for each from the most recent available MBTA and Central Transportation Planning Staff (CTPS) data. The net new inbound transit riders generated by the DPIR Program during the AM peak hour were assigned to the various transit lines based on the distribution presented in the PNF. The new trips were added to the existing peak load point data to establish future peak ridership. The resulting No-Build and Full-Build conditions peak load point characteristics for policy capacity and crush capacity are shown in Table 4-9.

As shown, most of the lines operate well today, even using the more comfortable policy capacity standards. Orange and Blue line service has improved in recent years with the phasing in of six-car trains. On the Red Line, however, the aging fleet has caused reduced headways resulting in trains that are more crowded.

As shown in the table, the Project will add only marginally to existing peak load volumes. The highest increases in AM peak hour inbound ridership will be 224 riders total on all the Green Line branches to the south and 147 new riders on the Orange Line south. The Project will increase AM peak hour ridership on the more heavily burdened Orange Line north and Red Line south by only 35-75 riders, or about one rider per minute. Under crush capacity, these volumes can be handled well within the overall capacity.

4.2.3 DPIR Haymarket Design Improvements

After hearing community concerns and meeting with MBTA Bus Operations, the Proponent is making a number of improvements to Haymarket Bus Station and the adjacent East Parcel Plaza, including:

- Adding an additional 10 feet of depth along the majority of the bus station waiting area. This additional depth will increase the capacity of passengers to wait for the Route 111 Bus and the 400 Series Commuter Bus.
- The East Parcel Plaza has also been widened from 60 feet to 85 feet providing additional waiting area capacity outside the Haymarket Bus Station area.
- The Proponent has committed to providing electronic displays within the East Parcel Plaza that will provide real time information of the arrival of the buses as well as the green and orange lines.
- The Proponent will also be providing space for the Charlie Card Pay Stations at the Haymarket Bus Station so bus patrons will not have to go down into the Subway Station to purchase or replenish Charlie Cards.
- In addition, the Proponent has committed to provide a new Hubway Station at the southern end of the Eastern Parcel which will allow a new mode choice for Haymarket Bus Station riders.

Many of the improvements listed above help create a “mobility hub” on the East Parcel. The Proponent will continue to meet with the MBTA and the community on both facility and operational improvements to the Haymarket bus facility

**Table 4-9
MBTA Subway Operations – Impact during AM Peak Period**

Subway Line	Origin	Peak Load Point	Capacity		No-Build Conditions			Build Conditions under DPIR Program				
					Peak Load ¹⁾ (riders)	Percent Capacity Used		New Project Riders Inbound	Peak Load ¹⁾ (riders)	Percent Increase	Percent Capacity Used	
			Policy ²⁾	Crush ²⁾		Policy	Crush				Policy	Crush
Orange Line North	Oak Grove	North Station to Haymarket	9,432	16,128	7,590	80%	47%	73	7,671	1.0%	81%	48%
Orange Line South	Forest Hills/Back Bay to NE Medical	Back Bay to NE Medical	9,432	16,128	5,750	61%	36%	147	5,914	2.6%	63%	37%
Green Line West	Boston College, Commonwealth Avenue, Riverside, Heath	Copley Junction to Copley	7,575	18,525	6,650	88%	36%	224 ³⁾	6,899	3.4%	91%	37%
Green Line North	Lechmere, North Station, Government Center	North Station to Haymarket	3,131	18,525	2,285	73%	12%	28	2,316	1.2%	74%	12%
Red Line North	Alewife	Central to Kendall	9,018	14,526	8,690	96%	60%	147	8,847	1.7%	98%	61%
Red Line South	Ashmont, Braintree	Broadway to South Station	9,018	14,526	10,435	116%	72%	34	10,479	0.3%	116%	72%
Blue Line	Wonderland	Maverick to Aquarium	6,840	10,944	5,150	75%	47%	55	5,211	1.1%	76%	48%

Notes:

1) based on CTPS estimates

2) based on MBTA schedules, cars per train, and policy/crush capacity per car.

3) Of riders boarding the Green Line at west surface stations, B Branch riders account for 33%, C Branch is 17%, D Branch is 27%, and E Branch = 23%

Page Intentionally Left Blank

4.3 Transportation Access Plan Agreement

As individual PDA components are further developed through the Article 80 Large Project Review process, the Proponent will work with BTM and BED to develop mitigation and transportation demand management (TDM) measures appropriate for each building and/or land use. The proposed mitigation and TDM measures will be presented in each individual PNF. Specific mitigation and TDM measures for each building or development phase will then be codified in the Transportation Access Plan Agreement (TAPA) as required for all developments subject to Article 80 Large Project Review.

5

Environmental Protection

5.1 Introduction

This chapter presents the findings from the supplemental environmental impact studies based on the revised Project, such as wind, daylight, air quality, noise and temporary construction impacts. This chapter also provides an update to impact studies previously presented in the PNF (e.g., shadows) as well as an update on the sustainable design approach. While all environmental impact categories were initially considered in the PNF, several were not further evaluated in this DPIR because the project change would not result in changes that would materially affect these impact categories. (Refer to Table 2-3 for a list of the impact categories and how they were addressed in either the PNF or DPIR or may be handled under future filings of individual Project Components.)

When compared to the previously proposed project as presented in the PNF, the revised Project (as presented in this DPIR), which is also the “as-of-right” build condition (i.e., consistent with the future zoning for the Greenway District), generally results in a lesser degree of environmental impacts. While the Project may result in an increase in traffic or greater extent of shadows for periods of time compared to the existing Garage (or future No-Build Condition), the improved condition of the Project Site as a result of the proposed redevelopment far outweighs the negative impacts. The overall goal of the Project is to develop the Project Site with a variety of new uses while avoiding or minimizing potential adverse environmental and community impacts to the greatest extent feasible. Impacts will be mitigated by the substantial community benefits redevelopment will bring to the community, including the revitalization of the Government Center area which is a significant component of the City’s planning goals.



5.1.1 Overview of Impacts Studied

The PNF discussed the anticipated potential environmental impacts as a result of the Project, in accordance with Article 80 of the Zoning Code, where applicable. The PNF assessed potential Project-related impacts in the following categories:

- Wind (qualitative)
- Shadow
- Solar Glare (qualitative)
- Water Quality
- Flood Hazard Zones
- Solid and Hazardous Waste
- Groundwater/Geotechnical
- Green Building/Sustainability

Shadow impacts are re-assessed in this DPIR to reflect the Project changes described in the DPIR. The other above impact categories were not re-evaluated because the Project changes would not result in changes that would materially affect the impact category.

The following additional environmental impact analyses based on the revised Project are presented herein for the following categories:

- Wind
- Daylight
- Air Quality
- Noise
- Rodent Control Post-Construction
- Temporary Construction Impacts
- Sustainability/Green Building
- Historic Resources

The Proponent intends to update, as needed (i.e., based on changes in design), the environmental analyses conducted as part of the PNF or this DPIR as individual Project Components are designed in more detail and submitted for BRA review and approval as part of future Article 80, Large Project Review. These documents will include more specific measures intended to mitigate, limit, or minimize impacts, where appropriate, as required by local, state, and federal regulation.

5.2 Wind

A pedestrian wind tunnel study was conducted on the proposed redevelopment of the Project. The objective of the study was to assess the effect of the proposed redevelopment on local conditions in pedestrian areas around the study site and provide recommendations for minimizing adverse effects. The following configurations were simulated:

- No-Build Configuration: includes all existing surrounding buildings;
- Build Configuration (Revised DPIR Scheme): includes the proposed revised DPIR Scheme of the proposed redevelopment and all existing surroundings;
- Mitigation: includes wind mitigation measures on the revised DPIR scheme of the proposed redevelopment and all existing surroundings.

Refer to Appendix A of this DPIR for a graphic representation of these conditions.



5.2.1 Methodology

A scale model was equipped with specially designed wind speed sensors at 111 grade level locations, chosen in consultation with the BRA, which recorded the mean and fluctuating components of wind speed at a full-scale height of 5 feet above grade in pedestrian areas throughout the Project Site. The results were then combined with long-term meteorological data, recorded during the years 1981 to 2011 at Boston's Logan International Airport, in order to predict full scale wind conditions. Meteorological data in the form of wind roses are shown in the supporting documentation provided in Appendix A of this DPIR. The prevailing winds are from directions between southwest and northwest. In the case of strong winds, northeast and west-northwest are the dominant wind directions.

The interaction of these winds with major buildings, especially those that protrude above their surroundings, often cause increased local wind speeds at the pedestrian level. Typically, wind speeds increase with elevation above the ground surface, and taller buildings intercept these faster winds and deflect them down to the pedestrian level (Downwashing flows). The funneling of wind through gaps between buildings (Channeling flows) and the acceleration of wind around corners of buildings may also cause increases in wind speed. Conversely, if a building is surrounded by others of equivalent height, it may be protected from the prevailing upper-level winds, resulting in no significant changes to the local pedestrian-level wind environment.

5.2.1.1 Pedestrian Wind Comfort Criteria

The BRA has adopted two standards for assessing the relative wind comfort of pedestrians. First, the BRA wind design guidance criterion states that an effective gust velocity (hourly mean wind speed +1.5 times the root-mean-square wind speed) of 31 miles per hour (mph) should not be exceeded more than one percent of the time. The second set of criteria used by the BRA to determine the acceptability of specific location is based on the work of Melbourne (Melbourne, W.H., 1978, "Criteria for Environmental Wind Conditions", Journal of Industrial Aerodynamics, 3 (1978) 241 - 249.). This set of criteria is used to determine the relative level of pedestrian wind comfort for activities such as sitting, standing or walking. The criteria are expressed in terms of benchmarks for the 1-hour mean wind speed exceeded 1% of the time (i.e., the 99th percentile mean wind speed). They are presented in Table 5-1.

Table 5-1
Boston Redevelopment Authority Mean Wind Criteria*

Melbourne Category	Criteria*
1. Comfortable for Sitting	≤12 miles per hour
2. Comfortable for Standing	>12 and ≤15 miles per hour
3. Comfortable for Walking	>15 and ≤19 miles per hour
4. Uncomfortable for Walking	>19 and ≤27 miles per hour
5. Dangerous	> 27 miles per hour

Source: Boston Redevelopment Authority

* Applicable to the hourly mean wind speed exceeded one percent of the time.

The wind climate found in a typical urban downtown location in Boston is generally comfortable for the pedestrian use of sidewalks and thoroughfares and meets the BRA effective gust velocity criterion of 31 mph. However, without any mitigation measures, the general wind climate in a urban downtown location is likely to be uncomfortable for more passive activities such as sitting.



5.2.2 Pedestrian Level Wind Findings

5.2.2.1 Test Results

The appendix contains figures that graphically depict the wind comfort conditions at each wind measurement location based on the annual winds. Typically the summer and fall winds tend to be more comfortable than the annual winds while the winter and spring winds are less comfortable than the annual winds. The following summary of pedestrian wind comfort is based on the annual winds for each simulated configuration.

5.2.2.2 Future No-Build Condition

Wind conditions for the existing site and surroundings are comfortable for walking or better in general with the following exceptions. Winds at the northeast corner of the intersection of New Chardon and Canal Streets are uncomfortable. Uncomfortable wind conditions also exist to the southwest of the site along New Sudbury and Cambridge Streets (Figure 3a of Appendix A). Winds at five of these locations are also in exceedance of the effective gust criterion (Figure 4a of Appendix A).

5.2.2.3 Build (DPIR Scheme)

With the addition of the revised DPIR Scheme of the redevelopment, wind comfort categorizations at approximately 66% of the tested locations at grade either improved or remained unchanged. However, additional uncomfortable winds (Figure 3b of Appendix A) and effective gust exceedances (Figure 4b of Appendix A) are predicted along New Sudbury, Congress and New Chardon Streets. Winds between the buildings in the east parcel of the redevelopment are also expected to be uncomfortable in general with an effective gust exceedance at one location.

However, it should be noted, that the wind test results are based upon simple preliminary massing and this initial wind tunnel test is primarily meant to identify areas which need to be mitigated, either through shaping of the building design or through other mitigation measures. As each Project Component goes forward, its design will be advanced further and will take into account the results of this initial wind tunnel study. In addition, each Project Component will undergo its own wind tunnel study where wind impacts are evaluated again and further mitigation or design changes may be made to ensure that the Project Component will meet BRA wind criteria guidelines.

5.2.2.4 Preliminary Mitigation (DPIR Scheme)

The Proponent's wind consultant did study some initial wind mitigation measures. The mitigation study included trees along Surface Road, New Sudbury and Congress Streets and between the EP-B1 hotel/condo and EP-B2 (office building) of the East Parcel. A canopy was also included at the northwest corner of the west parcel along the WP-B2 (office building).

With these wind control measures in place, the wind comfort conditions are predicted to improve in the areas of concern. The canopy at the northwest corner is also expected to help redirect downwashed flows away from pedestrian level, thereby mitigating effective gust exceedances in the area. The trees included along the walkways also helped alleviate uncomfortable winds and gust exceedances. It is to be noted that wind control efficacy of landscaping is significantly reduced in winter due to loss of foliage. Marcescent trees however, are expected to produce the desired effects even in winter. Again, this is only suggesting a few of the mitigation measures that can be implemented. However, it does show that wind conditions created by the DPIR scheme can be mitigated. Shaping of the buildings, as they advance through their individual Article 80 processes, will also further mitigate wind conditions.

5.2.2.5 Continued Evaluation of Wind Mitigation

At this stage of master planning the buildings are not designed, but simply represented as massing. As the design progresses to a more detailed level in the individual Project Component's Article 80 Process, mitigation measures such as the shaping of the office building, providing setbacks, incorporating detailed architectural façade elements such as louvers and landscape interventions off-site will improve the "uncomfortable" conditions to "comfortable" conditions.

5.3 Shadow

Based on the comments received for the PNF submission, the following two important design and massing changes have been adapted that would have a reduction in shadows throughout.

- ▶ Reduction of the height of the WP-B2 (Office Tower) from 600 feet to 528 feet, a reduction of 72 feet, which reduces shadow impact particularly on the Rose Kennedy Greenway Parks.
- ▶ Reduction of height of the EP-B2 (Hotel/Condominium Tower) from 275 feet to 157 feet, also reducing shadow impact on the adjacent areas including the Rose Kennedy Greenway Parks.

The Project, like any new building development in Boston, will cast shadow on areas to its west, northwest, north, northeast and east. This extensive study indicated minimal net new shadow impact on the Greenway Parks from March to August, and on the Charles River, Boston Harbor, Beacon Hill, North End, and West End in different times of a year.

Figures 5.1a through 5.1p present updated shadows for the revised Project. Figures 5.2a-5.2o present the changes in shadows compared to the PNF project and, as required by the BRA Scoping Determination, an overlap study has also been provided, shown on Figure 5.2p. All buildings under construction and any proposed buildings anticipated to be completed prior to the completion of the Project are included in the study model.

Additionally, per the request of the BRA, an expanded shadow study has been conducted as a part of the DPIR submission. The shadow studies are conducted for the 21st day of each calendar month from sunrise to sunset, at every daylight hour, on the hour, of each day. A further detailed shadow study has also been conducted for the two Rose Kennedy Greenway North End Parcel where the shadows are shown in 15

minute intervals. Due to the extent of graphics this expanded study required and their large file sizes, this study has been provided electronically on a CD-ROM (Appendix B of this DPIR).

The following sections provide a summary of findings for the updated shadows study and aims to address specific items of the BRA Scoping Determination.



5.3.1 Rose F. Kennedy Greenway North End Parcels

For the months of January, February, September, October, November and December, the proposed development has no shadow impact on the Greenway Parks as the graphic reveals. For other months, the shadow impact on the Greenway Parks, which shadow impact varies in size and does not start typically until after 4:00 PM, ranges from less than 2 hours in March to 3 hours 30 minutes on June 21st.

- March: Part of the Greenway Parks is under the shadow of the proposed development between 16:30 to 18:15 for less than 2 hours.
- April: Part of the Greenway Parks is under the shadow of the proposed development between 16:00 to 18:45 for 2 hours 45 minutes.
- May: Part of the Greenway Parks is under the shadow of the proposed development between 16:30 to 19:45 for 3 hours 15 minutes.
- June: Part of the Greenway Parks is under the shadow of the proposed development between 16:30 to 20:00 for 3 hours 30 minutes.
- July: Part of the Greenway Parks is under the shadow of the proposed development between 16:30 to 19:45 for 3 hours 15 minutes.
- August: Part of the Greenway Parks is under the shadow of the proposed development between 16:00 to 19:00 for 3 hours.

Again, it is important to note, that the shadow impact on the two Greenway Parks, does not cover the entire area of the two parks and varies both in area and duration through the time periods identified above.

5.3.2.1 Greenway Park Landscaping

To better understand what impact these late day shadows would have on the Greenway Parks, the Proponent engaged a landscape consultant to review the type of plantings currently found within the North End Parks of the Rose Kennedy Greenway and to assess the potential shadow impact on the existing landscape based on the area and duration of those shadows. After review, the consultant concluded that there would be no material adverse impacts to those plantings caused by the net new shadow. The planting mix in those parcels includes evergreen shrubs and a mix of flowering perennials. The species represented within these zones, such as *Perovskia*, *Buxus*, and *Rosa* spp. and are ones that are classified as full-sun species. Full-sun is typically understood as 6 hours or more of daylight per day. Even at its most extreme, June 21st, the net new shadow on the longest day would still allow for more than 9 hours of daylight, more than enough to maintain those plants.



5.3.3 Charles River

Shadow impacts on Charles River are only noticed in the early morning 8:00 shadow study of January, October, November and December. At no other times is an impact noticed. Since the shadow moves quickly in the morning, the maximum duration of impact is less than one hour.



5.3.4 Boston Harbor

Shadow impacts on Boston Harbor are only noticed in the late afternoon before the sunset from January to April, and from August to October as exhibited below. The maximum length of impact is less than one hour. During May, June, July, November, and December, when dates are closer to Solstice, there is no shadow impact due to the northwestern sunset angle in the summer and the earlier sunset time in the winter.

- January: From 16:00 to 16:35 Sunset
- February: From 17:00 to 17:18 Sunset
- March: From 18:00 to 18:53 Sunset
- April: From 19:00 to 19:27 Sunset
- May: No Impact
- June: No Impact
- July: No Impact
- August: From 19:00 to 19:28 Sunset
- September: From 18:00 to 18:36 Sunset
- October: From 17:00 to 17:46 Sunset
- November: No Impact
- December: No Impact



5.3.5 Other major open spaces

As required by the BRA Scoping Determination, other major open space areas considered include: City Hall Plaza; Cardinal Cushing Park; and the park behind the Brooke Courthouse. The shadow studies does not find any net shadow impact on the major open spaces including City Hall Plaza, Cardinal Cushing Park, and the park behind the Brooke Courthouse. This is mainly due to the buildings adjacent to those public spaces already casting shadow on them.



5.3.6 Daylighting of Congress Street

Unusual, however, for new development in Boston, the Project will, starting in Phase 2A, provide periods of

new sunlight on streets now covered or shaded by the existing garage structure throughout the year. Because the eastern half of the Garage will be removed and replaced with three smaller buildings and a public open space, shadow is actually eliminated on parts of Congress Street and the East Parcel. Coupled with the new public space created on the East Parcel, the Project will make the Rose Kennedy Greenway Parks more accessible and attractive.

5.4 Daylight

The Project is expected to alter the view of the skydome from the Project Site's adjacent streets and sidewalks. Due to the planning goals for the area (e.g., mixed-use development of higher densities), the Project will have some new skydome impacts where taller buildings are constructed and brought closer to the street edge than the existing garage, which is set back from the street in some places (i.e., New Chardon Street). However, by removing the large portion of the Garage that currently covers Congress Street and creates a tunnel effect; the Project will improve the amount of daylight that penetrates through the Project Site. Removal of this portion of the Garage will provide a substantial community benefit in terms of daylight at the Project Site and is consistent with the City's plans for this area. Additionally, by removing the portion of the garage located above the East Parcel, additional daylight will be provided to the East Parcel public plaza.

The proposed mixed-use nature of the Project will increase the foot traffic along the adjacent sidewalks of Congress Street, New Chardon Street and New Sudbury Street, which will be further improved with new public realm improvements. In addition, the new East Parcel public plaza/promenade, open to the sky, will enhance the pedestrian connection from Canal Street to the North End Greenway Parks. The net effect of the Project will be a substantial enhancement of the public realm in this area.

As required by the Section 80B-2(c) of the City of Boston Zoning Code, an analysis of the percentage of skydome obstructed under no build and build conditions with particular focus around the Rose F. Kennedy Greenway will be provided for each Project Component as part of the Article 80B, Large Project Review.



5.4.1 Key Findings

The Project will result in changes to daylight around the Project Site due to the desired density and massing of the Project. However, the removal of the existing garage structure provides a significant amount of new daylight along Congress Street. This increase in daylight is not captured in this analysis due to the limitations of the BRADA program. The proposed mixed-use nature of the Project will, by design, increase the pedestrian activity along the adjacent sidewalks and will transform the East Parcel into a vibrant urban pedestrian plaza. Pedestrian enjoyment of the urban experience in this area will be further enhanced through such improvements and the net effect of the Project will be a substantial improvement of the public realm in this area.



5.4.2 Methodology

The daylight analysis was prepared using the BRA's Daylight Analysis Program (BRADA) and in accordance with the requirements of Article 80B. The daylight analysis used the BRADA (described further below) by

comparing the existing/no-build condition to the PNF build condition. The DPIR scheme was not studied in detail as the DPIR scheme would have less impact than the PNF build condition due to the reduction in height. The following viewpoints were used for this daylight analysis:

- ▶ **Bowker Street** – This viewpoint is located on the centerline of New Sudbury Street, centered on the southern façade for the existing garage and Project.
- ▶ **New Chardon Street** – This viewpoint is located on the centerline of New Chardon Street, centered on the northern façades for the existing garage and Project.
- ▶ **John F. Fitzgerald Surface Road** – This viewpoint is located on the centerline of John F. Fitzgerald Surface Road, centered on the eastern façade for the existing garage and Project.
- ▶ **New Sudbury Street** – This viewpoint is located on the centerline of New Sudbury Street, centered on the southern façade for the existing garage and Project.

These viewpoints represent one viewpoint for each major building façade fronting a public way or passage, as appropriate. The viewpoints from Congress Street looking west and east to the existing garage structure cannot be modeled because of the tunnel effect created by the garage that connects over the street. In this case, the existing skydome is fully obstructed and the Project can only improve the skydome obstruction.

In addition to the viewpoints listed above, in response to the BRA Scoping Determination, the amount of daylight was measured for the viewpoint of the centerline of the proposed public plaza on the East Parcel. Under the Existing/No-Build Condition, the skydome is assumed to be completely obstructed because the existing garage structure currently covers this space. Under the PNF Build Condition, with the removal of the structure and construction of the East Parcel building components including the plaza, an approximately 20 percent increase in skydome is expected.

5.4.2.1 BRADA Software

The BRADA program was developed in 1985 by the Massachusetts Institute of Technology to estimate the pedestrian's view of the skydome taking into account the massing and building materials used. The software approximates a pedestrian's view of a site based on input parameters such as: location of viewpoint, length and height of buildings and the relative reflectivity of the building facades. The model typically uses the midpoint of an adjacent right-of-way or sidewalk as the analysis viewpoint. Based on this data, the model calculates the perceived skydome obstruction and provides a graphic depicting the analysis conditions.



5.4.3 Existing/No-Build Daylight Conditions

The Existing/No-Build daylight conditions are presented in Figures 5.3a-e. Under the Existing/No-Build Condition, the existing garage structure obstructs over half of the Project Site's skyplane from the centerline of the surrounding roadways, with exception of New Chardon Street where only about 15 percent of the skyplane is currently obstructed. This is because the Garage is setback from New Chardon Street. Currently, Bowker Street is the most significantly impacted, with over 80% of the skyplane obstructed.



5.4.4 Build Daylight Conditions

The future daylight conditions are presented by Project Component in Figures 5.3a-d. Because the majority of the skyplane is obstructed at the centerline of Bowker Street under the Existing/No-Build Condition (82 percent), there is very little to almost no change as a result of the Project with an increase in obstructed skyplane of three percent at the most at full build (Figure 5.3a).

There is very little to no change in the amount of obstructed skyplane along New Sudbury Street with WP-B1 and WP-B2, and an approximately 10 percent decrease with the remaining development due to the removal of the garage structure over Congress Street (Figure 5.3b).

Under both Existing/No-Build and Build Conditions, daylight along the John F. Fitzgerald Surface Road is obstructed by the existing and proposed building overhang over the MBTA Haymarket bus facility. Overhangs under both conditions were treated as zero feet back from the property line and zero feet back from the street because the BRADA program is unable to account for building facades overhead. With redevelopment of the East Parcel, the building frontage is much taller and wider compared to existing conditions and, therefore, the program recognizes this as a significant increase in skyplane obstruction, which, in reality there will be little to no change due to the building overhang (Figure 5.3c). The amount of obstructed skyplane along this roadway is currently well over half (almost 68 percent). Under Phase 2A (partial deconstruction of the Garage), however, there is a significant increase in daylight due to the removal of the existing garage structure over Congress Street.

The skyplane obstruction along New Chardon Street essentially doubles with the redevelopment of the West Parcel (from about 15 percent to around 30 percent), as illustrated in Figure 5.3d. The increase in the amount of obstructed skyplane is to be expected and cannot be avoided when replacing a lower rise building (i.e., the Garage) with a much taller building (i.e., the proposed residential and office buildings); however, at full-build it remains under 50 percent due to the building setback.

Because daylight is assumed to be completely obstructed over the area of the proposed East Parcel public plaza due to the existing garage structure currently covering the space, removal of this portion of the Garage, even with the new buildings, will increase the amount of daylight on the East Parcel, as illustrated in Figure 5.3e.

The Project is consistent with the planning goals for the Greenway (e.g., mixed-use development of higher densities than what currently exists set back from the Greenway). The desired density and massing of the Project necessitates obstructing portions of daylight around the Project Site while the removal of the existing garage structure provides a significant amount of new daylight along Congress Street not captured in this analysis due to the limitations of the BRADA program.

5.5 Air Quality

This section presents an overview of the results of the air quality assessment conducted for the Project. The purpose of the air quality assessment is to demonstrate that the Project satisfies applicable local, state, and federal air quality requirements. Specifically, the air quality assessment for the Project includes a localized

(microscale, or “hot spot”) study that evaluates the Project-related concentrations (from vehicles traveling through congested intersections in the project area) of carbon monoxide (CO) and particulate matter (PM_{2.5} and PM₁₀) at sensitive receptor locations. The air quality assessment also evaluated Ultra-Fine Particulates and a stationary analysis of the garage ventilation to determine the potential change in air pollution for the Project.

As discussed in Chapter 4, *Transportation and Parking*, the revised Project in this DPIR represents an overall reduction in vehicle trips, especially during the peak hours (a five (5) percent reduction in the morning peak hour and a seven (7) percent reduction in the evening peak hour), thereby reducing the increase in vehicle air emissions at sensitive receptor locations. Because the number of new vehicle trips under the revised Project is lower than estimated for the PNF program, a level of service analysis for the study intersections was not re-evaluated. Therefore, because the microscale air quality study was based on the larger PNF program this study represents a more conservative assessment.



5.5.1 Summary of Key Findings

The mobile source air quality analysis demonstrates that the Project’s motor vehicle emissions at nearby intersections and from the parking garage meet the Massachusetts and National Ambient Air Quality Standards (NAAQS) for CO, PM₁₀ and PM_{2.5}. The air quality evaluation demonstrates that the Project complies with city, state, and federal air quality requirements. The microscale analysis evaluated impacts from the Proposed Project’s generated motor vehicle traffic at the most congested intersections in the Study Area. State and federal modeling procedures were used to determine worst-case concentrations. The results demonstrate that all existing and future No-Build and Build CO, PM₁₀, and PM_{2.5} concentrations will be below the NAAQS.

The air quality study demonstrates that the Project conforms to the Clean Air Act Amendments because:

- ▶ No new violation of the NAAQS will be created,
- ▶ No increase in the frequency or severity of any existing violations will occur, and
- ▶ No delay in attainment of any NAAQS will result.



5.5.2 Air Quality Background and Regulatory Context

The 1990 Clean Air Act Amendments (CAAA) and the Massachusetts State Implementation Plan (SIP) require that proposed projects not cause any new violation of the NAAQS for pollutants of concern, or increase the frequency or severity of any existing violations, or delay attainment of any NAAQS. The air quality study includes a hotspot (microscale) evaluation of mobile source pollutants. The microscale analysis evaluated CO, PM₁₀, and PM_{2.5} concentrations from roadways and intersections.

The Environmental Protection Agency (EPA) and Massachusetts Department of Environmental Protection (DEP) have established guidance for modeling and review for air quality analysis prepared pursuant to the Massachusetts Environmental Policy Act (MEPA) process. The City of Boston requires that air quality analyses prepared for DPIRs meet the EPA and DEP guidelines.

5.5.2.1 Pollutants of Concern and Attainment Status

Air pollution is of concern because of its demonstrated effects on human health, in particular the respiratory effects of the pollutants and their potential toxic effects, as described below.

Carbon Monoxide

Carbon monoxide (CO) is a colorless and odorless gas that is a product of incomplete combustion. Carbon monoxide is absorbed by the lungs and reacts with hemoglobin to reduce the oxygen carrying capacity of the blood. At low concentrations, CO has been shown to aggravate the symptoms of cardiovascular disease. It can cause headaches, nausea and, at sustained high concentration levels, can lead to coma and death.

Boston is a CO Maintenance area, meaning an area that formerly was non-attainment but has demonstrated that the air quality has improved to attainment. After 20 years of clean air quality, Maintenance areas can be re-designated to attainment. Projects located in Maintenance areas, as Redevelopment of Government Center Garage Project currently is, are required to evaluate their CO concentrations on the NAAQS.

Particulate Matter

Particulate matter is made up of small, solid particles and liquid droplets. PM_{10} refers to particulate matter with a nominal aerodynamic diameter of 10 micrometers or less, and $PM_{2.5}$ refers to particulate matter with an aerodynamic diameter of 2.5 micrometers or less. Particulates can enter the body through the respiratory system. Particulates over 10 micrometers in size are generally captured in the nose and throat and are readily expelled from the body. Particles smaller than 10 micrometers, and especially particles smaller than 2.5 micrometers, can reach the air ducts (bronchi) and the air sacs (alveoli) in the lungs. Particulates are associated with increased incidence of respiratory diseases, cardiopulmonary disease, and cancer.

Boston is currently in attainment/unclassifiable for PM_{10} and $PM_{2.5}$. An attainment/unclassifiable area is an area that does not yet have sufficient data to determine its attainment status. The EPA and Federal Highway Administration (FHWA) are in the process of developing modeling guidance for attainment/unclassifiable areas. This air quality evaluation included a microscale analysis to demonstrate compliance with the NAAQS.

Ultra-Fine Particulate Matter

Ultra-Fine Particulates (UFP) are particles ($PM_{0.1}$) with diameter of 0.1 micrometers or less. They are a concern because they are able to travel deep into the human respiratory system and potentially serve as a carrier for other compounds. In addition, UFP are also more difficult to measure and calculate impacts than PM_{10} and $PM_{2.5}$. Because UFP particles weigh almost nothing, they can stay airborne for a long time. However, $PM_{0.1}$ is a relatively new pollutant of concern. EPA is currently conducting and reviewing numerous air pollution studies to better understand (i.) the types of sources, (ii.) emission characteristics, and (iii.) human health effects associated with this pollutant.

To date, there is no state or federal NAAQS for UFP particles, nor is there any EPA or DEP recommended modeling procedures for assessing UFPs. Therefore, this pollutant was not directly assessed in this air quality chapter. The primary source of $PM_{0.1}$ is expected to be mobile sources, such as brakes and exhausts. The Project is expected to have a small impact on particulate matter. Similar trends would be expected for $PM_{0.1}$ as

for PM₁₀ and PM_{2.5} because PM_{0.1}, PM₁₀, and PM_{2.5} have some distinct similarities in their origins (e.g., mobile sources).

The Project will include TDM measures for mobile sources and the latest emission controls on mechanical equipment to help decrease the overall emissions of PM_{0.1}, PM₁₀, and PM_{2.5}, which will help lower potential health risks.

5.5.2.2 Air Quality Standards

The EPA has set the NAAQS to protect the public health. The NAAQS is presented in Table 5-2. The predominant source of air pollution anticipated from the Project is emissions from Project-related motor vehicle traffic. Carbon monoxide, PM₁₀, and PM_{2.5} are directly emitted by motor vehicles. Their concentrations can be calculated and compared to the NAAQS.

**Table 5-2
National Ambient Air Quality Standards**

Pollutant	Level	Averaging Time	Primary/Secondary ¹	Form/Rule
Carbon Monoxide	9 ppm (10 mg/m ³)	8-hour ¹	Primary	Not to be exceeded more than once per year
	35 ppm (40 mg/m ³)	1-hour ¹		
Lead	1.5 ug/m ³ ⁽²⁾	Rolling 3 Month Average	Primary and Secondary	Not to be exceeded
Nitrogen Dioxide	100 ppb	1-hour ⁴	Primary	98 th percentile, averaged over 3 years Annual Mean
	53 ppb ⁽³⁾	Annual	Primary and Secondary	
Ozone	0.075 ppm ⁽⁴⁾	8-hour ⁸	Primary and Secondary	Annual fourth-highest daily maximum 8-hr concentration, averaged over 3 years
Particulate Matter (PM _{2.5})	0.12 ug/m ³	Annual	Primary	Annual mean, averaged over 3 years
	15 ug/m ³	Annual	Secondary	Annual mean, averaged over 3 years
	35 ug/m ³	24-hour	Primary and Secondary	98 th percentile, averaged over 3 years
Particulate Matter (PM ₁₀)	150 ug/m ³	24-hour	Primary and Secondary	Not to be exceeded more than once per year on average over 3 years
Sulfur Dioxide	75 ppb ⁽⁵⁾	1-hour	Primary	3-hour ¹
	0.5 ppm	3-hour	Secondary	3-hour

¹ Primary standards provide public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

- 2 Final rule signed October 15, 2008. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- 3 The official level of the annual NO₂ standard is 0.053 ppm, equal to 53 ppb, which is shown here for the purpose of clearer comparison to the 1-hour standard.
- 4 Final rule signed March 12, 2008. The 1997 ozone standard (0.08 ppm, annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years) and related implementation rules remain in place. In 1997, EPA revoked the 1-hour ozone standard (0.12 ppm, not to be exceeded more than once per year) in all areas, although some areas have continued obligations under that standard (“anti-backsliding”). The 1-hour ozone standard is attained when the expected number of days per calendar year with maximum hourly average concentrations above 0.12 ppm is less than or equal to 1.
- 5 Final rule signed June 2, 2010. The 1971 annual and 24-hour SO₂ standards were revoked in that same rulemaking. However, these standards remain in effect until one year after an area is designated for the 2010 standard, except in areas designated nonattainment for the 1971 standards, where the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standard are approved.



5.5.3 Mobile Source Analysis

The microscale (“hot spot”) air quality analysis evaluated the emissions of mobile sources from nearby intersections. The following outlines the methodology and analysis assumptions and results for the mobile source analysis for the Project.

5.5.3.1 Mobile Source Methodology

The mobile source modeling followed the EPA’s modeling guidelines.¹ The traffic data was evaluated and the intersections that are currently the most congested and expected to experience an increase in project-generated traffic were identified. Emission factors were obtained from DEP and were combined with the traffic data in EPA’s mobile source model to calculate CO, PM₁₀, and PM_{2.5} worst-case concentrations. The microscale worst-case concentrations from the mobile sources determined the maximum project’s CO, PM₁₀, and PM_{2.5} concentrations and were compared to the NAAQS.

The microscale analysis utilizes traffic and emissions data for the existing and future No-Build and Build conditions, as described previously. The microscale analysis utilized the traffic (volumes and speeds) and emission factor data for the 2013 Existing, 2028 No-Build, and 2028 Build Conditions. These data were incorporated into air quality models to demonstrate that the project will meet the CAAA criteria. The microscale analysis calculated CO, PM₁₀, and PM_{2.5} concentrations at congested intersections near the project site under Existing, No-Build, and Build conditions.

Mobile Source Study Area

The objective of the microscale analysis was to evaluate the CO, PM₁₀, and PM_{2.5} concentrations at congested intersections in the study area. The intersections in the study area were ranked based on traffic volumes and Level of Service (LOS). The mobile source study area includes any intersection (including garage entrance/exits) where the LOS is expected to deteriorate to D and the Project causes a 10 percent increase in traffic or where the level of service is E or F and the Project contributes to a reduction in LOS. The following intersections, which are presented in Figure 5.4, were selected for analysis:

- Merrimack Street at Staniford Street, Causeway Street and Lomasney Way (Lowell Square)



¹ *Guideline for Modeling Carbon Monoxide From Roadway Intersections*, US Environmental Protection Agency, Office of Air Quality Planning and Standards, Technical Support Division; Research Triangle Park, NC; EPA-454/R-92-006 (Revised); September 1995

- North Washington Street at Causeway Street (Keany Square)
- North Washington Street at Thatcher Street and Valenti Way
- North Washington Street at Beverly Street
- New Chardon Street at North Washington Street and the Summer Tunnel Off-Ramp and I-93 Southbound and Callahan Tunnel On-Ramps
- North Street at Congress Street
- New Chardon Street at Congress Street and Merrimac Street
- New Chardon Street at Cambridge Street
- New Sudbury Street at Congress Street
- New Sudbury Street at Blackstone Street and Surface Road

Mobile Source Modeling

The microscale analysis calculated maximum 1-hour and 8-hour CO concentrations in the project area during the peak CO season (winter), maximum 24-hour PM₁₀ concentrations, and maximum 24-hour and annual PM_{2.5} concentrations for PM summer season. The EPA's computer model CAL3QHC Version 2² was used to predict CO, PM₁₀, and PM_{2.5} concentrations for each intersection. Receptor locations were selected near the congested intersections based upon areas where the public has access. The intersection receptors were placed at the edge of the roadway, but not closer than 10 feet (3 meters) from the nearest travel lane, as required by EPA. The results calculated at these receptor locations represent the highest concentrations at each intersection. Receptor locations farther away from the intersections will have lower concentrations because of the CO dispersion characteristics. The receptor locations that are along other roadways in the study area are also expected to have lower CO concentrations than the receptor locations at the intersection. The emission rates for vehicles traveling along these roadways are much lower than the emission rates for vehicles queuing at intersections.

The CO, PM₁₀, and PM_{2.5} concentrations were calculated directly using the EPA computer model. The 1-hour CO concentrations include a 1-hour background concentration of 3.0 ppm. The 8-hour CO concentrations were derived by applying a persistence factor of 0.70 to the 1-hour CO concentrations. Similar to the 1-hour CO emissions, the concentrations are expressed in parts per million (ppm) and include an 8-hour background concentration of 2.1 ppm.

The 24-hour PM₁₀ concentrations were derived by applying a persistence factor of 0.40 to the 1-hour PM₁₀ concentrations. The persistence factor for PM₁₀ was obtained from the DEP's modeling guidelines.³ The background concentrations⁴ assumed for the 24-hour PM₁₀ was 39.3ug/m³.



² *User's Guide to CAL3QHC Version 2.0: A Modeling Methodology for Predicting Pollutant Concentrations Near Roadway Intersections*, US Environmental Protection Agency, Office of Air Quality Planning and Standards, Technical Support Division; Research Triangle Park, NC; EPA-454/R-92-005; November 1992

³ *First Level Screening Guideline for Determining the Air Quality Impact of Stationary Source Air Pollution* January 1996.

⁴ 2009-2011 *New England Annual Report on Air Quality*, United States Environmental Protection Agency, Region 1, Office of Environmental Measurement and Evaluation North Chelmsford, MA 01863, Ecosystems Assessment Unit.

The 24-hour PM_{2.5} concentrations were derived by applying a persistence factor of 0.40 to the 1-hour PM_{2.5} concentrations. The background concentration assumed for the 24-hour PM_{2.5} was 20.7 ug/m³. The annual PM_{2.5} concentrations were derived by applying a persistence factor of 0.08 to the 1-hour PM_{2.5} concentrations. The background concentration assumed for the annual PM_{2.5} was 9.2 ug/m³.

Emission Rates

All the vehicle emission factors used in the microscale analysis were obtained using the EPA's MOBILE 6.2⁵ emissions model. MOBILE 6.2 calculates CO, PM₁₀, and PM_{2.5} emission factors from motor vehicles in grams per vehicle-mile. The emission rates calculated in this study were adjusted to reflect Massachusetts-specific conditions, such as the state vehicle registration age distribution, the statewide Inspection and Maintenance (I/M) Program, and the Stage II Vapor Recovery System.⁶ Emission factors for the mobile sources were determined using the DEP-recommended temperatures for the winter (CO) season and summer (PM) season.

Traffic Data

The air quality study utilized motor vehicle traffic data specifically developed for each analysis condition. The Build Condition used for the microscale analysis includes the physical and operational mitigation proposed to improve traffic operations. The microscale analysis used the morning and evening peak hour traffic conditions during the CO season (winter). Vehicle speeds were developed based upon traffic volumes, observed traffic flow characteristics, and roadway capacity. The traffic data were developed based on the traffic study presented in this DPIR.

5.5.3.2 Mobile Source Existing Air Quality Conditions

The CAAA resulted in states being divided into attainment and non-attainment areas, with classifications based upon the severity of their air quality problems. The Project is located in the Boston Metropolitan area, which has been classified as a "Maintenance" area for CO and an attainment area for PM₁₀ and PM_{2.5}.

The microscale analysis determined that the 1-hour CO concentrations for the 2013 Existing Condition ranged from a minimum of 3.3 parts per million (ppm) at the intersection of New Sudbury Street at Blackstone Street/Surface Road to a maximum of 4.8 ppm at the intersection of North Washington Street at Causeway Street (Keany Square). The corresponding 8-hour CO concentrations ranged from a minimum of 2.3 ppm to a maximum of 3.4 ppm. The microscale CO results are presented in Table 5-3 through Table 5-6 (presented below). All the 1-hour and 8-hour concentrations are below the CO NAAQS of 35 and 9 ppm, respectively. These values are consistent with the area's designation as a CO Maintenance area.

The microscale analysis determined that the 24-hour PM₁₀ concentrations for the 2013 Existing Condition ranged from a minimum of 39.7 micrograms per cubic meter (ug/m³) at the intersection of North Street at Congress Street and New Sudbury Street at Blackstone Street/Surface Road to a maximum of 43.3 ug/m³ at the intersection of New Chardon Street at Washington Street/Sumner Tunnel Off-Ramp/I-93

▼
5 MOBILE 6.2 (Mobile Source Emission Factor Model), The May 19, 2004 official release from US EPA, Office of Mobile Sources, Ann Arbor, MI.

6 *The Stage II Vapor Recovery System* is the process of collecting gasoline vapors from vehicles as they are refueled. This requires the use of a special gasoline nozzle at the fuel pump.

Southbound/Callahan Tunnel On-Ramps. The microscale PM₁₀ results are presented in Table 5-7 and Table 5-8 (presented below). All concentrations are below the PM₁₀ NAAQS of 150 ug/m³.

The microscale analysis determined that the 24-hour PM_{2.5} concentrations for the 2013 Existing Condition ranged from a minimum of 20.7 ug/m³ at the intersection of North Street at Congress Street and New Sudbury Street at Blackstone Street/Surface Road to a maximum of 22.7 ug/m³ at the intersection of New Chardon Street at Washington Street/Sumner Tunnel Off-Ramp/I-93 Southbound/Callahan Tunnel On-Ramps. The maximum annual PM_{2.5} concentrations ranged from a minimum of 9.2 ug/m³ to a maximum of 9.6 ug/m³. The microscale PM_{2.5} results are presented in Table 5-9 through Table 5-12 (presented below). All the 24-hour and annual concentrations are below the PM_{2.5} NAAQS of 35 and 15 ug/m³, respectively.

5.5.3.3 Mobile Source Future Air Quality Conditions (Project-Related Impacts)

The following sections present the future Project-related emissions. The microscale (“hot spot”) air quality analysis evaluated the Project-related (from traffic) concentrations of CO, PM_{2.5}, and PM₁₀ from motor vehicle emissions at nearby intersections and the proposed below-grade parking garage exhaust system. This analysis demonstrates that the Project will meet and is well below the NAAQS and Massachusetts standards for CO, PM₁₀, and PM_{2.5}.

Carbon Monoxide (CO)

The highest CO concentrations for each intersection are presented in Table 5-3 to Table 5-6. The results show that there are minimal to no increases for 1-hour and 8-hour CO concentrations between the 2028 No-Build and Build conditions due to the minor traffic volume increase and minimal intersection delays experienced at the study intersections. Due to the high mode-share for walking and transit, the Project is anticipated to produce minimal vehicular traffic during the peak hours. The 1-hour CO concentrations ranged between 3.2 and 6.2 ppm, and the 8-hour CO concentrations ranged between 2.2 and 5.5 ppm for both 2028 No-Build and Build conditions. The results of the microscale analysis demonstrate that the 2028 No-Build and Build CO concentrations (both 1- and 8-hour values) for the proposed project are below the NAAQS.

**Table 5-3
Predicted Maximum 1-Hour CO Concentrations: Morning Peak Hour (Parts Per Million)^{1, 2}**

Intersection # ¹	Intersection	Receptor	1-Hour CO Concentrations (ppm) (Morning Peak Hour)		
			2013 Existing	2028 No-Build	2028 Build
1	Merrimack Street at Staniford Street, Causeway Street and Lomasney Way (Lowell Square)	R1 – O’Neill Federal Building	4.1	4.2	4.2
		R2 –Quiznos Sub/ Residences	3.9	3.8	3.8
		R3 – 150 Staniford Street	4.0	4.1	4.1
		R4 - Charles F. Hurley Building	4.0	3.9	3.9
2	North Washington Street at Causeway Street (Keany Square)	R5 – Tennis Courts/Freedom Trail	4.8	4.9	4.9
		R6 – Parking/Cheese Shop	4.7	4.9	4.9
		R7 – 251 Causeway/Residences	4.8	4.9	4.9
		R8 - Strada (234 Causeway)	4.7	5.0	5.1
3	North Washington Street at Thatcher Street and Valenti Way	R9 – Supreme Nails & Spa	4.3	5.0	4.9
		R10 – Vision North/Residences	4.4	5.1	5.1
		R11 – Open Space/Valenti Square	4.5	6.1	5.7
		R12 – Nebo Pizzeria/Event Parking	4.2	5.0	5.0
4	North Washington Street at Beverly Street	R13 – Open Space/Valenti Square	4.4	5.5	5.3
		R14 – Joe Tecce’s Restaurant	4.7	6.1	6.2
		R15 – Open Space/Vent	4.5	5.8	5.7
5	New Chardon Street at North Washington Street and the Sumner Tunnel Off-Ramp and I-93 Southbound and Callahan Tunnel On-Ramps	R16 – Residences	4.4	6.9	6.8
		R17 – Project Site	4.3	7.8	7.8
		R18 – The Grand Canal Restaurant	4.6	5.6	5.6
6	North Street at Congress Street	R19 – Robert Scibilia Square/Park	4.1	4.1	4.2
		R20 – Open Space/Quincy Market	4.1	4.5	4.6
		R21 – Boston City Hall	3.8	4.1	4.2
		R22 – Boston City Hall	4.2	4.3	4.4

Source: Vanasse Hangen Brustlin, Inc.

1 See Figure 5.4

2 The concentrations are expressed in parts per million (ppm) and include a 1-hour background concentration of 3.0ppm. The 1-hour NAAQS for CO is 35 ppm. The emissions presented represent the highest emissions experienced at each intersection.

Table 5-3 (continued)
Predicted Maximum 1-Hour CO Concentrations: Morning Peak Hour (Parts Per Million)^{1, 2}

Intersection # ¹	Intersection	Receptor	1-Hour CO Concentrations (ppm) (Morning Peak Hour)		
			2013 Existing	2028 No-Build	2028 Build
7	New Chardon Street at Congress Street and Merrimac Street	R23 – Parking Lot	4.5	4.2	4.5
		R24 - Registry of Deeds and Probate	4.1	4.0	4.0
		R25 – Government Center Garage	3.9	3.9	4.0
		R26 – Office Building	4.1	4.0	4.1
8	New Chardon Street at Cambridge Street	R27 – Cardinal Cushing Park	4.0	3.9	3.9
		R28 – Rite Aid Pharmacy	4.5	4.4	4.4
		R29 – Dunkin Donuts	4.5	4.3	4.3
		R30 – Office Building	4.5	4.4	4.4
9	New Sudbury Street at Congress Street	R31 - Government Center Garage	4.0	4.0	4.2
		R32 – Parking Garage	4.6	4.3	4.9
		R33 – Open Space	4.2	4.0	4.6
		R34 - Government Center Garage	4.2	4.1	4.5
10	New Sudbury Street at Blackstone Street and Surface Road	R35 – I-93 Tunnel	3.7	3.7	3.7
		R36 – Open Space	3.7	3.6	3.8
		R37 – Office Building	4.0	3.8	4.1
		R38 - Government Center Garage	3.9	3.8	4.0
		R39 - Median	3.4	3.4	3.5

Source: Vanasse Hangen Brustlin, Inc.

1 See Figure 5.4

2 The concentrations are expressed in parts per million (ppm) and include a 1-hour background concentration of 3.0ppm. The 1-hour NAAQS for CO is 35 ppm. The emissions presented represent the highest emissions experienced at each intersection.

**Table 5-4
Predicted Maximum 1-Hour CO Concentrations: Evening Peak Hour (Parts Per Million)^{1, 2}**

Intersecti on # ¹	Intersection	Receptor	1-Hour CO Concentrations (ppm) (Evening Peak Hour)		
			2013 Existing	2028 No-Build	2028 Build
1	Merrimack Street at Staniford Street, Causeway Street and Lomasney Way (Lowell Square)	R1 – O'Neill Federal Building	4.2	4.1	4.1
		R2 –Quiznos Sub/ Residences	4.0	4.1	4.2
		R3 – 150 Staniford Street	4.1	4.1	4.1
		R4 - Charles F. Hurley Building	4.1	3.9	4.0
5	New Chardon Street at North Washington Street and the Sumner Tunnel Off-Ramp and I-93 Southbound and Callahan Tunnel On-Ramps	R16 – Residences	4.6	4.5	4.5
		R17 – Project Site	4.3	4.2	4.2
		R18 – The Grand Canal Restaurant	4.4	4.4	4.4
7	New Chardon Street at Congress Street and Merrimac Street	R23 – Parking Lot	4.6	4.3	4.5
		R24 - Registry of Deeds and Probate	4.0	4.0	4.1
		R25 – Government Center Garage	4.0	3.9	3.9
		R26 – Office Building	4.2	4.1	4.1
8	New Chardon Street at Cambridge Street	R27 – Cardinal Cushing Park	4.0	4.0	4.0
		R28 – Rite Aid Pharmacy	4.4	4.3	4.3
		R29 – Dunkin Donuts	4.4	4.3	4.3
		R30 – Office Building	4.1	4.1	4.1
9	New Sudbury Street at Congress Street	R31 - Government Center Garage	4.2	4.0	4.1
		R32 – Parking Garage	4.6	4.3	4.6
		R33 – Open Space	4.5	4.3	4.4
		R34 - Government Center Garage	4.2	4.1	4.1
10	New Sudbury Street at Blackstone Street and Surface Road	R35 – I-93 Tunnel	3.9	3.9	3.9
		R36 – Open Space	4.0	3.9	3.9
		R37 – Office Building	4.0	4.0	4.0
		R38 - Government Center Garage	4.0	3.9	4.0
		R39 - Median	3.5	3.5	3.5

Source: Vanasse Hangen Brustlin, Inc.

- 1 See Figure 5.4. The evening peak hour concentrations have been assessed for these intersections because the volumes were slightly higher than the morning peak hour.
- 2 The concentrations are expressed in parts per million (ppm) and include a 1-hour background concentration of 3.0ppm. The 1-hour NAAQS for CO is 35 ppm. The emissions presented represent the highest emissions experienced at each intersection.

**Table 5-5
Predicted Maximum 8-Hour CO Concentrations : Morning Peak Hour (Parts Per Million)^{1, 2}**

Intersection # ¹	Intersection	Receptor	8-Hour CO Concentrations (ppm) (Morning Peak Hour)		
			2013 Existing	2028 No-Build	2028 Build
1	Merrimack Street at Staniford Street, Causeway Street and Lomasney Way (Lowell Square)	R1 – O’Neill Federal Building	2.9	2.9	2.9
		R2 –Quiznos Sub/ Residences	2.7	2.7	2.7
		R3 – 150 Staniford Street	2.8	2.9	2.9
		R4 - Charles F. Hurley Building	2.8	2.7	2.7
2	North Washington Street at Causeway Street (Keany Square)	R5 – Tennis Courts/Freedom Trail	3.4	3.4	3.4
		R6 – Parking/Cheese Shop	3.3	3.4	3.4
		R7 – 251 Causeway/Residences	3.4	3.4	3.4
		R8 - Strada (234 Causeway)	3.3	3.5	3.6
3	North Washington Street at Thatcher Street and Valenti Way	R9 – Supreme Nails & Spa	3.0	3.5	3.4
		R10 – Vision North/Residences	3.1	3.6	3.6
		R11 – Open Space/Valenti Square	3.2	4.3	4.0
		R12 – Nebo Pizzeria/Event Parking	2.9	3.5	3.5
4	North Washington Street at Beverly Street	R13 – Open Space/Valenti Square	3.1	3.9	3.7
		R14 – Joe Tecce’s Restaurant	3.3	4.3	4.3
		R15 – Open Space/Vent	3.2	4.1	4.0
5	New Chardon Street at North Washington Street and the Sumner Tunnel Off-Ramp and I-93 Southbound and Callahan Tunnel On-Ramps	R16 – Residences	3.1	4.8	4.8
		R17 – Project Site	3.0	5.5	5.5
		R18 – The Grand Canal Restaurant	3.2	3.9	3.9
6	North Street at Congress Street	R19 – Robert Scibilia Square/Park	2.9	2.9	2.9
		R20 – Open Space/Quincy Market	2.9	3.2	3.2
		R21 – Boston City Hall	2.7	2.9	2.9
		R22 – Boston City Hall	2.9	3.0	3.1

Source: Vanasse Hangen Brustlin, Inc.

1 See Figure 5.4

2 The concentrations are expressed in parts per million (ppm). 8-Hour CO background of 2.1 ppm and a persistence factor of 0.70 were used. The 8-hour NAAQS for CO is 9 ppm. The emissions presented represent the highest emissions experienced at each intersection.

**Table 5-5
Predicted Maximum 8-Hour CO Concentrations : Morning Peak Hour (Parts Per Million)^{1, 2}**

Intersection # ¹	Intersection	Receptor	8-Hour CO Concentrations (ppm) (Morning Peak Hour)		
			2013 Existing	2028 No-Build	2028 Build
7	New Chardon Street at Congress Street and Merrimac Street	R23 – Parking Lot	3.2	2.9	3.2
		R24 - Registry of Deeds and Probate	2.9	2.8	2.8
		R25 – Government Center Garage	2.7	2.7	2.8
		R26 – Office Building	2.9	2.8	2.9
8	New Chardon Street at Cambridge Street	R27 – Cardinal Cushing Park	2.8	2.7	2.7
		R28 – Rite Aid Pharmacy	3.2	3.1	3.1
		R29 – Dunkin Donuts	3.2	3.0	3.0
		R30 – Office Building	3.2	3.1	3.1
9	New Sudbury Street at Congress Street	R31 - Government Center Garage	2.8	2.8	2.9
		R32 – Parking Garage	3.2	3.0	3.9
		R33 – Open Space	2.9	2.8	3.2
		R34 - Government Center Garage	2.9	2.9	3.2
10	New Sudbury Street at Blackstone Street and Surface Road	R35 – I-93 Tunnel	2.6	2.6	2.6
		R36 – Open Space	2.6	2.5	2.7
		R37 – Office Building	2.8	2.7	2.9
		R38 - Government Center Garage	2.7	2.7	2.8
		R39 - Median	2.4	2.4	2.5

Source: Vanasse Hangen Brustlin, Inc.

1 See Figure 5.4

2 The concentrations are expressed in parts per million (ppm). 8-Hour CO background of 2.1 ppm and a persistence factor of 0.70 were used. The 8-hour NAAQS for CO is 9 ppm. The emissions presented represent the highest emissions experienced at each intersection.

**Table 5-6
Predicted Maximum 8-Hour CO Concentrations: Evening Peak Hour (Parts Per Million)^{1, 2}**

Intersection # ¹	Intersection	Receptor	8-Hour CO Concentrations (ppm) (Evening Peak Hour)		
			2013 Existing	2028 No-Build	2028 Build
1	Merrimack Street at Staniford Street, Causeway Street and Lomasney Way (Lowell Square)	R1 – O'Neill Federal Building	2.9	2.9	2.9
		R2 –Quiznos Sub/ Residences	2.8	2.9	2.9
		R3 – 150 Staniford Street	2.9	2.9	2.9
		R4 - Charles F. Hurley Building	2.9	2.7	2.8
5	New Chardon Street at North Washington Street and the Sumner Tunnel Off-Ramp and I-93 Southbound and Callahan Tunnel On-Ramps	R16 – Residences	3.2	3.2	3.2
		R17 – Project Site	3.0	2.9	2.9
		R18 – The Grand Canal Restaurant	3.1	3.1	3.1
7	New Chardon Street at Congress Street and Merrimac Street	R23 – Parking Lot	3.2	3.0	3.2
		R24 - Registry of Deeds and Probate	2.8	2.8	2.9
		R25 – Government Center Garage	2.8	2.7	2.7
		R26 – Office Building	2.9	2.9	2.9
8	New Chardon Street at Cambridge Street	R27 – Cardinal Cushing Park	2.8	2.8	2.8
		R28 – Rite Aid Pharmacy	3.1	3.0	3.0
		R29 – Dunkin Donuts	3.1	3.0	3.0
		R30 – Office Building	2.9	2.9	2.9
9	New Sudbury Street at Congress Street	R31 - Government Center Garage	2.9	2.8	2.9
		R32 – Parking Garage	3.2	3.0	3.2
		R33 – Open Space	3.2	3.0	3.1
		R34 - Government Center Garage	2.9	2.9	3.0
10	New Sudbury Street at Blackstone Street and Surface Road	R35 – I-93 Tunnel	2.7	2.7	2.7
		R36 – Open Space	2.8	2.7	2.7
		R37 – Office Building	2.8	2.8	2.9
		R38 - Government Center Garage	2.8	2.7	2.8
		R39 - Median	2.5	2.5	2.5

Source: Vanasse Hangen Brustlin, Inc. 1 See Figure 5.4. The evening peak hour concentrations have been assessed for these intersections because the volumes were slightly higher than the morning peak hour.

2 The concentrations are expressed in parts per million (ppm). 8-Hour CO background of 2.1 ppm and a persistence factor of 0.70 were used. The 8-hour NAAQS for CO is 9 ppm. The emissions presented represent the highest emissions experienced at each intersection.

Particulate Matter (PM₁₀)

The analysis results show that the maximum increase for 24-hour PM₁₀ concentrations between the 2028 No-Build and Build conditions is 3.6 ug/m³. The 24-hour PM₁₀ for 2028 No-Build and Build conditions ranged between 39.7 and 43.3 ug/m³. The results of the microscale analysis demonstrate that the 2028 No-Build and Build PM₁₀ concentrations for the Project are below the NAAQS. The highest PM₁₀ concentrations for each intersection are presented in Table 5-7 and Table 5-8.

**Table 5-7
Predicted Maximum 24-Hour PM₁₀ Concentrations: Morning Peak Hour (ug/m³)^{1,2}**

Intersection # ¹	Intersection	Receptor	24-Hour PM ₁₀ Concentrations (ug/m ³)		
			2013 Existing	2028 No-Build	2028 Build
1	Merrimack Street at Staniford Street, Causeway Street and Lomasney Way (Lowell Square)	R1 – O'Neill Federal Building	40.5	40.5	40.5
		R2 – Quiznos Sub/ Residences	40.5	40.5	40.5
		R3 – 150 Staniford Street	40.5	40.5	40.5
		R4 - Charles F. Hurley Building	40.5	40.5	40.5
2	North Washington Street at Causeway Street (Keany Square)	R5 – Tennis Courts/Freedom Trail	41.7	41.7	41.7
		R6 – Parking/Area	41.7	41.7	41.7
		R7 – 251 Causeway/Residences	41.3	41.3	41.3
		R8 - Strada (234 Causeway)	41.3	41.3	41.7
3	North Washington Street at Thatcher Street and Valenti Way	R9 – Supreme Nails & Spa	41.3	41.3	41.3
		R10 – Vision North/Residences	41.3	41.3	41.3
		R11 – Open Space/Valenti Square	41.3	42.5	42.1
		R12 – Nebo Pizzeria/Event Parking	40.9	41.3	41.3
4	North Washington Street at Beverly Street	R13 – Open Space/Valenti Square	41.3	41.7	41.7
		R14 – Joe Tecce's Restaurant	41.7	42.5	42.5
		R15 – Open Space/Vent	41.3	41.7	41.7
5	New Chardon Street at North Washington Street and the Sumner Tunnel Off-Ramp and I-93 Southbound and Callahan Tunnel On-Ramps	R16 – Residences	41.3	42.9	42.9
		R17 – Project Site	40.9	43.3	43.3
		R18 – The Grand Canal Restaurant	41.3	41.7	41.7
6	North Street at Congress Street	R19 – Robert Scibilia Square/Park	40.5	40.5	40.5
		R20 – Open Space/Quincy Market	40.5	40.9	40.9
		R21 – Boston City Hall	40.5	40.5	40.5
		R22 – Boston City Hall	40.5	40.5	40.5

Source: Vanasse Hangen Brustlin, Inc.

1 See Figure 5.4

2 The concentrations are expressed in micrograms per cubic meter (ug/m³). The background concentrations assumed for the 24-Hour PM₁₀ was 39.3ug/m³. The NAAQS for PM₁₀ is 150 ug/m³. The emissions presented represent the highest emissions experienced at each intersection.

Table 5-7 (Continued)
Predicted Maximum 24-Hour PM₁₀ Concentrations: Morning Peak Hour (ug/m³)^{1,2}

Intersection # ¹	Intersection	Receptor	24-Hour PM ₁₀ Concentrations (ug/m ³)		
			2013 Existing	2028 No-Build	2028 Build
7	New Chardon Street at Congress Street and Merrimac Street	R23 – Parking Lot	40.5	40.5	40.5
		R24 - Registry of Deeds and Probate	40.5	40.5	40.5
		R25 – Government Center Garage	40.5	40.5	40.5
		R26 – Office Building	40.5	40.5	40.5
8	New Chardon Street at Cambridge Street	R27 – Cardinal Cushing Park	40.5	40.5	40.5
		R28 – Rite Aid Pharmacy	40.9	40.9	40.9
		R29 – Dunkin Donuts	40.9	40.9	40.9
		R30 – Office Building	40.9	40.5	40.5
9	New Sudbury Street at Congress Street	R31 - Government Center Garage	40.5	40.5	40.5
		R32 – Parking Garage	40.9	40.9	41.7
		R33 – Open Space	40.5	40.5	40.9
		R34 - Government Center Garage	40.5	40.5	40.9
10	New Sudbury Street at Blackstone Street and Surface Road	R35 – I-93 Tunnel	40.1	40.1	40.1
		R36 – Open Space	40.1	40.1	40.1
		R37 – Office Building	40.5	40.1	40.5
		R38 - Government Center Garage	40.1	40.1	40.5
		R39 - Median	39.7	39.7	40.1

Source: Vanasse Hangen Brustlin, Inc.

1 See Figure 5.4

2 The concentrations are expressed in micrograms per cubic meter (ug/m³). The background concentrations assumed for the 24-Hour PM₁₀ was 39.3ug/m³. The NAAQS for PM₁₀ is 150 ug/m³. The emissions presented represent the highest emissions experienced at each intersection.

**Table 5-8
Predicted Maximum 24-Hour PM₁₀ Concentrations: Evening Peak Hour (ug/m³)^{1,2}**

Intersection # ¹	Intersection	Receptor	24-Hour PM ₁₀ Concentrations (ug/m ³) (Evening Peak Hour)		
			2013 Existing	2028 No-Build	2028 Build
1	Merrimack Street at Staniford Street, Causeway Street and Lomasney Way (Lowell Square)	R1 – O'Neill Federal Building	40.5	40.5	40.5
		R2 –Quiznos Sub/ Residences	40.5	40.5	40.5
		R3 – 150 Staniford Street	40.5	40.5	40.5
		R4 - Charles F. Hurley Building	40.5	40.5	40.5
5	New Chardon Street at North Washington Street and the Sumner Tunnel Off-Ramp and I-93 Southbound and Callahan Tunnel On-Ramps	R16 – Residences	40.9	40.9	40.9
		R17 – Project Site	40.5	40.5	40.5
		R18 – The Grand Canal Restaurant	40.9	40.9	40.9
7	New Chardon Street at Congress Street and Merrimac Street	R23 – Parking Lot	40.9	40.5	40.9
		R24 - Registry of Deeds and Probate	40.5	40.5	40.9
		R25 – Government Center Garage	40.5	40.5	40.5
		R26 – Office Building	40.5	40.5	40.5
8	New Chardon Street at Cambridge Street	R27 – Cardinal Cushing Park	40.5	40.5	40.5
		R28 – Rite Aid Pharmacy	40.9	40.9	40.9
		R29 – Dunkin Donuts	40.9	40.9	40.9
		R30 – Office Building	40.5	40.5	40.5
9	New Sudbury Street at Congress Street	R31 - Government Center Garage	40.9	40.5	40.5
		R32 – Parking Garage	40.9	40.9	40.9
		R33 – Open Space	40.5	40.5	40.9
		R34 - Government Center Garage	40.5	40.5	40.5
10	New Sudbury Street at Blackstone Street and Surface Road	R35 – I-93 Tunnel	40.1	40.1	40.1
		R36 – Open Space	40.5	40.5	40.5
		R37 – Office Building	40.5	40.5	40.9
		R38 - Government Center Garage	40.5	40.5	40.5
		R39 - Median	39.7	39.7	39.7

Source: Vanasse Hangen Brustlin, Inc.

1 See Figure 5.4

2 The concentrations are expressed in micrograms per cubic meter (ug/m³). The background concentrations assumed for the 24-Hour PM₁₀ was 39.3ug/m³. The NAAQS for PM₁₀ is 150 ug/m³. The emissions presented represent the highest emissions experienced at each intersection.

Particulate Matter 2.5 (PM_{2.5})

The results show that there are minimal increases for 24-hour and annual PM_{2.5} concentrations between the 2028 No-Build and Build conditions due to the minor traffic volume increase and minimal intersection delays experienced at the study intersections. The 24-hour and annual PM_{2.5} for 2028 No-Build and Build conditions ranged from 20.7 to 22.7 ug/m³ and 9.2 to 9.6 ug/m³ respectively. The results of the microscale analysis demonstrate that the 2028 No-Build and Build PM_{2.5} concentrations for the proposed project are below the NAAQS. The highest PM_{2.5} concentrations for each intersection are presented in Tables 5-9 to Table 5-12.

**Table 5-9
Predicted Maximum 24-Hour PM_{2.5} Concentrations: Morning Peak Hour (ug/m³)^{1,2}**

Intersection # ¹	Intersection	Receptor	24-Hour PM _{2.5} Concentrations (ppm)		
			2013 Existing	2028 No-Build	2028 Build
1	Merrimack Street at Staniford Street, Causeway Street and Lomasney Way (Lowell Square)	R1 – O'Neill Federal Building	21.5	21.5	21.5
		R2 – Quiznos Sub/ Residences	21.5	21.1	21.1
		R3 – 150 Staniford Street	21.1	21.1	21.1
		R4 - Charles F. Hurley Building	21.5	21.1	21.1
2	North Washington Street at Causeway Street (Keany Square)	R5 – Tennis Courts/Freedom Trail	21.9	21.9	21.9
		R6 – Parking Area	21.9	21.9	21.9
		R7 – 251 Causeway/Residences	21.9	21.5	21.5
		R8 - Strada (234 Causeway)	21.9	21.5	21.9
3	North Washington Street at Thatcher Street and Valenti Way	R9 – Supreme Nails & Spa	21.5	21.5	21.5
		R10 – Vision North/Residences	21.9	21.9	21.9
		R11 – Open Space/Valenti Square	21.9	21.9	21.9
		R12 – Nebo Pizzeria/Event Parking	21.5	21.5	21.5
4	North Washington Street at Beverly Street	R13 – Open Space/Valenti Square	21.5	21.9	21.9
		R14 – Joe Tecce's Restaurant	21.9	21.9	21.9
		R15 – Open Space/Vent	21.5	21.9	21.9
5	New Chardon Street at North Washington Street and the Sumner Tunnel Off-Ramp and I-93 Southbound and Callahan Tunnel On-Ramps	R16 – Residences	21.9	22.3	22.3
		R17 – Project Site	21.5	22.7	22.7
		R18 – The Grand Canal Restaurant	21.5	21.9	21.9
6	North Street at Congress Street	R19 – Robert Scibilia Square/Park	21.5	21.1	21.5
		R20 – Open Space/Quincy Market	21.5	21.5	21.5
		R21 – Boston City Hall	21.5	21.1	21.1
		R22 – Boston City Hall	21.5	21.1	21.5

Source: Vanasse Hangen Brustlin, Inc.

1 See Figure 5.4

2 The concentrations are expressed in micrograms per cubic meter (ug/m³). The background concentrations assumed for the 24-Hour PM_{2.5} was 20.7 ug/m³. The NAAQS for PM_{2.5} is 35 ug/m³. The emissions presented represent the highest emissions experienced at each intersection.

Table 5-9 (Continued)
Predicted Maximum 24-Hour PM_{2.5} Concentrations: Morning Peak Hour (ug/m³)^{1,2}

Intersection # ¹	Intersection	Receptor	24-Hour PM ₁₀ Concentrations (ug/m ³)		
			2013 Existing	2028 No-Build	2028 Build
7	New Chardon Street at Congress Street and Merrimac Street	R23 – Parking Lot	21.5	21.5	21.5
		R24 - Registry of Deeds and Probate	21.5	21.5	21.5
		R25 – Government Center Garage	21.5	21.1	21.1
		R26 – Office Building	21.5	21.1	21.5
8	New Chardon Street at Cambridge Street	R27 – Cardinal Cushing Park	21.5	21.1	21.5
		R28 – Rite Aid Pharmacy	21.5	21.5	21.5
		R29 – Dunkin Donuts	21.5	21.5	21.5
		R30 – Office Building	21.5	21.5	21.5
9	New Sudbury Street at Congress Street	R31 - Government Center Garage	21.5	21.1	21.5
		R32 – Parking Garage	21.5	21.5	21.9
		R33 – Open Space	21.5	21.1	21.5
		R34 - Government Center Garage	21.5	21.1	21.5
10	New Sudbury Street at Blackstone Street and Surface Road	R35 – I-93 Tunnel	21.1	21.1	21.1
		R36 – Open Space	21.1	21.1	21.1
		R37 – Office Building	21.5	21.1	21.5
		R38 - Government Center Garage	21.1	21.1	21.1
		R39 - Median	21.1	21.1	21.1

Source: Vanasse Hangen Brustlin, Inc.

1 See Figure 5.4

2 The concentrations are expressed in micrograms per cubic meter (ug/m³). The background concentrations assumed for the 24-Hour PM_{2.5} was 20.7 ug/m³. The NAAQS for PM_{2.5} is 35 ug/m³. The emissions presented represent the highest emissions experienced at each intersection.

Table 5-10
Predicted Maximum 24-Hour PM_{2.5} Concentrations: Evening Peak Hour (ug/m³)^{1, 2}

Intersection # ¹	Intersection	Receptor	24-Hour PM _{2.5} Concentrations (ug/m ³) (Evening Peak Hour)		
			2013 Existing	2028 No-Build	2028 Build
1	Merrimack Street at Staniford Street, Causeway Street and Lomasney Way (Lowell Square)	R1 – O'Neill Federal Building	21.5	21.1	21.1
		R2 – Quiznos Sub/ Residences	21.5	21.1	21.1
		R3 – 150 Staniford Street	21.5	21.1	21.1
		R4 - Charles F. Hurley Building	21.5	21.1	21.1
5	New Chardon Street at North Washington Street and the Sumner Tunnel Off-Ramp and I-93 Southbound and Callahan Tunnel On-Ramps	R16 – Residences	21.5	21.5	21.5
		R17 – Project Site	21.5	21.1	21.5
		R18 – The Grand Canal Restaurant	21.5	21.5	21.5
7	New Chardon Street at Congress Street and Merrimac Street	R23 – Parking Lot	21.5	21.5	21.5
		R24 - Registry of Deeds and Probate	21.5	21.1	21.5
		R25 – Government Center Garage	21.5	21.1	21.5
		R26 – Office Building	21.5	21.1	21.5
8	New Chardon Street at Cambridge Street	R27 – Cardinal Cushing Park	21.5	21.1	21.5
		R28 – Rite Aid Pharmacy	21.5	21.5	21.5
		R29 – Dunkin Donuts	21.5	21.5	21.5
		R30 – Office Building	21.5	21.5	21.5
9	New Sudbury Street at Congress Street	R31 - Government Center Garage	21.5	21.5	21.5
		R32 – Parking Garage	21.9	21.5	21.5
		R33 – Open Space	21.5	21.1	21.5
		R34 - Government Center Garage	21.5	21.1	21.5
10	New Sudbury Street at Blackstone Street and Surface Road	R35 – I-93 Tunnel	21.1	21.1	21.1
		R36 – Open Space	21.5	21.1	21.1
		R37 – Office Building	21.5	21.1	21.1
		R38 - Government Center Garage	21.5	21.1	21.1
		R39 - Median	21.1	21.1	21.1

Source: Vanasse Hangen Brustlin, Inc.

1 See Figure 5.4

2 The concentrations are expressed in micrograms per cubic meter (ug/m3). The background concentrations assumed for the 24-Hour PM10 was 20.7ug/m3 . The NAAQS for PM10 is 35 ug/m3. The emissions presented represent the highest emissions experienced at each intersection.

**Table 5-11
Predicted Maximum Annual PM_{2.5} Concentrations: Morning Peak Hour (ug/m³)^{1,2}**

Intersection # ¹	Intersection	Receptor	Annual PM _{2.5} Concentrations (ppm)		
			2013 Existing	2028 No-Build	2028 Build
1	Merrimack Street at Staniford Street, Causeway Street and Lomasney Way (Lowell Square)	R1 – O’Neill Federal Building	9.4	9.4	9.4
		R2 –Quiznos Sub/ Residences	9.4	9.3	9.3
		R3 – 150 Staniford Street	9.3	9.3	9.3
		R4 - Charles F. Hurley Building	9.4	9.3	9.3
2	North Washington Street at Causeway Street (Keany Square)	R5 – Tennis Courts/Freedom Trail	9.4	9.4	9.4
		R6 – Parking Area	9.4	9.4	9.4
		R7 – 251 Causeway/Residences	9.4	9.4	9.4
		R8 - Strada (234 Causeway)	9.4	9.4	9.4
3	North Washington Street at Thatcher Street and Valenti Way	R9 – Supreme Nails & Spa	9.4	9.4	9.4
		R10 – Vision North/Residences	9.4	9.4	9.4
		R11 – Open Space/Valenti Square	9.4	9.4	9.4
		R12 – Nebo Pizzeria/Event Parking	9.4	9.4	9.4
4	North Washington Street at Beverly Street	R13 – Open Space/Valenti Square	9.4	9.4	9.4
		R14 – Joe Tecce’s Restaurant	9.4	9.4	9.4
		R15 – Open Space/Vent	9.4	9.4	9.4
5	New Chardon Street at North Washington Street and the Sumner Tunnel Off-Ramp and I-93 Southbound and Callahan Tunnel On-Ramps	R16 – Residences	9.4	9.5	9.5
		R17 – Project Site	9.4	9.6	9.6
		R18 – The Grand Canal Restaurant	9.4	9.4	9.4
6	North Street at Congress Street	R19 – Robert Scibilia Square/Park	9.4	9.3	9.4
		R20 – Open Space/Quincy Market	9.4	9.4	9.4
		R21 – Boston City Hall	9.4	9.3	9.3
		R22 – Boston City Hall	9.4	9.3	9.4

Source: Vanasse Hangen Brustlin, Inc.

1 See Figure 5.4

2 The concentrations are expressed in micrograms per cubic meter (ug/m3). The background concentrations assumed for the annual PM_{2.5} was 9.2 ug/m³. The NAAQS for PM_{2.5} is 15 ug/m³. The emissions presented represent the highest emissions experienced at each intersection.

Table 5-11 (Continued)
Predicted Maximum Annual PM_{2.5} Concentrations: Morning Peak Hour (ug/m³)^{1,2}

Intersection # ¹	Intersection	Receptor	24-Hour PM ₁₀ Concentrations (ug/m ³)		
			2013 Existing	2028 No-Build	2028 Build
7	New Chardon Street at Congress Street and Merrimac Street	R23 – Parking Lot	9.4	9.4	9.4
		R24 - Registry of Deeds and Probate	9.4	9.4	9.4
		R25 – Government Center Garage	9.4	9.3	9.3
		R26 – Office Building	9.4	9.3	9.4
8	New Chardon Street at Cambridge Street	R27 – Cardinal Cushing Park	9.4	9.3	9.4
		R28 – Rite Aid Pharmacy	9.4	9.4	9.4
		R29 – Dunkin Donuts	9.4	9.4	9.4
		R30 – Office Building	9.4	9.4	9.4
9	New Sudbury Street at Congress Street	R31 - Government Center Garage	9.4	9.3	9.4
		R32 – Parking Garage	9.4	9.4	9.4
		R33 – Open Space	9.4	9.3	9.4
		R34 - Government Center Garage	9.4	9.3	9.4
10	New Sudbury Street at Blackstone Street and Surface Road	R35 – I-93 Tunnel	9.3	9.3	9.3
		R36 – Open Space	9.3	9.3	9.3
		R37 – Office Building	9.3	9.3	9.3
		R38 - Government Center Garage	9.3	9.3	9.3
		R39 - Median	9.3	9.3	9.3

Source: Vanasse Hangen Brustlin, Inc.

1 See Figure 5.4

2 The concentrations are expressed in micrograms per cubic meter (ug/m³). The background concentrations assumed for the annual PM_{2.5} was 9.2 ug/m³. The NAAQS for PM_{2.5} is 15 ug/m³. The emissions presented represent the highest emissions experienced at each intersection.

**Table 5-12
Predicted Maximum Annual PM_{2.5} Concentrations: Evening Peak Hour (ug/m³)^{1, 2}**

Intersection # ¹	Intersection	Receptor	Annual PM _{2.5} Concentrations (ug/m ³) (Evening Peak Hour)		
			2013 Existing	2028 No-Build	2028 Build
1	Merrimack Street at Staniford Street, Causeway Street and Lomasney Way (Lowell Square)	R1 – O'Neill Federal Building	9.4	9.3	9.3
		R2 –Quiznos Sub/ Residences	9.4	9.3	9.3
		R3 – 150 Staniford Street	9.4	9.3	9.3
		R4 - Charles F. Hurley Building	9.4	9.3	9.3
5	New Chardon Street at North Washington Street and the Sumner Tunnel Off-Ramp and I-93 Southbound and Callahan Tunnel On-Ramps	R16 – Residences	9.4	9.4	9.4
		R17 – Project Site	9.4	9.3	9.4
		R18 – The Grand Canal Restaurant	9.4	9.4	9.4
7	New Chardon Street at Congress Street and Merrimac Street	R23 – Parking Lot	9.4	9.4	9.4
		R24 - Registry of Deeds and Probate	9.4	9.3	9.4
		R25 – Government Center Garage	9.4	9.3	9.4
		R26 – Office Building	9.4	9.3	9.4
8	New Chardon Street at Cambridge Street	R27 – Cardinal Cushing Park	9.4	9.3	9.4
		R28 – Rite Aid Pharmacy	9.4	9.4	9.4
		R29 – Dunkin Donuts	9.4	9.4	9.4
		R30 – Office Building	9.4	9.4	9.4
9	New Sudbury Street at Congress Street	R31 - Government Center Garage	9.4	9.4	9.4
		R32 – Parking Garage	9.4	9.4	9.4
		R33 – Open Space	9.4	9.3	9.4
		R34 - Government Center Garage	9.4	9.3	9.4
10	New Sudbury Street at Blackstone Street and Surface Road	R35 – I-93 Tunnel	9.3	9.3	9.3
		R36 – Open Space	9.4	9.3	9.3
		R37 – Office Building	9.4	9.3	9.3
		R38 - Government Center Garage	9.4	9.3	9.3
		R39 - Median	9.3	9.3	9.3

Source: Vanasse Hangen Brustlin, Inc.

1 See Figure 5.4

- 2 The concentrations are expressed in micrograms per cubic meter (ug/m³). The background concentrations assumed for the 24-Hour PM₁₀ was 9.2 ug/m³. The NAAQS for PM₁₀ is 15 ug/m³. The emissions presented represent the highest emissions experienced at each intersection.



5.4.4 Parking Garage Emissions Analysis

The Project will include ventilation fans associated with the enclosed parking garage. A air quality assessment of the emissions related to the ventilation fans has been included for CO.

5.4.4.1 Parking Garage Emissions Analysis Methodology

The air emissions from the Garage exhaust system were calculated using EPA's air quality model AERMOD⁷ to generate emission estimates that demonstrate whether or not the project will comply with the NAAQS. The AERMOD model is an air dispersion computer program designed to assess emissions generated by stationary sources and takes into consideration the complexities of multiple sources, meteorological data, and varying terrain geometry. AERMOD modeling procedures follow EPA guidance for evaluating stationary source emissions. AERMOD incorporates multiple sources, meteorological data, source emission data, stack and building geometry, and detailed surrounding land use and topography. These data were incorporated into AERMOD to generate concentrations that demonstrate whether or not the proposed project would comply with the NAAQS.

The Garage exhaust system was treated as an area source. The 2028 idling emission factor from MOBILE 6.2 was used to calculate the parking garage's exhaust emission rate. The source data include the emission rate, exhaust release height, and area of the exhaust shaft. Table 5-13 *Garage Ventilation Fan Parameters for Redevelopment of Government Center* presents the parameters used for the air quality analysis for the proposed ventilations fans associated with the Project's enclosed parking garage.

The air dispersion model included five years of meteorological data (2008 through 2012) representative of the study area. The surface data and upper air data are obtained from the weather station located at Logan International Airport (Station 14739) and Chatham, MA (Station 14684), respectively. Building downwash can cause increased impacts at nearby receptor locations. Downwash occurs when the stack height is not sufficient to allow the plume to rise and disperse into the atmosphere. Building downwash was included in the analysis.



⁷ Breeze AERMOD Version 7.4.1. Release Date 26 Jan 2012

**Table 5-13
Garage Ventilation Fan Parameters**

Stack Parameters	Shaft Parameters
Emission Factor	0.00053805 g/(s-m ²)
Release Height	140 feet
Area Length	25 feet
Area Width	10 feet

The potential air quality impact was determined based upon potential emissions from the Garage ventilation fans operating at full load at sensitive receptor locations. The air quality analysis included 3,600 receptor locations in the vicinity of the Project. The receptor locations were placed in the form of a polar array, at every 10 degree in 10 meter increments, up to a radius of 1,000 meters around the Facility.

5.5.4.2 Parking Garage Emissions Analysis Findings

AERMOD included a downwash component to represent the worst case conditions for the proposed Project. Even with downwash conditions, the air quality analysis indicated that the maximum predicted concentrations are all below the NAAQS. The annual emissions of the ventilation fans associated with the enclosed parking garage are projected to be 5,756 ug/m³ and 943 ug/m³ for the 1-hour and 8-hour CO emissions respectively. These emissions are well below the NAAQS standards of 40,000 ug/m³ for the 1-hour and 10,000 ug/m³ for the 8-hour CO emissions. Table 5-14 presents the results for the analysis of the resulting CO pollutant.

**Table 5-14
Predicted Annual Emissions for the Garage Ventilation Fans ¹**

Pollutants	National Ambient Air Quality Standards (NAAQS) (CO)	Project Emissions ¹
Carbon Monoxide (CO) 1-Hour	40,000 ug/m ³	5,756 ug/m ³
Carbon Monoxide (CO) 8-Hour	10,000 ug/m ³	943 ug/m ³

¹ Represents 994 vehicles during the Project Build Morning Peak Hour Condition.



5.5.5 Stationary Sources

The Project will include stationary sources, such as heating boilers, hot water heaters, and emergency generators. Because the Project is currently under design, the size and number of the stationary sources have not yet been finalized. A stationary source air quality assessment will be provided as part of the Article 80B, Large Project Review for each Project Component as the design of building systems progresses. The project

team will work with the BRA, BED, and DEP to establish appropriate methodology and parameters of the air quality analysis for each building during Article 80B and/or MEPA review, as required. Furthermore, the Project will obtain operating permits for appropriate equipment under DEP's regulations (310 CMR 7.02), as may be required. The DEP regulatory process will ensure that these emission sources meet the NAAQS.

5.6 Noise

The purpose of this section is to present the noise assessment associated with the revised Project, as presented herein. The noise assessment included noise monitoring to determine existing sound levels and calculations of future sound levels associated with potential mechanical equipment. This section provides a background on noise, the regulatory context for assessing noise impacts associated with development projects, including the City of Boston's noise standards, and the noise assessment methodology and findings.



5.6.1 Summary of Key Findings

The noise assessment determined that existing ambient sound levels exceed the City of Boston's noise standards. The analysis calculated the maximum overall sound level at the sensitive receptor locations. The Project will be designed to not generate sound levels that exceed the City's noise standards. By enclosing three sides of the Garage, the Project provides a significant noise benefit as it will screen existing noise internal to the Garage (i.e., engine noise, car alarms). Based on recent noise monitoring, the existing sound levels are greater than the City's nighttime standard of 50 dB(A) and because the building mechanical equipment will be located within mechanical penthouses on the rooftops of each building, the sound levels generated by the Project's building mechanical equipment will range from 38 dB(A) to 48 dB(A) resulting in an overall sound level change (increase) by one decibel at only six of the 13 sensitive receptor locations, which is in compliance with the City of Boston noise standards. Additionally, since a majority of the service and loading activities will be serviced on-site and within the proposed buildings, noise impacts to the sensitive receptor locations will be negligible. The creation of the East Parcel public plaza creates an on-site sensitive receptor that will need to be considered due to noise from the adjacent MBTA Haymarket bus facility. The current project design of EP-B2 is expected to act as a screen to mitigate the noise from the buses on this new public space. Additionally, the proposed residential units will not be impacted by the major transportation facilities (airport, rail line, and major highways) in the vicinity of the Project.



5.6.2 Noise Background

Noise is defined as unwanted or excessive sound. Sound becomes unwanted when it interferes with normal activities, such as sleep, work, or recreation. How people perceive sound depends on several measurable physical characteristics. These factors include:

- *Intensity* - Sound intensity is often equated to loudness.
- *Frequency* - Sounds are comprised of acoustic energy distributed over an array of frequencies. Acoustic frequencies, commonly referred to as tone or pitch, are typically measured in Hertz. Pure tones have all their energy concentrated in a narrow frequency range.

Sound levels are most often measured on a logarithmic scale of decibels (dB). The decibel scale compresses the audible acoustic pressure levels which can vary from the threshold of hearing (0 dB) to the threshold of pain (120 dB). Because sound levels are measured in dB, the addition of two sound levels is not linear. Adding two equal sound levels creates a 3 dB increase in the overall level. Research indicates the following general relationships between sound level and human perception:

- A 3 dB increase is a doubling of acoustic energy and is the threshold of perceptibility to the average person.
- A 10 dB increase is a tenfold increase in acoustic energy but is perceived as a doubling in loudness to the average person.

The human ear does not perceive sound levels from each frequency as equally loud. To compensate for this phenomenon in perception, a frequency filter known as A-weighted [dB(A)] is used to evaluate environmental noise levels. Table 5-15 presents a list of common outdoor and indoor sound levels

**Table 5-15
Common Outdoor and Indoor Sound Levels**

Outdoor Sound Levels	Sound Pressure (μ Pa)*	-	Sound Level dB(A)**	Indoor Sound Levels
	6,324,555	-	110	Rock Band at 5 m
Jet Over Flight at 300 m		-	105	
	2,000,000	-	100	Inside New York Subway Train
Gas Lawn Mower at 1 m		-	95	
	632,456	-	90	Food Blender at 1 m
Diesel Truck at 15 m		-	85	
Noisy Urban Area—Daytime	200,000	-	80	Garbage Disposal at 1 m
		-	75	Shouting at 1 m
Gas Lawn Mower at 30 m	63,246	-	70	Vacuum Cleaner at 3 m
Suburban Commercial Area		-	65	Normal Speech at 1 m
	20,000	-	60	
Quiet Urban Area—Daytime		-	55	Quiet Conversation at 1 m
	6,325	-	50	Dishwasher Next Room
Quiet Urban Area—Nighttime		-	45	
	2,000	-	40	Empty Theater or Library
Quiet Suburb—Nighttime		-	35	
	632	-	30	Quiet Bedroom at Night
Quiet Rural Area—Nighttime		-	25	Empty Concert Hall
Rustling Leaves	200	-	20	
		-	15	Broadcast and Recording Studios
	63	-	10	
		-	5	
Reference Pressure Level	20	-	0	Threshold of Hearing

Source: *Highway Noise Fundamentals*. Federal Highway Administration, September 1980.

* μPa – MicroPascals, which describe pressure. The pressure level is what sound level monitors measure.

** dB(A) – A-weighted decibels, which describe pressure logarithmically with respect to 20 μPa (the reference pressure level).

A variety of sound level indicators can be used for environmental noise assessments. These indicators describe the variations in intensity and temporal pattern of the sound levels. The following is a list of sound level descriptors:

- Lmin is the minimum sound level measured during the time period.
- L10 is the sound level which is exceeded for 10 percent of the time during the time period. During a 100 minute period, the L10 would be the sound level which was exceeded by other sound levels for 10 minutes.
- L90 is the sound level which is exceeded for 90 percent of the time during the time period. The L90 is generally considered to be the ambient or background sound level.
- Lmax is the maximum sound level measured during the time period.

Typical noise sources associated with development projects include: vehicular traffic (highways); and building mechanical equipment, such as chillers, garage exhaust fans, and emergency generators.



5.6.3 Noise Regulatory Context

The City of Boston and HUD have developed noise impact criteria that establish noise thresholds deemed to result in adverse impacts. The noise assessment compares existing and future sound levels to the criteria and determine whether or not the Project will be impacted by the nearby transportation facilities surrounding the Project Site or generates noise impact at sensitive receptor locations in the vicinity of the Project.

5.6.3.1 City of Boston Noise Standards

Under Chapter 40, Section 21 of the General Laws of the Commonwealth of Massachusetts and the City of Boston Code, Ordinances, Title 7, Section 50, the Air Pollution Control Commission of the City of Boston has adopted Regulations for the Control of Noise in the City of Boston.⁸ These regulations establish maximum allowable sound levels based upon the land use affected by the proposed development. Table 5-16 summarizes the maximum allowable sound levels that should not be exceeded.



⁸ City of Boston Air Pollution Control Commission, *Regulations for the Control of Noise in the City of Boston*. (website: http://www.cityofboston.gov/Images_Documents/noise_reg_tcm3-13127.pdf)

Table 5-16
City of Boston Zoning District Noise Standards, dB(A)

Land Use Zone District	Daytime	All Other Times
	(7:00 AM – 6:00 PM)	(6:00 PM – 7:00 AM)
Residential	60	50
Residential/Industrial	65	55
Business	65	65
Industrial	70	70

Source: Regulations for the Control of Noise in the *City of Boston, Air Pollution Control Commission*.

For a residential zoning district, the maximum noise level affecting residential uses shall not exceed the Residential Noise Standard. The residential land use noise standard is 60 dB(A) for daytime periods (7:00 AM to 6:00 PM) and 50 dB(A) for nighttime conditions (6:00 PM to 7:00 AM).

The City of Boston’s regulations on construction sound levels state that operation of any construction devices, excluding impact devices, may not exceed a L10 sound level of 75 dB(A) or Lmax sound level of 86 dB(A) at a residential land use during any time period.

5.6.3.2 HUD Noise Impact Criteria

Construction of new noise sensitive uses, such as residential units, requesting HUD assistance will need to meet HUD’s acceptable noise exposures. HUD has established guidelines and procedures, which are presented in The Noise Guidebook⁹ (the “Guidebook”), in assessing noise impacts on residential developments. HUD’s guidance and procedures states that if the proposed residential development is located near a major noise source, such as within 15 miles of an airport, within 1,000 feet of a major highways or roads, or within 3,000 feet of a railroad line, then the Proponent must undertake a noise assessment.

HUD has established an L_{dn} of 65 dB or lower as an acceptable exterior sound level and an L_{dn} of 45 dB as an interior standard. L_{dn} represents a Day-Night average sound level. This is the average of all sound levels that occur during a 24-hour period, with a significant penalty (10 dB) added to sound levels that occur between 10:00 PM and 7:00 AM. Sound levels above 65 dB but not exceeding 75 dB are normally unacceptable. However, with noise attenuation measures such as special building construction material, a waiver may be granted. HUD considers sound levels above 75 dB to be unacceptable. The HUD standard is intended to protect residential receptors from sound levels that cause interference with normal activities, such as sleep and conversation.

5.6.3.3 Massachusetts DEP

Because the Project is likely to include one or more emergency generators for building life safety, an appropriate DEP air permit (Self Certification) will be applied for during the design and construction process. Additionally, DEP regulations (310 CMR 7.00) include noise requirements for operation of emergency

▼
⁹ Section 51.103, *The Noise Guidebook*, U.S. Department of Housing and Urban Development, Office of Environment and Energy.

generators, which need to be documented within 60 days of the initial operation. The Proponent will submit the appropriate permit application to DEP, including the noise mitigation measures, such as acoustic enclosures and exhaust silencers necessary to meet the DEP's noise criteria.



5.6.4 Noise Assessment Methodology

The noise assessment consists of two components:

1. The evaluation of noise impacts from activities associated with the Project on nearby sensitive receptor locations; and
2. The evaluation of noise impacts from nearby major transportation facilities on the Project.

5.6.4.1 Potential Project Related Noise Impacts

The noise assessment evaluated the potential sound level impacts associated with the Project's operations, such as building mechanical equipment and service/loading activities for the Existing and Build Conditions. The noise assessment included measurements of existing ambient background sound levels and an evaluation of potential project generated sound levels. The study area was evaluated and sensitive receptor locations were identified. The noise assessment determined the sound level associated with the Project at the sensitive receptor locations.

A noise monitoring program was developed to measure existing sound level in the vicinity of the Project site. The noise analysis calculated sound levels associated with potential mechanical equipment, such as exhaust fans, cooling towers, and emergency generators. Since the Project is in the early stages of the design process, specific technical specifications of all mechanical equipment are not available at this time of this evaluation. Manufacturer's sound level data for the cooling towers and emergency generators were available and were incorporated in this analysis. Reference sound levels for the exhaust systems were based on data of potential equipment of similar type and size. The noise analysis assumed that all mechanical equipment would be operating at full load concurrently. As such, the noise analysis focused on the nighttime period as it is more sensitive to sound level changes since nighttime ambient sound levels are lower than daytime ambient sound levels.

Applying the properties of sound propagation over hard ground, the noise analysis projected sound levels to sensitive receptor locations. The noise analysis assumed sound level reductions due to distance and building blockages. The sensitive receptor locations, described further below, included apartments at nearby residential buildings in the North End, Beacon Hill, and future residential developments north of the Project Site.

The noise assessment also evaluated noise associated with the Project's loading activities. The analysis examined the building design, such as location of the loading area, and management of deliveries at the Project Site.

5.6.4.2 Potential Noise Impacts on the Project

The noise assessment also evaluated the potential noise impacts from nearby transportation facilities such as airports, railroads, and major highways. HUD's guidance and procedures states that if the proposed residential development is located near a major noise source, i.e., airports (within 15 miles), railroads (within 3,000 feet), or major highways or roadways (within 1,000 feet), then the applicant must undertake a noise assessment. The Project is located approximately:

- Two miles from Logan International Airport,
- 1,600 feet from the MBTA commuter rail tracks at North Station, and
- 1,100 feet from Interstate 93 (I-93) section not in tunnel.

The Project is located at distances that are at or within the HUD thresholds requiring a noise assessment. If exterior sound levels exceed the HUD criteria, mitigation, such as wall design and construction and/or window construction will be evaluated as part of the noise assessment to meet HUD's interior sound level requirement.

The noise assessment also evaluated noise associated with the MBTA Haymarket Station on the Project. The assessment examined the building design, such as location of Project's sensitive areas in relation to the Station.

5.6.4.3 Sensitive Receptor Locations

The noise analysis included evaluation of the study area to identify sensitive receptor locations that have outdoor activities and that may potentially be sensitive to noise associated with the Project. The noise analysis identified thirteen (13) sensitive receptor locations in the vicinity of the Project. The analysis evaluated the following receptor locations:

- R1 - Cooper Street Residences,
- R2 - Stillman Street Residences,
- R3 - Salem Street Residences,
- R4 - Hanover Street Residences,
- R5 - Millennium Bostonian Hotel,
- R6 - Bowdoin Street Residences,
- R7 - The West End Apartments,
- R8 - Proposed Forecaster Building Development,
- R9 - Proposed One Canal Street Development'
- R10 - Proposed Trinity Development,
- R11 - Proposed Victor Development,
- R12 - Proposed Merano Development, and

- R13 – Temporary Home for Women and Children.

These receptor locations, selected based on land use considerations, represent the most sensitive locations in the vicinity of the Project Site. Figure 5.5 depicts the receptor locations used in the noise analysis.



5.6.5 Existing Noise Conditions

A noise monitoring program was conducted to establish existing sound levels. The existing sound levels were measured using a Type 1 sound analyzer (Larson Davis 831). Measurements were conducted during the weekday late night (11:00 PM to 1:00 AM) periods at sensitive receptor areas on June 26, 2013. The measured sound level data under existing conditions was dominated by noise from local roadways (such as Congress Street and Cross Street) and mechanical equipment (i.e., window air conditioning units and rooftop units) from nearby buildings.

The existing measured L90 sound levels range from 55 dB(A) to 57 dB(A) during the nighttime period. These sound levels are typical of an urban area. The result of the noise monitoring program indicates that the sound levels in the vicinity of the Project exceed the City’s nighttime standard of 50 dB(A) for Residential Districts. The existing measured sound level data are presented in Table 5-16.

Table 5-16
Measured Existing Nighttime Sound Levels, dB(A)

Monitoring Location*	Boston Noise Criteria	Measured L90 Sound Levels
M1 – Friend Street	50	57
M2 – Stillman Street	50	55

Source: Vanasse Hangen Brustlin, Inc.

Bold values exceed noise criteria.

* Refer to Figure 5.5 for monitoring locations.



5.6.6 Potential Project-Related Noise Sources

The noise assessment evaluated the potential Project-related noise sources, including building mechanical equipment, and service and loading activities at the sensitive receptor locations. These potential noise sources are described further below.

5.6.6.1 Project Mechanical Equipment

The noise analysis assumed that the Project would have a combination of exhaust fans (including garage exhaust system), cooling towers, and emergency generators based upon its energy requirements. The sound levels from the mechanical equipment were projected to the sensitive receptor locations. Since the equipment will be located within a mechanical penthouse, reduction due to the enclosure was taken into consideration in the calculation. The noise analysis also included the impacts of sound propagation due to building blockages from the existing and proposed buildings. Since the design of the proposed buildings are higher than

surrounding buildings in the vicinity of the Project, reductions due to blockage from the proposed building's rooftop was also considered.

The Project will include one or more emergency generators, of various sizes, for building life safety. The determination of specific generator parameters, such as the number of units, size, and location will be made during the building design process. The Project will apply for the appropriate Massachusetts Department of Environmental Department (DEP) air permits, which include additional noise requirements described in DEP regulations under 310 CMR 7.00. When the details of the emergency generators are developed, the Proponent will submit the appropriate application forms to DEP including the noise mitigation measures necessary to meet the DEP's noise criteria, such as acoustic enclosures and exhaust silencers.

5.6.6.2 Project's Loading Activities

The West Parcel will be designed to accommodate service and loading operations to occur off-street, internal to the building. All delivery vehicles will access the West Parcel loading area via Bowker Street and New Sudbury Street. Building loading and servicing at the East Parcel will be from several locations. Loading docks will be accessed via New Chardon Street. Additional curbside loading cut-ins along both New Chardon Street and New Sudbury Street will be provided for smaller single-panel delivery vehicles for the retail uses. The loading areas will be managed so that service and loading operations do not impact the access roadway and abutting streets. Since the majority of the loading activities will be serviced within the proposed buildings and the Garage, and smaller delivery vehicles will utilize external loading cut-ins, noise impacts to the sensitive receptor locations will be negligible.

5.6.6.3 Potential Noise Impacts on the Project

The noise assessment evaluated the potential noise impacts from existing nearby transportation facilities at the Project's sensitive receptor locations.

East Parcel Public Plaza

The East Parcel public plaza between EP-B1 and EP-B2 is proposed to include outdoor café seating and other potential uses, which creates a new on-site sensitive receptor that must be considered due the adjacent at-grade MBTA Haymarket bus facility. The current design of EP-B2 incorporates access to the ground-floor retail and an office lobby on the west side of the building. As such, the building structure will act as a screen to mitigate the existing bus noise from the Haymarket bus facility located to the east. The Project will include bus and transit operations improvements, including a new transit ticket kiosk in order to improve passenger bus loading and real-time bus/train information screens to better inform passengers. These measures will help buses operate more efficiently; thereby, reducing noise from bus idling. Additional noise reduction measures will be considered through the re-design of the MBTA Haymarket bus facility, in cooperation with the MBTA.

Residential Component

Since the Project includes a residential component, the noise assessment evaluated the potential noise impacts to future residents from nearby transportation facilities, such as airports, railroads, and major highways. HUD's guidance and procedures states that if the proposed residential development is located near a major noise source, such as within 15 miles of an airport, within 3,000 feet of a railroad line, or 3,000 feet of major highways or roads, then the Proponent must undertake a noise assessment. The Project Site is located at distances that are at or within the HUD requiring a noise assessment. The Project Site is located:

- Approximately two miles from Logan International Airport;
- Approximately 1,600 feet from the MBTA commuter rail tracks at North Station; and
- Approximately 1,100 feet from Interstate 93 (I-93).

Based on HUD procedures and guidance, the Project is located within distance of the nearby major transportation facilities, therefore, the noise assessment evaluated noise associated with these facilities.

Airport Activity

Logan International Airport is located approximately two miles east of the Project site. Noise data from the 2010 Logan Airport Environmental Data Report¹⁰ indicates that the Project is located beyond the 65 dB Ldn contour. Therefore, the Project will not be impacted by airport activities.

Rail Activity

The Massachusetts Bay Transportation Authority (MBTA) operates railroad tracks at North Station located approximately 1,600 feet north of the Project site. The tracks are utilized by the commuter rail trains and the rapid transit Orange Line. Even though the railroad tracks are located within the HUD threshold of 3,000 feet, the area is a dense urbanized area with buildings providing shielding between the Project site and railroad tracks. Therefore, the sound level associated with rail activities is negligible.

Roadway Activity

The Project site is located approximately 1,100 feet from the section of I-93 that is not located in the tunnel, which is beyond HUD's threshold of 1,000 feet. Therefore, the sound level from the traffic associated with I-93 is negligible.



5.6.7 Noise Assessment Findings

The noise analysis calculated the potential sound levels at the sensitive receptor locations assuming full operation of the building mechanical equipment for the Project. Since the existing sound levels are greater than the City's nighttime standard, the sound levels from the Project must be below the nighttime standard of 50 dB(A) in order to have negligible impacts at the sensitive receptor locations. To minimize the Project-related potential noise impacts, the building mechanical equipment will be located within mechanical



¹⁰ Chapter 6, Boston-Logan International Airport 2010 Environmental Data Report, EOE #3247, Massachusetts Port Authority, Economic Planning & Development, October 2011.

penthouse on the roof of each building. As shown in Table 5-17, the sound levels generated by the building mechanical equipment range from 38 dB(A) to 48 dB(A). These sound levels are below the City’s nighttime standard of 50 dB(A). Based upon these results, the Project’s will result in a slight increase in the overall sound level at the sensitive receptor locations by no more than one decibel. As previously stated, three decibels is barely perceivable by the human ear. Therefore, the Project will have negligible noise impacts at the surrounding sensitive receptor locations.

Table 5-17
Sensitive Receptor Location Sound Levels, dB(A)

Receptor Location*	Existing	Mechanical Equipment	Build	Sound Level Change
R1 – Cooper Street Residences	55	47	56	+1
R2 – Stillman Street Residences	55	48	56	+1
R3 – Salem Street Residences	55	46	56	+1
R4 – Hanover Street Residences	55	45	55	+0
R5 – Millennium Bostonian Hotel	57	40	57	+0
R6 – Bowdoin Street Residences	57	39	57	+0
R7 – The West End Apartments	57	38	57	+0
R8 – Proposed Forecaster Building Development	57	44	57	+0
R9 – Proposed One Canal Street Development	55	45	55	+0
R10 – Proposed Trinity Development	55	47	56	+1
R11 – Proposed Victor Development	55	46	56	+1
R12 – Proposed Merano Development	55	45	56	+1
R13 – Temporary Home for Women and Children	57	47	57	+0

Source: Vanasse Hangen Brustlin, Inc.

* See Figure 5.5 or receptor locations.

Bold values exceed noise criteria.

The sound levels, associated with the Project’s loading activities, will also be negligible at the sensitive receptor locations due to Project’s building design and management of the loading area. Additionally, the layout of the Project’s building design will mitigate the noise associated with the bus activities generated by the MBTA Haymarket Station.

The sound levels for the residential components of the Project are expected to meet the HUD interior criteria because the noise impacts from the nearby major transportation facilities will be negligible due to the blockage from surrounding structures and the noise reductions from the wall construction.

5.7 Temporary Construction Impacts

Construction impacts are temporary in nature and are typically related to air (dust), noise, and stormwater runoff. Temporary construction-period impacts will be managed to minimize disruption to the surrounding neighborhood. As stated in the PNF, construction management plans (CMPs) will be prepared for each Project Component as part of the Article 80B, Large Project Review and will address numerous temporary construction-related impacts.

To support the DPIR, the Project's Construction Manager has developed conceptual construction logistics plans depicting a construction logistics scenario for each Project Component, which are presented in Appendix E. It must be noted that as each Project Component progresses in design, the respective construction managers will be refining and expanding the construction management plans to address sub-phases and reflect the input of the regulatory authorities having jurisdiction over construction management plans, including the Boston Fire Department and BTM.

As noted by several PNF commenters, over the duration of the Project, there are likely to be several other development projects in the areas adjacent to the Project Site. Figure 5.6 lists many of the likely development or public sector projects that could be in construction at the same time as the Project. As stated by the Proponent's representatives during several IAG and public meetings, the Proponent is committed to participating in coordinated construction management planning efforts that may be sponsored by the City and/or groups, such as the Downtown North Association and A Better City. It has been demonstrated in areas such as the Longwood Medical and Academic Area that coordinated construction communication and logistical planning (i.e., signage programs, selective truck routes, etc.) can help mitigate temporary transportation issues associated with concurrent construction projects.



5.7.1 Construction Air Quality

Construction and demolition activities associated with the Project will result in a slight, short-term increase in air pollution emissions. The primary source of potential construction emissions is from fugitive dust resulting from construction operations (e.g., clearing, grading) and vehicle emissions from construction equipment. To minimize fugitive dust emissions, a water truck or other construction water source will be kept on construction sites during excavation activities. Also, during construction, emission controls from construction vehicles and machinery would include proper maintenance and reduced idling on-site. Overall, therefore, the impacts on ambient air quality from construction activities associated with site-specific development are not expected to be significant.

5.7.1.1 Fugitive Dust

Fugitive dust consists of soil particles that become airborne when disturbed by heavy equipment operations or through wind erosion of exposed soil after groundcover (either lawn or pavement) is removed. This construction-related air-quality impact (i.e., fugitive dust) would be of relatively short duration.

Dust control measures during dry or windy periods will be implemented. The appropriate methods of dust control would be determined by the surfaces affected (i.e., roadways or disturbed areas) and would include, as necessary, the application of water, the use of stone in construction roads, and vegetative cover. Additionally, regular sweeping of pavement of adjacent roadway surfaces during construction will be conducted to minimize the potential for vehicular traffic to create airborne dust and particulate matter.

5.7.1.2 Truck Emissions

Overall, air quality in the vicinity of the Project Site area would not be expected to be substantially affected by redevelopment because of emission control procedures and the temporary nature of construction activities. Emissions from the operation of construction machinery (carbon monoxide [CO], nitrogen oxides [NOx], particulate matter [PM], volatile organic compounds [VOCs], and greenhouse gases) are short-term and not generally considered substantial.

During construction within the Project Site, emission controls for construction vehicle emissions would be employed, including, as appropriate, proper maintenance of all motor vehicles, machinery, and equipment associated with construction activities (i.e., the maintenance of manufacture's muffler equipment or other regulatory-required emissions control devices). The Commonwealth of Massachusetts anti-idling law will be enforced during all construction phases of the Project with the installation of on-site anti-idling signage at loading and drop-off/pick-up/waiting areas. In addition, the Proponent is committed to meeting the requirements the MassDEP State Revolving Fund (SRF) for diesel construction equipment. These require that all non-road diesel equipment rated 50 horsepower or greater that will be used on a project site meet EPA's Tier 4 emission limits or be retrofitted with appropriate emission reduction equipment. Emission reduction equipment includes EPA-verified, CARB-verified or DEP-approved diesel oxidation catalysts or diesel particulate filters.



5.7.2 Construction Noise

The construction activity associated with the Project may temporarily increase nearby sound levels due to the use of heavy machinery. Heavy machinery is expected to be used intermittently throughout the Project's construction phases, typically during daytime periods. The construction phases that will generate the highest sound levels include the demolition of existing structure, site excavation and grading, and construction of the foundation for the proposed buildings. The City of Boston noise control regulation considers construction sound levels to be an impact to residential land uses if the L10 sound level is in excess of 75 dB(A) or the Lmax sound level is in excess of 86 dB(A). A CMP will be developed for each Project Component in coordination with the City of Boston, which will include a construction noise assessment and identify measures to ensure that the City of Boston noise regulation is met. Additionally, a Vibration Monitoring Plan will be developed as part of the CMP for each Project Component.



5.7.3 Construction Truck Traffic

The construction logistics plans provided in Appendix E describe the proposed construction site access and truck routes. Figures E-2.1 and E-2.2 identify the proposed construction truck routes by Project Component. Site access will generally be provided off New Sudbury and New Chardon Streets for construction activities on the West Parcel and off Congress Street and the Surface Road for construction activities on the East Parcel. It must be noted that as each Project Component progresses in design, the construction managers will develop detailed CMPs with Traffic Control Plan to address sub-phases and reflect input of the regulatory authorities having jurisdiction over construction management plans, including the BFD and BTM. These plans will also need to reflect overlapping phases or buildings under construction simultaneously at the Project.

5.8 Rodent Control Post-Construction

Trash and solid waste removal will be handled by the building maintenance staff. The Proponent will maintain a service contract with a professional pest control firm to address rodent/pest control during the operational phase of the redevelopment. In addition, no open top dumpsters will be allowed as an additional precaution to deter infestation.

5.9 Sustainable Design/Green Building

Chapter 4, *Environmental Protection* of the PNF presented a description of the comprehensive approach to sustainability for the Project. This section aims to build on what was previously presented as an update to the ongoing sustainability design process by introducing the development of specific targets, goals, and strategies in the form of a preliminary sustainability plan for the Project. It is intended that the sustainability plan will be used by the design team as each of the Project Components are advanced through the design process, under construction, and put into operations.



5.9.1 Sustainable Design Approach Overview

The Project is inherently sustainable as it aims to utilize land efficiently through redevelopment of an obsolete above-grade parking garage site with a dense mixed-use development, promote the use of alternative modes of transportation, encourage pedestrian activity, promote the use of local materials, provide for a high-quality indoor environment for users, and reduce environmental impacts both locally and globally. The Proponent is committed to continued exploration of practical ideas for creating a sustainable development that contributes to urban resilience in Boston. Project design will be goal-oriented generally focused on reduced environmental impact and improved occupant comfort as well as contribution to the community. The Proponent is committed to incorporating many key aspects of sustainability and high performance building design, where applicable and feasible. Furthermore, the Proponent is committed to meeting the applicable requirements of the future City of Boston Building Energy Reporting and Disclosure Ordinance.

The Project as a whole will meet Article 37, Green Buildings of the Zoning Code. The Proponent has set an overall design goal of achieving LEED certification through the GBCI for the Project Components (a targeting a Gold rating under LEED-Core and Shell (CS) for the commercial components and Silver rating under LEED-New Construction (NC) for residential components). Figures 5.7a and 5.7b show the preliminary LEED Scorecards by each key use. As demonstrated by the LEED Scorecards, the Proponent is focused on achieving LEED credits marked “Yes” or “Maybe.” As the design of each Project Component progresses, individual LEED Scorecards will be developed specific to the uses and building users. These LEED Scorecards and supporting credit descriptions will be presented as part of the future Article 80, Large Project Review for each Project Component.

The Project will also achieve one of the four Boston Green Building Credits (Modern Mobility) and will explore compliance with Groundwater Recharge (although the Project is not subject to Article 32, Groundwater Conservation Overlay District). Generally, it is the Proponent’s intent to lease and operate the buildings in a sustainable manner.

In order to incorporate sustainability into the Project, early on in the design process the Proponent brought on a sustainability consultant, which led the design team in a comprehensive sustainability workshop. The workshop's primary focus was to develop a sustainability vision and to set priorities for the Project. The workshop sought to define the long-term view for the Project as it will be implemented over a span of time. More importantly, the workshop focused on creating a positive contribution to Boston's fabric for decades to come. The following key drivers, or goals, emerged from the workshop:

1. Positive contribution to the community and built environment
2. Model for transit oriented development
3. Ability to cope with future climate change
4. Energy Efficiency
5. Resource Efficiency (i.e. water, waste and materials)
6. Sustainable Operations



5.9.2 Sustainability Goals, Targets, and Strategies

With the sustainability framework for the Project identified (described above), specific goals have preliminarily been established for each framework component, as described below.

Goal #1: Positive contribution to the community and built environment

Goals

- a. Enhance pedestrian experience on site, 'pedestrian first' design
- b. Increase pedestrian connectivity from North Station to Greenway
- c. Create comfortable microclimate for exterior spaces

Goal #2: Model for transit oriented development

Goals

- a. Exemplar for Boston's Complete Streets Program
- b. Reduce auto use by residents and office occupants
- c. Improve traffic flows around site

Goal #3: Energy Efficiency

Goals

- a. Reduce energy use beyond minimum requirement
- b. Optimize major plant systems and reduce peak loads

Goal #4: Resource Efficiency - Water

Goals

- a. Explore reduction of potable water consumption beyond minimum LEED requirement
- b. Use available water for non-potable uses in a cost effective manner

Goal #4: Resource Efficiency – Waste and Materials

Goals

- a. Use building materials efficiently
- b. Use building materials with low environmental impacts
- c. Reuse portion of existing garage to reduce environmental impacts and embodied energy

Goal #5: Ability to Cope with Future Climate Change

Goals

- a. Resilient to flooding
- b. Resilient to extreme heat
- c. Create comfortable microclimate for exterior spaces

Goal #6: Sustainable Operations

Goals

- a. Easy to maintain
- b. Able to measure, manage and improve energy, water and waste use
- c. Attracts sustainable tenants



5.9.3 Next Steps

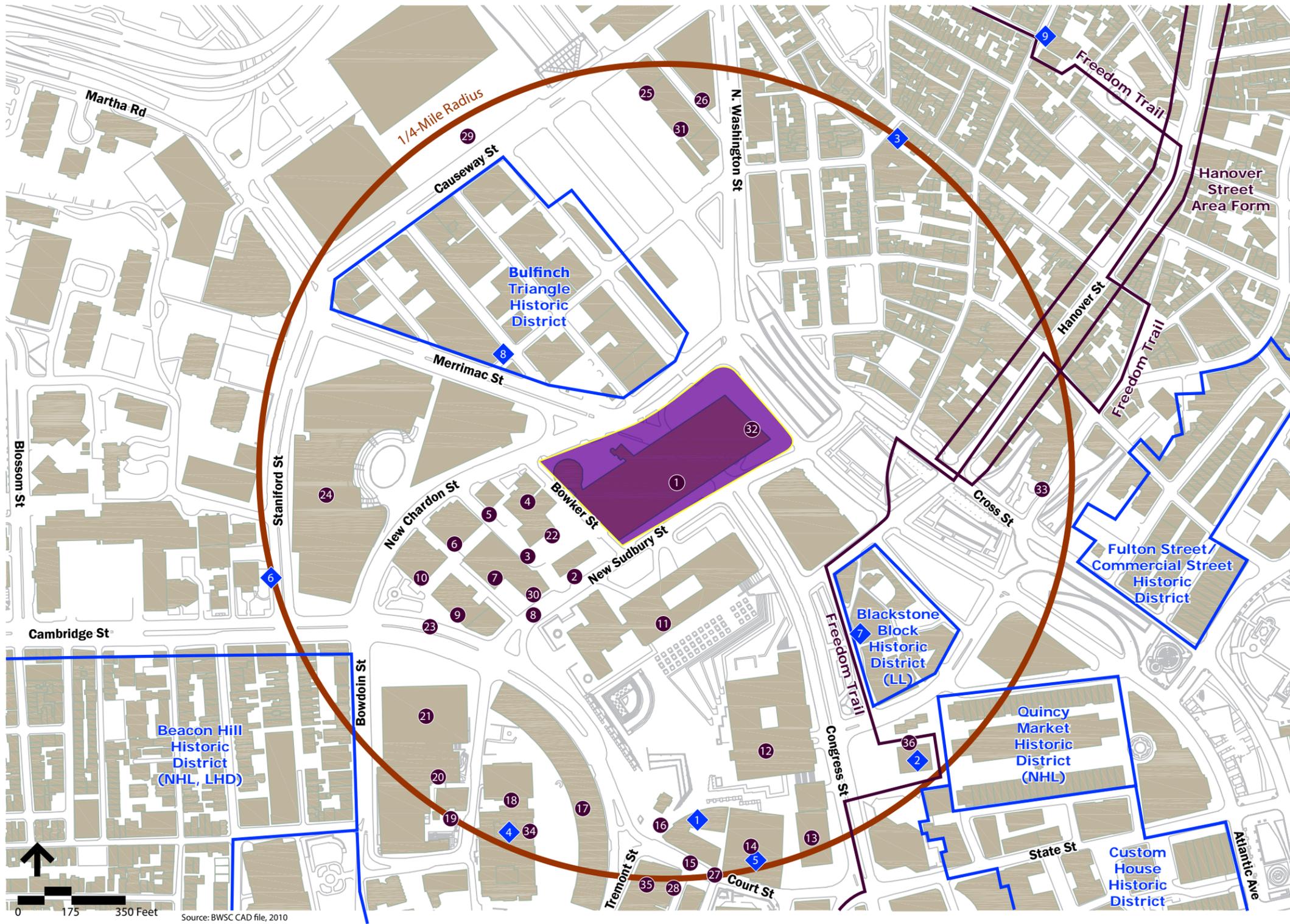
As each Project Component is advanced the Proponent will be reviewing and incorporating sustainable measures in more detail for each Project Component. In addition, specific targets for each goal will be set and will be tracked against the Project Component. These sustainable measures, along with an updated LEED checklist will be submitted as part of the future Article 80 Large Project Review submissions for each Project Component. The Proponent will build upon the key drivers and goals as referenced above for each Project Component.

5.10 Historic Resources

The PNF assessed the potential Project-related impacts related to pedestrian-level wind, shadows, vehicle traffic, and views. As demonstrated above and in previous Chapter 4, the revised Project results in a reduction in shadows and vehicle traffic and, therefore, the Project will continue to have no adverse visual or audio effect on the surrounding historic properties. Based on the wind study, the Proponent and design team are aware of the potential for high wind activity and/or channeling flows. A key goal of project design is to continue to assess potential wind impacts in order to mitigate such potential wind impacts through design. Special attention will be given to potential wind impacts on nearby historic resources, including Bulfinch Triangle District and Bowker Street properties west of the Project Site.

Additionally, as with the PNF program, the Project is not expect to have a negative impact on views. The removal of a portion of the existing garage structure (Government Center Garage, BOS. 2024) over Congress Street and the opening up of the East Parcel with a new public plaza continues to provide a significant public benefit.

As each Project Component is designed and submitted for BRA review and approval under the Article 80B, Large Project Review of the Zoning Code, a more refined understanding of potential impacts on historic resources will be presented. Specific measures intended to mitigate, limit, or minimize impacts, where appropriate, as required by local, state, and federal regulation will also be included in these documents.



- National Register Individually Listed Properties**
- 1 Sears Crescent and Block
 - 2 Faneuil Hall (NHL, PR, LL)
 - 3 Vermont Building
 - 4 John Adams Courthouse
 - 5 Ames Building (LL)
 - 6 Old West Church (NHL, PR)
 - 7 Union Oyster House (NHL, LL)
 - 8 138-142 Portland Street
 - 9 The Old North Church
- MHC Individually Inventoried Properties**
- 1 Government Center Parking Garage
 - 2 District 1 Police Station
 - 3 Boston Edison Substation
 - 4 Overseers of the Public Welfare Building
 - 5 O'Neal Building (Jewish Family and Children's Services)
 - 6 Royal Globe Insurance Company
 - 7 R.K.O. General Building
 - 8 One Bulfinch Place
 - 9 New England Telephone and Telegraph
 - 10 Bulfinch Building
 - 11 JFK Federal Building
 - 12 Boston City Hall
 - 13 New England Merchants National Bank
 - 14 One Washington Mall
 - 15 City Bank and Trust Building
 - 16 Government Center MBTA Station
 - 17 One, Two and Three Center Plaza
 - 18 Suffolk County Courthouse Addition
 - 19 Metropolitan District Commission Building
 - 20 McCormack Office Building
 - 21 Leverett Saltonstall Building
 - 22 Temporary Home for Women
 - 23 Bowdoin Street MBTA Station
 - 24 Lindemann Mental Health Center
 - 25 Dow Braman and Company Building
 - 26 Keaney Square Building
 - 27 Old Colony Trust Building
 - 28 United States Trust Company Building
 - 29 North Station MBTA Substation and Signal Tower
 - 30 Capital Bank Building
 - 31 6-24 Medford Street
 - 32 Haymarket MBTA Station
 - 33 Traffic Tunnel Administration Building
 - 34 Rufus Choate Statue
 - 35 Hemenway Building
 - 36 Faneuil Hall Greenhouses

Redevelopment of Government Center Garage
Boston, MA

Figure 5.1a

MARCH 21ST SHADOW STUDY (UTC-5)



9:00 AM

Net New Shadow (Facade) Net New Shadow (Street Level) Net New Shadow (Rooftop)



Figure 5.1b

MARCH 21ST SHADOW STUDY (UTC-5)



12:00 PM

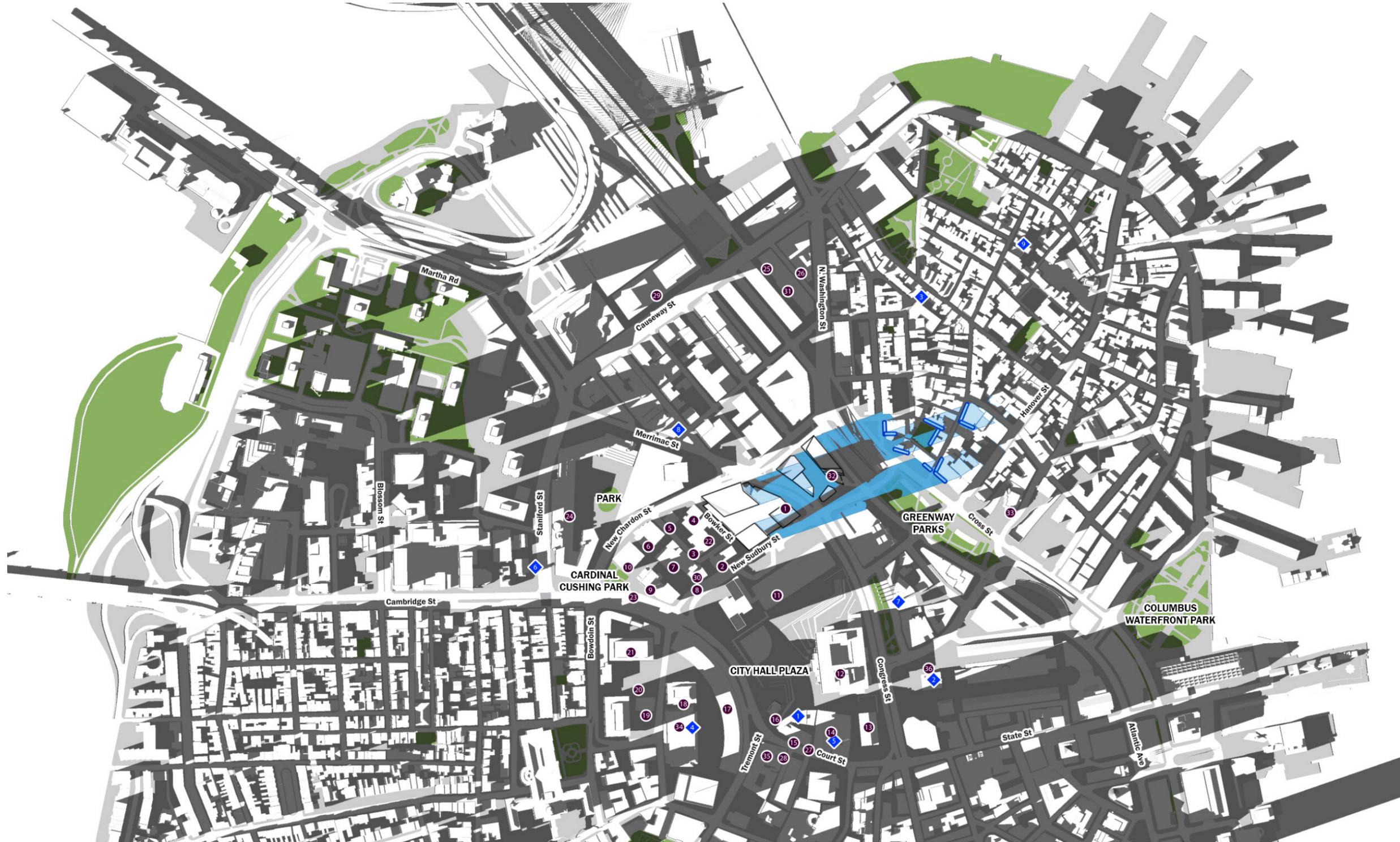
Net New Shadow (Facade) Net New Shadow (Street Level) Net New Shadow (Rooftop)

Redevelopment of Government Center Garage
Boston, MA Figure 5.1c



3:00 PM

Net New Shadow (Facade) Net New Shadow (Street Level) Net New Shadow (Rooftop)



5:00 PM

Net New Shadow (Facade) Net New Shadow (Street Level) Net New Shadow (Rooftop) N



9:00 AM

Net New Shadow (Facade) Net New Shadow (Street Level) Net New Shadow (Rooftop) N

Redevelopment of Government Center Garage
Boston, MA

Figure 5.1f



12:00 PM

Net New Shadow (Facade) Net New Shadow (Street Level) Net New Shadow (Rooftop)

Redevelopment of Government Center Garage
Boston, MA Figure 5.1g



3:00 PM

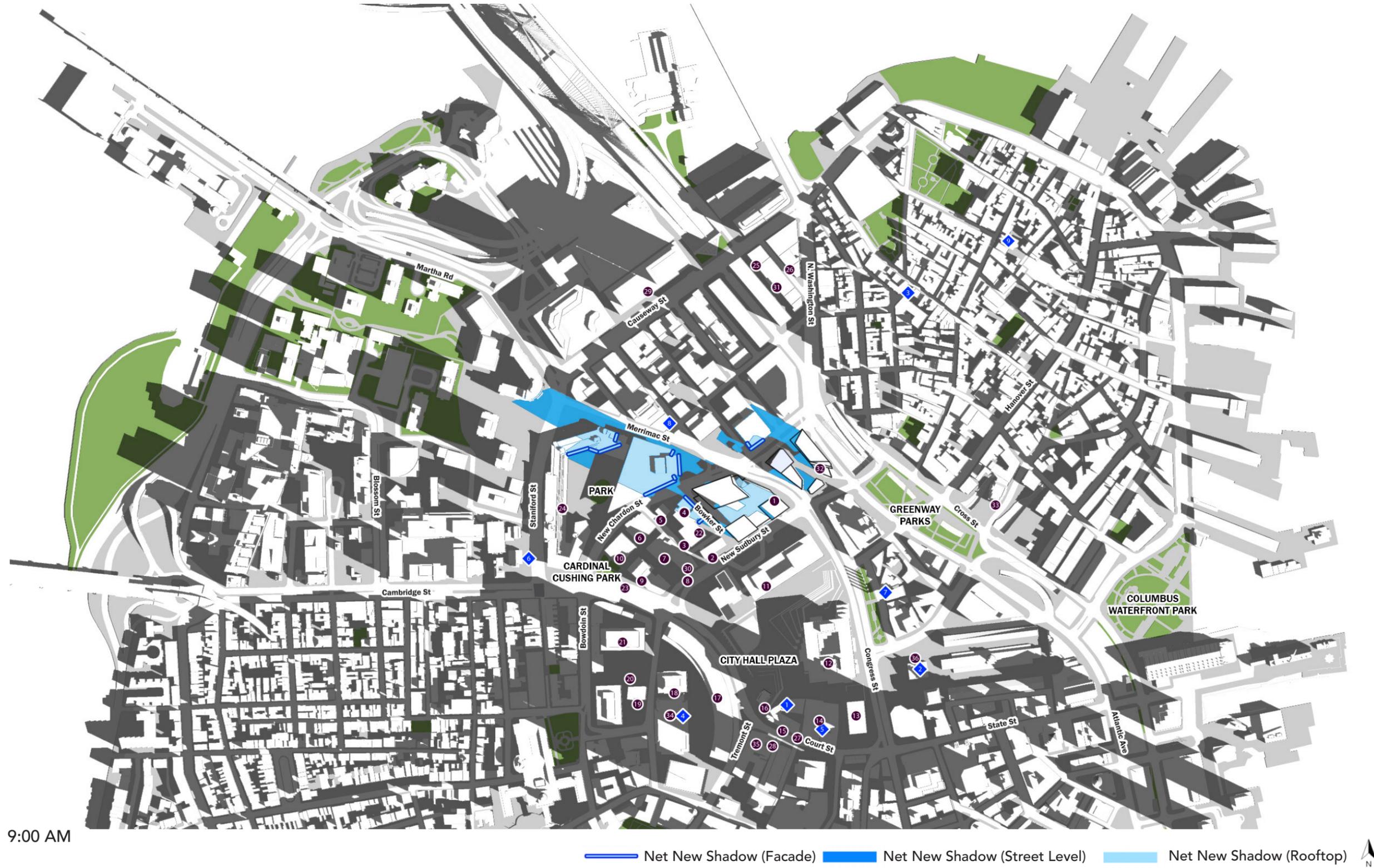
Net New Shadow (Facade) Net New Shadow (Street Level) Net New Shadow (Rooftop) N

Redevelopment of Government Center Garage
Boston, MA

Figure 5.1h



SEPTEMBER 21ST SHADOW STUDY (UTC-5)



SEPTEMBER 21ST SHADOW STUDY (UTC-5)



SEPTEMBER 21ST SHADOW STUDY (UTC-5)

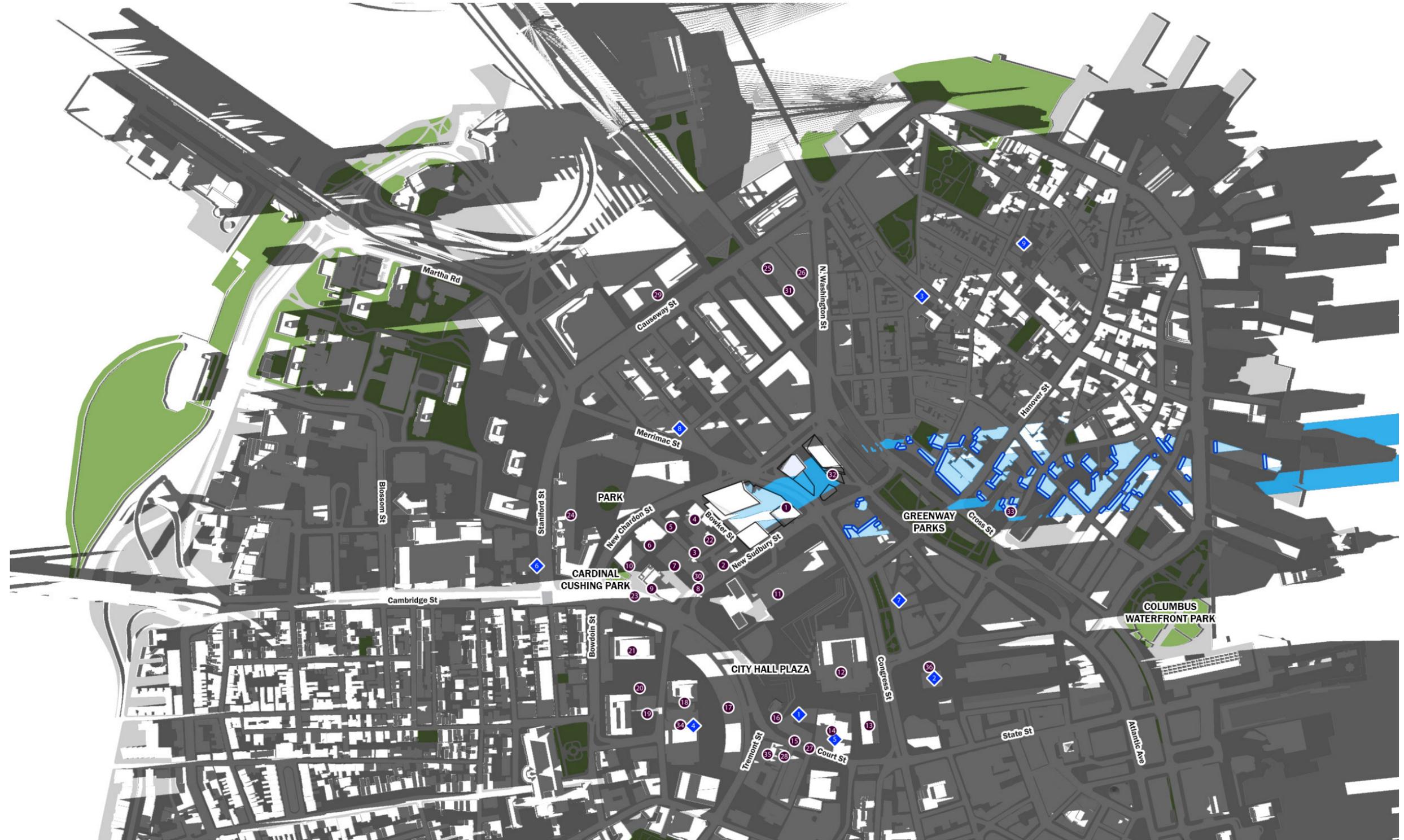


3:00 PM

Net New Shadow (Facade) Net New Shadow (Street Level) Net New Shadow (Rooftop)



Redevelopment of Government Center Garage
Boston, MA Figure 5.11

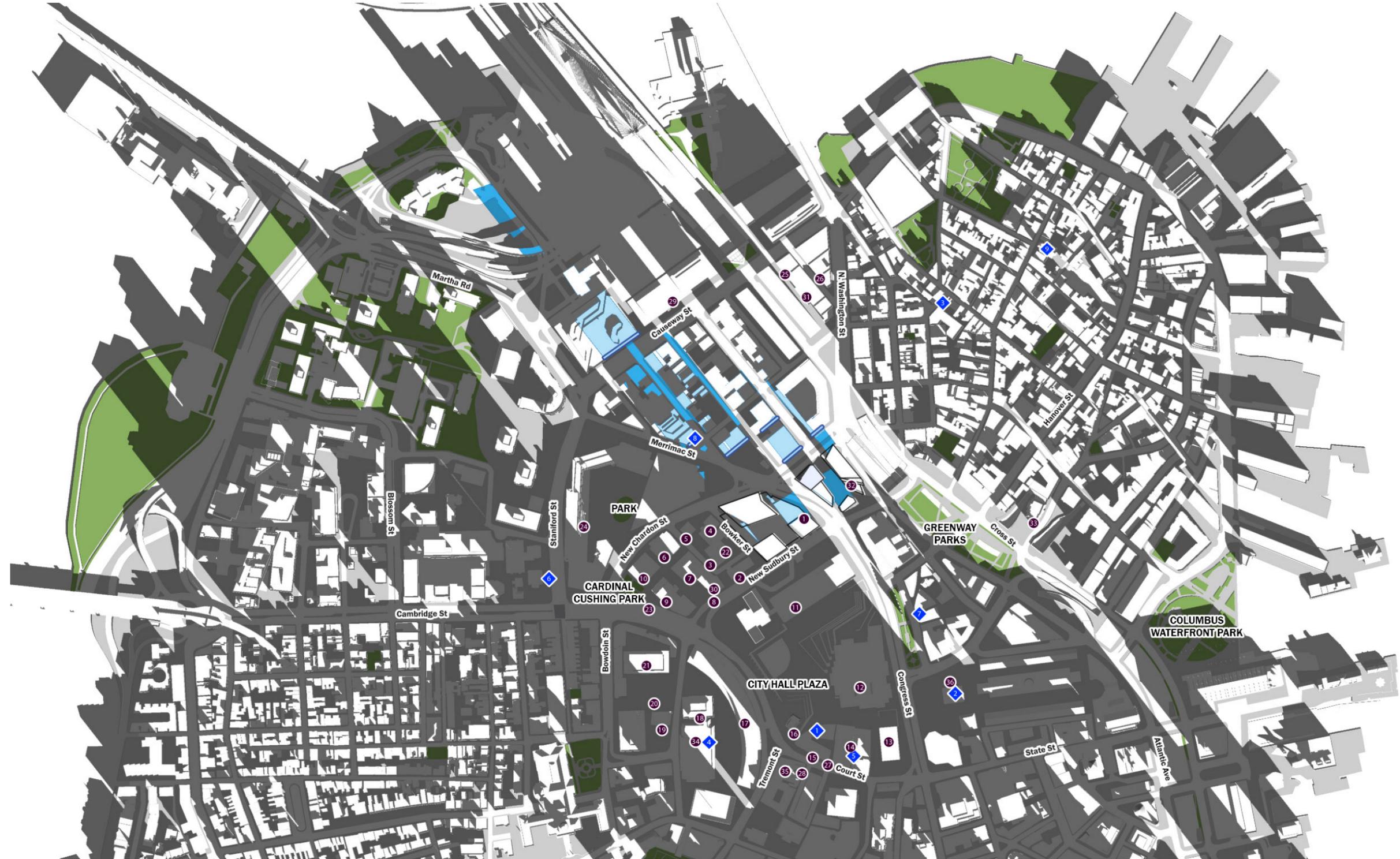


5:00 PM

Net New Shadow (Facade) Net New Shadow (Street Level) Net New Shadow (Rooftop)



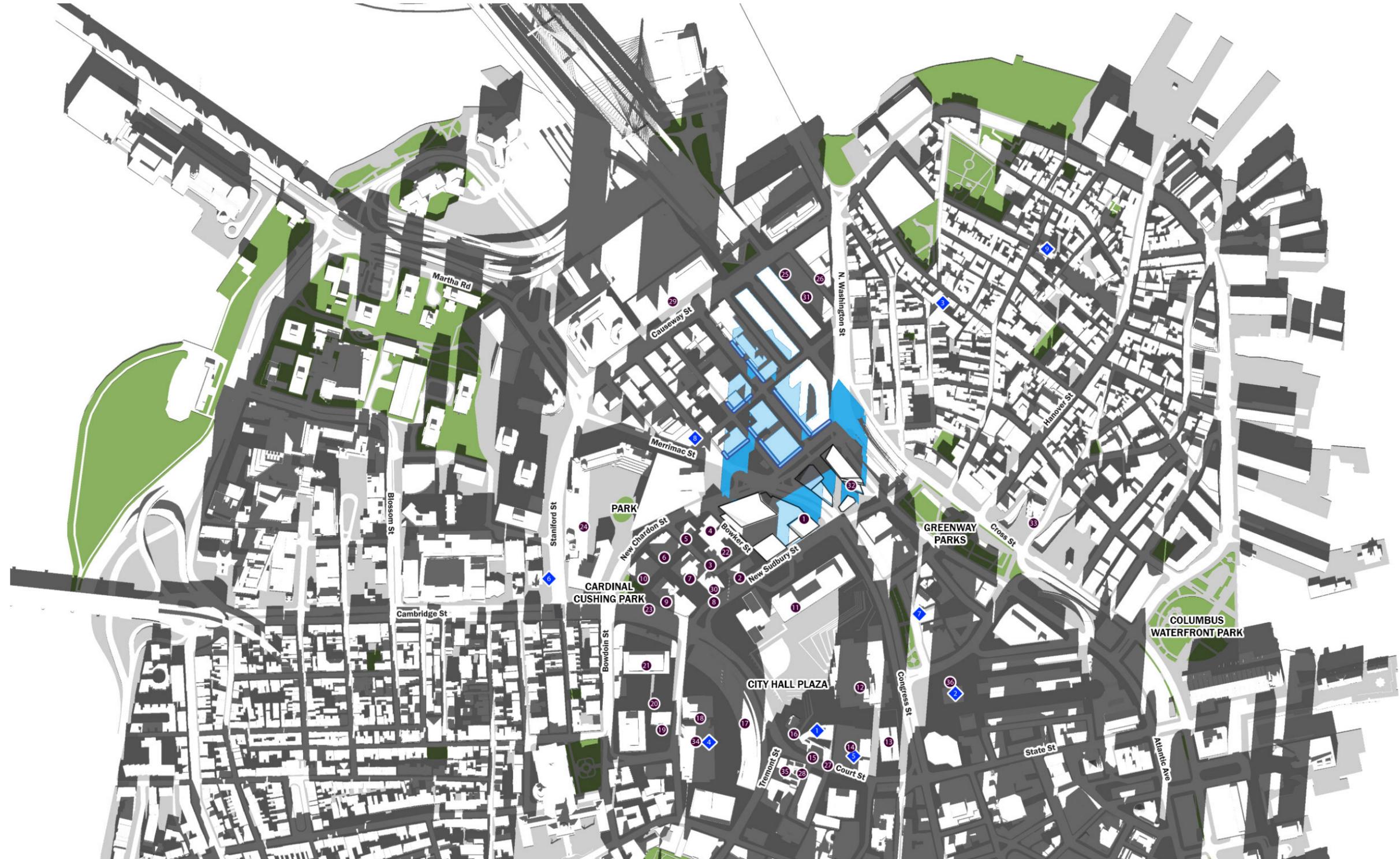
DECEMBER 21ST SHADOW STUDY (UTC-5)



9:00 AM

— Net New Shadow (Facade) Net New Shadow (Street Level) Net New Shadow (Rooftop) N

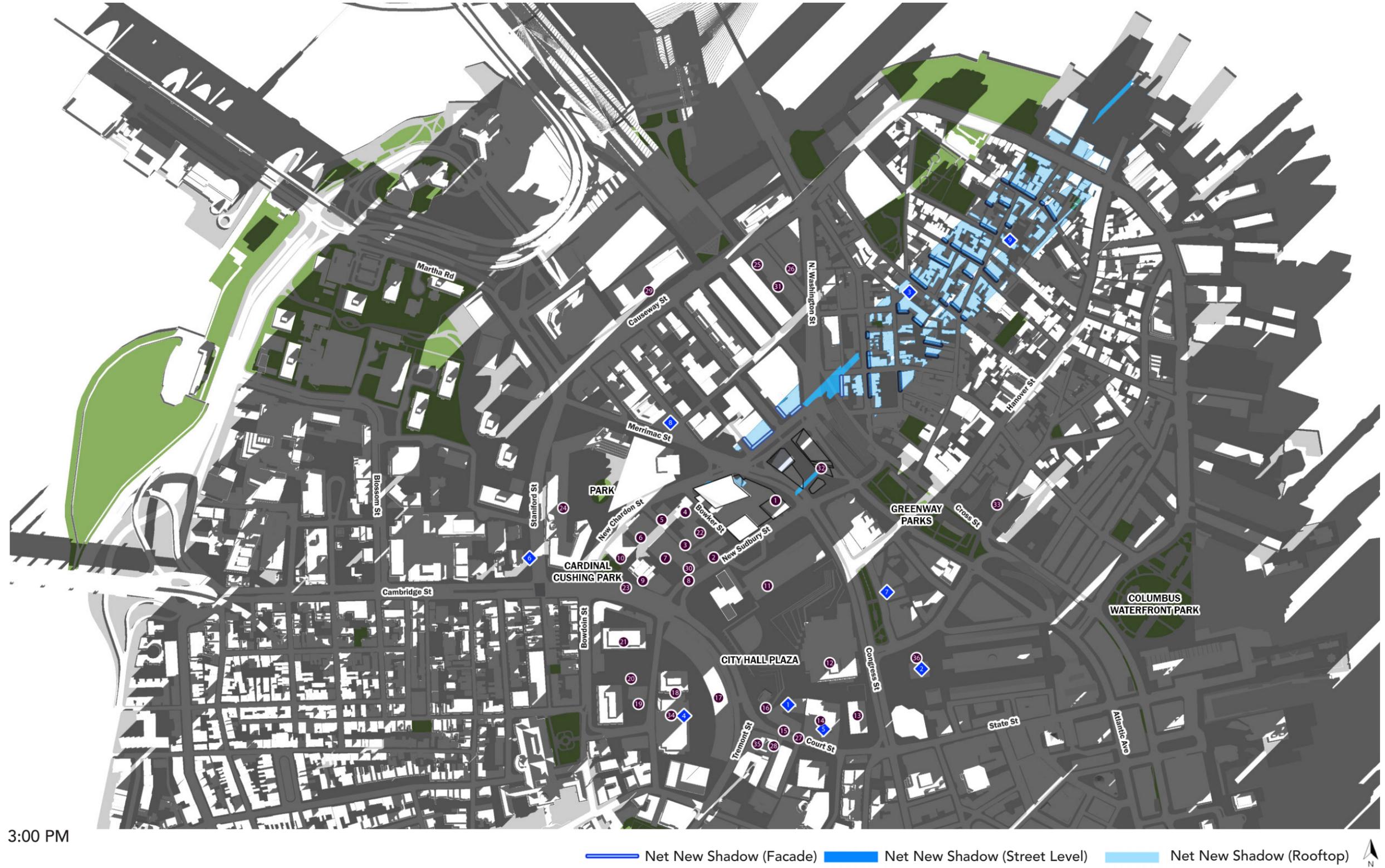
DECEMBER 21ST SHADOW STUDY (UTC-5)



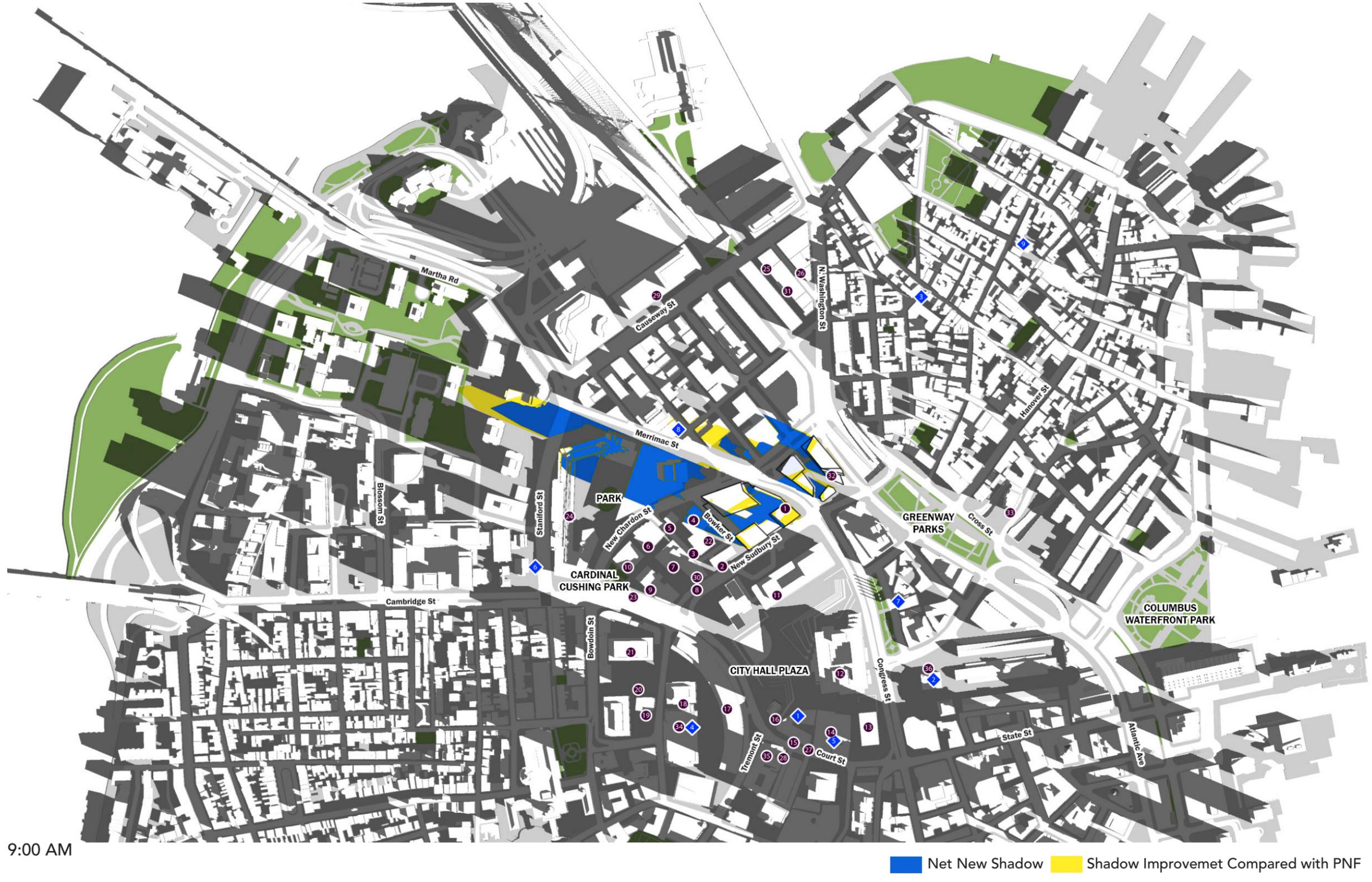
12:00 PM

Net New Shadow (Facade) Net New Shadow (Street Level) Net New Shadow (Rooftop)

DECEMBER 21ST SHADOW STUDY (UTC-5)



MARCH 21ST SHADOW STUDY (UTC-5)



Redevelopment of Government Center Garage
Boston, MA

Figure 5.2a



March 21 9:00AM Shadow Comparison between PNF & DPIR Scheme

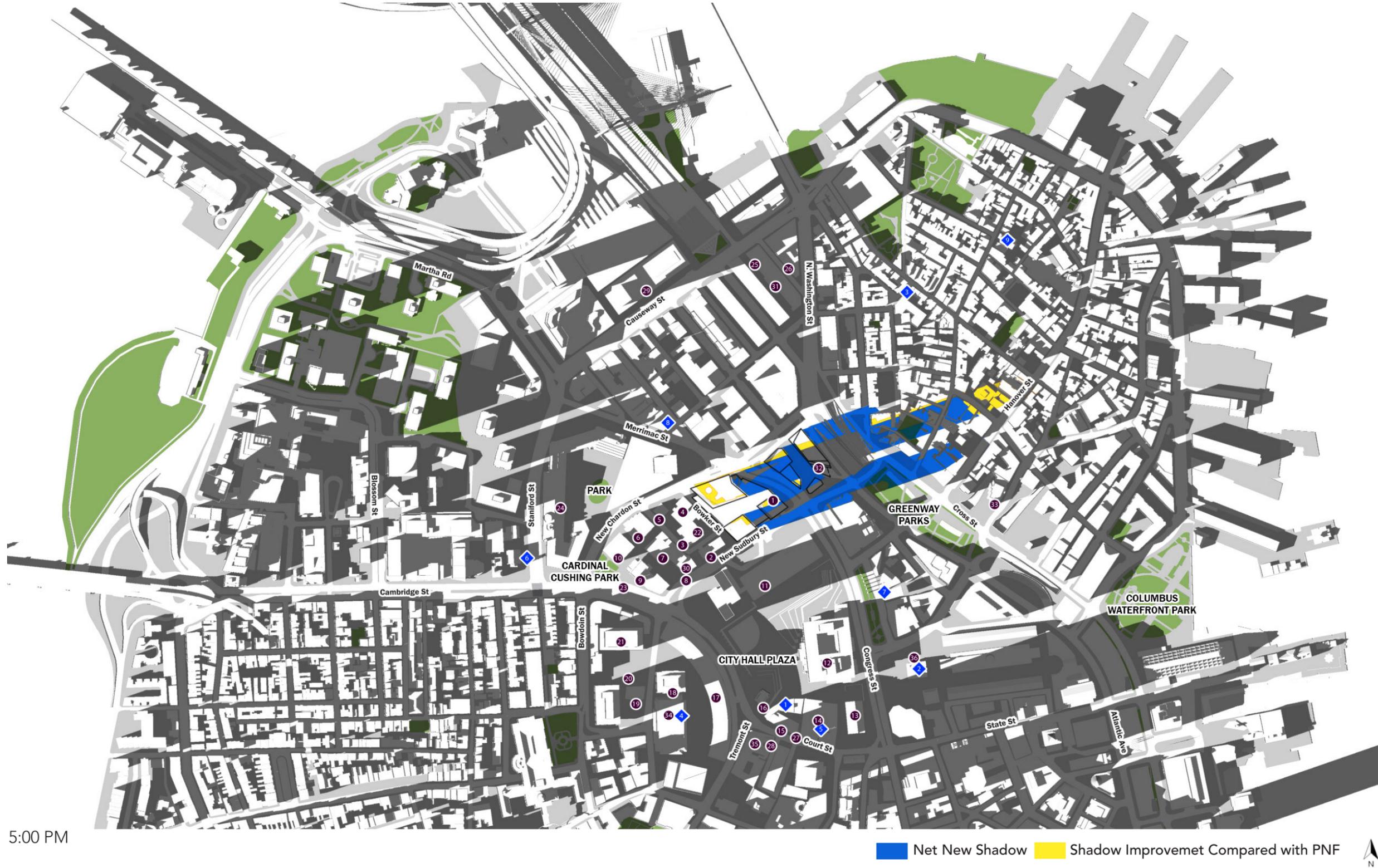
MARCH 21ST SHADOW STUDY (UTC-5)



Redevelopment of Government Center Garage
Boston, MA

Figure 5.2b





5:00 PM

Net New Shadow Shadow Improvement Compared with PNF



Redevelopment of Government Center Garage
Boston, MA

Figure 5.2X



March 21) . \$SDA Shadow Comparison between PNF / DPIR Scheme

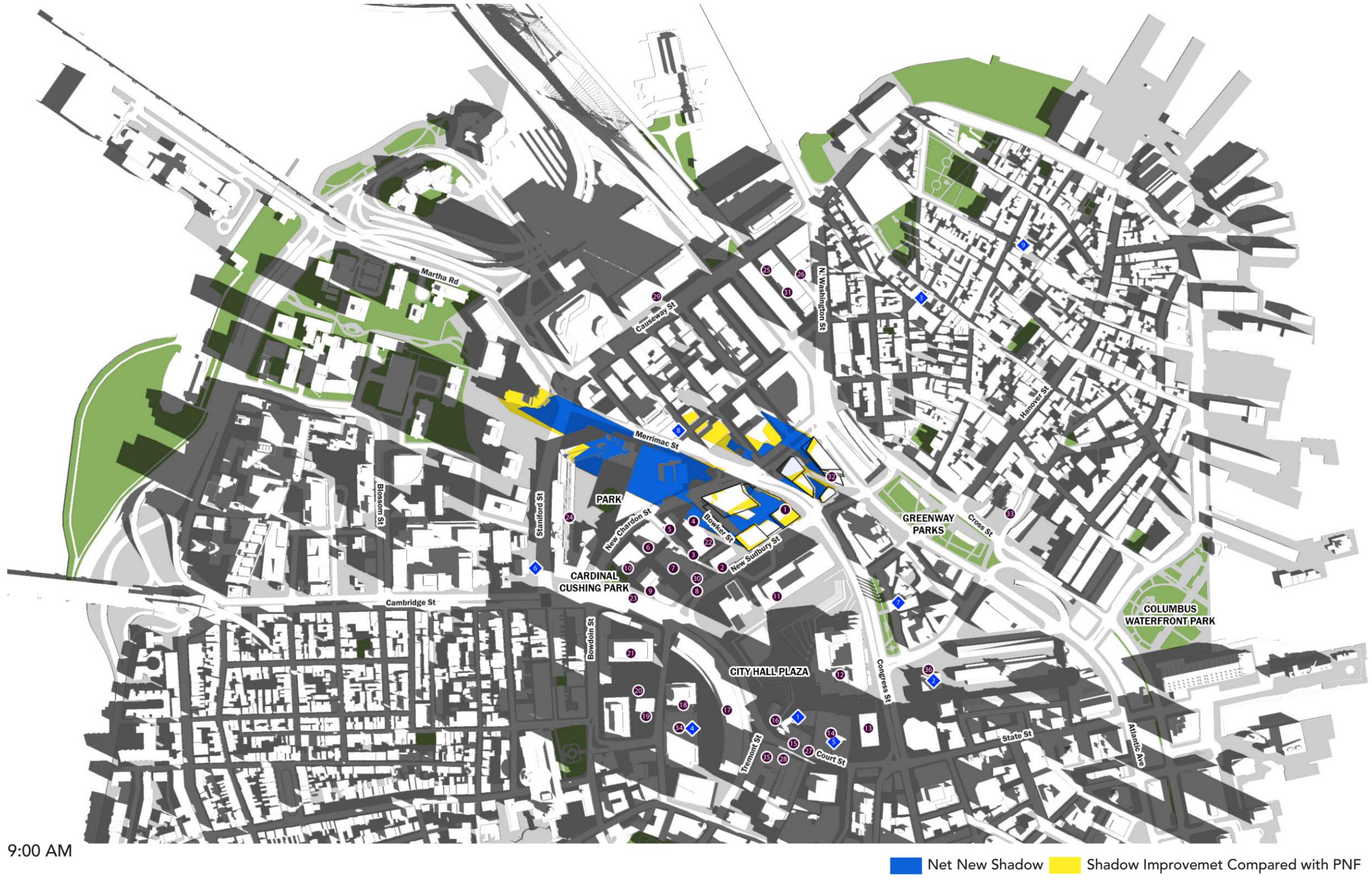








SEPTEMBER 21ST SHADOW STUDY (UTC-4)



Redevelopment of Government Center Garage
Boston, MA

Figure 5.2i



September 21 9:00AM Shadow Comparison between
PNF & DPIR Scheme

SEPTEMBER 21ST SHADOW STUDY (UTC-4)

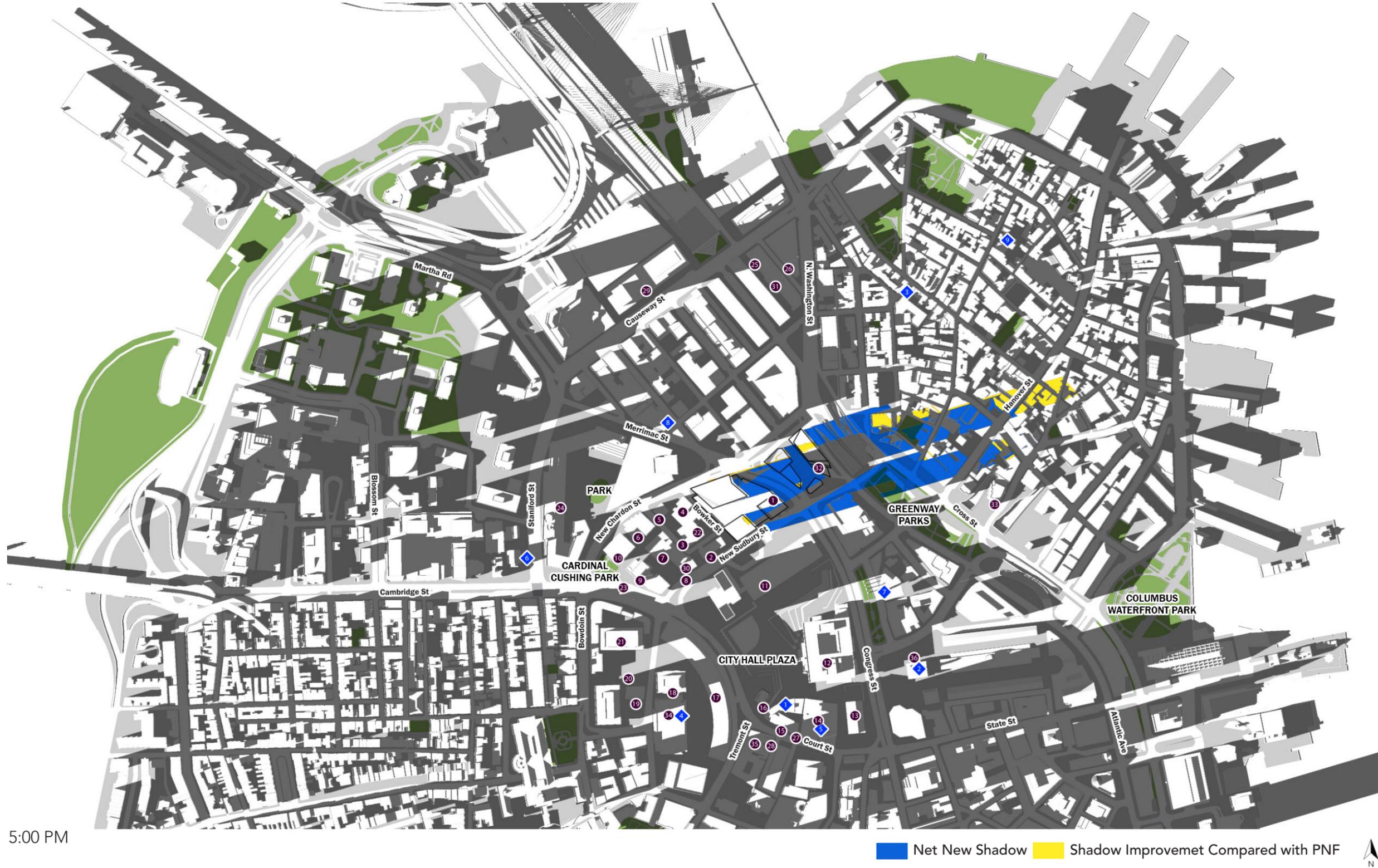


Redevelopment of Government Center Garage
Boston, MA

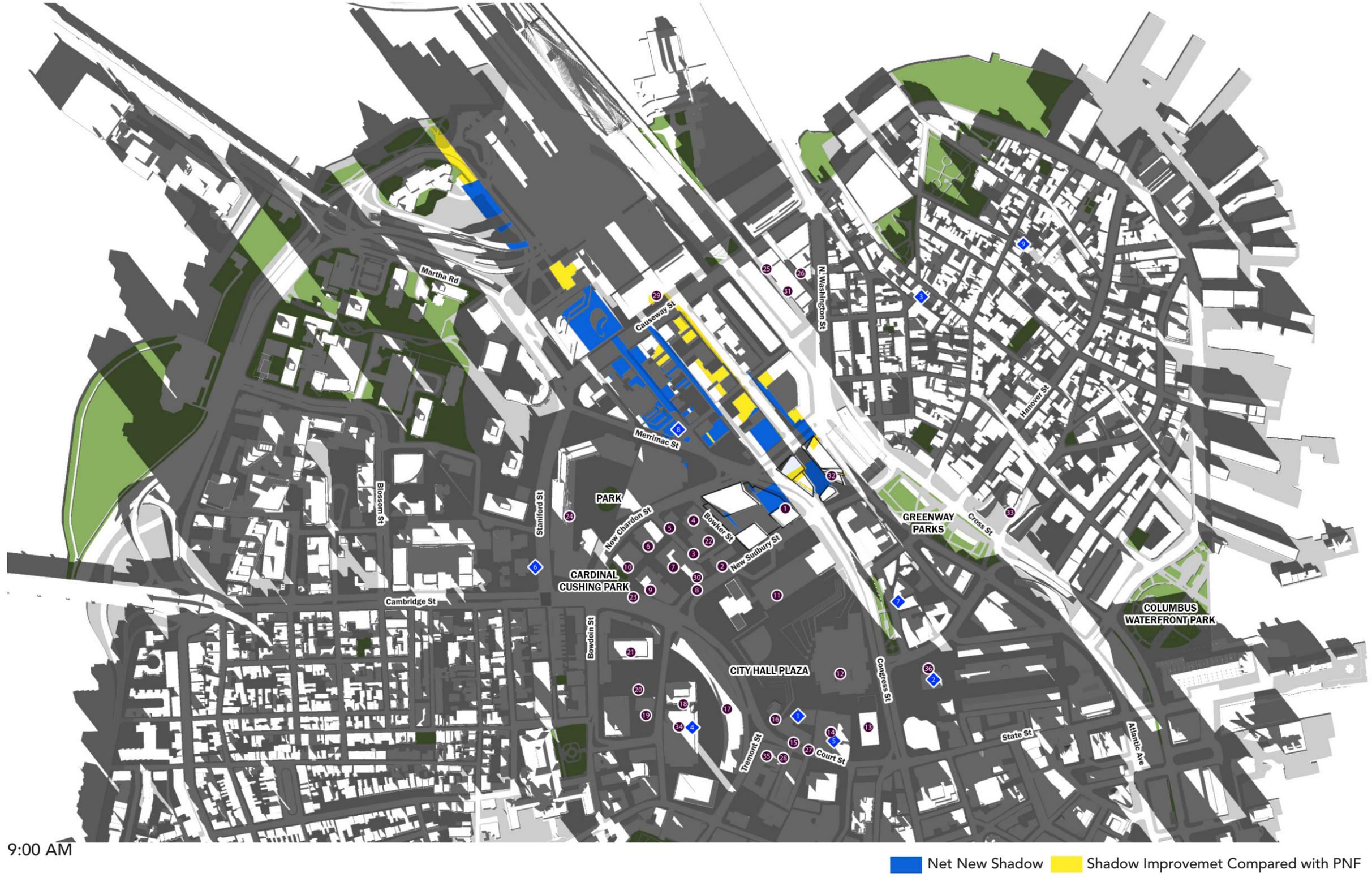
Figure 5.2j

September 21 12:00PM Shadow Comparison between
PNF & DPIR Scheme





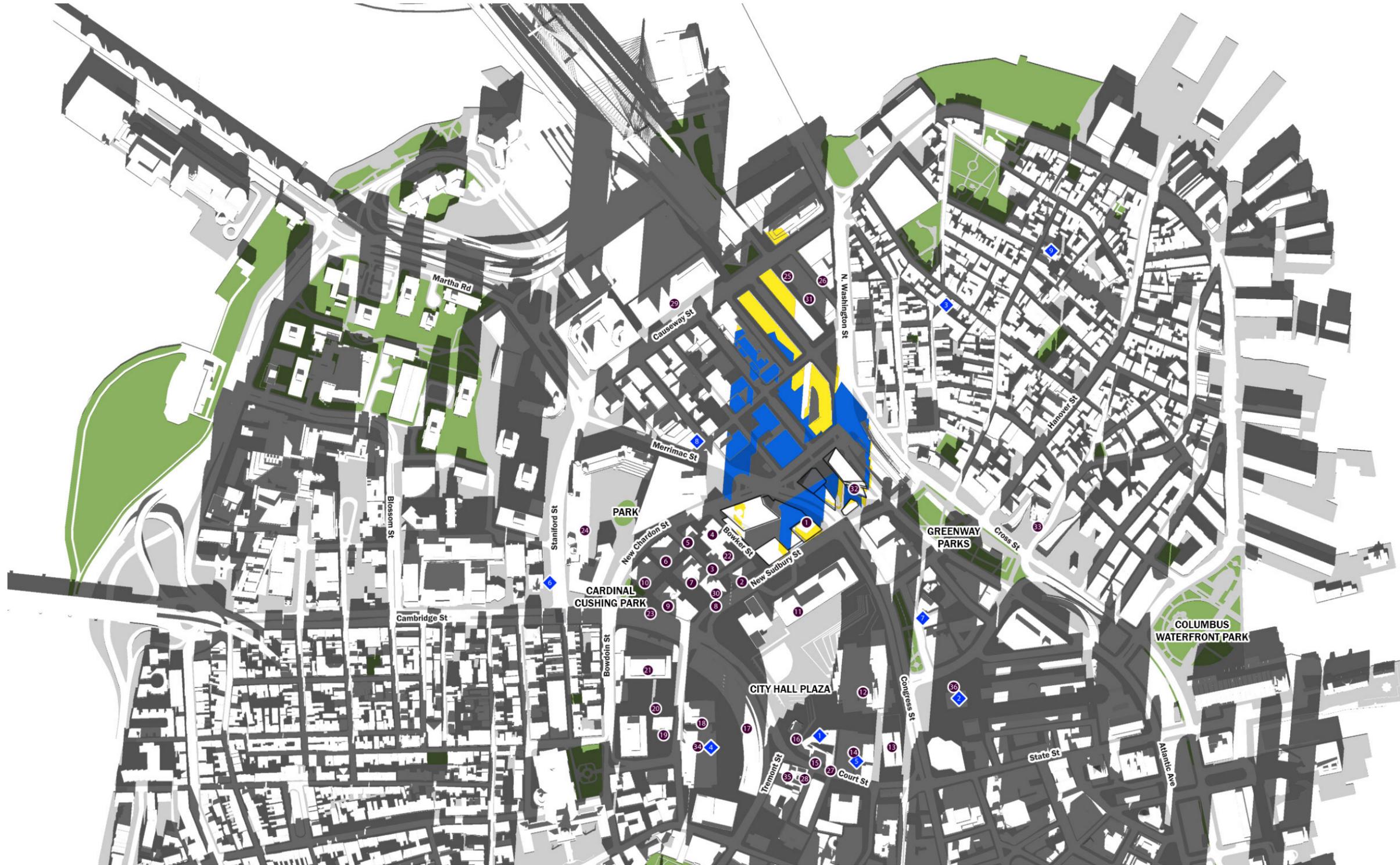
DECEMBER 21ST SHADOW STUDY (UTC-5)



Redevelopment of Government Center Garage
Boston, MA

Figure 5.2m

DECEMBER 21ST SHADOW STUDY (UTC-5)



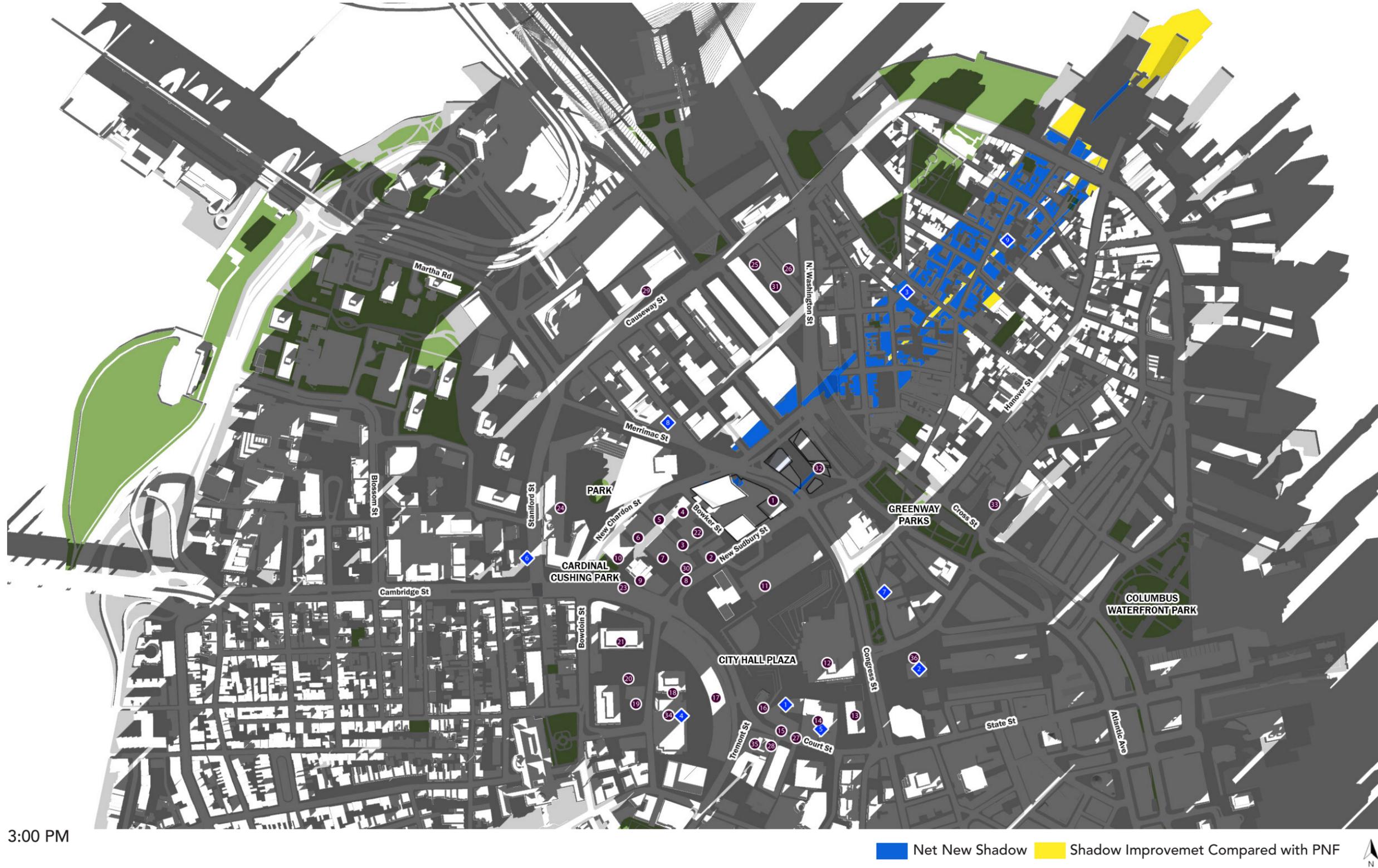
12:00 PM

Net New Shadow Shadow Improvement Compared with PNF

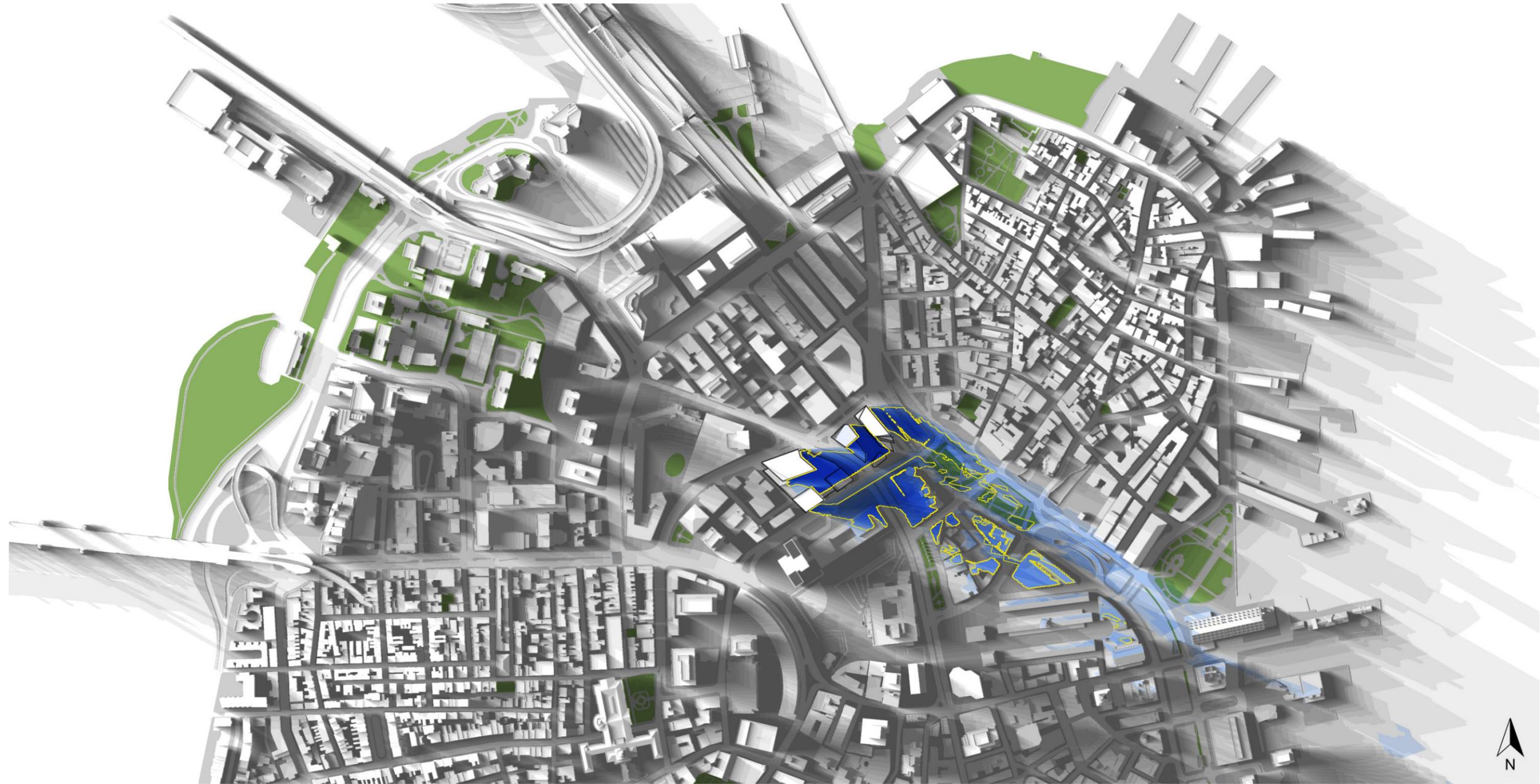


Redevelopment of Government Center Garage
Boston, MA

Figure 5.2n



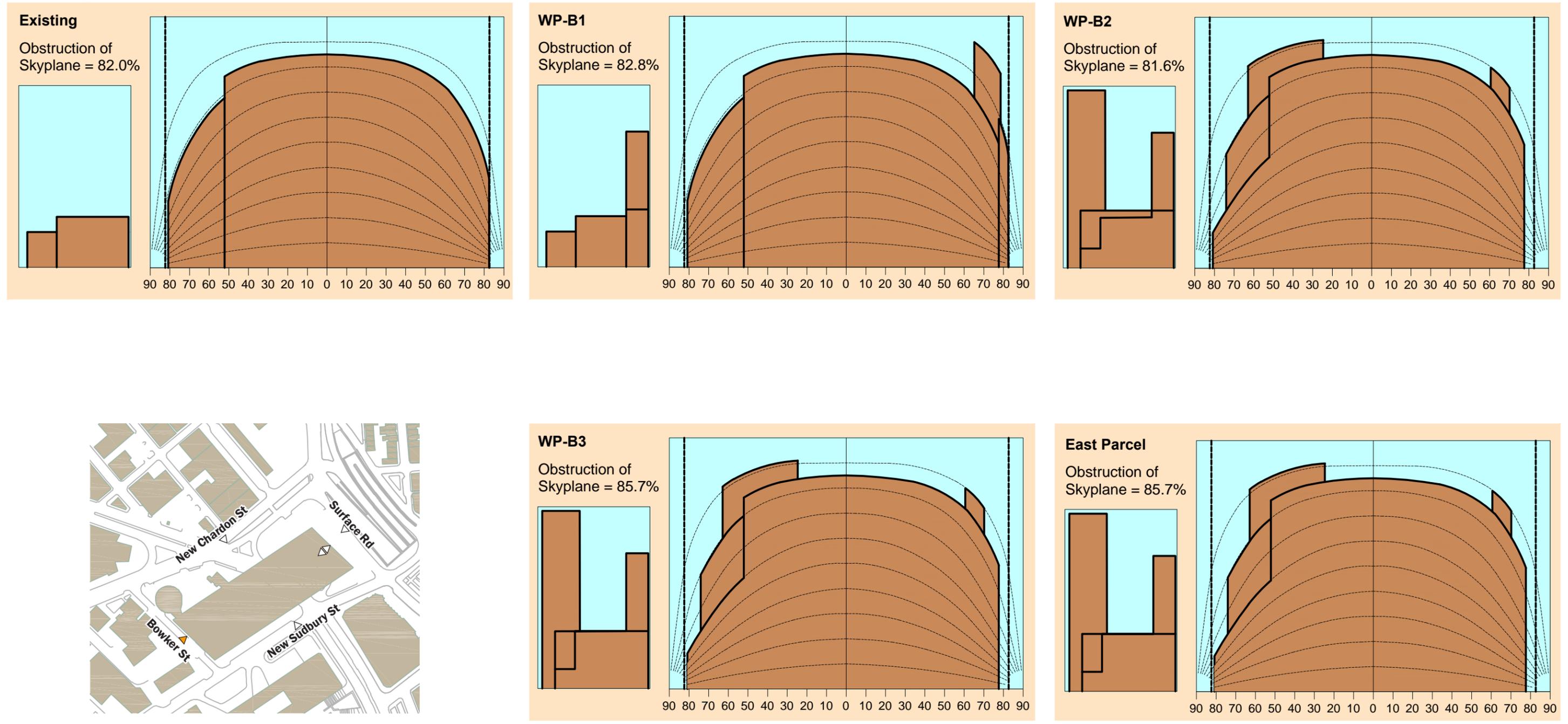
ACCUMULATED SHADOW STUDY FOR JUNE 21ST

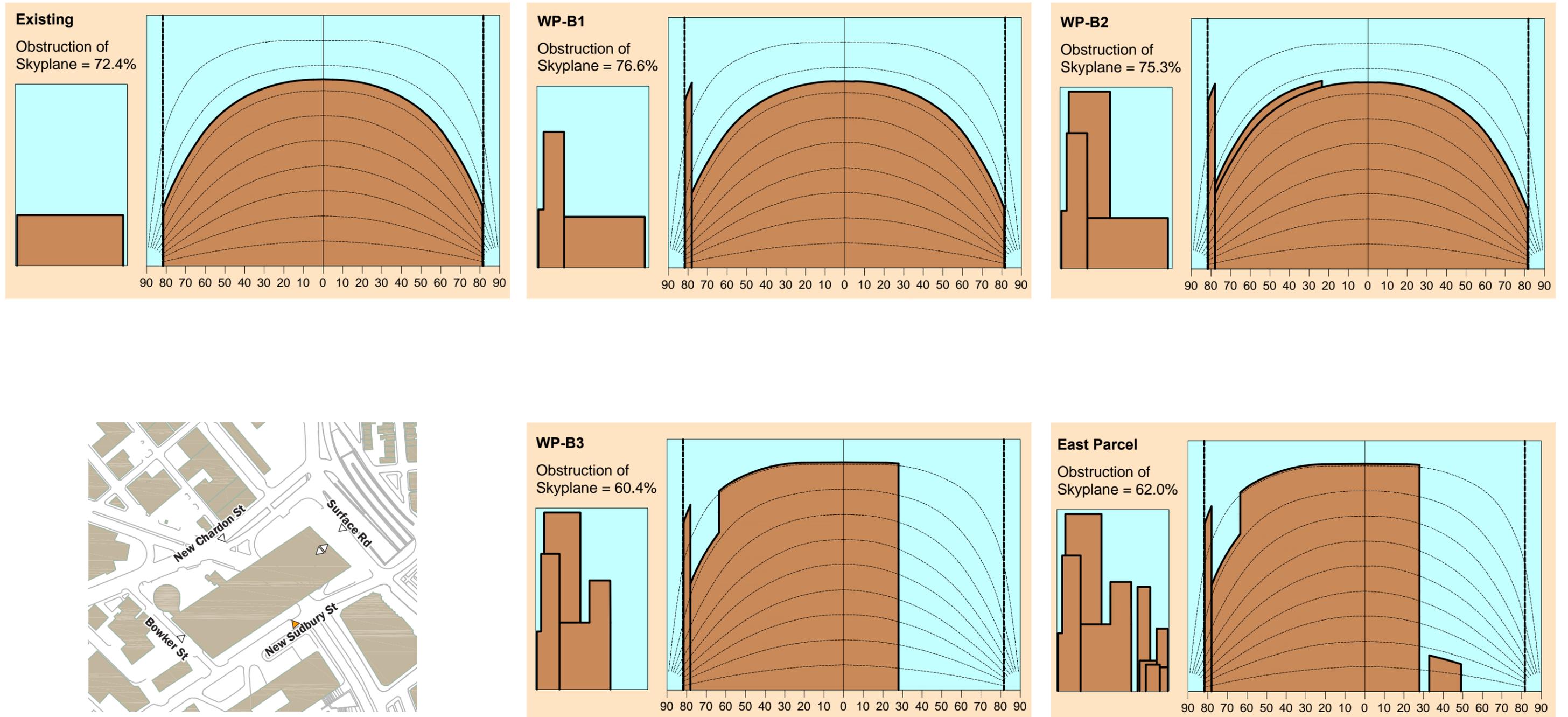


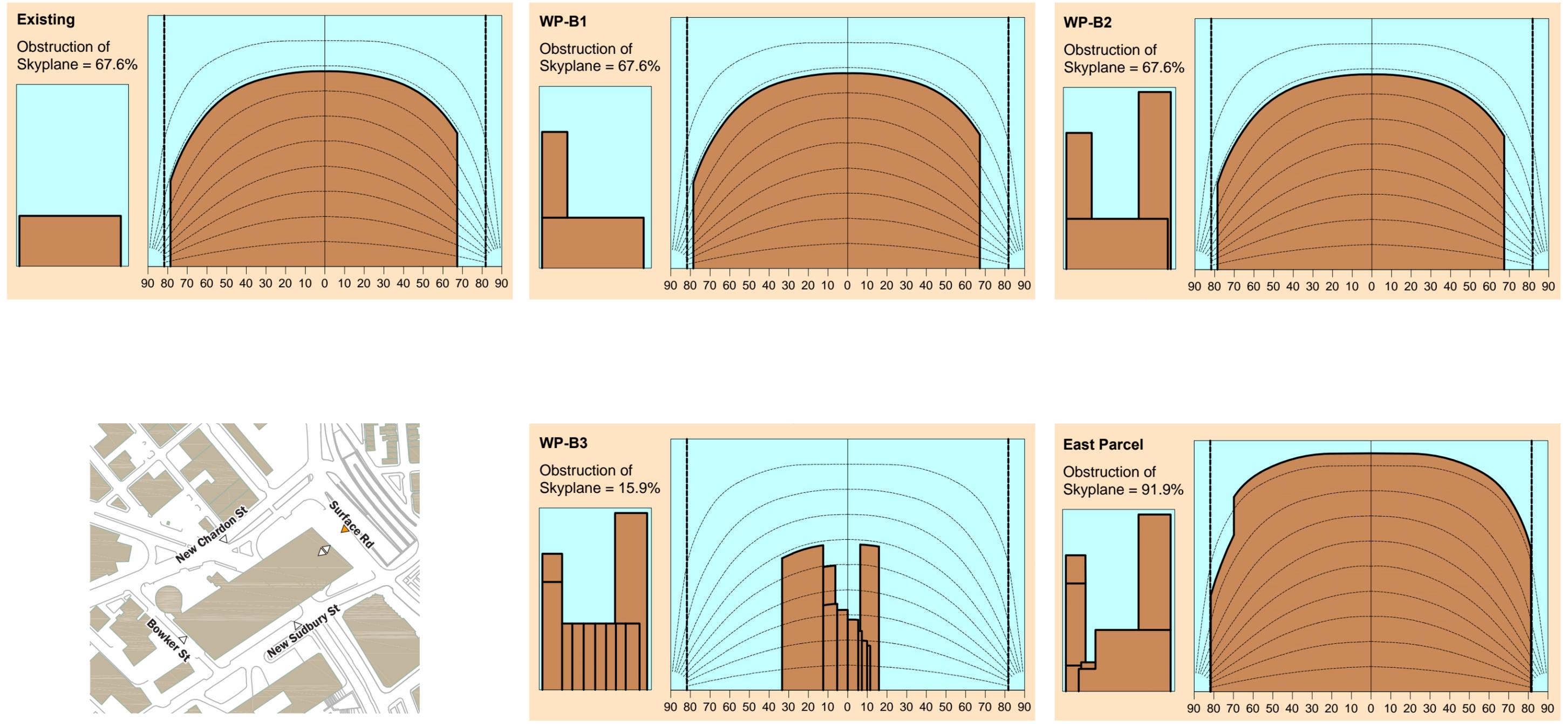
■ Net New Shadow ■ Area for Shadow Impact for more than 1 hour

Redevelopment of Government Center Garage
Boston, MA

Figure 5.2p

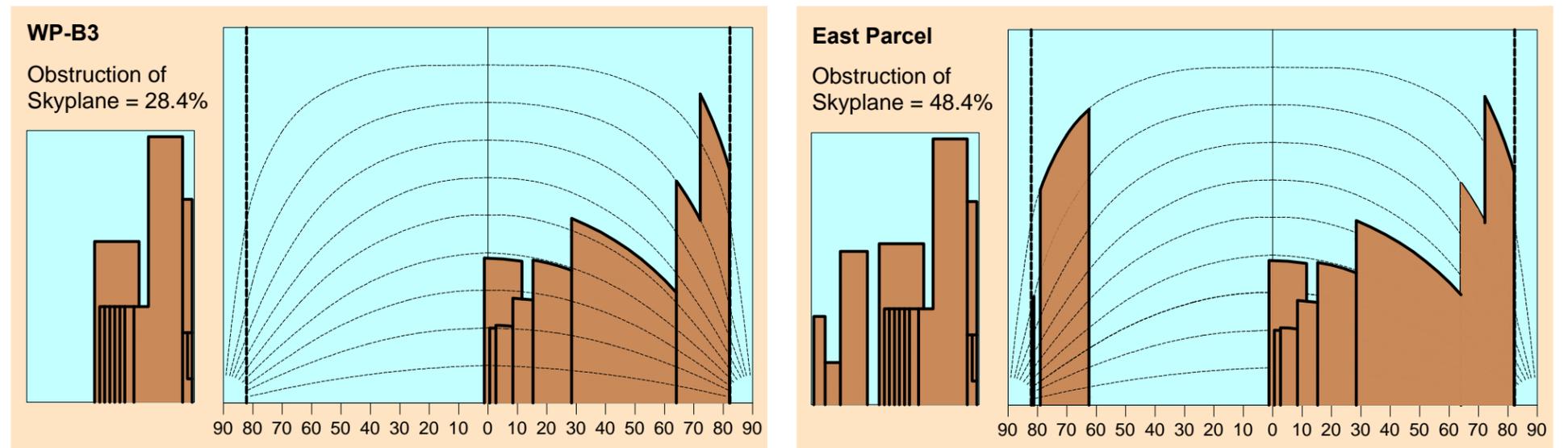
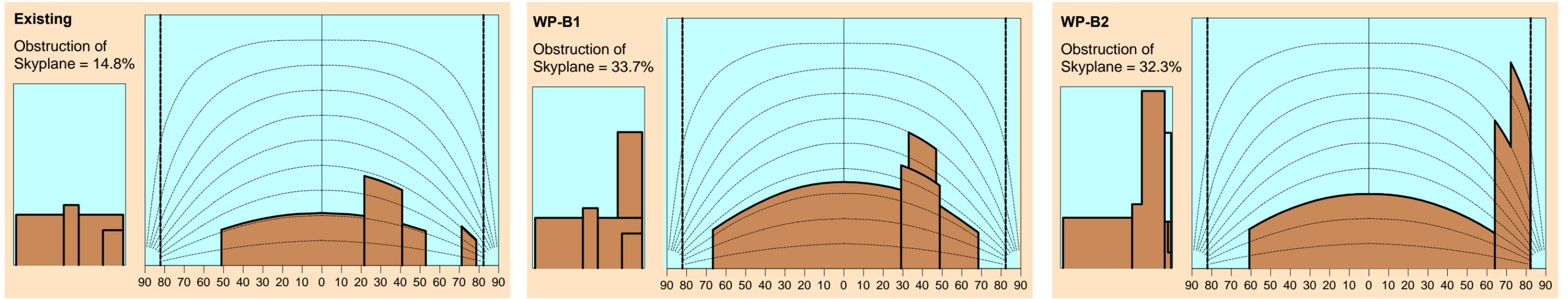


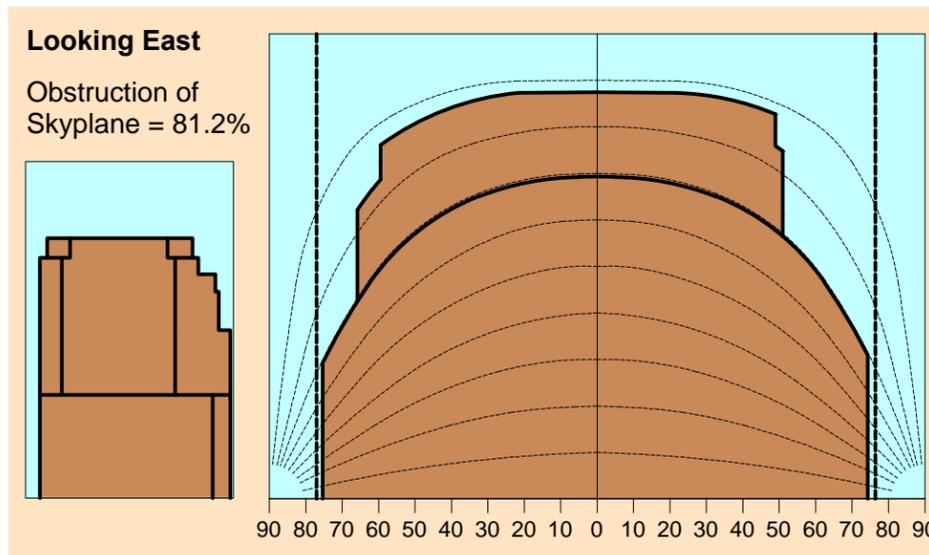
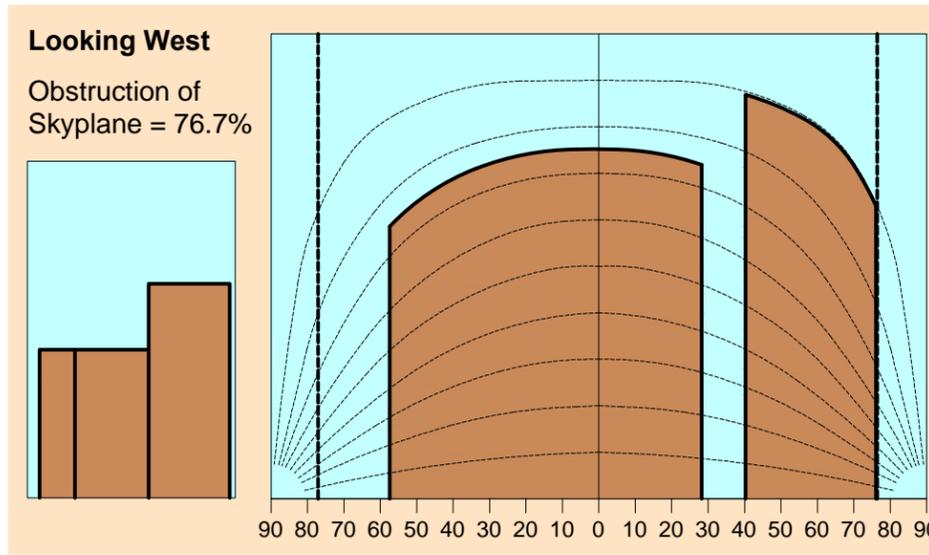


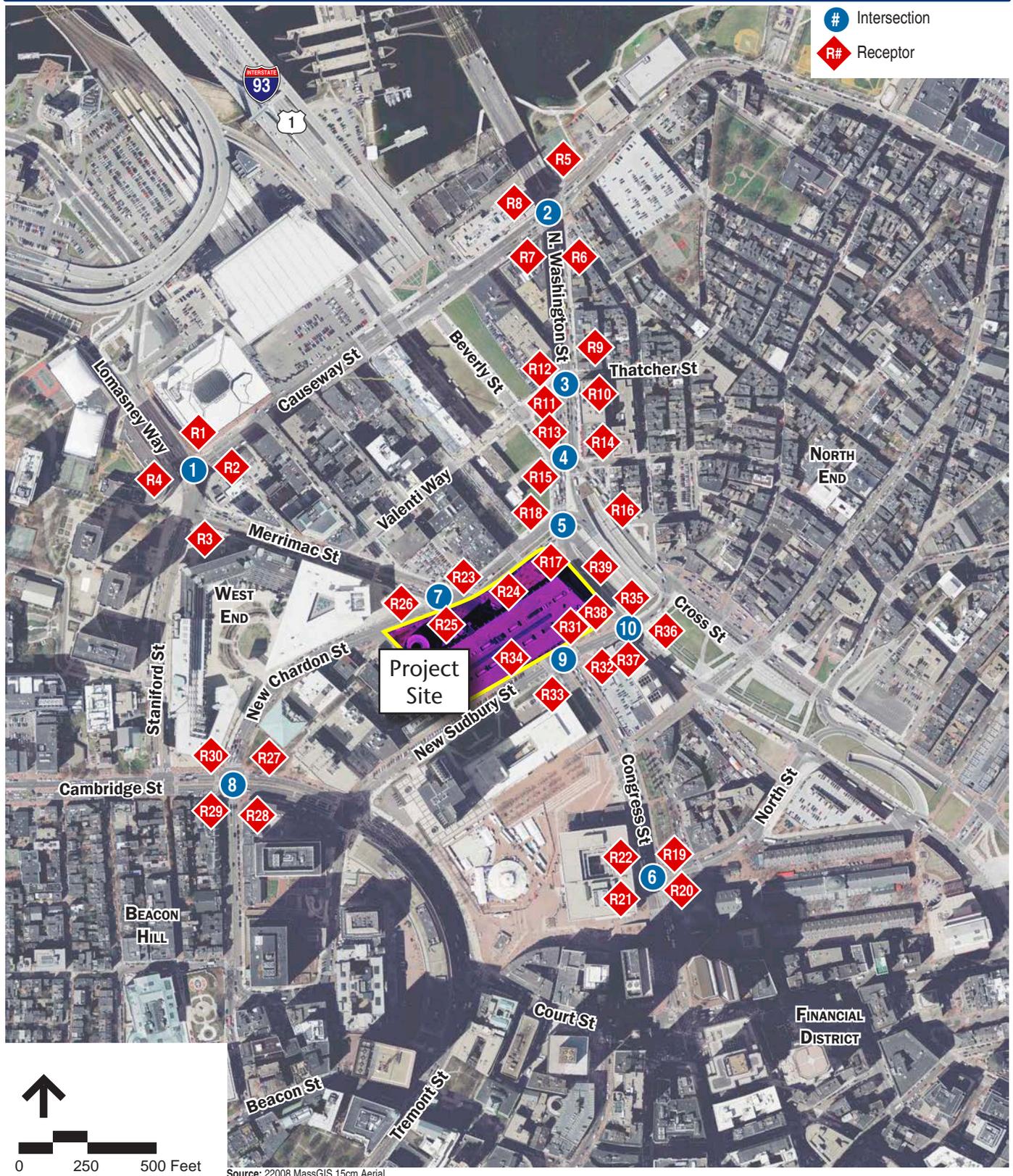


Redevelopment of Government Center Garage
Boston, MA

Figure 5.3c

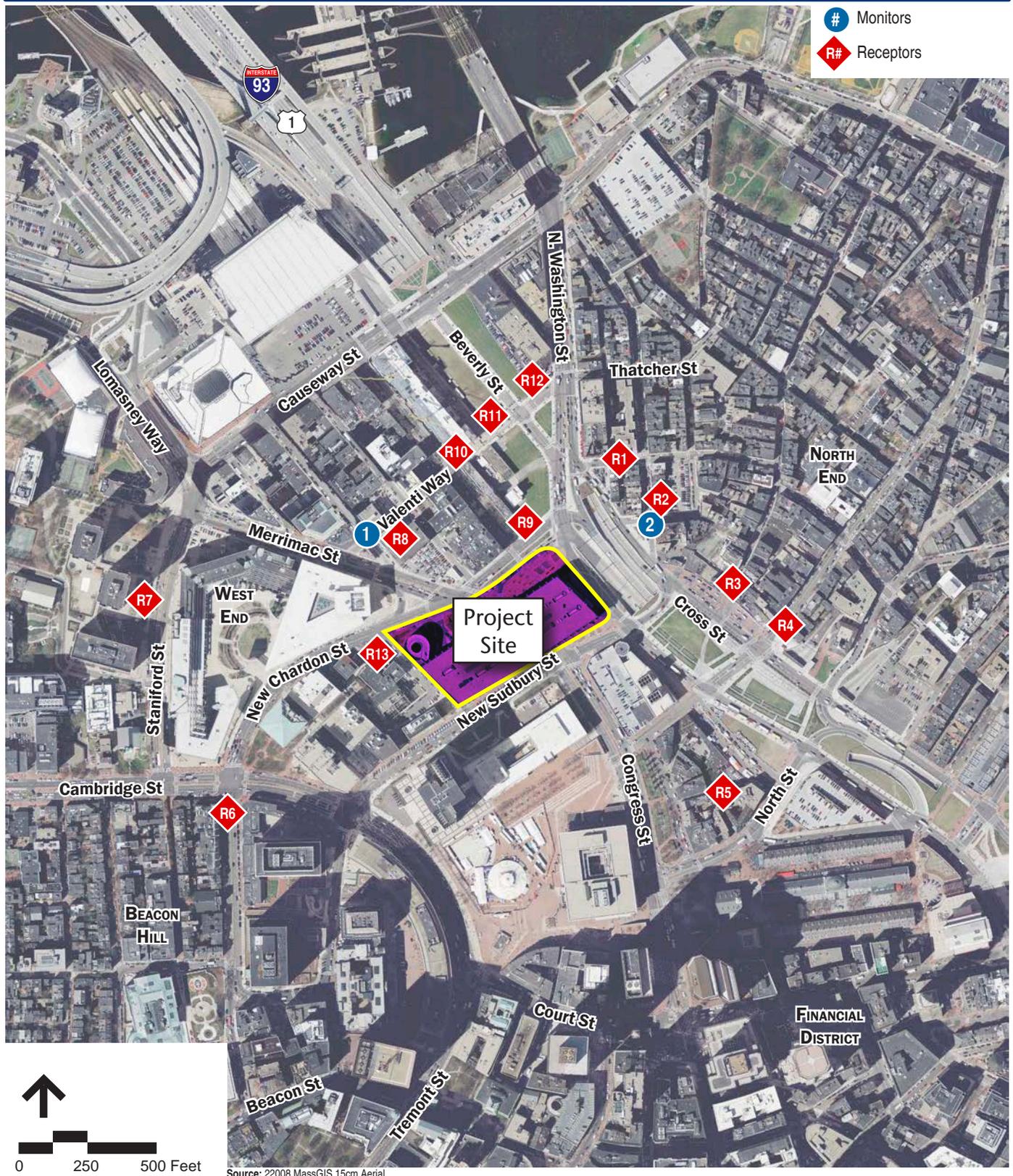






Redevelopment of Government Center Garage
Boston, MA

Figure 5.4



Redevelopment of Government Center Garage
Boston, MA

Figure 5.5



Redevelopment of Government Center Garage
Boston, MA

Figure 5.*

 LEED 2009 for Core and Shell Development		Project Checklist		Project Name
				Date
21	4	3	Sustainable Sites	Possible Points: 28
Y	?	N		
Y			Prereq 1 Construction Activity Pollution Prevention	
1			Credit 1 Site Selection	1
5			Credit 2 Development Density and Community Connectivity	5
		1	Credit 3 Brownfield Redevelopment	1
6			Credit 4.1 Alternative Transportation—Public Transportation Access	6
2			Credit 4.2 Alternative Transportation—Bicycle Storage and Changing Rooms	2
3			Credit 4.3 Alternative Transportation—Low-Emitting and Fuel-Efficient Vehicles	3
	2		Credit 4.4 Alternative Transportation—Parking Capacity	2
		1	Credit 5.1 Site Development—Protect or Restore Habitat	1
	1		Credit 5.2 Site Development—Maximize Open Space	1
		1	Credit 6.1 Stormwater Design—Quantity Control	1
1			Credit 6.2 Stormwater Design—Quality Control	1
1			Credit 7.1 Heat Island Effect—Non-roof	1
1			Credit 7.2 Heat Island Effect—Roof	1
1			Credit 8 Light Pollution Reduction	1
1			Credit 9 Tenant Design and Construction Guidelines	1
4	5	1	Water Efficiency	Possible Points: 10
Y			Prereq 1 Water Use Reduction—20% Reduction	
2	2		Credit 1 Water Efficient Landscaping	2 to 4
	2		Credit 2 Innovative Wastewater Technologies	2
2	1	1	Credit 3 Water Use Reduction	2 to 4
18	5	14	Energy and Atmosphere	Possible Points: 37
Y			Prereq 1 Fundamental Commissioning of Building Energy Systems	
Y			Prereq 2 Minimum Energy Performance	
Y			Prereq 3 Fundamental Refrigerant Management	
8	5	8	Credit 1 Optimize Energy Performance	3 to 21
		4	Credit 2 On-Site Renewable Energy	4
2			Credit 3 Enhanced Commissioning	2
2			Credit 4 Enhanced Refrigerant Management	2
3			Credit 5.1 Measurement and Verification—Base Building	3
3			Credit 5.2 Measurement and Verification—Tenant Submetering	3
		2	Credit 6 Green Power	2
4	3	6	Materials and Resources	Possible Points: 13
Y	?	N		
Y			Prereq 1 Storage and Collection of Recyclables	
		5	Credit 1 Building Reuse—Maintain Existing Walls, Floors, and Roof	1 to 5
2			Credit 2 Construction Waste Management	1 to 2
		1	Credit 3 Materials Reuse	1
1	1		Credit 4 Recycled Content	1 to 2
1	1		Credit 5 Regional Materials	1 to 2
	1		Credit 6 Certified Wood	1
7	2	3	Indoor Environmental Quality	Possible Points: 12
Y			Prereq 1 Minimum Indoor Air Quality Performance	
Y			Prereq 2 Environmental Tobacco Smoke (ETS) Control	
1			Credit 1 Outdoor Air Delivery Monitoring	1
		1	Credit 2 Increased Ventilation	1
1			Credit 3 Construction IAQ Management Plan—During Construction	1
1			Credit 4.1 Low-Emitting Materials—Adhesives and Sealants	1
1			Credit 4.2 Low-Emitting Materials—Paints and Coatings	1
1			Credit 4.3 Low-Emitting Materials—Flooring Systems	1
	1		Credit 4.4 Low-Emitting Materials—Composite Wood and Agrifiber Products	1
		1	Credit 5 Indoor Chemical and Pollutant Source Control	1
		1	Credit 6 Controllability of Systems—Thermal Comfort	1
1			Credit 7 Thermal Comfort—Design	1
		1	Credit 8.1 Daylight and Views—Daylight	1
1			Credit 8.2 Daylight and Views—Views	1
4	2		Innovation and Design Process	Possible Points: 6
1			Credit 1.1 Innovation in Design: Exemplary Performance SS 4.1	1
1			Credit 1.2 Innovation in Design: Specific Title	1
1			Credit 1.3 Innovation in Design: Specific Title	1
		1	Credit 1.4 Innovation in Design: Specific Title	1
		1	Credit 1.5 Innovation in Design: Specific Title	1
1			Credit 2 LEED Accredited Professional	1
2			Regional Priority Credits	Possible Points: 4
1			Credit 1.1 Regional Priority: SS 7.1	1
1			Credit 1.2 Regional Priority: SS 7.2	1
			Credit 1.3 Regional Priority: Specific Credit	1
			Credit 1.4 Regional Priority: Specific Credit	1
60	21	27	Total	Possible Points: 110

Certified 40 to 49 points Silver 50 to 59 points Gold 60 to 79 points Platinum 80 to 110

Redevelopment of Government Center Garage
Boston, MA

Figure 5.+V



Preliminary LEED
Core & Shell Scorecard for Office
Components

6

Infrastructure

6.1 Introduction

The following chapter provides an update to the infrastructure needs and systems that will support the Project based on the revised height and massing changes since the PNF, as described in Chapter 1, *Project Description*.

The Project will use the existing water, sewer, electrical and natural gas systems available in public streets adjacent to the Project Site. These systems include those owned or managed by the Boston Water and Sewer Commission (BWSC), private utility companies, and on-site infrastructure systems. Research indicates that these services are available at the site frontage. All system designs will be confirmed through coordination with the utility authorities as the project design progresses.

6.2 Sanitary Sewer

Local sanitary sewer service is provided by BWSC via the following systems:

- An 18-inch sanitary sewer located in New Sudbury Street and Merrimac Street (also known as Congress Street for this portion of the roadway), which flows to the Merrimac Street/New Chardon Street intersection, ultimately connecting to the West Side Interceptor.
- 12-inch sanitary sewers in Bowker Street that connect to a 15-inch sanitary sewer in New Chardon Street that ultimately connects to the West Side Interceptor.
- Both sanitary sewer systems eventually discharge to the Deer Island Treatment Plant for treatment and disposal.

The Proponent will coordinate with BWSC on the design for proposed connections to their sewer systems. In addition, the Proponent will submit a General Service Application and site plan to the BWSC for review as project design progresses. Table 6-1 presents an updated summary of wastewater generation by Project Component based upon the revised DPIR program.

**Table 6-1
Net New Wastewater Generation**

Building	Use	Quantity	Flow Rate (gpd)	Sewage Generation (gpd)
New Project-Related Sewage Generation				
<u><i>West Parcel</i></u>				
WP-B1	Residential	464	110/bdrm	51,040
	Retail	2,350	50/1,000 sf	118
<i>WP-B1 Total</i>				<i>51,158</i>
WP-B2	Office	1,014,000	75/1,000 sf	76,050
	Retail	9,050	50/1,000 sf	453
<i>WP-B2 Total</i>				<i>76,503</i>
WP-B3	Residential	291	110/bdrm	32,010
	Retail	8,400	50/1,000 sf	420
<i>WP-B3 Total</i>				<i>32,430</i>
<u><i>East Parcel</i></u>				
EP-B1	Residential	57	110/bdrm	6,270
	Hotel	196	110/room	21,560
	Retail	17,400	50/1,000 sf	870
<i>EP-B1 Total</i>				<i>28,700</i>
EP-B2	Office	163,800	75/1,000 sf	12,285
	Retail	20,300	50/1,000 sf	1,015
<i>EP-B2 Total</i>				<i>13,300</i>
EP-B3	Retail	25,000	50/1,000 sf	1,250
<i>EP-B3 Total</i>				<i>1,250</i>
Total New Project-Related Sewage Generation				203,340
Existing Sewage Generation to be Removed				
Existing Garage	Office	256,000	(75/1,000sf)	(19,200)
	Retail	37,100	(50/1,000sf)	(1,855)
<i>Existing Total</i>				<i>(21,055)</i>
Total Existing to be Removed				(21,055)
Net New Wastewater Generation				182,285

In total, the Project will generate an estimated 182,285 gallons per day (gpd) of new wastewater flows. This is a reduction of 5,715 gpd from the estimates provided in the PNF. As shown in Table 6-1, WP-B1 and WP-B2 generate approximately 51,160 gpd and 76,500 gpd, respectively, which exceeds the 50,000 gpd trigger requiring a Sewer Connection Permit from the DEP. Under current regulations, the other Project Components would only require either DEP Self-certifications or BWSC approval.

Sanitary sewer connections for the Project are likely to be on New Chardon Street, Merrimac Street, Congress Street and New Sudbury Street. The sanitary sewers are available along the frontage and should be available at numerous locations. Individual building connections will be determined as each phase advances and will be included in subsequent Article 80 and BWSC filings. As described earlier, the sanitary sewers in the streets range in size from 12-inches to 18-inches and have full-flow capacities ranging from approximately 1,850,000 gallons per day to 8,380,000 gallons per day. These capacities are far in excess of Project-generated wastewater.

6.3 Water Supply

Domestic and fire protection water at the Project Site is provided by BWSC in the following streets and sizes:

- A 16-inch fire service main in New Sudbury Street;
- A 12-inch Southern High (SH) main in New Sudbury Street;
- A 12-inch Southern Low (SL) main in New Sudbury Street;
- A 16-inch fire service main in Merrimac Street;
- A 12-inch SH main in Merrimac Street/Congress Street;
- A 12-inch SL main in Merrimac Street/Congress Street;
- A 16-inch fire service in New Chardon Street (westerly of Merrimac Street);
- A 12-inch fire service in New Chardon Street (easterly of Merrimac Street);
- A 30-inch SL main in New Chardon Street (westerly of Merrimac Street);
- A 12-inch SL main in New Chardon Street (easterly of Merrimac Street);
- A 16-inch SH main in New Chardon Street (westerly of Merrimac Street);
- A 12-inch SH main in New Chardon Street (easterly of Merrimac Street);
- 12-inch SH mains in Bowker Street; and
- 12-inch and 8-inch SL mains in Bowker Street.

Domestic water and fire protection connections will be provided via the numerous 12-inch and 16-inch mains. The larger mains provide local area supply and capacity for the system as a whole. The Project will not connect to the 30-inch SL main in New Chardon Street.

Domestic water demand is based on estimated sewage generation with an added factor of 10 percent for consumption, system losses and other use. Based upon sewage generation rates outlined in the DEP Sewer Connection and Extension Regulations, 310 CMR 15.203.f, the Project will require approximately 200,515 gpd of domestic water (a reduction in of approximately 6,500 gpd from the PNF). As outlined earlier in this section, BWSC has robust water infrastructure in the streets surrounding the Project.

Regarding air conditioning make-up water, the Project is in the master planning stage and specific MEP equipment has not been selected. As each individual project component advances through its individual Article 80 Large Project Review, MEP equipment will be defined and separate calculations for air conditioning make-up water will be completed. Also, as noted herein, the Project is planning to use harvested rainwater to provide air conditioning make-up water.

As discussed in the stormwater section below and as part of the overall sustainability plan for the Project, the Proponent will be actively exploring means to reduce domestic water demand, including the harvesting of rain water for mechanical uses and irrigation and the careful selection of plumbing fixtures.

6.4 Stormwater Management

The Project is located in a densely developed area consisting of impervious rooftops and impervious paved surfaces. BWSC owns and maintains an extensive system of catch basins, manholes and drain pipes in the area immediately adjacent to the Project Site. This system of pipes, catch basins and manholes drains to specific areas within the Charles River Watershed.

The storm drainage system serving the Project Site drains primarily to the Charles River. The surface drainage for New Sudbury Street, Merrimac Street/Congress Street, New Chardon Street and Bowker Street drains to Combined Sewer Outfall (CSO) 049 in Charles River near the Nashua Street Jail.

Local storm drain service can be provided by BWSC via the following systems:

- A 15-inch storm drain in Bowker Street connects to a 36-inch storm drain in New Chardon Street
- A 30-inch storm drain in New Sudbury Street connects to a 42-inch storm drain in Merrimac Street
- 12-inch drains from the East Parcel connecting across Market Street to Canal Street

Table 6-2
Stormwater Discharge Rates

Site	Event (yr)	Pre-development and Maximum Post-Development Discharge Rate (cfs)
Project Site	2	13.04
	10	18.88
	25	22.61
	100	27.18

The 15-inch storm drain in Bowker Street has a flowing full, but not surcharged, capacity of 7.1 cfs. The 36-inch drain in New Chardon Street adjacent to the project site has a flowing full, but not surcharged, capacity of 71.5 cfs. The existing 42-inch storm drain in Merrimac Street has a flowing full, but not surcharged, capacity of 31.5 cfs. The 12-inch drain from the East Parcel has a flowing full, but not surcharged, capacity of 3.5 cfs. As discussed in the following paragraphs, the Project will be introducing stormwater control measures that will both improve water quality and reduce runoff. As the Project Components are developed, the stormwater controls associated with each Component will be defined and submitted to BWSC as part of the Site Plan Approval Process.

Targeting the treatment of the first inch of stormwater runoff per BWSC requirements, equivalent to an estimated volume of 14,700 cubic feet, the Project is exploring the use of stormwater control measures, as follows:

- *Subsurface infiltration systems* – the Proponent is considering the use of sub-grade, precast concrete infiltration systems, designed to detain and infiltrate stormwater runoff from both impervious and pervious surfaces.
- *Green roofs* – the Proponent is considering the establishment of green roofs.
- *Rainwater harvesting* – the Proponent is considering the harvesting of roof runoff for use in mechanical make-up water, and irrigation.
- *Tree pit filters* - the use of tree pit filtration along curb lines is being considered as a method to improve road runoff water quality.

- *Proprietary treatment devices* – proprietary filter devices (i.e. JellyFish, Vortech, etc.) may also be used as a method to improve stormwater quality.

In addition to these measures, the design team will be exploring ground-level stormwater management control measures, such as bioretention swales, tree pit filters, and landscaped planter areas. Proposed stormwater management controls will be established in compliance with BWSC standards.

Given that, under existing conditions, the Project Site is virtually impervious, the Project is not expected to result in the introduction of any additional peak flows, volumes, pollutants or sediments that would potentially impact the receiving waters of the BWSC's stormwater drainage system. In fact, with the introduction of the stormwater control measures currently planned, runoff rates and volumes will be reduced, lessening the Site's impact on BWSC's system, and stormwater runoff quality will be improved.

6.5 Utilities



6.5.1 Energy

Gas service at the Project Site is provided by National Grid in Sudbury Street, New Chardon Street and Bowker Street. National Grid has three existing gas mains that could potentially service the Project: a 6-inch main in Bowker Street, a 6-inch main in New Chardon Street and a 16-inch main in New Sudbury Street. Depending on the source of energy selected for the Project Components, the total net new natural gas demand for the Project could be approximately 92,800 cubic feet per hour (CFH) and is broken down as follows:

- WP-B1 – 18,000 CFH
- WP-B2 – 37,000 CFH
- WP-B3 – 13,000 CFH
- EP-B1 – 16,000 CFH
- EP-B2 – 6,000 CFH
- EP-B3 – 2,800 CFH

The Project Team has met with National Grid and has identified an intermediate pressure 16-inch main in New Sudbury Street that can service the project. As each of the Project Components progress, the Proponent will further coordinate with National Grid to further define the service requirements. Should the Proponent elect to use steam as an energy source, natural gas demand would be reduced.

NSTAR operates underground electric systems in Merrimac Street/Congress Street, New Chardon Street, New Sudbury Street, Bowker Street and Hawkins Street. These systems include primary power serving an existing electrical substation on Hawkins Street. The total electrical demand associated with the Project is estimated at 22,700 kW and is broken down as follows:

- WP-B1 – 4,000 kW
- WP-B2 – 11,600 kW
- WP-B3 – 2,400 kW

- EP-B1 – 2,800 kW
- EP-B2 – 1,400 kW
- EP-B3 – 500 kW

The Proponent and NSTAR have met concerning the Project and the demands associated with each Project Component. For the first component, WP-B1, NStar will provide service from New Sudbury Street. NSTAR will use the loads provided herein to continue their area-wide planning and engineering efforts, acknowledging the Project build-out schedule. As each Project Component advances, the Proponent and NSTAR will coordinate the final design and installation of electrical service.



6.5.2 Telecommunications

The Proponent will select private telecommunications companies to provide telephone, cable and data services. There are several potential candidates with substantial downtown Boston networks capable of providing service and there are numerous duct bank systems in the streets abutting the Project Site. Upon selection of a provider or providers, the Proponent will coordinate service connection locations and obtain appropriate approvals. Comcast has indicated it can provide service to the Project via existing infrastructure in Bowker Street. Other telecommunications providers currently provide service to the Project Site.



6.5.3 Steam

Veolia/Trigen owns underground steam system in the area including the following:

- A 14-inch main in Merrimac Street/Congress Street;
- A 12-inch main in New Chardon Street;
- A 6-inch main in Bowker Street.

The Proponent and Veolia/Trigen have met to discuss the Project. Veolia can provide steam to the project from their existing infrastructure. To serve the first component, a service lateral in New Sudbury Street may be required. As the individual components advance, the Proponent and Veolia will coordinate the final design and installation of steam infrastructure should the Proponent elect to use Veolia/Trigen steam for heating and/or hot water needs. Should steam be selected as an energy source, natural gas demand will be reduced accordingly. The estimated steam demand for the Project would total 70,200 pounds per hour (lb/hr) and is broken down as follows:

- WP B1 – 14,600 lb/hr
- WP B2 – 35,600 lb/hr
- WP B3 – 9,200 lb/hr
- EP B1 – 4,200 lb/hr
- EP B2 – 5,800 lb/hr
- EP B3 – 800 lb/hr

7

Responses to Comments

Introduction

The following presents a copy of each comment letter received by the BRA during the public review period for the PNF. Each comment letter received is listed in Table 7-1 below.

**Table 7-1
Comment Letters Index**

Letter No.	Commenter
S	BRA Scoping Determination, August 9, 2013
1	Boston Transportation Department, July 16, 2013
2	Boston Water and Sewer Commission, July 3, 2013
3	Katie Pedersen, July 1, 2013
4	The Beacon Hill Civic Association, July 6, 2013
5	North End/Waterfront Residents' Association, July 8, 2013
6	Downtown North Association, July 8, 2013
7	West End Civic Association, July 8, 2013
8	Save the Harbor Save the Bay, July 11, 2013
9	Councilor Salvatore LaMattina, July 8, 2013
10a	State Representative Aaron Michlewitz, July 11, 2013
10b	State Representative Aaron Michlewitz, July 12, 2013
11	Senator Anthony Petrucelli, July 12, 2013
12	Building and Construction Trades Council, July 12, 2013
13	Iron Workers Local 7, July 10, 2013
14	Sprinklerfitters Local 550, July 12, 2013
15	Kimberly A. Paikos, July 10, 2013
16a	Miriam H. Kanter, July 3, 2013
16b	Miriam H. Kanter, July 12, 2013
17	William Georgaqui, July 2, 2013
18	David Roderick, July 8, 2013

Letter No.	Commenter
19	Jane Forrestall, July 8, 2013
20	Linda Ellenbogen, July 8, 2013
21	Michael Ross, City Council, July 17, 2013
22	Boston Public Works Department, July 26, 2013
23	C. Forbes Dewey, Jr., July 12, 2013
24	Boston Fire Department, June 13, 2013
25	Boston Environmental and Energy Services, July 30, 2013

Each comment is assigned a number, appearing in at the top of the relative comment letter. Appearing after each comment letter is a section that provides a copy of each substantive comment with a direct narrative response. The enumerated comments/responses correlate with the code numbers that appear on the comment letters.

In summary, the comments received on the Project, as presented in the PNF could be categorized into the following key themes:

- Building height and massing, specifically:
 - The proposed height of the office building on the West Parcel (WP-B2); and
 - The proposed heights of the buildings on the East Parcel.
- Project phasing and the timing of public benefits, specifically:
 - Removal of the existing garage structure over Congress Street; and
 - Redevelopment of the East Parcel, including the new public plaza.

BRA Scoping Determination

Comment S.1

- "A. GENERAL INFORMATION*
- 1. Proponent Information*
 - a. Development Team*
 - (1) Names*
 - (a) Developer (including description of development entity and type of organization)*
 - (b) Financial partner(s)*
 - (c) Attorney*
 - (d) Proposed Project consultants and architect (2) Business address and telephone number for each (3) Designated contact for each*
 - (4) A completed Disclosure of Beneficial Interests form in accordance with Section 808-8 of the Code."*

Response

Chapter 2, *General Information and Regulatory Context* of this DPIR presents the above-referenced information.

Comment S.2

- "Legal Information*
- (1) Legal judgments or actions pending concerning the Proposed Project.*
 - (2) History of tax arrears on property owned in Boston by the Applicant.*
 - (3) Evidence of site control over the Project Site, including current ownership and existing purchase options of any parcels in the Proposed Project, as well as a list of all restrictive covenants, applicable agreements, contractual restrictions, and/or other encumbrances affecting the Proponent's right or ability to construct the Proposed Project, and identify any parcels of interest that must be acquired by the Proponent to complete the Proposed Project.*
 - (4) Nature and extent of any and all public and private easements into, through, or surrounding the Project Site."*

Response

Chapter 2, *General Information and Regulatory Context* of this DPIR presents the above-referenced information.

Comment S.2a

“Design Development Information (See Urban Design Staff for required design development and contract document submissions)”

Response

Chapters 1, 3, 4 and 5 of this DPIR provide Design Development Information. In addition, specific comments from Urban Design Staff are addressed further below.

Comment S.3

“Project Site

- a. An area map identifying the location of the Proposed Project.*
- b. Description of metes and bounds of Proposed Project area or certified survey of Proposed Project area owned by the Proponent.*
- c. Description of metes and bounds of property not owned by the Proponent whose acquisition would be necessary to construct the Proposed Project.*
- d. A list of all property owners with addresses located within five hundred (500) feet of the boundaries of the Proposed Project site.”*

Response

Chapter 2, *General Information and Regulatory Context* of this DPIR presents the above-referenced information.

Comment S.4

“Regulatory Controls and Permits

- a. An updated listing of all anticipated permits or approvals required from other municipal, State or Federal agencies, including a proposed application schedule shall be included in the DPIR.*
- b. A statement on the applicability of the Massachusetts Environmental Policy Act ("MEPA") should be provided. All required MEPA documentation should be provided to the BRA as well as a proposed schedule for the MEPA procedures and review.*
- c. A statement of existing requirements and provisions, if any, under all applicable agreements, including the Government Center Urban Renewal Area Plan.”*

Response

Chapter 2, *General Information and Regulatory Context* of this DPIR presents the above-referenced information.

Comment S.5

“Existing zoning requirements or zoning computation form, and any anticipated requests for zoning relief, including steps necessary to implement a Planned Development Area Designation.”

Response

Chapter 2, *General Information and Regulatory Context* of this DPIR presents the zoning requirements and steps necessary to implement the proposed Planned Development Area.

Comment S.6

“In view of the proposed phasing of the Proposed Project and the individual Proposed Project components, the DPIR should also identify those elements of Large Proposed Project Review which would be more appropriately addressed by each individual Proposed Project at a later date.”

Response

Chapter 1, *Project Description* of this DPIR provides a description of the updated phasing plan for the Project as well as the elements anticipated to be subject to future Large Project Review.

Comment S.7

“Community Outreach

a. Names and addresses of Proposed Project area owners, abutters, and any community or business groups which, in the opinion of the Applicant, may be substantially interested in or affected by the Proposed Project.

b. A list of meetings held and proposed with interested parties, including the IAG, public agencies, abutters, and community and business groups.”

Response

Chapter 1, *Project Description* of this DPIR provides a detailed description of the extensive community outreach and agency coordination process the Proponent has engaged in.

Comment S.8

“The DPIR shall contain a full description of the Proposed Project and its elements, including size, physical characteristics, and proposed uses. This section of the DPIR shall also present

the development context of the Proposed Project (description of the surrounding environment), existing site conditions, Proposed Project purpose and objectives, and approximate total development cost and development schedule.”

Response

Refer to Chapter 1, *Project Description* of this DPIR for a full description of the Project and its elements, including the key changes since the PNF in response to BRA and community feedback.

Comment S.9

“The Proponent must submit a site plan, which identifies and outlines each parcel. This information must include the following and be provided in the same section of the DPIR:

- (i) Assessing Parcel identification number*
- (ii) Address*
- (iii) Ownership*
- (iv) Lot size*
- (v) Gross building area*
- (vi) Occupancies/tenancies in each building”*

Response

Chapter 2, *General Information and Regulatory Context* of this DPIR presents information on the Project Site, including ownership.

Comment S.10

“The Proponent must provide more details with respect to the affordable housing component of the Proposed Project, which must comply with the Mayor's Executive Order relative to the inclusionary Development Policy.”

Response

The Proponent will comply with the Mayor’s Executive Order which established the Inclusionary Development Policy where developers must provide 15 percent of the market rate units as affordable units, which equates to approximately 13 percent of the total units. Refer to Chapter 1, *Project Description*, 1.4.1.2 *Affordable Housing*, of this DPIR for additional information.

Comment S.11

“The DPIR must include complete analysis of the following Proposed Project Alternative in addition to similar analysis of the Proposed Project as proposed in the PNF. ...

1. *A description of the alternative to the Proposed Project that was considered shall be presented and the primary differences between the alternative, particularly as it may affect environmental conditions, shall be discussed."*

Response

Chapter 1, *Project Description* describes the project alternatives considered and evaluated in this DPIR.

Comment S.12

"The Proponent shall include descriptions of proposed public benefits including but not limited to the following categories:

1. *Anticipated Employment Levels*
 - a. *Estimated number of full-time, long-term construction jobs created by the Proposed Project's construction.*
 - b. *Estimated number of permanent jobs created by the Proposed Project.*
2. *Workforce Development Plan*
 - a. *The Proponent is expected to provide a workforce development plan and needs assessment for the Proposed Project.*
 - b. *The Proponent shall describe the efforts it will undertake to ensure that an appropriate share of new jobs and construction jobs will be filled by Boston residents.*
3. *Public Facilities*
 - a. *The Proponent shall include space in the Proposed Project to provide District A-1 Police Station parking to replicate the forty-two (42) spaces removed from the New Sudbury Street and Bowker Street.*
4. *Other Community Benefits*
 - a. *The Proponent shall include a list and description of other potential community benefits to be provided.*
5. *Implementation of Community Benefits*
 - a. *The Proponent shall include a preliminary schedule outlining community benefits for each component of the Proposed Project. The ultimate nature and timing of the contemplated community benefits will be memorialized in a Cooperation Agreement between the BRA and the Proponent."*

Response

Chapter 1, Project Description, Section 1.4, *Community Benefits* of this DPIR provides a summary of community benefits, including information regarding the proposed Workforce Development Plan, impact fee payment, and timing of benefits. The area for the proposed replication of the forty-two (42) police parking spaces is identified on Figure 1.6.

Comment S.13

“A daylight analysis for both build and no-build conditions shall be conducted by measuring the percentage of skydome that is obstructed by the Proposed Project building(s) and evaluating the net change in obstruction. If alternative massing studies are requested or result as part of the Article 80 development review process, daylight analysis of such alternatives shall also be conducted for comparison. The study should treat three elements as controls for data comparisons: existing conditions, the 'as-of-right' (defined in this case as the applicable general area zoning), and context examples. The areas of interest include New Sudbury, Congress, Bowker, and New Chardon streets, and the Southbound Surface Artery, as well as the proposed continuation of the Canal Street corridor. Daylight analyses should be taken for each major building facade fronting these public ways. The midpoint of each public accessway or roadway should be taken as the study point. The BRADA program must be used for this analysis.”

Response

By removing the large portion of the Garage that currently covers Congress Street creating a tunnel effect; the Project will improve the amount of daylight that penetrates through the Project Site. Removal of this portion of the Garage will provide a substantial community benefit in terms of daylight at the Project Site and is consistent with the City’s plans for this area. Chapter 5, *Environmental Protection* of this DPIR presents a full assessment of changes to daylight as a result of the Project.

Comment S.14

“The Project shall take into account as strict height limits the FAA limits as defined by Massport's Logan Airspace Map, should the bounds impact the Project Site.”

Response

The Project is within the height limits, as defined on Massport’s Logan Airspace Map. Figure 1.1 shows the approximate location of the Project Site. At this location, Massport shows allowable heights between 725 and 775 feet.

Comment S.15

“The Proposed Project should meet the 'performance standard' of generally having a lesser degree of environmental impacts than either the full 'as-of-right' build-out or existing conditions, whichever are most impactful. I.E., criteria such as daylight, shadows, and wind should be at least neutral or improved on average, recognizing that some elements or points may be worse, but proving that the whole is better as a Project. We will expect in fact that mitigations or positive urban benefits will result from this Project and in balance far outweigh any negative impact.”

Response

Chapter 5, *Environmental Protection* of this DPIR provides a comparison of the previously proposed project presented in the PNF and the revised project presented in this DPIR (as the “as-of-right” build condition consistent with the future zoning for the Greenway District). Overall, the revised Project generally results in a lesser degree of environmental impacts than the previously proposed program as presented in the PNF. While the Project may result in an increase in traffic or greater extent of shadows for periods of time compared to the existing Garage, the improved condition of the Project Site as a result of the redevelopment far outweighs the negative impacts.

Comment S.16

“The highest building elements generally should be as separated from each other as possible. They should also be as varied in height (600' seems appropriate as a high point) and architectural treatment, including shaping, as possible, yet be of a family- just a very interesting one. No two should read as one, nor should (now including the base) the aggregate west parcel read as one. Where desirable to create an emphasis or signify major program entry, the high elements could come straight down to the ground...but only if wind conditions permit such; generally the high elements should not be right at edges, particularly those that may impact lower adjacencies. Again, variation in this rule is key.”

Response

As described in Chapter 3, *Urban Design* of this DPIR, it is the intent of the current scheme to create a diversity of buildings while being of a family. A diversity of heights is maintained along with variation. In addition, each building of the proposed redevelopment will need to go through its own individual Article 80 Large Project Review in the future, at which time the architecture and design of that specific building will be advanced further and presented again to the community and the BRA.

Comment S.17

“The most active ground floor program elements (local retail, entry to the MBTA, restaurants) should be not only retained but enhanced as a positive element of the Project, with entries possibly on all sides. A hierarchy of such uses should be considered, with most uses augmenting strong pedestrian corridors, but some uses encouraging the use of new connections as well. The initial diagrams and studies are promising in this regard. Transparency and views into the uses must be maximized on each frontage. Expand upon your idea of incorporating bicycle stations into the Project...both public and private.”

Response

Figure 1.6 shows the updated ground floor plan, which reflects improvements to the proposed pedestrian plaza on the East Parcel. Key improvements include widening of the plaza to further enhance the quality of the space and enlarged Haymarket MBTA bus facility platforms for better functionality. In addition, the Proponent has consulted the BRA’s draft Greenway Overlay District list of ground-level uses (Appendix A of Article 49A) and will aim to incorporate such uses to be consistent with the BRA’s goals for activating the ground-level spaces throughout the District.

Regarding bicycle stations, the Proponent has proposed both a 850-space bicycle parking facility on the West Parcel for employees and residents and a new Hubway Station on the East Parcel.

The 850-space bicycle parking facility will be accessible from Congress Street/Merrimac Street. Showers and changing rooms will also be associated with the bicycle parking facility. The Proponent will also be seeking a bicycle vendor or store that would potentially co-locate and/or manage the bicycle parking facility. At 850 bicycle parking spaces this would be the largest bicycle parking facility in the City of Boston. Currently planned as a private bicycle facility for on-site users, the Proponent will explore opening up the facility to off-site patrons as well.

The Hubway Station will be located on the south/southeast corner of the East Parcel, allowing both Haymarket Station Bus riders and Subway Riders easy access to the Hubway Station while also minimizing bike/pedestrian conflicts on the new East Parcel Plaza. The Proponent will work with the City of Boston and Hubway to determine the appropriate scale and size of the Proposed Hubway Station. Also, as noted in the PNF, the Proponent has committed to providing this Hubway Station with Phase 1 of the Project. The Proponent will work with the City of Boston and Hubway to temporarily relocate the Hubway station, as necessary, during the demolition of the eastern portion of the Government Center Garage and the construction of the East Parcel buildings.

In addition, to the 850-bicycle parking facility and the new Hubway station, the Proponent will be incorporating exterior short term bicycle parking facilities, where

appropriate, around the site. These short term facilities will be incorporated as each Phase of the project advances and their locations will be reviewed with the BRA.

Comment S.18

“Multiple upper story uses are accordingly encouraged to enliven the streets with a diversity of activity throughout the day. This also implies variation in the type of office and residential spaces; vary also the residential units and provide a robust mix including units that are sized for families.”

Response

Overall, the Project incorporates a mix of uses, including apartments, condominiums, hotel, office and ground-floor retail uses. In addition, there is second-story retail on the East Parcel. This mix of uses will encourage a sustained and diverse level of activity throughout the day, evenings and weekends. Also, the majority of the ground-/street-level is dedicated to active retail uses or lobby entries to the proposed buildings achieving a more continuous and active street front than currently exists.

The Project calls for variety in unit mix as well as office floor plates. As mentioned in the PNF, the two proposed residential buildings (WP-B1 and WP-B3) on the West Parcel will have a range of unit types, including micro-units, studios, one bedroom, two bedrooms and three bedrooms. Smaller units will line the existing garage, hiding it from view providing a more active and dynamic street corridor on both New Sudbury and Congress Streets. As the residential buildings rise above the Garage, larger units (including two bedrooms and three bedrooms) will be added in. As for the office building on the West Parcel, the lower floors along New Chardon Street, which wrap the north side of the Garage are smaller floorplates until they also get above the Garage where they become larger. This variety will help encourage a diversity of tenants for this building.

The East Parcel will have a hotel/condominium building (EP-B1) and a signature retail building (EP-B3) both of which will bring 18/7 activity to the new public plaza. The condominium portion of WP-B1 will also include larger residential units. The office building on the East Parcel (EP-B2) will have smaller floor plates than typical Boston office buildings, but large enough with unique views and a very active location that will be very attractive to office tenants particularly in the design and high-tech industries.

Overall, the design and layout of the Project was envisioned from the street level up, to ensure the end result was vibrant active blocks not only at the street level but also along the floors above. As each Project Component is advanced through individual Article 80 Large Project Review, the unit mix, floor plate sizes and ground-floor uses, and any potential refinements, will be presented again to the community and the BRA.

Comment S.19

“Above-grade garage floors should be covered as shown in the PNF's podium treatment, with program uses on all sides. Treatment of any directly visible portions of the garage should be of a high architectural character with robustly convincing detail. Necessary service and vehicular access functions should not occur directly, or at least be minimized, on Sudbury, Congress or New Chardon streets.”

Response

The above-grade garage will be fully faced by program uses on New Sudbury, Congress Street and New Chardon Streets. However, a portion of the façade on Bowker Street will not be covered.

Major service and parking entries are located on Bowker Street. The project is situated in an urban area with multiple buildings. Where service functions are provided on other locations, the aperture of such areas will be minimized and architectural treated.

Comment S.20

“Open Space as a resource, at a minimum for the residential component but also for the public, needs to be placed on the site. There are some suggestions- extensive green roofs (which could relate directly to some of the program uses), the treatment of the eastern parcel passages, some potential thinking about the corners on Bowker and at Merrimac and New Chardon. But these are more streetscape enhancements. If no public space can be accomplished on site, consider a substantial contribution to one nearby. The old Cook+ Fox competition design featured a series of green roofs which, seen from a birds'-eye view, seemed to cascade down to the Greenway as though the parks were ascending into the skies. This is a potentially evocative concept which should be researched and expanded upon, if feasible, in the DPIR submission. Any public or semi-public green roof space should have its presence also visibly signaled from the street- a feature lacking, for example, on the Cambridge Center garage roof garden.”

Response

The Project will add a significant amount of usable open space where currently little exists today, specifically:

- An approximate 18,000 square foot public plaza on the East Parcel that will provide a significantly improved pedestrian connection between Canal Street and the North End Greenway Parks and the Market District along Congress Street. This plaza, appropriately shielded by new buildings from the adjacent Haymarket Bus Station and Congress Street, will have new ground level retail uses, outdoor seating opportunities, incorporate the existing Haymarket Station entrance and have a mix of uses (hotel, office, residential) which will provide

18/7 activity in an area of the city that is dominated by 9 AM to 5 PM government uses. (Note: Based on community input this public plaza was also increased from the PNF submission to this DPIR submission. This increase was achieved through expanding the width of the proposed plaza around the existing Haymarket Station subway entrance. This will provide for additional seating areas and public circulation space in the proposed plaza.)

- The West Parcel will incorporate a spacious new landscaped roof deck area that will be shared and utilized by the three West Parcel buildings. This area is currently being programmed into zones for the future tenants and employees of these West Parcel Buildings. The ability to create this extensive amount of usable open space roof area is unique in the City of Boston. This will allow the Proponent to provide open space to its residents and tenants in the urban core of Boston which traditionally relies upon only public open space for area residents and employees.
- The East Parcel hotel and office buildings will also be incorporating roof decks and terraces, allowing hotel guests and employees additional open space opportunities. With the lower height of 157 feet on the hotel/condo building, the hotel building and office building are now both shown to be stepping down from the Bulfinch Triangle to the North End Parks, creating a series of green roof terraces.
- The Proponent will be reconstructing all major road segments around the site which include new streetscape, landscaping and lighting improvements.
- The Project will also be contributing 1% of hard construction costs, by phase, to the BRA. Through these funds, the Project could enhance or expand existing parks in the surrounding neighborhoods.

Overall, the Project is incorporating a significant amount of open space, in excess of 50,000 square feet of plaza and roof deck areas. This is significantly more than most recent development projects in the City of Boston, many of which have provided little or no additional open space in the very dense urban core of Boston.

Comment S.21

“Street edges and new sidewalks created as a result of any version of the Proposed Project must conform to all applicable standards and be appropriately sized to bear pedestrian traffic peaks. Street trees and plantings should be included in site plans. Pedestrian paths in general should be reinforced, building multiple pathways through the site, and through the buildings themselves where possible. Future connections should be considered, as well as existing elements such as so-called Brattle Path. Improve to the maximum extent the pedestrian nature of Bowker Street, so that it becomes more active and usable as a connector.”

Response

All street edges and sidewalks surrounding the Project Site will conform to Boston Complete Streets standards. The updated public realm plan (Figure 3.5) shows street trees and plantings.

The condition of Bowker Street will be improved by the creation of retail at the base of the office building, streetscape improvements (i.e. lighting, landscape) and landscape improvements at the pedestrian connection between Bowker Street and New Sudbury Street. Given the existing garage will remain it is not feasible to provide additional pedestrian connections through the West Parcel.

Comment S.22

“The architectural expression of the tower elements should be clarified. They should be differentiated, and shaped as part of the skyline, but of the same family. Consider the view studies requested in the list of materials later to achieve a massing and orientation which begins to break the scale of the towers and podium elements down to that of the appropriate scale-giving datum elements in the area. This effect will be most noticeable from the intermediate range of direct views, including views from nearby neighborhoods and from both directions along the Greenway/North Washington Street and Cambridge/Tremont streets.”

Response

The office building (WP-B2) has been set back an additional 20 feet from Bowker Street with a total setback of 50 feet allowing for a generous buffer with the adjacent block to the west.

The architectural expression of the project is intended to be highly contemporary in nature. The Project will create six individual buildings in addition to the remaining portion of the Garage. In keeping with the general context of the surrounding neighborhood each building will have its own address, identity and direct pedestrian entrance from the street. It is the intent of the development to develop individual architectural expression for each of the buildings while maintaining a holistic composition. The massing geometries of the proposed vision respond to the desirelines that are often acute from one another as well as the development seen from various neighborhoods and important distant views. The acute geometry of sites produces unique buildings in Boston that are not regularized shapes. The Project Site is organized into two blocks: East Parcel and West Parcel. West Parcel is unified by the base podium on which the three buildings sit. The scale of the buildings on the east parcel is in keeping with the scale of Bulfinch Triangle and Blackstone Block. However, the architectural expression of the block as it attempts to reconnect multiple districts will reflect the qualities of these districts while maintaining a contemporary aesthetic.

The Proponent and its Architect have further evaluated the shaping of the tower elements. In particular, the office building (WP-B2) will be shaped further and has also been set back further from Bowker Street, allowing for a more generous buffer with the adjacent block to the west. In addition, the Proponent has created the views as required later in the Scoping Determination and will use them to continue to evaluate the shaping of the proposed office building (WP-B2). Some preliminary shaping concepts for the office building (WP-B2) are presented in the DPIR. Also, it is important to note, that each of the proposed buildings will go through its individual Article 80 Large Project Review, at which time the shape and design of each building will be further refined and presented to the BRA and community in greater detail.

Comment S.23

“The architectural expression of the podium elements should partake of the tower elements to connect the two vertically. Differentiation by programming elements (office, residence, hotel, etc.) lends itself to this effort, while possibly breaking up the podium wall. To accomplish this latter, try to push inward on the podium to add a convincing variety of depth to its edges. Go beyond the preliminary PNF drawings, maintain at least the quality of materials indicated therein, mark this space in the City as an important connection, add a visual playfulness to any contextual references, and break the deadening effect of the current Garage's high mass.”

Response

As described in Chapter 3, *Urban Design*, the updated design reflects the desired architectural expression of the podium elements. In addition, this would be further refined and updated as each Project component goes through its individual Article 80 Large Project Review.

Comment S.24

“The Project continues to feel too dense, crowded, despite the revision downward from the 2009 version, and exceeds the guidelines. In this instance, lower the overall density by about 10% and increase both the variation in height and the program of the Project elements to maximize separation and light and air from multiple viewpoints.”

Response

As presented in this DPIR, upon receiving comments from both the community and the BRA, the Proponent has agreed to lower both the height and density of the Project overall. Specifically, the Proponent has lowered the proposed 600-foot office building on the West Parcel (WP-B2) to 528 feet (a 12 percent reduction) and also lowered the proposed 275-foot proposed hotel/condominium building (EP-B1) to 157 feet. In addition, the overall proposed square footage of new uses has been

reduced by approximately 122,000 gross square feet. Combined, these changes will lessen the overall impacts of the Project, as demonstrated in this DPIR.

Also, the Proponent has changed the overall phasing of the Project with the goal of realizing the key public benefit of the removal of the Garage over Congress Street sooner. The demolition of the eastern portion of the existing garage has been moved up to Phase 2A. This change in phasing will allow the construction impacts of the garage demolition to be complete prior to the majority of the proposed buildings coming online.

Comment S.25

“Assume the ability to capture the sidewalk parcels on the eastern parcel and study lower heights of the buildings proposed to bring across the sense of scale of the Bulfinch Triangle District. Vary that between 100' and 150', with the lower element toward the Greenway.”

Response

As presented in Chapter 1, *Project Description* of this DPIR, the East Parcel condo/hotel building (EP-B1) has been lowered from 275 feet to 157 feet. . The hotel/condo building and office building, now similar in height, both stepped down in height towards the North End Greenway Parcels. Also, the third retail building is approximately 60' feet in height. Combined these three buildings have an appropriate sense of scale and create a height transition by stepping down from the Bulfinch Triangle to the Parcel 7 Garage.

Comment S.26

“Maintain a robust through-block connection. To the maximum extent possible, provide publicly accessible exterior, interior and/or rooftop spaces. We ask that the infrastructure (MBTA, i.e.) constraints in particular be studied to clarify any limitations for the lower eastern parcel elements as well. To these ends, study more closely the 'special retail' pavilion to define its role. Consider making it more a special element in open space. Such an element and its attendant spaces should enhance qualities of year-round usability, light and airiness, plantings and greenery, and open invitation and sense of welcome to the public as an essentially public space, and not merely a forecourt for the building lobbies. You are directed also to study an alternative which removes this as an occupied structure completely, in favor of open space. The spaces must function as a public sidewalk 24 hours a day...or with no more limitations than the current spaces have.”

Response

Figure 1.6 shows the updated ground floor plan, which reflects improvements to the proposed pedestrian plaza on the East Parcel. Key improvements include widening of the plaza to further enhance the quality of the space and enlarged Haymarket

MBTA bus facility platforms for better functionality. The Proponent will continue to evaluate creating more public open space, including an alternative that replaces the retail building (EP-B3) with additional open space. In either alternative, the new public pedestrian plaza will function as a public sidewalk 24 hours a day and seamlessly integrate both with the Haymarket bus station and entrance/exit to the subway station below.

Comment S.27

"The proposed phasing daylights Congress Street late in the Project's execution arc, leaving the least dense and most complex, public parcel (the east, just discussed) for last. Modify the proposed phasing so that this is accomplished earlier, preferably right after completion of the first phase. Complete work on the eastern parcel before the western is in its final phase."

Response

The Proponent has heard from several community groups voicing concerns over the timing of when the eastern portion of the existing garage structure would be demolished given the overall project timeframe of 15-20 years stated in the PNF. Given these concerns the Proponent has agreed to the following:

1. Move up the demolition of the garage from Phase 3A to Phase 2A,
2. Commit to a demolition start date no later than 1st quarter of 2023 for the eastern portion of the garage,
3. Proponent would be prohibited from obtaining a certificate of occupancy for any new proposed buildings, except for the Phase 1A building (Apartment Building), until demolition of the eastern portion of the existing garage structure is substantially complete or well underway.

This is a material change in the project phasing, which will bring the public benefits sooner to the overall community. Also, it has the additional benefit of demolishing the garage before the majority of density is brought on-line which should further mitigate construction impacts to the area.

Comment S.28

"The Proposed Project includes edge sliver parcels not currently under control of the redeveloper. Define these edges and ownership. Evidence of the team's ability to procure these parcels must be submitted."

Response

Refer to Chapter 2, *General Information and Regulatory Context* of this DPIR for detailed information on the Project Site, including ownership.

Comment S.29

"Proposed Project's schematic design must be submitted for the DPIR.

1. *Written description of program elements and space allocation (in square feet) for each element, as well as Project totals.*

Response: Provided in this DPIR.

2. *Neighborhood plan, elevations and sections at an appropriate scale (1"=100' or larger as determined by the BRA) showing relationships of the proposed project to the neighborhood context:*
 - a. *massing*
 - b. *building height*
 - c. *scaling elements*
 - d. *open space*
 - e. *major topographic features*
 - f. *pedestrian and vehicular circulation*
 - g. *land use*

Response: The items are provided in the DPIR. Please refer to the figures provided in Chapter 3, *Urban Design* as well as Appendix H.

3. *Color, or black and white 8"x10" photographs of the site and neighborhood.*

Response: Numerous existing site photographs are provided in Figure 1.5 and in Appendix H.

4. *Sketches and diagrams to clarify design issues and massing options.*

Response: Please refer to Chapter 3, *Urban Design* of the DPIR for diagrams outlining the proposed massing.

5. *Eye-level perspective (reproducible line or other approved drawings) showing the proposal (including main entries and public areas) in the context of the surrounding area. Views should display a particular emphasis on important viewing areas such as key intersections, pathways, or public parks/attractions. Some of these viewpoints may have already been suggested and used in presentations to the public: north and south along the Greenway and the Merrimac/Congress Street corridor, from City Hall Plaza, from the Longfellow Bridge, Science Museum, and Zakim Bridge, from adjacent residential neighborhoods (Beacon Hill, West End, North End,) from the Public Garden, from Memorial Drive, from the Harbor, et al. Long-ranged (distanced) views of the proposed project must also be studied to assess the impact on the skyline or other view lines. At least one bird's-eye perspective should also be included. All perspectives should show (in separate comparative sketches) at least both the build and no-build conditions; any alternatives proposed should be*

compared as well. The BRA should approve the view locations before analysis is begun. View studies should be cognizant of light and shadow, massing and bulk.

Response: Please refer to Chapter 3, *Urban Design* and Appendix H of the DPIR for the requested eye-level and birds-eye representations.

6. *Additional aerial or skyline views of the project, if and as requested.*

Response: An updated aerial view has been provided as Figure 3.4 of this DPIR.

7. *Site sections at 1"=20' or larger (or other scale approved by the BRA) showing relationships to adjacent buildings and spaces.*

Response: A site section has been provided in Appendix H.

8. *Site plan(s) at an appropriate scale (1"=20' or larger, or as approved by the BRA) showing:*

- a. *general relationships of proposed and existing adjacent buildings and open spaces*
- b. *open spaces defined by buildings on adjacent parcels and across streets*
- c. *general location of pedestrian ways, driveways, parking, service areas, streets, and major landscape features*
- d. *pedestrian, handicapped, vehicular and service access and flow through the parcel and to adjacent areas*
- e. *survey information, such as existing elevations, benchmarks, and utilities*
- f. *phasing possibilities*
- g. *construction limits*

Response: Please refer to Chapter 3, *Urban Design* and Appendix H of this DPIR for proposed design information.

9. *Massing model (ultimately in basswood) at 1":40'0" for use in the Authority's Downtown Model*

Response: The Project Architect will prepare the requested massing model.

10. *Study model at 1" = 16' or 1" = 20' showing preliminary concept of setbacks, cornice lines, fenestration, facade composition, etc. Such a model would be most helpful in investigating the east parcel, as well as any publicly accessible green roof area.*

Response: The development being a master plan project, at this stage will not have the detail required to develop a model to a 1" = 16' or 1" = 20' scale. These models will be provided during the Article 80, Large Project Review of the individual Project Components.

11. *Drawings at an appropriate scale (. 1":32'0", or as determined by BRA) describing architectural massing, facade design and proposed materials including:*
 - a. *building and site improvement plans*
 - b. *neighborhood elevations, sections, and/or plans showing the development in the context of the surrounding area*
 - c. *sections showing organization of functions and spaces, and relationships to adjacent spaces and structures*
 - d. *preliminary building plans showing ground floor and typical upper floor(s).*
 - e. *phasing, if any, of the Proposed Project*

Response: Figures presented in Chapter 3, *Urban Design* and Appendix H address the plans and sections requested here in 11 by 17 formats. The development, being a master plan project at this stage, has not been developed to a schematic design stage and will not have the detail to develop drawings to 1" = 32'. These drawings will be provided during the Article 80 process of individual Project components.

12. *A written and/or graphic description of the building materials and its texture, color, and general fenestration patterns is required for the proposed development.*

Response: Please refer to Chapter 3, *Urban Design* and Appendix H of this DPIR for proposed design information.

13. *Electronic files describing the site and Proposed Project at Representation Levels one and two ("Streetscape" and "Massing") as described in the document Boston "Smart Model": CAD & 3D Model Standard Guidelines.*

Response: This information will be provided to the BRA under separate cover.

14. *Full responses, which may be in the formats listed above, to any urban design-related issues raised in preliminary reviews or specifically included in the BRA seeping determination, preliminary adequacy determination, or other document requesting additional information leading up to BRA Board action, inclusive of material required for Boston Civic Design Commission review.*
15. *Proposed schedule for submission of all design or development-related materials.*
16. *Diagrammatic sections through the neighborhood (to the extent not covered in item #2 above) cutting north-south and east-west at the scale and distance indicated above.*
17. *True-scale three-dimensional graphic representations of the area indicated above either as aerial perspective or isometric views showing all buildings, streets, parks, and natural features."*

Response

The majority of the above comments are addressed in the report graphics provided in this DPIR presented as 11x17 sheets. The Project, being a master plan project at this stage, has not been developed to a schematic design stage and does not yet have the level of detail to develop drawings at the various scales requested. These more

detailed drawings at the specific scales will be provided during the Article 80, Large Project Review process of individual Project Components.

Comment S.30

“In addition to the comments and scoping by others, the Proponent is directed to conduct a specific shadow analysis for the specific time range of any new impacts on the Greenway Parks...in other words defining rough extent and duration in terms of hours and time of year. Give particular attention to the period from March 21 to October 21. If overall duration is greater than one hour, provide an overlap study which defines any area impacted by shadows for a period greater than one hour. Include less detailed impact duration studies, if applicable, for other open spaces in the area, including City Hall Plaza, Cardinal Cushing Park, and the park behind the Brooke Courthouse. All net new shadows shall be defined as outlined elsewhere either by darker tone or color and shall be clearly shown to their full plan extent, whether on street, park, or rooftop. Provide a full range dawn-to-dusk continuous shadow animation in electronic format. Shadow impacts for each phase are not necessary to study, as the final condition will have the accumulated impacts.”

Response

Consistent with Boston Environmental and Energy Services’ comments (Letter 25), hourly shadows have been studied for every daylight hour of every month of the year. In addition, Rose Kennedy Greenway shadows have been provided for every 15 minutes. Appendix B of this DPIR includes this comprehensive shadows study. Shadows have been updated for the revised Project (presented in Figures 5.1a-5.1p). Figures 5.2a-5.2o illustrate the changes in shadows compared to the PNF project and, as requested above, an overlap study has also been provided (shown on Figure 5.2p). An animation of shadows on Rose Kennedy Greenway for July 21st will be provided within two weeks of the filing of this DPIR.

Comment S.31

“Regarding wind, all wind tunnel test points shall be approved by BRA staff before conduction of testing. Wind analysis may be requested at points within several blocks of the property(ies) in question; where contiguous to open space, analysis may extend to likely bounds of no impact, possibly to the limits of the wind tunnel (the Greenway and City Hall Plaza fall into this category). Analysis of results and effective mitigation shall be presented in the DPIR using diagram methodology so that the delta or changes manifested by the project relative to existing or as-of-right conditions...again, whichever provides the higher base impacts...are clearly understood. Given the significant active spaces and interaction proposed by the Project, the Proponent is encouraged to expand upon the thinking contained in the PNF that uses the notion of shaping or detailing buildings to reduce localized impacts on heavily used or enjoyed spaces; such a detailed study would benefit the Project and advance that discussion in Boston generally.”

Response

The wind study results are presented in Chapter 5, *Environmental Protection* of this DPIR. Wind sensor locations were reviewed and approved by the BRA on July 2, 2013. The wind study results included in this DPIR are based on these previously approved wind sensor points.

Comment S.32

“The discussion of Proposed Project impacts on infrastructure systems should be organized system-by-system as suggested below. The applicant's submission must include an evaluation of the Proposed Project's impact on the capacity and adequacy of existing water, sewerage, energy (including gas and steam), and electrical communications (including telephone, fire alarm, computer, cable, etc.) utility systems, and the need reasonably attributable to the proposed project for additional systems facilities.”

Response

Chapter 6, *Infrastructure* of this DPIR discusses the Project's impacts on water, sewer, energy and telecommunication systems.

Comment S.33

“Any system upgrading or connection requiring a significant public or utility investment, creating a significant disruption in vehicular or pedestrian circulation, or affecting any public or neighborhood park or streetscape improvements, comprises an impact which must be mitigated. The DPIR must describe anticipated impacts in this regard, including specific mitigation measures, and must include nearby Proposed Project (i.e. the four approved Bulfinch Triangle Parcels, Harbor Garage, Nashua Street Residences, Garden Garage, Lovejoy Wharf, et al.) build-out figures in the analysis. ”

Response

The Project Team has met with the major energy providers (NSTAR, National Grid, and Veolia) to discuss the project. The energy providers have affirmed their system availability adjacent to the site and have respectively acknowledged their on-going planning concerning new development projects not just in the area surrounding the Project, but also in Boston/Cambridge as a whole. No utility provider has identified specific utility-related projects that would be required to service the Project, particularly given the time horizon for full-build. Chapter 6, *Infrastructure* of this DPIR describes the utility infrastructure available at the Project Site.

Comment S.34

“Utility Systems and Water Quality

- a. Estimated water consumption and sewage generation from the Proposed Project and the basis for each estimate. Include separate calculations for air conditioning system make-up water*
- b. Description of the capacity and adequacy of water and sewer systems and an evaluation of the impacts of the Proposed Project on those systems; sewer and storm drain systems should include a tributary flow analysis as part of this description*
- c. Identification of measures to conserve resources, including any provisions for recycling or 'green' strategies, including green roofs and recharging*
- d. Description of the Proposed Project's impacts on the water quality of Boston Harbor or other water bodies that could be affected by the Project, if applicable*
- e. Description of mitigation measures to reduce or eliminate impacts on water quality*
- f. Description of impact of on-site storm drainage on water quality*
- g. Information on how the Proposed Project will conform to requirements of the Ground Water Trust under Article 32, if applicable, by providing additional recharge opportunities*
- h. Detail methods of protection proposed for infrastructure conduits and other artifacts, including the MBTA tunnels and station structures, and BWSC sewer lines and water mains, during construction*
- i. Detail the energy source of the interior space heating; how obtained, and, if applicable, plans for reuse of condensate.”*

Response

Chapter 6, *Infrastructure* of this DPIR provides water and sewer estimates, discussions concerning system capacities, water quality improvement measures as well as other requested information.

The Project is not subject to the requirement of Article 32. However, the Project will be consistent with the objective of Article 32 requirements to improve or maintain groundwater elevations.

Upon detailed design of the individual Project components, the Proponent will work with the MBTA and BWSC to develop infrastructure protection requirements. Displacement mats will be used over the tunnels, utilities and lateral support as required.

The interior space heating source of energy will be finalized in conjunction with the development of each project component. At this time the Proponent has consulted with both National Grid and Veolia, both of whom have infrastructure adjacent to the Project Site.

Comment S.35

“Energy Systems

- a. Description of energy requirements of the project and evaluation of project impacts on resources and supply*
- b. Description of measures to conserve energy usage and consideration of the feasibility of including solar energy provisions or other on-site energy provisions, including wind, geothermal, and cogeneration.”*

Response

Chapter 6, *Infrastructure* of this DPIR outlines the Project’s energy requirements and Chapter 5, *Environmental Protection* outlines measures to conserve energy and produce renewable energy.

Comment S.36

“Any other system (emergency systems, gas, steam, optic fiber, cable, etc.) impacted by this development should also be described in brief. The location of transformer and other vaults required for electrical distribution or ventilation must be chosen to minimize disruption to pedestrian paths and public improvements both when operating normally and when being serviced, and must be described. Storm drain and sewage systems should be separated or separations provided for in the design of connections.”

Response

Separate storm drain and sanitary sewer connections will be provided in accordance with BWSC requirements. Transformer locations will be chosen to minimize disruption to pedestrian paths and other public improvements.

Comment S.37

“The balance of the notion of ‘embedded energy’ as balanced with the long-term energy savings proposed by this Project should be discussed. The Proponent should investigate energy strategies that take advantage of this scale of construction, including those that incorporate green roof strategies as well as solar orientation and materials/systems that maximize efficiencies, daylighting strategies, wind and geothermal systems, and cogeneration. Some interesting diagrams of the building systems considered as infrastructure are included in the PNE; this thinking should be expanded.”

Response

A key objective of the Project is maintaining a substantial portion of the garage structure intact and in use, which results in a significant savings in embodied energy

and materials. Keeping half the existing garage structure significantly reduces the need for raw materials and associated energy to transport new materials and rebuild the Garage in addition to reducing the amount of construction waste created in demolition. As illustrated in Figure 4.11 of the PNF, this equates to over 468 million BTUs of energy, or over four million gallons of gasoline. As each Project component advances, the Proponent will further evaluate energy strategies for the component and the overall Project.

Comment S.38

“The Proponent shall demonstrate that the MBTA transit system has sufficient existing capacity to address the ridership demand associated with the Proposed Project as defined by the trip generation analysis prepared by the Proponent's transportation consultant and included in the PNF.”

Response

A discussion of transit impacts is presented in Section A2.3.2.6 of the PNF and further discussed in Chapter 4, *Transportation and Parking* of the DPIR. These statistics are based on currently published MBTA ridership data. Also, please note the following key items:

- The Proponent has added an additional 10 feet of width/depth of waiting areas for the Haymarket Bus Station. In addition, per the request of the MBTA, the Proponent is also providing space for Charlie Card Pay Stations.
- With the reduction in the DPIR program by approximately 122,000 GSF and additional shifting of office use to residential use, the overall Project transit trips during the AM and PM peak hours will decrease by about 7 percent and 9 percent, respectively.
- Updated DPIR analysis by the Project's transportation engineer, Howard Stein Hudson, of the additional MBTA riders during peak hours added by the proposed Project continues to show that the MBTA subway lines and the existing platforms at Haymarket Station can accommodate the additional MBTA riders.
- Long-term service planning is undertaken by the Central Transportation Planning Staff (CTPS) whose ridership forecast models include all potential development in the downtown core. These transit ridership forecasts include the Bulfinch Triangle/North Station area development projects that are either recently completed, currently under construction, or in the permitting and planning stages, including the redevelopment of the Government Center Garage.
- The Proponent has held on-site meetings with Director of Bus Operations and Deputy Director of Bus Operations to discuss design plans for the reconfiguration of the bus way including MBTA requested improvements and construction related impacts to passengers and pedestrians..

- ▶ The Proponent has also met with Subway Operations/Light Rail Operations and all supporting departments to provide a project overview including scope of work and schedule. The meeting included discussions with each department to answer specific questions and concerns.
- ▶ Coordination meetings with MBTA Bus Operations and MBTA Subway Operations/Light Rail Operations will continue during the design and construction phases.

Comment S.39

“The Proponent will have to execute a Transportation Access Plan Agreement ("TAPA") with BTM as each Proposed Project component moves forward, which will codify the specific measures, mitigation and agreements between the Proponent and BTM. The Proponent shall be responsible for all costs associated with mitigation efforts including, but not limited to design and engineering, construction, and inspection”

Response

As individual Project Components are further developed through the Article 80, Large Project Review process, the Proponent will work with BTM develop appropriate mitigation and transportation demand management (TDM) measures appropriate for each building and/or land use. The proposed mitigation and TDM measures will be presented in each individual PNF. Specific mitigation and TDM measures for each building or development phase will then be codified in the Transportation Access Plan Agreement (TAPA) as required for all developments subject to Article 80 Large Project Review.

Comment S.40

“Although the Proponent's presentations have included information regarding the proposed sequencing of the construction, the DPIR should include a specific narrative regarding the proposed sequencing of construction. The Proposed Project is described in the PNF as a multi-phased project. The Proponent should articulate the scope and construction timeframe of each phase. The Proponent needs to specify and explain the nature of the interim conditions.”

Response

Chapter 1, *Project Description* of this DPIR presents the revised project phasing plan. Chapter 5, *Environmental Protection* and Appendix E of this DPIR provide additional information regarding potential temporary construction impacts and detailed logistic plans by Project Component.

A more detailed Construction Management Plan (CMP) will be created and executed by the Proponent as each individual Project Component is advanced. Also, an asbestos containing material (ACM) study will be conducted by the Proponent prior to commencement of demolition of the eastern portion of the existing garage structure.

Comment S.41

“The Proposed Project consists of multiple buildings and accordingly the Proponent shall be required to submit separate LEED checklists, together with explanatory narratives demonstrating compliance with specific points. The Proponent shall also demonstrate that the Proposed Project will meet the requirements of Article 37 with appropriate supporting documentation and by certification from a LEED Accredited Professional.”

Response

The PNF presented a description of the comprehensive approach to sustainability for the Project, which includes obtaining LEED certification for all Project Components exceeding Article 37 requirements. As demonstrated by the preliminary LEED Scorecards provided in this DPIR (Figures 5.8a and 5.8b), the Proponent is focused on achieving LEED credits regarding the above mentioned categories where majority of these credits are marked “Yes” or “Maybe.” As the design of each Project Component progresses, individual LEED Scorecards will be developed specific to the uses and building users. These Scorecards and supporting credit descriptions will be presented as part of the future Article 80, Large Project Review for each Project Component.

Comment S.42

“The DPIR should include a discussion on how the Proponent intends to develop specific targets, or Key Performance Indicators (KPIs) of the proposed tracking system. KPIs may include setting an energy targets by building based on Energy Usage Intensity (EUI), potable water use reduction targets by building, a design standard of adequate recycling facilities for the various uses, and/or targets on the amount of waste recycled by building or use.”

Response

The ‘Sustainable Design/Green Building’ section of Chapter 5, *Environmental Protection* of this DPIR, builds on and provides an update to the ongoing sustainability design process by introducing the development of specific targets and metrics, and strategies in the form of a preliminary sustainability plan for the Project, such as an energy benchmarking and tracking system through the use of tenant sub-metering. These energy benchmarking and tracking strategies will be further detailed as each Project Component advances. Given the overall redevelopment will be built in phases over time, technologies and strategies may evolve.

Comment S.43a

“the following issues must be addressed:

- *emergency vehicle access to all new buildings as well as any existing buildings that might be affected-this requirement should be evaluated in light of traffic impacts caused by the Proposed Project on surrounding streets, alleys, and accessways;*
- *impact on availability and accessibility of hydrant locations for new buildings as well as any existing buildings that might be impacted;*
- *impact on availability and accessibility to connection locations for new buildings as well as for any existing buildings that might be impacted;*
- *impact that a transformer vault fire or explosion will have on the fire safety of the building(s), particularly as it relates to the location of the vault;*
- *need for Boston Fire Department permit requirements as outlined in the Boston Fire Prevention Code, the Massachusetts Fire Prevention Regulations 527 CMR, and the Massachusetts fire Prevention Laws (M.G.L. c. 148); and*
- *if the Proposed Project will include air-supported structures, the impact of the design on fire safety relative to the interaction of the area underneath the structure to the structure as well as to the interaction of the structure to the area underneath the structure.”*

Response

1. The Proponent will meet with Boston Fire Department (BFD) during the design of each Project Component to review emergency vehicle site access. With the deconstruction of the existing garage structure over Congress Street, access is expected to be improved. In addition, many of the proposed buildings have new pull-off areas, improving access and accessibility for emergency vehicles.
2. The Proponent will meet with BFD during the design of each Project Component to determine if hydrant access has been impacted.
3. The Proponent will coordinate with BFD to review siamese connection and fire command center locations.
4. The Proponent will evaluate impacts due to potential transformer vault incidents.
5. As listed in Table 2-2 of Chapter 2, *General Information and Regulatory Context* of this DPIR, the Proponent is aware of the need for a Fuel Storage Permit and will evaluate the need for additional BFD permits/approvals for each Project Component as design progresses.
6. The Project will be removing the air-supported structure over Merrimac Street. For any proposed air-supported structures, the Proponent will consider the impacts noted.

Comment S.43b

“The DPIR must address the comments from the Boston Public Works Department Commissions (“PWD”) included in Appendix A, and incorporated herein by reference and made a part of.”

Response

The Proponent has responded to the comments from the Boston Public Works Department Commission. See Responses to Comments Letter #22 below for specific responses.

Comment S.44

“In the DPIR, the Proponent must demonstrate that the Proposed Project does not encroach into any critical airspace surfaces, as defined by the FAA, and will not affect aircraft operations. In the DPIR, the Proponent must document the Proposed Project's compliance with the FAA's Obstruction Standards of Federal Aviation Regulations Part 77 relating to the safe and efficient use of navigable airspace by aircraft utilizing Logan International Airport and to the operation of air navigation facilities.”

Response

The Project is under the height limits as defined on Massport’s Logan Airspace Map and, therefore, will not pose a hazard to air navigation or encroach into any airspace surfaces. Each Project Component exceeding 200 feet in height, including construction cranes will be required to receive a determination of no impact from the Federal Aviation Administration (FAA). As the FAA determinations expire, the Proponent will file with the FAA on a phase-by-phase basis as the design of each Project Component progresses. These submittals will also outline the lighting proposed to comply with FAA requirements.

Comment S.45

“The Proponent must identify and delineate any and all property interests currently owned by others that it proposes to occupy temporarily or permanently as part of the Proposed Project's development and specify the process or procedure to acquire such property interests.”

Response

Chapter 2, *General Information and Regulatory Context* of this DPIR presents information on the Project Site, including ownership.

Comment S.46

“The Proponent must also identify any and all private third party rights and/or interests in the Proposed Project site that would be affected by the Proposed Project's development. These rights may include (but not be limited to): leases, easements, existing agreements, covenants, restrictions, and other encumbrances that may affect the Proponent's ability to construct the Proposed Project.”

Response

There are no private third party rights and/or interests associated with the Project Site.

Comment S.47

“In connection with the Proposed Project and its impact on the surrounding communities, the DPIR should include the Proponent's commitments with respect to a Proposed Project or component impact fee based upon the Urban Renewal formula of up to 1% of hard construction costs.”

Response

The Proponent is committed to pay the BRA an impact fee equal to one (1) percent of hard construction costs for each Project Component. Refer to Section 1.4.1.3 of Chapter 1, *Project Description* of this DPIR for additional information on the 1% impact fee.

BOSTON REDEVELOPMENT AUTHORITY
SCOPING DETERMINATION
GOVERNMENT CENTER GARAGE PROJECT
SUBMISSION REQUIREMENTS
FOR DRAFT PROJECT IMPACT REPORT

PROPOSED PROJECT: REDEVELOPMENT OF THE GOVERNMENT CENTER GARAGE

PROPOSED PROJECT SITE: 50 NEW SUDBURY STREET, GOVERNMENT CENTER, BOUNDED BY NEW CHARDON STREET TO THE NORTH, SURFACE ROAD AND RAMPS TO 1-93 TO THE EAST, SUDBURY STREET TO THE SOUTH, AND BOWKER STREET TO THE WEST

PROPONENT: BULFINCH CONGRESS HOLDINGS, LLC
C/O THE HYM INVESTMENT GROUP, LLC
ONE CONGRESS STREET
BOSTON, MA 02114

DATE: AUGUST 9, 2013

I. PREAMBLE AND PROCESS BACKGROUND

The Boston Redevelopment Authority ("BRA") is issuing this Scoping Determination pursuant to Section 80B-5.3 of the Boston Zoning Code (the "Code") in response to and based on the review of the Proposed Project Notification Form ("PNF") for the Redevelopment of the Government Center Garage Project (the "Proposed Project"), which The HYM Investment Group, LLC (the "Proponent") on behalf of Bulfinch Congress Holdings, LLC (the "Applicant" or "BCH") submitted to the BRA on June 5, 2013. BCH is a Delaware limited liability company, whose members are NEBF Real Estate and UKI Boston, LLC. Notice of the receipt by the BRA of the PNF was published in the *Boston Herald* on June 6, 2013, which initiated a 30-day public comment period. The Scoping Determination requires the Proponent to respond to comments received from City and State agencies, elected officials, the appointed Impact Advisory Group ("IAG"), and the public.

On June 21, 2011, in accordance with the BRA's policy on mitigation as outlined in Mayor Thomas M. Menino's Executive Order Relative to the Provision of Mitigation by Development Proposed Projects in Boston, the Proponent submitted a Letter of Intent ("LOI") for the redevelopment of the Government Center Garage parcel, located at 50 New Sudbury Street in Government Center, which includes a project area of approximately 4.8 acres, and an existing 11-story, 143-foot tall parking garage structure with 2,310 parking spaces and 313,527 square feet of office and retail space; the replacement of a portion of the existing structure with six buildings introducing 771 new housing units, 204 new hotel rooms, approximately 1.3 million square feet of office, and 82,500 square feet of retail.

On November 3, 2008, in connection with a prior proposal for the development of the Government Center Garage, the BRA solicited IAG nominations. Nominations were made by the local elected representatives and city councilor, as well as the Mayor's Office of Neighborhood Services and City Councilors at Large. Nominations were also made by the BRA.

IAG members:

1. Ms. Deborah Connors
2. Ms. Jane Forestall
3. Ms. Francine Gannon
4. Ms. Linda Jonash
5. Ms. Martha Maquire
6. Mr. Bob O'Brien
7. Ms. Kimberly Paikos
8. Mr. David Roderick
9. Mr. Frederick (Tad) Stahl
10. Mr. Joseph McDonald

Subsequent to the filing of the LOI and prior to the filing of the PNF, the Proponent held numerous meetings with neighborhood groups, civic leaders and elected representatives. The Proponent also held a preliminary meeting with the IAG on June 4, 2013, prior to the filing of the PNF.

Notice of the receipt by the BRA of the PNF and the PNF were sent to the City's public agencies pursuant to Section 80A-2 of the Code, as well as to the IAG members. Pursuant to Section 80B-5.3 of the Code, a scoping session was held on June 19, 2013 with the City of Boston's public agencies, at which time the Proposed Project was reviewed and discussed. Members of the IAG were also invited to attend the scoping session.

The Proponent conducted an advertised public meeting on June 19, 2013 at Boston City Hall. IAG working session meetings were also held on June 12, June 26, and July 10, and were open to the public. On June 12, 2013, the presentation focused on Proposed Project overview and urban design. On June 26, 2013, the presentation focused on transportation and parking, as well as potential environmental impacts and sustainability. At the July 10, 2013 meeting, the presentation focused on specific responses to public comments received on the PNF. The Proponent also created a website, www.governmentcentergarageredevelopment.com, on which the presentations from each of the community meetings, including the community meetings that were held by the Proponent prior to the PNF submission as well as the community meetings and IAG working session meetings following the filing of the PNF, can be downloaded. The public was also notified of public meetings and Proposed Project status/updates through the use social media, including Facebook, Twitter, and Google+ postings. The IAG and the community will continue to have an opportunity to provide input regarding the Proposed Project throughout the Article 80 review process.

In addition to the public meetings outlined herein, the Proponent has met with the following groups and elected officials: State Representative Jay Livingstone, City Councilor Michael Ross (Staff), City Councilor Sal LaMattina, State Senator Anthony Petrucelli, State Representative Aaron Michelwitz, City Councilor Stephen Murphy, Downtown North Association, Beacon Hill Civic Association, West End Civic Association, Boston Harbor Association Staff, Save the Harbor, Save the Bay Staff, Greenway Conservancy Staff, and Friends of the North End Park Leadership.

Written comments in response to the PNF received by the BRA from City agencies are included in **Appendix A** and must be answered in their entirety. Written comments in response to the PNF received by the BRA from the public are included in **Appendix B** and must be answered in their entirety. Written comments in response to the PNF received by the BRA from the IAG are included in **Appendix C** and must be answered in their entirety. The DPIR should include complete responses to all comments included in **Appendices A, B and C**, within the framework of the criteria outlined in the Scoping Determination.

Public comments, including comments received by elected officials and neighborhood organizations/civic groups, received by the BRA during the comment period are included in **Appendix B** and must be answered in their entirety.

IAG comments received by the BRA during the comment period are included in **Appendix C** and must be answered in their entirety.

The Scoping Determination requests additional information that the BRA requires for its review of the Proposed Project in connection with Article 80 of the Code, Development Review and Approval and other applicable sections of the Code.

In addition to the specific submission requirements outlined in the sections below, the following points are highlighted for additional emphasis and consideration:

- Throughout this initial phase of review, the Proponent has taken steps to meet with local residents, elected officials, abutters, and City and State agencies. These conversations must continue, ensuring that what is presented in the DPIR is beneficial to the adjacent neighborhoods and the City of Boston as a whole.
- All development Proposed Projects have construction impacts. As with any urban development, there needs to be a balance of construction related inconveniences with the daily activities that will continue to occur adjacent to the Proposed Project. A description of the anticipated approach to managing construction activities must be included in the DPIR. Each component/phase of the Proposed Project will include a detailed Construction Management Plan/s (CMP), to be coordinated with the appropriate City agencies.
- In keeping with the Green Growth District Study, the Proponent needs to demonstrate in the DPIR how it intends to achieve a high level of Leadership in Energy and Environmental Design standards.

II. PROPOSED PROJECT DESCRIPTION

The Proposed Project is located at 50 New Sudbury Street in Government Center, and includes approximately 176,549 square feet of land (approximately 4.8 acres) and an existing 11 story, approximately 143 foot-tall structure, known as the Government Center Garage, which contains approximately 2,310 parking spaces and approximately 313,527 square feet of office and retail, totaling approximately 1.3 million square feet. The Government Center Garage parcel is bounded by New Chardon Street to the North, Surface Road and Ramps to 1-93 to the East, New Sudbury Street to the South, and Bowker Street to the West. The site includes the fee of Congress Street and the garage occupies the "air-rights" volume above the street. The Proponent proposes to "re-open" Congress Street with the demolition of a portion of the garage structure and a "conveyance" back to the City. The MBTA's Haymarket Station, which services bus routes and provides access to both the Orange and Green Line, also is included within the site (the "Project Site").

The Proponent proposes to construct approximately 2.4 million gross square feet of net new transit-oriented, mixed use development, approximately 476,400 gross square feet of remaining parking garage and office for a total development of approximately 2.9 million square feet. The Proposed Project will introduce 771 new housing units, 204 new hotel rooms, approximately 1.3 million square feet of office space, 82,500 square feet of retail space and 1,159 parking spaces. The Proposed Project includes the construction of six new components, three on the portion of the site west of Congress Street (the "West Parcel") and three on the portion of the site east of Congress Street (the "East Parcel"). The Proposed Project will include a reconfigured MBTA Haymarket bus facility.

The West Parcel components include: a 403-unit, 470-foot tall residential building (WP-B1); an approximately 1.2 million square foot, 600-foot tall office building (WP-B2); and a 248-unit, 275-foot tall residential building (WP-B3). All three West Parcel components include retail spaces, totaling approximately 20,000 square feet. The West Parcel components will be built around and above the portion of the existing garage that will remain and will include 1,159 parking spaces.

The East Parcel (EP) includes three components: a 275-foot tall building that includes 120 residential units, a 204-key hotel, and 17,400-square foot of retail (EP-B1); a 125-foot tall building containing 116,800 square feet of office space and 20,300 square feet of retail space (EP-B2); and a 60-foot tall, 25,000-square foot retail building (EP-B3).

III. ARTICLE 80 PROCESS REQUIREMENTS

The Proposed Project is being reviewed pursuant to Article 80, Development Review and Approval, which sets forth a comprehensive procedure for Proposed Project review of the following components: transportation, environmental protection, urban design, historic resources, infrastructure systems, site plan, tidelands, and Development Impact Project, if any. The Proponent is required to prepare and submit to the BRA a Draft Project Impact Report ("DPIR") that meets the requirements of the Scoping Determination by detailing the Proposed Project's impacts and proposed measures to mitigate, limit or minimize such impacts. The DPIR shall contain the information necessary to meet the specifications of Section 80B-3 (Scope of Large Proposed Project Review; Content of Reports) and Section 80B-4 (Standards for Large Proposed Project Review Approval), as required by the Scoping Determination. After submitting the DPIR, the Proponent shall publish notice of such submittal as required by Section 80A-2. Pursuant to Section 80B-4(c)(i)(3), the BRA shall issue a written Preliminary Adequacy Determination ("PAD") within ninety (90) days. Public comments, including the comments of public agencies, shall be transmitted in writing to the BRA no later than fifteen (15) days prior to the date by which the BRA must issue its PAD. The PAD shall indicate the additional steps, if any, necessary for the Proponent to

satisfy the requirements of the Scoping Determination. If the BRA determines that the DPIR adequately describes the Proposed Project's impacts and, if appropriate, proposed measures to mitigate, limit or minimize such impacts, the PAD will announce such a determination and that the requirements of further review are waived pursuant to Section 80B-5.4(c)(iv). Section 80B-6 requires the Director of the BRA to issue a Certification of Compliance indicating the successful completion of the Article 80 development review requirements before the Commissioner of Inspectional Services can issue any building permit for the Proposed Project.

General Applicability of Scoping Determination Requirements

The Proponent shall be required to perform all analyses as detailed in the following sections of this Scoping Determination (including, but not limited to the Environmental Protection Component, Urban Design Component, and Transportation Component sections) except where otherwise noted.

IV. REVIEW/SUBMISSION REQUIREMENTS

In addition to full-size scale drawings, sixty-five (65) copies of the bound DPIR submission and one (1) CD containing a PDF file of the DPIR containing all submission materials reduced to size 8-1/2" x 11", except where otherwise specified, are required. The DPIR filing should be printed on both sides of the page on recycled paper. In addition, an adequate number of copies of the DPIR must be available for community review. A copy of this Scoping Determination and a specific list of required information should be included in the DPIR submission for review.

All of the information requested below must be provided in the DPIR. Additionally, throughout the review process of the DPIR, the BRA and other City agencies may require additional information to assist in the review of the Proposed Project.

A. GENERAL INFORMATION

1. Proponent Information
 - a. Development Team
 - (1) Names
 - (a) Developer (including description of development entity and type of organization)
 - (b) Financial partner(s)
 - (c) Attorney
 - (d) Proposed Project consultants and architect
 - (2) Business address and telephone number for each
 - (3) Designated contact for each
 - (4) A completed Disclosure of Beneficial Interests form in

S-1

accordance with Section 80B-8 of the Code.

- b. Legal Information S-2
- (1) Legal judgments or actions pending concerning the Proposed Project.
 - (2) History of tax arrears on property owned in Boston by the Applicant.
 - (3) Evidence of site control over the Project Site, including current ownership and existing purchase options of any parcels in the Proposed Project, as well as a list of all restrictive covenants, applicable agreements, contractual restrictions, and/or other encumbrances affecting the Proponent's right or ability to construct the Proposed Project, and identify any parcels of interest that must be acquired by the Proponent to complete the Proposed Project.
 - (4) Nature and extent of any and all public and private easements into, through, or surrounding the Project Site.
2. Design Development Information (See Urban Design staff for required design development and contract document submissions).
3. Project Site S-3
- a. An area map identifying the location of the Proposed Project.
 - b. Description of metes and bounds of Proposed Project area or certified survey of Proposed Project area owned by the Proponent.
 - c. Description of metes and bounds of property not owned by the Proponent whose acquisition would be necessary to construct the Proposed Project.
 - d. A list of all property owners with addresses located within five hundred (500) feet of the boundaries of the Proposed Project site.
4. Regulatory Controls and Permits S-4
- a. An updated listing of all anticipated permits or approvals required from other municipal, State or Federal agencies, including a proposed application schedule shall be included in the DPIR.
 - b. A statement on the applicability of the Massachusetts Environmental Policy Act ("MEPA") should be provided. All required MEPA documentation should be provided to the BRA as well as a proposed schedule for the MEPA procedures and review.
 - c. A statement of existing requirements and provisions, if any, under all applicable agreements, including the

- d. Government Center Urban Renewal Area Plan. Existing zoning requirements or zoning computation form, and any anticipated requests for zoning relief, including steps necessary to implement a Planned Development Area Designation. S-5

In view of the proposed phasing of the Proposed Project and the individual Proposed Project components, the DPIR should also identify those elements of Large Proposed Project Review which would be more appropriately addressed by each individual Proposed Project at a later date. In such cases, the Proponent may be required to submit supplemental information or a Proposed Project Notification Form for each Proposed Project phase at a later date and address those elements which are not addressed or mitigated in the DPIR for the Proposed Project or Proposed Project components. Filings for each individual Proposed Project or component would be considered to be supplemental documentation and studies all under Article 80. S-6

5. Community Outreach S-7
- a. Names and addresses of Proposed Project area owners, abutters, and any community or business groups which, in the opinion of the Applicant, may be substantially interested in or affected by the Proposed Project.
 - b. A list of meetings held and proposed with interested parties, including the IAG, public agencies, abutters, and community and business groups.

B. PROPOSED PROJECT DESCRIPTION S-8

1. Proposed Project Description
- a. The DPIR shall contain a full description of the Proposed Project and its elements, including size, physical characteristics, and proposed uses. This section of the DPIR shall also present the development context of the Proposed Project (description of the surrounding environment), existing site conditions, Proposed Project purpose and objectives, and approximate total development cost and development schedule.
 - b. The Proponent must submit a site plan, which identifies and outlines each parcel. This information must include the S-9

following and be provided in the same section of the DPIR:

- (i) Assessing Parcel identification number
- (ii) Address
- (iii) Ownership
- (iv) Lot size
- (v) Gross building area
- (vi) Occupancies/tenancies in each building

2. Affordable Housing

S-10

The Proponent must provide more details with respect to the affordable housing component of the Proposed Project, which must comply with the Mayor's Executive Order relative to the inclusionary Development Policy.

C. PROPOSED PROJECT ALTERNATIVES

S-11

The DPIR must include complete analysis of the following Proposed Project Alternative in addition to similar analysis of the Proposed Project as proposed in the PNF. The analysis required, as noted in this Scoping Determination, must be performed by the Proponent for the Proposed Project Alternative, unless otherwise noted, and the results provided in the DPIR.

1. A description of the alternative to the Proposed Project that was considered shall be presented and the primary differences between the alternative, particularly as it may affect environmental conditions, shall be discussed.
2. The analysis as provided for in the Environmental Protection Component, Urban Design Component, and Transportation Component sections of this Scoping Determination shall be required for the Proposed Project Alternative, unless otherwise noted.
 - (i) Alternative 1 — No-Build/Government Center Garage Scenario as a means of measuring the baseline. *Because the existing Government Center Garage was constructed pursuant to a Land Disposition Agreement and the Government Center Urban Renewal Plan, a No-Build Alternative can be considered to be the existing condition.*

D. COMMUNITY BENEFITS

S-12

The Proponent shall include descriptions of proposed public benefits including but not limited to the following categories:

1. Anticipated Employment Levels
 - a. Estimated number of full-time, long-term construction jobs created by the Proposed Project's construction.
 - b. Estimated number of permanent jobs created by the Proposed Project.

2. Workforce Development Plan
 - a. The Proponent is expected to provide a workforce development plan and needs assessment for the Proposed Project.
 - b. The Proponent shall describe the efforts it will undertake to ensure that an appropriate share of new jobs and construction jobs will be filled by Boston residents.

3. Public Facilities
 - a. The Proponent shall include space in the Proposed Project to provide District A-1 Police Station parking to replicate the forty-two (42) spaces removed from the New Sudbury Street and Bowker Street.

4. Other Community Benefits
 - a. The Proponent shall include a list and description of other potential community benefits to be provided.

5. Implementation of Community Benefits
 - a. The Proponent shall include a preliminary schedule outlining community benefits for each component of the Proposed Project. The ultimate nature and timing of the contemplated community benefits will be memorialized in a Cooperation Agreement between the BRA and the Proponent.

E. URBAN DESIGN AND USES COMPONENT

In 2009, Bulfinch Congress Holdings, LLC first proposed the redevelopment of the Government Center Garage. After a brief hiatus, the ownership (Bulfinch Congress Holdings, LLC) remains the same; in 2010 the HYM Investment Group, LLC took over as developer for the Project, hired a new architect, re-strategized the project approach particularly regarding the existing Garage structure, and resubmitted a new PNF (June 5, 2013) to start the process. The proposal does

not include the block to the West considered earlier. Bounded roughly by New Sudbury, the Greenway, New Chardon, and Bowker streets, the Proposed Project overall is about 2.9 rather than 3.7 million SF, still in a mixed-use complex containing residential, hotel, and retail uses. The site currently controlled by the Proponent contains the 2300-car Garage planned as part of the Government Center Urban Renewal Area and designed by Kallman, McKinnell and Wood (Hresko and Mintz in a collaboration added the two upper office floors much later, with its distinctive offset core). The existing Garage erodes above the north end of the Haymarket T subway and bus station and contains a small amount of retail while spanning the vital downtown arterial of Congress and Merrimac streets. The Garage would be subsumed/demolished in phases under the proposal favored by the Proponent. Boston Landmarks approval of the demolition via Article 85 will be required. CBT Inc. are now the architects.

This Proposed Project aims to bring daylight to Congress Street underneath the current structure, creating a separate lower-scaled development of three buildings (60', 125' and 275') on the parcel closest to the Greenway, while enhancing pedestrian connections between the North Station area and the Financial District. The mix of uses would bring a stronger retail presence and more office uses to the area, potentially greatly improving the pedestrian environment and enhancing the office uses already extant in the area, while also adding residential and hotel uses. The upper portion of the site would also contain three structures (275', 470', 600') embedding the garage on this side (effectively a 108' podium, screened by program). These would be the first three phases, which culminate in the removal of the Garage portion over Congress and to the east. The Proposed Project increases the FAR to less than 14, above that permitted within the Government Center /Markets District zoning, but comparable to several downtown tower complexes. This will require zoning relief as things stand, although the process is not decided. Scoping for a DPIR is expected; BCDC comments will be welcomed as part of that input. The new scheme may have some advantage in terms of wind and shadow impacts - which have been a concern of the BRA for the Greenway.

DAYLIGHT COMPONENT

S-13

A daylight analysis for both build and no-build conditions shall be conducted by measuring the percentage of skydome that is obstructed by the Proposed Project building(s) and evaluating the net change in obstruction. If alternative massing studies are requested or result as part of the Article 80 development review process, daylight analysis of such alternatives shall also be conducted for comparison. The study should treat three elements as controls for data comparisons: existing conditions, the 'as-of-right' (defined in this case as the applicable general area zoning), and context examples. The areas of interest

include New Sudbury, Congress, Bowker, and New Chardon streets, and the Southbound Surface Artery, as well as the proposed continuation of the Canal Street corridor. Daylight analyses should be taken for each major building facade fronting these public ways. The midpoint of each public accessway or roadway should be taken as the study point. The BRADA program must be used for this analysis.

If a Proponent wishes to substitute a more contemporary computer program for the 1985 BRADA program, its equivalency must first be demonstrated to the satisfaction of BRA staff before it is utilized for inclusion in the DPIR, and it must be commonly available to Boston development team users.

URBAN DESIGN

The BCDC re-voted to review the revised Proposed Project on July 9, 2013 and saw a preliminary presentation. The Project was referred to Design Committee. When sufficient progress preparing a Preferred Alternative in the DPIR in response to the Scoping Document has been made on the design pursuant to preliminary BCDC, IAG, and BRA staff comments, BCDC Design Committee meetings should be scheduled by contacting David Carlson, Executive Director of the BCDC. Minutes from the Government Center Garage portion of the July BCDC meeting are attached.

It should be noted that we reserve the right to comment at the DPIR stage toward the submission of an FPIR. The Government Center Garage Redevelopment Project at its core remains an Urban Renewal project. The key goals of such are to reinvent and renew the socio-economic and physical fabric of the City for its ultimate betterment...and to conform to the overall Plan for the District. The Government Center Garage was intended to provide parking for the workers in and visitors to the area, and in the character of the planning of its day, made a bold architectural gesture in homage to the automobile that spanned the new Congress Street alignment and crested above the Haymarket Circle nexus. In the late 1980s, two vast office floors were added to increase value and bring workers to the area. The treatment of the huge span over Congress Street was never fully mitigated, and it tended to separate the City along a very strong arterial connector which serves many as a gateway to the area. One does not revisit such a Project lightly, but the basic concepts should include a continued accommodation of what might be reduced and differentiated mode parking for the area, and connect neighborhoods by making connections both physical and real but also visual and contextual, including public realm improvements that are at least the equal in positive attribute to any factors that might be perceived as negative. The following urban design objectives should be addressed in the DPIR submission for all scenarios except as noted.

1) The Project shall take into account as strict height limits the FAA limits as defined by Massport's Logan Airspace Map, should the bounds impact the Project Site.

S-14

2) Standard alternatives for study include no-build (the existing condition) and an 'as-of-right' build-out...in this case FAR 7, with a height of 100'. This alternative is less than the existing and so infeasible. The Greenway Guidelines may be used as an as-of-right comparison. The Proponent has presumed a process allowing the flexibility in density and height appropriate both to the expense of taking down an economically viable use, and to the uses proposed, as well as the 'high frame' City planning concept promulgated for this section of the City around City Hall Plaza. We also assume that the Proposed Project as represented in the DPIR will have taken into account any necessary mitigating factors discovered as a result of further studies by the Proponent. The PNF version may be studied as an alternative, but the Proponent may instead substitute a Preferred Project that addresses issues below and meets the Greenway Guidelines.

3) The Proposed Project should meet the 'performance standard' of generally having a lesser degree of environmental impacts than either the full 'as-of-right' build-out or existing conditions, whichever are most impactful. I.E., criteria such as daylight, shadows, and wind should be at least neutral or improved on average, recognizing that some elements or points may be worse, but proving that the whole is better as a Project. We will expect in fact that mitigations or positive urban benefits will result from this Project and in balance far outweigh any negative impact. Specific shadow and wind investigations will be requested - a separate category in this memorandum - to determine what the impacts are specifically regarding the Rose Kennedy Greenway parks. Heights, tower locations and setbacks should be adjusted to minimize any impacts on the Greenway.

S-15

4) The highest building elements generally should be as separated from each other as possible. They should also be as *varied* in height (600' seems appropriate as a high point) and architectural treatment, including *shaping*, as possible, yet be of a family - just a very interesting one. No two should read as one, nor should (now including the base) the aggregate west parcel read as one. Where desirable to create an emphasis or signify major program entry, the high elements could come straight down to the ground...but only if

S-16

wind conditions permit such; generally the high elements should not be right at edges, particularly those that may impact lower adjacencies. Again, *variation* in this rule is key.

- 5) The most active ground floor program elements (local retail, entry to the MBTA, restaurants) should be not only retained but enhanced as a positive element of the Project, with entries possibly on all sides. A hierarchy of such uses should be considered, with most uses augmenting strong pedestrian corridors, but some uses encouraging the use of new connections as well. The initial diagrams and studies are promising in this regard. Transparency and views into the uses must be maximized on each frontage. Expand upon your idea of incorporating bicycle stations into the Project...both public and private. S-17

- 6) Multiple upper story uses are accordingly encouraged to enliven the streets with a diversity of activity throughout the day. This also implies variation in the type of office and residential spaces; vary also the residential units and provide a robust mix including units that are sized for families. S-18

- 7) Above-grade garage floors should be covered as shown in the PNF's podium treatment, with program uses on all sides. Treatment of any directly visible portions of the garage should be of a high architectural character with robustly convincing detail. Necessary service and vehicular access functions should not occur directly, or at least be minimized, on Sudbury, Congress or New Chardon streets. S-19

- 8) Open Space as a resource, at a minimum for the residential component but also for the public, needs to be placed on the site. There are some suggestions – extensive green roofs (which could relate directly to some of the program uses), the treatment of the eastern parcel passages, some potential thinking about the corners on Bowker and at Merrimac and New Chardon. But these are more streetscape enhancements. If no public space can be accomplished on site, consider a substantial contribution to one nearby. The old Cook + Fox competition design featured a series of green roofs which, seen from a birds'-eye view, seemed to cascade down to the Greenway as though the parks were ascending into the skies. This is a potentially evocative concept which should be researched and expanded upon, if feasible, in the DPIR submission. Any public or semi-public green roof space should have its presence also visibly signaled from the street – a feature lacking, for example, on the Cambridge Center garage roof garden. S-20

- 9) Street edges and new sidewalks created as a result of any version of the Proposed Project must conform to all applicable standards and be appropriately sized to bear pedestrian traffic peaks. Street trees and plantings should be included in site plans. Pedestrian paths in general should be reinforced, building multiple pathways through the site, and through the buildings themselves where possible. Future connections should be considered, as well as existing elements such as so-called Brattle Path. Improve to the maximum extent the pedestrian nature of Bowker Street, so that it becomes more active and usable as a connector. **S-21**
- 10) The architectural expression of the tower elements should be clarified. They should be differentiated, and shaped as part of the skyline, but of the same family. Consider the view studies requested in the list of materials later to achieve a massing and orientation which begins to break the scale of the towers and podium elements down to that of the appropriate scale-giving datum elements in the area. This effect will be most noticeable from the intermediate range of direct views, including views from nearby neighborhoods and from both directions along the Greenway/North Washington Street and Cambridge/Tremont streets. **S-22**
- 11) The architectural expression of the podium elements should partake of the tower elements to connect the two vertically. Differentiation by programming elements (office, residence, hotel, etc.) lends itself to this effort, while possibly breaking up the podium wall. To accomplish this latter, try to push inward on the podium to add a convincing variety of depth to its edges. Go beyond the preliminary PNF drawings, maintain at least the quality of materials indicated therein, mark this space in the City as an important connection, add a visual playfulness to any contextual references, and break the deadening effect of the current Garage's high mass. **S-23**
- 12) The Project continues to feel too dense, crowded, despite the revision downward from the 2009 version, and exceeds the guidelines. In this instance, lower the overall density by about 10% and increase both the variation in height and the program of the Project elements to maximize separation and light and air from multiple viewpoints. **S-24**
- 13) Assume the ability to capture the sidewalk parcels on the eastern parcel and study lower heights of the buildings proposed to bring across the sense of scale of the Bulfinch Triangle District. Vary that between 100' and 150', with the lower element toward the Greenway. **S-25**

Maintain a robust through-block connection. To the maximum extent possible, provide publicly accessible exterior, interior and/or rooftop spaces. We ask that the infrastructure (MBTA, i.e.) constraints in particular be studied to clarify any limitations for the lower eastern parcel elements as well. To these ends, study more closely the 'special retail' pavilion to define its role. Consider making it more a special element in open space. Such an element and its attendant spaces should enhance qualities of year-round usability, light and airiness, plantings and greenery, and open invitation and sense of welcome to the public as an essentially public space, and not merely a forecourt for the building lobbies. You are directed also to study an alternative which removes this as an occupied structure completely, in favor of open space. The spaces must function as a public sidewalk 24 hours a day...or with no more limitations than the current spaces have.

S-26

- 14) The proposed phasing daylights Congress Street late in the Project's execution arc, leaving the least dense and most complex, public parcel (the east, just discussed) for last. Modify the proposed phasing so that this is accomplished earlier, preferably right after completion of the first phase. Complete work on the eastern parcel before the western is in its final phase.

S-27

- 15) The Proposed Project includes edge sliver parcels not currently under control of the redeveloper. Define these edges and ownership. Evidence of the team's ability to procure these parcels must be submitted.

S-28

Among others, the refined design included in the DPIR must satisfactorily address all the above parameters. An accurate sense of scale of the Proposed Project in its context must be achieved. Focus on key distanced views, as well as key intermediate/user viewpoints, to guide the design composition of the Proposed Project. Reinforce all pedestrian pathways; develop a plan which shows the building program and how it supports such activity within the future pedestrian/public access network. Active programming that will engage the public and ideally spill seasonally into the public realm at the ground floor should remain (and should be maximized). Take note of the fundamental contextual strengths of the site, including its connections to North Station and the MBTA, and incorporate that sense into the overall design approach...tempered by the proposed uses.

The BRA reserves the right to add additional concerns during the course of the process of combined BRA staff, IAG, and BCDC review which may affect the responses detailed in the DPIR. The following urban design materials for the

Proposed Project's schematic design must be submitted for the DPIR.

1. Written description of program elements and space allocation (in square feet) for each element, as well as Project totals.
2. Neighborhood plan, elevations and sections at an appropriate scale (1"=100' or larger as determined by the BRA) showing relationships of the proposed project to the neighborhood context:
 - a. massing
 - b. building height
 - c. scaling elements
 - d. open space
 - e. major topographic features
 - f. pedestrian and vehicular circulation
 - g. land use
3. Color, or black and white 8"x10" photographs of the site and neighborhood.
4. Sketches and diagrams to clarify design issues and massing options.
5. Eye-level perspective (reproducible line or other approved drawings) showing the proposal (including main entries and public areas) in the context of the surrounding area. Views should display a particular emphasis on important viewing areas such as key intersections, pathways, or public parks/attractions. Some of these viewpoints may have already been suggested and used in presentations to the public: north and south along the Greenway and the Merrimac/Congress Street corridor, from City Hall Plaza, from the Longfellow Bridge, Science Museum, and Zakim Bridge, from adjacent residential neighborhoods (Beacon Hill, West End, North End,) from the Public Garden, from Memorial Drive, from the Harbor, et al. Long-ranged (distanced) views of the proposed project must also be studied to assess the impact on the skyline or other view lines. At least one bird's-eye perspective should also be included. All perspectives should show (in separate comparative sketches) at least both the build and no-build conditions; any alternatives proposed should be compared as well. The BRA should approve the view locations before analysis is begun. View studies should be cognizant of light and shadow, massing and bulk.
6. Additional aerial or skyline views of the project, if and as requested.

7. Site sections at 1"=20' or larger (or other scale approved by the BRA) showing relationships to adjacent buildings and spaces.
8. Site plan(s) at an appropriate scale (1"=20' or larger, or as approved by the BRA) showing:
 - a. general relationships of proposed and existing adjacent buildings and open spaces
 - b. open spaces defined by buildings on adjacent parcels and across streets
 - c. general location of pedestrian ways, driveways, parking, service areas, streets, and major landscape features
 - d. pedestrian, handicapped, vehicular and service access and flow through the parcel and to adjacent areas
 - e. survey information, such as existing elevations, benchmarks, and utilities
 - f. phasing possibilities
 - g. construction limits
9. Massing model (ultimately in basswood) at 1":40'0" for use in the Authority's Downtown Model
10. Study model at 1" = 16' or 1" = 20' showing preliminary concept of setbacks, cornice lines, fenestration, facade composition, etc. Such a model would be most helpful in investigating the east parcel, as well as any publicly accessible green roof area.
11. Drawings at an appropriate scale (e.g., 1":32'0", or as determined by BRA) describing architectural massing, facade design and proposed materials including:
 - a. building and site improvement plans
 - b. neighborhood elevations, sections, and/or plans showing the development in the context of the surrounding area
 - c. sections showing organization of functions and spaces, and relationships to adjacent spaces and structures
 - d. preliminary building plans showing ground floor and typical upper floor(s).

- e. phasing, if any, of the Proposed Project
- 12. A written and/or graphic description of the building materials and its texture, color, and general fenestration patterns is required for the proposed development.
- 13. Electronic files describing the site and Proposed Project at Representation Levels one and two ("Streetscape" and "Massing") as described in the document Boston "Smart Model": CAD & 3D Model Standard Guidelines.
- 14. Full responses, which may be in the formats listed above, to any urban design-related issues raised in preliminary reviews or specifically included in the BRA scoping determination, preliminary adequacy determination, or other document requesting additional information leading up to BRA Board action, inclusive of material required for Boston Civic Design Commission review.
- 15. Proposed schedule for submission of all design or development-related materials.
- 16. Diagrammatic sections through the neighborhood (to the extent not covered in item #2 above) cutting north-south and east-west at the scale and distance indicated above.
- 17. True-scale three-dimensional graphic representations of the area indicated above either as aerial perspective or isometric views showing all buildings, streets, parks, and natural features.

SHADOW AND WIND COMMENTS

S-30

In addition to the comments and scoping by others, the Proponent is directed to conduct a specific shadow analysis for the specific time range of any new impacts on the Greenway Parks....in other words defining rough extent and duration in terms of hours and time of year. Give particular attention to the period from March 21 to October 21. If overall duration is greater than one hour, provide an overlap study which defines any area impacted by shadows for a period greater than one hour. Include less detailed impact duration studies, if applicable, for other open spaces in the area, including City Hall Plaza, Cardinal Cushing Park, and the park behind the Brooke Courthouse. All net new shadows shall be defined as outlined elsewhere either by darker tone or color and shall be clearly shown to their full plan extent, whether on street, park, or rooftop. Provide a full range dawn-to-dusk continuous shadow animation in electronic format. Shadow impacts for *each phase* are not necessary to study, as the final condition will have the accumulated impacts.

Regarding wind, all wind tunnel test points shall be approved by BRA staff before conduction of testing. Wind analysis may be requested at points within several blocks of the property(ies) in question; where contiguous to open space, analysis may extend to likely bounds of no impact, possibly to the limits of the wind tunnel (the Greenway and City Hall Plaza fall into this category). Analysis of results and effective mitigation shall be presented in the DPIR using diagram methodology so that the delta or changes manifested by the project relative to existing or as-of-right conditions...again, whichever provides the higher base impacts...are clearly understood. Given the significant active spaces and interaction proposed by the Project, the Proponent is encouraged to expand upon the thinking contained in the PNF that uses the notion of shaping or detailing buildings to reduce localized impacts on heavily used or enjoyed spaces; such a detailed study would benefit the Project and advance that discussion in Boston generally.

S-31

INFRASTRUCTURE SYSTEMS COMPONENT

An infrastructure impact analysis must be performed.

The discussion of Proposed Project impacts on infrastructure systems should be organized system-by-system as suggested below. The applicant's submission must include an evaluation of the Proposed Project's impact on the capacity and adequacy of existing water, sewerage, energy (including gas and steam), and electrical communications (including telephone, fire alarm, computer, cable, etc.) utility systems, and the need reasonably attributable to the proposed project for additional systems facilities.

S-32

Any system upgrading or connection requiring a significant public or utility investment, creating a significant disruption in vehicular or pedestrian circulation, or affecting any public or neighborhood park or streetscape improvements, comprises an impact which must be mitigated. The DPIR must describe anticipated impacts in this regard, including specific mitigation measures, and must include nearby Proposed Project (i.e. the four approved Bulfinch Triangle Parcels, Harbor Garage, Nashua Street Residences, Garden Garage, Lovejoy Wharf, et al.) build-out figures in the analysis. The standard scope for infrastructure analysis is given below:

S-33

1. Utility Systems and Water Quality

S-34

- a. Estimated water consumption and sewage generation from the Proposed Project and the basis for each estimate. Include separate calculations for air conditioning system make-up water
- b. Description of the capacity and adequacy of water and sewer systems and an evaluation of the impacts of the Proposed Project on those systems; sewer and storm drain systems should include a

tributary flow analysis as part of this description

- c. Identification of measures to conserve resources, including any provisions for recycling or 'green' strategies, including green roofs and recharging
- d. Description of the Proposed Project's impacts on the water quality of Boston Harbor or other water bodies that could be affected by the Project, if applicable
- e. Description of mitigation measures to reduce or eliminate impacts on water quality
- f. Description of impact of on-site storm drainage on water quality
- g. Information on how the Proposed Project will conform to requirements of the Ground Water Trust under Article 32, if applicable, by providing additional recharge opportunities
- h. Detail methods of protection proposed for infrastructure conduits and other artifacts, including the MBTA tunnels and station structures, and BSWC sewer lines and water mains, during construction
- i. Detail the energy source of the interior space heating; how obtained, and, if applicable, plans for reuse of condensate.

Thorough consultation with the planners and engineers of the utilities will be required, and should be referenced in the Infrastructure Component section.

2. Energy Systems

S-35

- a. Description of energy requirements of the project and evaluation of project impacts on resources and supply
- b. Description of measures to conserve energy usage and consideration of the feasibility of including solar energy provisions or other on-site energy provisions, including wind, geothermal, and cogeneration.

Additional constraints or information required are described below. Any other system (emergency systems, gas, steam, optic fiber, cable, etc.) impacted by this development should also be described in brief. The location of transformer and other vaults required for electrical distribution or ventilation must be chosen to minimize disruption to pedestrian paths and public improvements both when operating normally and when being serviced, and must be described. Storm drain and sewage systems should be separated or separations provided for in the design

S-36

of connections.

This proposal calls for the radical modification of an older Project that was basically the reconstruction of more than one entire City block. The balance of the notion of 'embedded energy' as balanced with the long-term energy savings proposed by this Project should be discussed. The Proponent should investigate energy strategies that take advantage of this scale of construction, including those that incorporate green roof strategies as well as solar orientation and materials/systems that maximize efficiencies, daylighting strategies, wind and geothermal systems, and cogeneration. Some interesting diagrams of the building systems considered as infrastructure are included in the PNF; this thinking should be expanded.

S-37

Excerpted from the BCDC Meeting Minutes of July 9, 2013:

The next item was a presentation of the new Government Center Garage Project. Tom O'Brien (TOB) introduced the project and his team, including Kishore Varani (KV) and David Nagahiro of CBT. TOB: The Government Center Garage was built in 1970 and has been a blight and obstacle ever since. The prior scheme, as you know, was not phased. But it's an operating garage, so this proposal phases. We include some sidewalks, but this is mostly on our own site. (Shows aerial.) It's possible to sink structure into the spaces between the trays. That allows us to build two buildings, and then to cut off the garage at the end. The area is also not safe. KV: The area is designed for cars, it's not good for pedestrians or bikers. The garage is hard to understand, too. (Notes phasing, shows diagram.) We are undoing the urban renewal project; this is a transformative vision. We are embracing environmental stewardship, creating great public spaces and architecture. (Shows the massive wall of the garage.) There is only one comparable transformative project - the Prudential Center. (Shows diagrams of the garage's placement in the City.) This is a complex project made even more interesting by keeping the garage core, salvaging the infrastructure. The existing garage retail is not very successful. Our plan is to wrap the garage with activity, and to use the other parcel to create a pedestrian link to the Greenway, with all retail or activity at the base, making every inch feel active. (Shows activity diagram.) It will be a garage for 850 bicycles, too. KV then showed building sizes as a figure-ground diagram. KV: We really pushed to create slender towers, address scales. (Shows evolution of massing thinking.) Along Congress there are two things, identical but not quite, like at State Street, but scaled back. It's not a singular icon, but a group of buildings as a composition. With individual personalities. "They can be all by different architects, as long as they're CBT." It's about 250,000 SF of land, and 2.9 million SF of building. (Shows axon view, notes program.) It's consistent with the guidelines. KV briefly noted sustainable strategies, with office LEED gold and residential LEED silver. He showed

shadows... MD: Later. Then before and after views, day and night.

AL asked about the width of the space. KV compared it to Faneuil Hall Marketplace. LW: The density here is comparable to the Seaport; you need to make sure the density compares to sidewalk width. DC: Like Washington Street, there has to be a balance between the spaces you create and the street life elsewhere. KV: On Sudbury, it's a little challenging. But the intent is NOT to siphon away activity. KS: Did you look at the east plaza as an enclosed space? KV: We did, but think it works as an open space. We didn't want to close it up, having opened it all to the sky. TOB: The team wanted it to be a public space, and wanted to keep it perceived that way. KS: Faneuil Hall Marketplace...but the Greenway is still not populated. There needs to be a diversity of spaces in a 4-season area. Not Saturday at 6, but Wednesday at 7. (KV began to respond.) KS: Look at Congress Street. Map nodes of activity in different time cycles. Imagine this in the context of all those other spaces. AL: I question the prototype of a slender tower. Your approach to the ground plane in general makes a lot of sense. The question is the assortment of towers. There is something there in the disposition of the towers that doesn't settle down yet. I'm looking for a family; they grow out of a common space. But they're not alike, and don't understand their differences. I don't know what the story line is. KV: Stepping down. AL: But it isn't. If you want the pair, then it's not a ladder. KV defended the scheme. AL: If three were the same, and one bigger. I urge you to think about them; they're like one big ensemble. They want to belong to the same hand. The tall ones are uncertain in their relationship. The ground plane....I was expecting more plaza, too. Not retail. TOB: We wanted to split the path. DM: I wonder if east and west aren't too much the same. If the blocks were more visually separate - maybe the two towers should not be the same. The 4th tower crossing the street is hard to explain. MD: The proliferation of little towerlets is perhaps what bothers us...you should do more massing studies. DM: The ground plane decisions are really very good, though. KV: Clearly, if one tower goes, the other gets taller. MD: Understood. AL: Another way to think about it, is that the east block is more a 150-foot block, and the other has 3 towers. The number, size, and height are not assembling yet into a single Project. KS: Not an International Place. KV: We looked at 3, 4 towers, and more. MD: We're supportive, but you have to study it more. With that, the new Government Center Garage Project was sent to Design Committee.

F. TRANSPORTATION COMPONENT

BTD's comment letter is included in **Appendix A** and is incorporated herein by reference and made a part hereof. The Proponent is required to address all comments included in BTD's comment letters in addition to the following

comments.

Transit Capacity

S-38

The Proponent shall demonstrate that the MBTA transit system has sufficient existing capacity to address the ridership demand associated with the Proposed Project as defined by the trip generation analysis prepared by the Proponent's transportation consultant and included in the PNF.

Transportation Access Plan Agreement

S-39

The Proponent will have to execute a Transportation Access Plan Agreement ("TAPA") with BTD as each Proposed Project component moves forward, which will codify the specific measures, mitigation and agreements between the Proponent and BTD. The Proponent shall be responsible for all costs associated with mitigation efforts including, but not limited to design and engineering, construction, and inspection.

G. ENVIRONMENTAL PROTECTION COMPONENT

The DPIR shall address the comments of the City of Boston's Environmental and Energy Services and the BRA's Environmental Review Specialist, included in **Appendix A**, and incorporated herein by reference and made a part hereof and must be addressed in its entirety.

Sequencing of Construction and Temporary Construction Impacts

S-40

Although the Proponent's presentations have included information regarding the proposed sequencing of the construction, the DPIR should include a specific narrative regarding the proposed sequencing of construction. The Proposed Project is described in the PNF as a multi-phased project. The Proponent should articulate the scope and construction timeframe of each phase. The Proponent needs to specify and explain the nature of the interim conditions.

The Proponent will be required to execute a Construction Management Plan ("CMP") for each Proposed Project component prior to construction of such component. Each CMP should detail the schedule, staging, parking, delivery, and other associated impacts of the construction of each construction phase, or Proposed Project component. The CMP shall include mitigation measures to ensure the short-term air quality impacts from fugitive dust expected during the early phases of construction from demolition of existing buildings and site preparation activities are minimal. These measures must be specifically designed to avoid negative impacts to the Proposed Project site's residential neighbors, and the Proponent must conduct a materials analysis of the concrete in the existing Government Center Garage structure to confirm that this concrete material does not contain any embedded Asbestos Containing

Material or other hazardous material that could be released during demolition of the existing structure.

Sustainable Design/Green Buildings

The purpose of Article 37 of the Boston Zoning Code is to ensure that major buildings are planned, designed, constructed and managed to minimize adverse environmental impacts; to conserve natural resources; to promote sustainable development; and to enhance the quality of life in Boston. Any Proposed Project subject to the provisions of Article 37 shall be LEED Certifiable (U.S. Green Buildings Council) under the most appropriate LEED rating system. Proponents are encouraged to integrate sustainable building practices at the pre-design phase. Proposed Projects which are subject to comply with Section SOB of the Boston Zoning Code, Large Project Review, shall be subject to the requirements of Article 37.

The Proposed Project consists of multiple buildings and accordingly the Proponent shall be required to submit separate LEED checklists, together with explanatory narratives demonstrating compliance with specific points. The Proponent shall also demonstrate that the Proposed Project will meet the requirements of Article 37 with appropriate supporting documentation and by certification from a LEED Accredited Professional.

S-41

Performance Standards and Indicators

The Proponent must commit to long-term sustainability performance standards and a system of performance indicators and metrics to track performance as each component building of the Proposed Project is completed and begins operation. The DPIR should include a discussion on how the Proponent intends to develop specific targets, or Key Performance Indicators (KPIs) of the proposed tracking system. KPIs may include setting an energy targets by building based on Energy Usage Intensity (EUI), potable water use reduction targets by building, a design standard of adequate recycling facilities for the various uses, and/or targets on the amount of waste recycled by building or use.

S-42

Building Materials Resource Center

Building demolition activities may offer an opportunity for recycling, reprocessing or donation of construction and building materials (e.g., glass, brick, stone, interior furnishing) to the Building Materials Resource Center ("BMRC"). This non-profit center offers, for only a handling fee, new and used materials for low and middle income homeowners. The Proponent is encouraged to contact the BMRC at the following address regarding disposal and/or acquisition of materials that may be appropriate for reuse:

Building Materials Resource Center
100 Terrace Street
Roxbury, MA 02120

Article 85

As indicated in the PNF, the Proposed Project would require partial demolition of existing structures. The proposed demolition requires Article 85 Demolition Delay review by the Boston Landmarks Commission (the "BLC"). BLC staff strongly encourages a thorough study of alternatives to rehabilitate, or incorporate historic buildings into proposed development plans, rather than demolition. Whether buildings are historically significant or not, demolition would constitute not only a loss of historic fabric, but also represents a loss of the building's embodied energy, fuel expenditure and air pollution during the demolition and removal of the building, as well as a large deposit of material to landfills. Proposed demolition of any building within Downtown or the Harborpark area requires Article 85 Demolition Delay review. Please note that "significances" describe in the PNF and attributed to the rating system of 1980 BLC Survey forms may no longer be relevant, as these survey forms are over 20 years old and are in the process of being reevaluated. The building proposed for demolition may be considered "significant" under the terms of Article 85.

H. INFRASTRUCTURE COMPONENT

The DPIR must address the comments of the Boston Water and Sewer Commission, included in **Appendix A**.

I. FIRE PREVENTION/CONTROL

The DPIR must address the comments of the Boston Fire Department, included in **Appendix A**.

In addition, the following issues must be addressed:

S-43

- emergency vehicle access to all new buildings as well as any existing buildings that might be affected-this requirement should be evaluated in light of traffic impacts caused by the Proposed Project on surrounding streets, alleys, and accessways;
- impact on availability and accessibility of hydrant locations for new buildings as well as any existing buildings that might be impacted;
- impact on availability and accessibility to connection locations for new buildings as well as for any existing buildings that might be impacted;

- impact that a transformer vault fire or explosion will have on the fire safety of the building(s), particularly as it relates to the location of the vault;
- need for Boston Fire Department permit requirements as outlined in the Boston Fire Prevention Code, the Massachusetts Fire Prevention Regulations 527 CMR, and the Massachusetts fire Prevention Laws (M.G.L. c. 148); and
- if the Proposed Project will include air-supported structures, the impact of the design on fire safety relative to the interaction of the area underneath the structure to the structure as well as to the interaction of the structure to the area underneath the structure.

J. PUBLIC WORKS COMPONENT

The DPIR must address the comments from the Boston Public Works Department Commission ("PWD") included in **Appendix A**, and incorporated herein by reference and made a part hereof.

Site Plan

The Proponent must provide an engineer's site plan for each phase at an appropriate engineering scale that shows curb functionality on both sides of all streets that abuts the property.

Sidewalks

The Proponent is responsible for the reconstruction of the sidewalks and roadways abutting the Proposed Project. This effort may constitute a License, Maintenance and Indemnification ("LM&I") agreement with the Public Improvement Commission ("PIC"). In order to encourage and compliment pedestrian improvements and travel along all sidewalks within the Public Right of Way within the Proposed Project limits, the reconstruction effort also must meet current ADAIAAB guidelines, including the installation of new or reconstruction of existing compliant pedestrian ramps at all corners of all intersections.

Discontinuances

Any and all discontinuances (sub-surface, surface or above surface) within the Public Right-of-Way ("ROW") must be processed through the PIC consistent with BRA approvals.

Landscaping

Proponent must seek approval from the Parks and Recreation Department for all landscape elements. Program must accompany a LM&I with the PIC.

Street Lighting

Street lighting needs must be consulted with the Street Lighting Division with the BPWD, and where needed, be installed by the Proponent, and must be consistent with the area lighting, to provide a consistent urban design.

Roadway

Based on the extent of construction activity, including utility connections and taps, the Proponent will be responsible for the reconstruction of the roadway sections that immediately abuts the property and to insure compliance to ADA/AAB guidelines.

Roadway Clearance

The Highway Division of Public Works is responsible for the clearance process pertaining to BPWD capital Proposed Projects, such as reconstruction, resurfacing, etc. Proponent must contact Mr. Mark Cardarelli in order to determine whether the development parcel(s) are on proposed capital Proposed Projects, or are free of conflict.

Public Trash Receptacles

Developer to consult with BPWD, and is responsible for purchasing solar powered trash compactors to be used in Public space consistent with City of Boston's plan.

Public Art

Developer is to contact the Boston Arts Commission to participate with the City's public arts program, creating notable art pieces in public spaces.

Note: these are the general standard and somewhat specific BPWD requirements applicable to every Proposed Project, more detailed comments will be addressed during the PIC review process.

K. BOSTON PARKS AND RECREATIONAL DEPARTMENT REVIEW

In accordance with the requirements of City Ordinance 7-4.11, since the Proposed Project is located within 100 feet of the North End park portion of the Rose Kennedy Greenway, the Proposed Project requires Parks and Recreation Commission approval.

L. AIRSPACE REQUIREMENTS

The Proponent acknowledges that the Federal Aviation Administration (the "FAA") must determine if the Proposed Project will pose a hazard to air navigation. In the DPIR, the Proponent must demonstrate that the Proposed Project does not encroach into any critical airspace surfaces, as defined by the

S-44

FAA, and will not affect aircraft operations. In the DPIR, the Proponent must document the Proposed Project's compliance with the FAA's Obstruction Standards of Federal Aviation Regulations Part 77 relating to the safe and efficient use of navigable airspace by aircraft utilizing Logan International Airport and to the operation of air navigation facilities.

M. PROPERTY CONSIDERATIONS

The Proponent must identify and delineate any and all property interests currently owned by others that it proposes to occupy temporarily or permanently as part of the Proposed Project's development and specify the process or procedure to acquire such property interests.

S-45

The Proponent must also identify any and all private third party rights and/or interests in the Proposed Project site that would be affected by the Proposed Project's development. These rights may include (but not be limited to): leases, easements, existing agreements, covenants, restrictions, and other encumbrances that may affect the Proponent's ability to construct the Proposed Project.

S-46

Nothing in this section of the Scoping Determination or in the Proponent's response thereto is intended to obviate or reduce the Proponent's obligation to subject any applicable occupancies of public rights of way to Public Improvements Commission review, nor shall anything contained in this Scoping Determination or in the Proponent's response thereto have any effect on the Proponent's obligations to any third parties in connection with such third party's rights in the Proposed Project site.

N. DEVELOPMENT IMPACT PROJECT

Based on the information provided in the PNF, the Proposed Project's uses meet the square footage threshold under Article BOB-7 of the Code to require the Proponent to enter into a Development Impact Proposed Project ("DIP") agreement.

O. BRA MITIGATION AGREEMENT

In connection with the Proposed Project and its impact on the surrounding communities, the DPIR should include the Proponent's commitments with respect to a Proposed Project or component impact fee based upon the Urban Renewal formula of up to 1% of hard construction costs. Although the Proposed Project will not be subject to urban renewal controls or a land deposition agreement, which were applicable to the construction and the redevelopment of the Government Center Garage, the BRA will expect the Proponent to make a commitment to contribute up to 1% of hard Proposed Project construction costs to a BRA

S-47

mitigation fund to be used by the BRA to mitigate and address certain impacts.

P. PUBLIC NOTICE AND CIRCULATION

The Proponent will be responsible for preparing and publishing in one or more newspaper(s) of general circulation in the City of Boston a Public Notice of the DPIR submission to the BRA as required by Article BOA-2. This notice shall be published on the date of filing of the DPIR, or within five (5) days after the receipt of the DPIR by the BRA. Public comments shall be transmitted to the BRA within seventy five (75) days of the date of the notice.

Following publication of the Public Notice, the Proponent shall submit a copy of the Public Notice to the BRA as well as the date of publication.

Two (2) copies of the DPIR should be delivered to the following libraries for review by the community:

- Boston Public Library's Main Branch, located at 700 Boylston Street
- North End Branch Library, located at 25 Parmenter Street
- West End Branch Library, located at 151 Cambridge Street

Letter 1

Boston Transportation Department

Comment 1.1

“This goal of connectivity should be carried throughout the project not only through building design, but through safe pedestrian and bikeway path connections around and through the site, connectivity of wayfinding signage from the site towards destinations within close proximity to the site as well as transportation connectivity through linked trips and information technologies that allow users to connect to a numerous transportation mode choices by means of transportation mobility hubs.”

Response

As described in the PNF and the DPIR, the Proponent is committed to providing safe and convenient pedestrian and bike connections in, around, and to the Project Site. The Proponent will improve all pedestrian crosswalks, add on-street bicycle accommodations where there are none, and install wayfiniding signage to important local destinations.

The Proponent is also committed to work with the City to provide a Mobility Hub on the Project Site by providing information technologies that allow users to connect and gather information about numerous mode choices and transportation alternatives available at or near the Project Site. The Project will many mode choices including a Hubway Station, MBTA Buses, MBTA Subways, Zipcars and public parking. In addition, amenities supporting different mode choices are being incorporated including an 850-bicycle parking facility, short term bicycle parking, electric car charging stations, preferred green vehicle parking and real time display of MBTA information within the East Parcel public plaza and building lobbies. Combined these mode choices and amenities will create a significant on-site Mobility Hub.

Comment 1.2

“During phase three, the garage over the East parcel and Congress Streets will be demolished and construction of an additional apartment building will commence-BTD requests the proponent coordinate with BTD engineering on CMP for road closures, detours and staging”

Response

The Proponent will coordinate with BTD on the development of future Construction Management Plans (CMPs) for all road closures, detours, and staging.

Comment 1.3

“The final redevelopment of the East Parcel, to occur in phase four, should be heavily coordinated with the MBTA. The Haymarket bus and MBTA operations and services will be significantly disrupted during this time. Additionally, there is also slated to have service disruptions at the nearby Government Center T Stop due to new head house construction which is slated to last at least two years. BTD requests that MBTA bus services along Surface Road be relocated, if services allow, to the curbside just north of the site on Congress Street in front of the Haymarket market place area.”

Response

The Proponent is committed to minimizing impacts to MBTA service throughout construction, but particularly when work is focused on the East Parcel and will directly impact MBTA facilities. The Proponent will work closely with the MBTA and BTD to analyze the feasibility of relocating bus service to Congress Street just south of New Sudbury Street during construction.

Comment 1.4

“The proponent should however work with BTD engineering to identify solutions for concerns on new roadway configurations along New Sudbury Street that will restrict parking for Boston Police and limit 4 lanes to 3 lanes. The proponent should coordinate this decision with Boston Police and help to identify any parking that is an immediate need that will be lost on both New Sudbury and Bowker Streets.”

Response

The Proponent will continue to work with BTD and the Boston Police Department on the proposed New Sudbury Street improvements to ensure that the new configuration allows safe and efficient movement of traffic and pedestrians and accommodates bicycles. As described in the PNF, the Boston Police Department’s (BPD) forty-two (42) on-street parking on New Sudbury Street at the Government Center Garage site will be relocated into the garage. Replacement of on-street BPD parking is expected to be an early action item prior to construction of the apartment building on New Sudbury Street (Phase 1A).

Comment 1.5

“Boston’s Climate Action Plan recommends an overall reduction in emissions of carbon dioxide and other GHG of 25 percent by 2020. In supporting this policy, BTD requires proponents to install parking for clean-fuel and non-motorized vehicle parking accounting for up to 5 percent of the anticipated total parking allotment. BTD requests this designated parking be identified in the retained parking garage and also be noted in inventory as further available options in the Bulfinch Triangle area (Dinosaur Capital EV charging).”

Response

The proponent will provide preferential parking for low-emission and clean-fuel vehicles at up to 5% of parking spaces in the garage. In addition, ten (10) recharging stations for electric vehicles will be installed in the garage along with sufficient infrastructure capacity for future accommodation of additional electric vehicle charging stations as demand arises. Refer to PNF Section 3.4.4.7 for a complete inventory of proposed bicycle accommodations for the Project, including on-site bicycle storage.

Comment 1.6

“Improved pedestrian crossings with special pavement treatments to differentiate a slowed vehicle zone and pleasant pedestrian environment should be installed along New Sudbury Street and New Chardon.”

Response

The Proponent is committed to improving the pedestrian experience in and around the site and will continue to work with BTD, PWD, and the community to improve all pedestrian crossings connecting to the site. These improvements can include special pavement treatments, especially on the heavily used pedestrian crosswalk across New Chardon Street connecting the East Parcel with Canal Street. The Proponent will also ensure designs are consistent with the City of Boston Complete Streets guidelines.

Comment 1.7

“The proponent should collaborate further with Public Works and BTD on streetscape plans as the project evolves and is finalized and consider the following: tree cover and sustainable storm water management practices should also be followed throughout the site.”

Response

Consistent with the City's Complete Streets Guidelines, the Proponent will work with BTM and PWD to include tree cover and sustainable storm water management practices with all proposed streetscape improvements.

Comment 1.8

"...the proponent should focus on facilitating safe and clearly marked pedestrian crossings and sidewalk widths, while allowing continuous traffic flow during peak times."

Response

The Proponent is committed to improving pedestrian safety and convenience in and around the site and will continue to work with BTM, PWD, and the community to improve all pedestrian crossings connecting to the Project Site.

Comment 1.9

"...the proponent should work with the City to ensure proper signage is installed that reflects the historic aesthetic of the area and provides proper directionals towards main tourists sites to include an entry towards Faneuil Hall, the Holocaust memorial, the indoor farmers market adjacent to the site at Haymarket, City Hall, etc."

Response

The Proponent will work with the City to install appropriate wayfinding signage on the Project Site to guide visitors to nearby attractions/destinations.

Comment 1.10

"The proponent should work with BTM engineering to ensure proper construction management planning to ensure traffic flow throughout the project timeline and phasings. The proponent should also coordinate with the proposed Boston Garden developers to work from the same base of existing traffic conditions."

Response

The Proponent will coordinate with BTM on the development of future Construction Management Plans (CMPs) for all road closures, detours, and staging. The proponent has directly coordinated, and will continue to coordinate, with the Boston Garden developers as requested.

Comment 1.11

“Real-time parking and transit information should also be considered in screens and in communal spaces located in residential, meeting, and in the public plaza areas within the new buildings.”

Response

As stated in the PNF, the Proponent intends to encourage the use of the existing public transit system through technology, such as the installation of real-time tracking displays of ‘live’ subway and bus schedules and/or parking information in the main lobbies of the proposed buildings and the East Parcel plaza.

Comment 1.12

“The site should have a mobility hub to provide a variety of rider information in one place. This hub should include information on site storage/ access to bike parking, hubway and car rentals, electric vehicle charging, as well as dynamic signage that provides trip itineraries, arrival/departure times for both bus and subway trips. These connections on the site and in the area should be clearly marked on any illustration in project filing drawings.”

Response

The Proponent will work with BTM to identify a location for a Mobility Hub location that maximizes the benefit of providing the mobility information.

Comment 1.13

“The proponent will need to comply with BTM's "Off-Street Loading Guidelines," which can be accessed at: http://www.cityofboston.gov/transportation/off_street.asp.”

Response

A complete discussion of expected loading demand as well as building servicing/delivery accommodations for the PDA is presented in Section A2.3.2.8 of the PNF. As individual PDA components are further developed through the Article 80 Large Project Review process, the Proponent will work with BTM to develop loading accommodations that comply with BTM's Off Street Loading Guidelines. Building servicing operations will be codified in a Transportation Access Plan Agreement (TAPA) for each development component subject to Article 80, Large Project Review.

Comment 1.14

“BTD asks the applicant to work with BTD engineering to ensure off-peak times for this loading to take place due to anticipated traffic congestion and heavy peak hour pedestrian traffic heading north east down New Sudbury. These concerns are also present at the cut-out loading zones indicated at lower New Sudbury Street along New Chardon Street- please work with BTD engineering to determine the appropriate size of commercial vehicles to be allowed to access these zones on-street.”

Response

As individual PDA components are further developed through the Article 80 Large Project Review process, the Proponent will work with BTD to minimize conflicts between deliveries and vehicular, pedestrian, and bicycle traffic. It is expected that these efforts will result in time of day restrictions for the use of loading docks and loading areas as well as restrictions as to the size of vehicle to be accommodated at these locations. These Project operational elements will be codified in the Transportation Access Plan Agreement (TAPA) for each of the individual development components subject to Article 80, Large Project Review.



BOSTON
TRANSPORTATION
DEPARTMENT

ONE CITY HALL SQUARE • ROOM 721
BOSTON, MASSACHUSETTS 02201
July 16, 2013
617-635-4680 • FAX 617-635-4295

John Fitzgerald, Senior Project Manger
Boston Redevelopment Authority
Boston City Hall, 9th Floor
Boston, MA 02201

RE: Project Notification Form for Redevelopment of Government Center Garage

Dear Mr. Fitzgerald:

Thank you for the opportunity to comment on the Redevelopment of Government Center Garage Project Notification Form (PNF) dated June 5, 2013 by Bulfinch Congress Holdings, LLC. The PNF is being submitted in connection with the purchase of the property in 2007 by BCH, with the primary goal of redeveloping the Garage with developer, HYM Investment Group, LLC (HYM).

The project site is 4.8 acres, comprised of a single fully built out parcel bounded by New Sudbury and New Chardon Streets on the south and the north. The site is bisected in a north-south direction by an extension of Merrimac Street. Merrimac Street continues southward, where Congress Street begins south of New Sudbury Street.

The applicant is proposing 6 new buildings and re-use of a portion of the existing parking garage in order to create a vibrant mix of uses, with enhanced public realm improvements, and new residential and retail opportunities in the area. The project will be developed in phases anticipated to span over a ten year period. Project details include:

- o Re-use of a portion of the existing parking garage as parking
- o 771 units of housing (apts and condos)
- o 204 hotel rooms
- o 1.3M SF of office space
- o 82,500 SF of retail
- o New public plaza and pedestrian promenade
- o LEED Gold target
- o 850 bicycle parking spots
- o 555-725 spaces for public vehicle parking btwn weekday, weeknight to weekends
- o Project will create 2,600 construction jobs and 6,000 permanent jobs

The following are the Boston Transportation Department's (BTD) comments on the combined impacts of all the components of the project. The proponent needs to address these comments and concerns when preparing future submissions as part of the Article 80 process as well as the Transportation Access Plan Agreement. Please note that upon BTD's final review and approval, a Transportation Access Plan

Agreement codifying the transportation agreements and mitigation reached with BTM needs to be executed.

Connectivity

The project is located within a quarter of a mile for MBTA Orange, Green, Blue, Red, and commuter rail lines, as well as multiple local and express bus routes. Please refer to the “phasing” comments regarding coordination of disruption of services along these lines during different project phases.

The project aims to reconnect the project site to the surrounding areas to include the North End, which consists of residential and neighborhood retail, including restaurants; The Market District & the Rose Kennedy Greenway, The Financial District, The West End- which consists of residential and institutional uses; and the Beacon Hill residential neighborhoods. This goal of connectivity should be carried throughout the project not only through building design, but through safe pedestrian and bikeway path connections around and through the site, connectivity of wayfinding signage from the site towards destinations within close proximity to the site as well as transportation connectivity through linked trips and information technologies that allow users to connect to a numerous transportation mode choices by means of transportation mobility hubs.

1.1

Phasing

The project is set to be built in four phases including a pre-redevelopment enabling phase. The construction of the apartment and office buildings will take place in phase one and two- BTM will work with the developer on the placement of bike accommodations within these buildings, per the “Off-Street Bike Parking Guidelines.” During phase three, the garage over the East parcel and Congress Streets will be demolished and construction of an additional apartment building will commence- BTM requests the proponent coordinate with BTM engineering on CMP for road closures, detours and staging. The final redevelopment of the East Parcel, to occur in phase four, should be heavily coordinated with the MBTA. The Haymarket bus and MBTA operations and services will be significantly disrupted during this time. Additionally, there is also slated to have service disruptions at the nearby Government Center T Stop due to new head house construction which is slated to last at least two years. BTM requests that MBTA bus services along Surface Road be relocated, if services allow, to the curbside just north of the site on Congress Street in front of the Haymarket market place area.

1.2

1.3

Parking

The project identifies the ability to provide public commercial parking for approximately 555 vehicles during the weekday, about 567 spaces on weeknights, and 725 on the weekend days. BTM thanks for the proponent for decreasing the overall parking supply at the Project Site to 1,159 spaces, which is below the maximum ratios determined for the area. The filing also reflects recommended parking ratio reductions from 2009 comments in residential, hotel, and commercial spaces. The proponent accounts for a parking demand of 894- taking into account 265 flex shared spaces for public event overflow.

BTM would like to thank the proponent for considering and providing updated information on existing garage supply in the area, traffic flow changes based on different modes as well as future parking demand and supply. The proponent should however work with BTM engineering to identify solutions for concerns on new roadway configurations along New Sudbury Street that will restrict parking for Boston Police and limit 4 lanes to 3 lanes. The proponent should coordinate this decision with Boston Police and help to identify any parking that is an immediate need that will be lost on both New Sudbury and Bowker Streets.

1.4

Boston’s Climate Action Plan recommends an overall reduction in emissions of carbon dioxide and other GHG of 25 percent by 2020. In supporting this policy BTM requires proponents to install parking for clean-fuel and non-motorized vehicle parking accounting for up to 5 percent of the anticipated total

1.5

parking allotment. BTD requests this designated parking be identified in the retained parking garage and also be noted in inventory as further available options in the Bulfinch Triangle area (Dinosaur Capital EV charging).

(Note: The City of Boston Environment Department will be conducting an inventory of public space and level of usage that will bring more clarity to current public parking space utility).

Pedestrian Connections/ Circulation

The new building designs and the removal of the attached section of the building will physically create new vistas along the project site, allowing for greater circulations around the site and to its connecting neighborhoods and tourist destinations. Improved pedestrian crossings with special pavement treatments to differentiate a slowed vehicle zone and pleasant pedestrian environment should be installed along New Sudbury Street and New Chardon where high counts of pedestrian activity take place will improve safety and encourage slower driving speeds.

1.6

The proponent has noted the project will create a more pleasant continuous pedestrian path along the side of new Chardon Street by removing a curb cut for car entry. The proponent should collaborate further with Public Works and BTD on streetscape plans for while the project evolves and is finalized and consider the following: tree cover and sustainable storm water management practices should also be followed throughout the site.

1.7

Please refer to the City of Boston Complete Streets guidelines (www.bostoncompletestreets.org) to ensure that these improvements are consistent with current policies. A review of the detailed design with respect to the new guidelines will take place as part of the TAPA process. Additionally, the addition of a new sidewalk along New Sudbury Street, the removal of parking along Bowker Street and the new bus station configuration along Surface Road will require approval by the City's Public Improvements Commission.

Facilitate safe pedestrian and bike connections

The applicant refers to the Boston Complete Streets Guidelines in the project PNF; these city goals and initiatives outline examples of enhanced pedestrian walkways through specific suggestions of sidewalk widths, crosswalk use and bump-outs improvements.

The new configuration along the site will frame and provide new pedestrian connections through recently created vistas framing the Zakim Bridge, and West End neighborhood along both New Chardon Street, and Merrimac Streets- to this end, the proponent should focus on facilitating safe and clearly marked pedestrian crossings and sidewalk widths, while allowing continuous traffic flow during peak times.

1.8

Wayfinding signage towards destinations & transportation options within close proximity to the site

The site is a main transportation hub with frequent visitors and residents - to this end, the proponent should work with the City to ensure proper signage is installed that reflects the historic aesthetic of the area and provides proper directionals towards main tourists sites to include an entry towards Faneuil Hall, the Holocaust memorial, the indoor farmers market adjacent to the site at Haymarket, City Hall, etc.

1.9

Transportation wayfinding signage could be provided in multiple forms to include kiosks, website, hand-held phone apps, dynamic signage at main transportation connection points as well as commercial signage at the point of connection

Bicycle Accommodation

BTD would like to thank the proponent for accounting for safe and covered bike parking facilities in the PNF. We ask the proponent to review the City's Bicycle Parking Guidelines when filing further

information on the residential and office building bike accommodations and outdoor rack siting. BTD looks forward to collaborating on this in the future and reviewing these site plans.

Traffic

The traffic impact study in the project area is bounded by 36 intersections, there are also several roadway projects as well as possible service disruptions to transit stops in the area. However, all projects are slated to be completed by this project completion. Additionally, estimated vehicle trips to and from the project site are expected to increase by 2,270 vehicle trips, with a majority of trips to use the regional highway system to access the site. The proponent should work with BTD engineering to ensure proper construction management planning to ensure traffic flow throughout the project timeline and phasings.

1.10

Transportation Demand Management

BTD thanks the proponent for the described TDM measures listed in the PNF and requests transportation information located in the area (Hubway, Car Share, electric vehicle parking, commercial parking availability, MBTA/bus times) to be made in the above mentioned mobility hub as well as available online, and accessible in a hand-held format for mobile devices for visitors and residents. Real-time parking and transit information should also be considered in screens and in communal spaces located in residential, meeting, and in the public plaza areas within the new buildings.

1.11

Mobility Hub

The site should offer however one mobility hub to provide a variety of rider information in one place. This hub should include information on site storage/ access to bike parking, hubway and car rentals, electric vehicle charging, as well as dynamic signage that provides trip itineraries, arrival/departure times for both bus and subway trips. These connections on the site and in the area should be clearly marked on any illustration in project filing drawings.

1.12

Service and Loading

We commend the proponents for providing new off-street facilities for service & loading activity as part of BTD's effort to reduce traffic congestion caused by off-street truck maneuvering and loading. The proponent will need to comply with BTD's "Off-Street Loading Guidelines," which can be accessed at: http://www.cityofboston.gov/transportation/off_street.asp. Additionally, the proponent is required to respond to the questions in the website's attached pdf.

1.13

Delivery locations will total six areas to include loading docks and cut-in loading zones along the curb. The proponent indicates that primary loading dock for office and services to the West Parcel will be located on Bowker Street; while the West Parcel apartment building loading dock will take place on New Sudbury Street. BTD asks the applicant to work with BTD engineering to ensure off-peak times for this loading to take place due to anticipated traffic congestion and heavy peak hour pedestrian traffic heading north east down New Sudbury. These concerns are also present at the cut-out loading zones indicated at lower New Sudbury St and along New Chardon Street- please work with BTD engineering to determine the appropriate size of commercial vehicles to be allowed to access these zones on-street.

1.14

Site Plan

The proponent needs to submit an engineered site plan within the context of the surrounding roadways at 1:20 scale depicting:

- Vehicular Access and Circulation
- Service and Loading*

- Parking Layout and Circulation
- Pedestrian Access and Circulation
- Bicycle Access and Circulation
- Area Shuttle/Van Pool Pickup and Drop-off
- Parking Spaces for Car Sharing services
- Roadways and Sidewalks
- Building Layout
- Bicycle Parking Locations and Types (covered, indoor, bike share, etc)
- Transit Stops and Connections
- Electric Vehicle Charging Stations

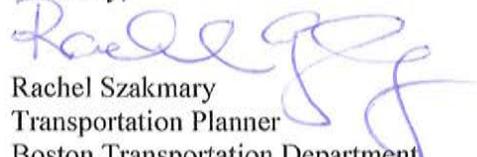
* *Trash compactors/dumpsters need to be depicted as well.*

Construction Management Plan

As the projects in the PNF advance, BCH and HYM and any other proponents will be required to develop and submit a detailed Construction Management Plan (CMP) to BTM for review and approval. The CMP will address TDM measures for construction workers, proposed street occupancies, equipment staging, sidewalk relocations and hours of construction work. BTM will work with the proponent to review and finalize operations for the CMP.

The issues raised above should be addressed in the TAPA to be provided for the projects in the PNF. BTM looks forward to working collaboratively with BCH and the community in review of these projects and to address any outstanding concerns in the permitting process.

Sincerely,



Rachel Szakmary
 Transportation Planner
 Boston Transportation Department
 Policy and Planning Division

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

Letter 2

Boston Water and Sewer Commission

Comment 2.1

"The Commission will not permit the proponent to connect to the 30-inch low service main for water service to the site."

Response

The Project will not connect to the 30-inch low service main.

Comment 2.2

"HYM should confirm the location of all water and sewer mains within the vicinity of the project area during the design phase of the project."

Response

The Project has commissioned an existing conditions survey with utility locations. As part of the Site Plan Approval process this survey will be provided to BWSC.

Comment 2.3

"Prior to demolition of any buildings, all water, sewer and storm drain connections to the buildings must be cut and capped at the main pipe in accordance with the Commission's requirements. The proponent must then complete a Termination Verification Approval Form for a Demolition Permit, available from the Commission and submit the completed form to the City of Boston's Inspectional Services Department before a demolition permit will be issued."

Response

Any water, sewer and drain cutting and capping will be in accordance with BWSC's requirements.

Comment 2.4

"All new or relocated water mains, sewers and storm drains must be designed and constructed at HYM'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. To assure compliance with the Commission's requirements, the proponent must submit a site plan and a General Service Application to the Commission's Engineering Customer Service Department for review and approval when the design of the new water and wastewater systems and the proposed service connections to those systems are 50 percent complete. The site plan should include the locations of new, relocated and existing water mains, sewers and drains which serve the site, proposed service connections as well as water meter locations."

Response

The Proponent plans on submitting separate Site Plan Approval packages per BWSC requirements for each Project Component.

Comment 2.5

"The Department of Environmental Protection, in cooperation with the Massachusetts Water Resources Authority and its member communities, are 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 this regard, DEP has been routinely requiring proponents proposing to add significant new wastewater flow to assist in the I/I reduction effort to ensure that the additional wastewater flows are offset by the removal of I/I. Currently, DEP is typically using a minimum 4:1 ratio for I/I removal to new wastewater flow added. The Commission supports the DEP/MWRA policy, and will require HYM 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."

Response

As directed, the Proponent will work with BWSC to develop a plan to address the DEP Infiltration/Inflow (I/I) reduction policy for each Project Component.

Comment 2.6

"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 greens capes, 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/>"

Response

As stated in the PNF, the Proponent will implement Boston's Complete Streets Guidelines with the objective to ensure the public streets surrounding the Project Site are: (i) multi-modal (i.e., pedestrians, people with disabilities, bicyclists, transit users, motor vehicle drivers); (ii) "green" (i.e., street trees with plants and soils to collect runoff to reduce flooding and pollution as well as environmentally-sensitive materials); and (iii) "smart" (i.e., intelligent signals, smart meters, Electric Vehicle (EV) charging stations, car and bicycle-sharing, way-finding and social networks for greater system efficiencies and user convenience). In conjunction with the Project's overall sustainability goals, the Proponent is also looking to integrate green infrastructure into public spaces, such as greenscapes, where appropriate, in order to reduce heat island effect and create comfortable microclimates. The Proponent will fully maintain these spaces based on a Maintenance Plan for each Project Component and/or overall Project Site.

Comment 2.7

"The water use and sewage generation estimates do not appear to be correct. The Commission requires that these values be recalculated and submitted with the Site Plan. HYM 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. HYM should also provide the methodology used to estimate water demand for the proposed project."

Response

In a telephone conversation on July 23, 2013, BWSC clarified that the estimates were accurate and correct. As per BWSC standard requirements, the estimates will be refined (if necessary) as part of the Site Plan filings for each Project Component. As described in the PNF, the Proponent is proposing to harvest rainwater to mitigate irrigation and air conditioning make-up water demand.

Comment 2.8

"For any proposed masonry repair and cleaning HYM 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 HYM 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. HYM 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."

Response

The Project does not currently contemplate Abrasive Blasting or Chemical Cleaning. However, if plans change, the Proponent will require its Contractor to obtain the necessary permits from BAPCC and BWSC.

Comment 2.9

“HYM should be aware that the US Environmental Protection Agency issued a draft 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, HYM will be required to apply for a RGP to cover these discharges”

Response

The Proponent is aware of the U.S. EPA Remediation General Permit program and, if applicable, will apply for permit coverage.

Comment 2.10

“HYM 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.”

Response

The Project does not currently contemplate building construction over BWSC water mains, sewers, or drains.

Comment 2.11

“It is HYM'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, HYM 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.”

Response

As requested by BWSC, the Proponent will evaluate the impacts on system capacity as part of each Project Component Site Plan Approval submittal. As described in the PNF and DPIR, BWSC has robust infrastructure adjacent to the Project Site. Regarding stormwater, stormwater flows from the Project Site will be reduced by the construction of green roofs and the harvesting of rainwater. Therefore, the Project's will reduce impacts on the stormwater system.

Comment 2.12

"HYM 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. HYM should also provide the methodology used to estimate water demand for the proposed project."

Response

As per BWSC standard requirements, the estimates will be refined (if necessary) as part of the Site Plan filings for each Project Component. As described in the PNF, in conjunction with the Project's overall sustainability goals, the Proponent is proposing to harvest rainwater to mitigate irrigation and make-up water demand.

Comment 2.13

"HYM should explore opportunities for implementing water conservation measures in addition to those required by the State Plumbing Code. In particular, HYM should consider outdoor landscaping which requires minimal use of water to maintain. If HYM 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."

Response

As discussed in the PNF, the Project is strongly committed to sustainable design, construction, and operations. In conjunction with the Project's overall sustainability goals, the Proponent is actively exploring water conservation measures and such measures will be detailed for each Project Component as it advances through its individual Article 80 Large Project Review process.

Comment 2.14

“HYM 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. HYM should contact the Commission's Operations Division for information on and to obtain a Hydrant Permit.”

Response

The Project will obtain Hydrant Permits in accordance with BWSC's comments.

Comment 2.15

“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, HYM should contact the Commission's Meter Department.”

Response

The Project will use the Meter Transmitter Units as required by BWSC.

Comment 2.16

“In conjunction with the Site Plan and the General Service Application HYM 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.*
- Includes 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 Storm water Management both during construction and after construction is complete.”*

Response

The Proponent plans on submitting separate Site Plan Approval packages per BWSC requirements for each Project Component. The packages will include the information requested by BWSC.

Comment 2.17

“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. HYM 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.”

Response

The Project, due to its phased components, is not anticipated to disturb over an acre of land at any time. If the project scope changes, the Proponent will review NPDES requirements.

Comment 2.18

“The Commission encourages HYM to explore additional opportunities for protecting stormwater quality on site by minimizing sanding and the use of deicing chemicals, pesticides, and fertilizers.”

Response

The Proponent will explore the reduced use of fertilizers, pesticides, and sanding as part of its overall sustainable operations objectives.

Comment 2.19

“The discharge of dewatering drainage to a sanitary sewer is prohibited by the Commission. HYM 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, HYM will be required to obtain a Remediation General Permit from the Environmental Protection Agency (EPA) for the discharge.”

Response

The Project does not currently anticipate deep excavations requiring significant dewatering. The Commission’s comments concerning dewatering are noted and if dewatering is required, the Proponent will obtain the referenced permits.

Comment 2.20

“HYM 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 storm water discharge on-site. Under no circumstances will stormwater be allowed to discharge to a sanitary sewer.”

Response

In conjunction with the Project’s overall sustainability goals, the Project currently includes retaining stormwater on-site through a variety of practices, primarily including harvesting. Where feasible (limited areas on the East Parcel located away from the MBTA tunnels), recharge will also be investigated. Recharge is not believed to be feasible on the West Parcel due to the reuse of the existing garage structure where connectivity to both soil and the drainage system is not available. The Project will provide separated storm and sanitary systems, in accordance with BWSC requirements.

Comment 2.21

“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, HYM will be required to meet MassDEP Stormwater Management Standards.”

Response

The Project will comply with the DEP Stormwater Management Standards, where feasible and applicable to redevelopment projects. The Proponent will work with BWSC to address the standards during the Site Plan Approval process.

Comment 2.22

“Sanitary sewage must be kept separate from stormwater and separate sanitary sewer and storm drain service connections must be provided.”

Response

The project design will call for separated sanitary sewage and storm drainage.

Comment 2.23

"The Commission requests that HYM 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. HYM should contact the Commission's Operations Division for information regarding the purchase of the castings."

Response

The Project will provide "Don't Dump" castings next to any catch basins created or modified as part of the Project.

Comment 2.24

"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. HYM is advised to consult with the Commission's Operations Department with regards to grease traps."

Response

Project tenants having kitchens or food service facilities will be required to provide grease control in accordance with BWSC and Plumbing Code requirements.

Comment 2.25

"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."

Response

The Proponent will be reviewing the modifications to the Garage to determine that floor drains on enclosed floors of the garage are directed through oil separators to the sanitary sewer system.

Comment 2.26

"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"

Response

If the Proponent proposes to re-use gravity service connections, the Proponent will perform dye testing to confirm connectivity to the appropriate system.

**Boston Water and
Sewer Commission**



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

July 3, 2013

Mr. John FitzGerald
Senior Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007

Re: Redevelopment of the Government Center Garage, City Proper
Project Notification Form

Dear Mr. FitzGerald:

The Boston Water and Sewer Commission (Commission) has reviewed Project Notification Form (PNF) for the Redevelopment of the Government Center Garage project in City Proper. This letter provides the Commission's comments on the PNF.

The proponent, Bulfinch Congress Holdings, LLC and HYM Investment Group, LLC (HYM), proposes to redevelop an approximately 4.8 acre site located at One Congress Street. The site is bounded by New Sudbury Street and New Chardon Street on the north and south and is bisected by an extension of Merrimac Street (commonly referred to as Congress Street). Merrimac Street continues southward as Congress Street, which begins south of New Sudbury Street.

One of the primary redevelopment goals of the project is to revitalize a key portion of the Government Center Urban Renewal Plan Area, originally developed as a 9-story 2,300 car parking garage. By replacing the existing structure with six mixed use buildings, the proponent hopes to improve the vitality and urban design of the Government Center and Bulfinch Triangle areas.

The proponent will construct six new buildings and reuse a portion of the existing garage in order to create a vibrant mix of uses that will enhance the surrounding neighborhoods. The project includes 771 new housing units, 204 new hotel rooms, approximately 1.3 million gross square feet of new office space, and 82,500 gross square feet of retail. The remaining portion of the existing garage will provide parking for the project.

According to the PNF, the proposed sanitary discharge will be 209,124 gallons per day (gpd) and the water demand for the project will be 207,000 gpd. For water service, the site is served by a 12-inch high service main, and a 16-inch low service water main on Sudbury



Street, a 12-inch high service main, and a 12-inch low service water main on Merrimac Street, a 30-inch low service main, a 12-inch low service main, a 16-inch high service main, and a 12-inch high service water main on New Chardon Street, a 12-inch high service, 12-inch low service, and a 8-inch low service water main on Bowker Street, and a 12-inch high service, 12-inch low service, and a 8-inch low service water main on Hawkins Street. The Commission will not permit the proponent to connect to the 30-inch low service main for water service to the site.

2.1

For sanitary sewer service, there is an 18-inch sanitary sewer located on Sudbury Street and a 12-inch sanitary sewer in Bowker Street and Hawkins Street that connect to a 15-inch sanitary sewer in New Chardon Street, both of which ultimately connect to the West Side Interceptor.

For storm drain service, there is a 12-inch storm sewer which flows into a 15-inch storm sewer on Hawkins Street, a 15-inch storm storm sewer on Bowker Street, both of which flow into an existing 36-inch storm sewer on New Chardon Street. There is a 30-inch storm sewer which flows into a 36-inch storm sewer on New Sudbury Street. On New Chardon Street, there is a 36-inch storm drain which flows into a 48-inch storm sewer on Merrimac Street. HYM should confirm the location of all water and sewer mains within the vicinity of the project area during the design phase of the project.

2.2

The Commission has the following comments regarding the PNF:

General

1. Prior to demolition of any buildings, all water, sewer and storm drain connections to the buildings must be cut and capped at the main pipe in accordance with the Commission's requirements. The proponent must then complete a Termination Verification Approval Form for a Demolition Permit, available from the Commission and submit the completed form to the City of Boston's Inspectional Services Department before a demolition permit will be issued.

2.3

2. All new or relocated water mains, sewers and storm drains must be designed and constructed at HYM'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. To assure compliance with the Commission's requirements, the proponent must submit a site plan and a General Service Application to the Commission's Engineering Customer Service Department for review and approval when the design of the new water and wastewater systems and the proposed service connections to those systems are 50 percent complete. The site plan should include the locations of new, relocated and

2.4



existing water mains, sewers and drains which serve the site, proposed service connections as well as water meter locations.

3. The Department of Environmental Protection, in cooperation with the Massachusetts Water Resources Authority and its member communities, are 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 this regard, DEP has been routinely requiring proponents proposing to add significant new wastewater flow to assist in the I/I reduction effort to ensure that the additional wastewater flows are offset by the removal of I/I. Currently, DEP is typically using a minimum 4:1 ratio for I/I removal to new wastewater flow added. The Commission supports the DEP/MWRA policy, and will require HYM 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. **2.5**
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/> **2.6**
5. The water use and sewage generation estimates do not appear to be correct. The Commission requires that these values be recalculated and submitted with the Site Plan. HYM 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. HYM should also provide the methodology used to estimate water demand for the proposed project. **2.7**
6. For any proposed masonry repair and cleaning HYM 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 HYM 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. HYM is advised that the **2.8**



Commission may impose additional conditions and requirements before permitting the discharge of the treated wash water to enter the sewer or drainage system.

7. HYM should be aware that the US Environmental Protection Agency issued a draft 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, HYM will be required to apply for a RGP to cover these discharges. **2.9**
8. HYM 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. **2.10**
9. It is HYM'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, HYM 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. **2.11**

Water

1. HYM 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. HYM should also provide the methodology used to estimate water demand for the proposed project. **2.12**
2. HYM should explore opportunities for implementing water conservation measures in addition to those required by the State Plumbing Code. In particular, HYM should consider outdoor landscaping which requires minimal use of water to maintain. If HYM 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. **2.13**
3. HYM 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. HYM should contact the Commission's Operations Division for information on and to obtain a Hydrant Permit. **2.14**



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, HYM should contact the Commission's Meter Department. **2.15**

Sewage / Drainage

1. In conjunction with the Site Plan and the General Service Application HYM will be required to submit a Stormwater Pollution Prevention Plan. The plan must: **2.16**
- 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.
 - Includes 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. HYM 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. **2.17**
3. The Commission encourages HYM to explore additional opportunities for protecting stormwater quality on site by minimizing sanding and the use of deicing chemicals, pesticides, and fertilizers. **2.18**
4. The discharge of dewatering drainage to a sanitary sewer is prohibited by the Commission. HYM is advised that the discharge of any dewatering drainage to the **2.19**



storm drainage system requires a Drainage Discharge Permit from the Commission. If the dewatering drainage is contaminated with petroleum products, HYM will be required to obtain a Remediation General Permit from the Environmental Protection Agency (EPA) for the discharge.

5. HYM 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. Under no circumstances will stormwater be allowed to discharge to a sanitary sewer. **2.20**
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, HYM will be required to meet MassDEP Stormwater Management Standards. **2.21**
7. Sanitary sewage must be kept separate from stormwater and separate sanitary sewer and storm drain service connections must be provided. **2.22**
8. The Commission requests that HYM 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. HYM should contact the Commission's Operations Division for information regarding the purchase of the castings. **2.23**
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. HYM is advised to consult with the Commission's Operations Department with regards to grease traps. **2.24**
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. **2.25**
11. 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 **2.26**



Thank you for the opportunity to comment on this project.

Yours truly,

A handwritten signature in black ink, appearing to read 'John P. Sullivan', written over the words 'Yours truly,'.

John P. Sullivan, P.E.
Chief Engineer

JPS/afh

C: ✓ Thomas N. O'Brien, HYM
Kathleen Pedersen, BRA
M. Zlody, BED
P. Larocque, BWSC

Letter 3

Katie Pedersen

Comment 3.1

“...the Proponent must complete a wind tunnel analysis of the Proposed Project to evaluate the Pedestrian Level Wind (PLW) impacts of each extending a minimum of 1,500 feet from the base of the Proposed Project. Measurement points for this PLW analysis should be placed at all building entrances, entrances to public transportation stations, crosswalks and public sidewalks, public plazas and gathering areas, parks and green spaces, and at regular intervals along the Greenway. These PLW studies must conform to the following specifications:

- *Customary Wind Roses based on aggregated Boston Wind data from Logan Airport 1945-1996*
- *Special test cases for conditions with sustained wind speeds of 30, 40, and 50 MPH; with gusts up to 1.5X sustained wind speed.”*

Response

On July 2, 2013, the BRA reviewed and commented on the proposed wind sensor locations to which the Proponent incorporated additional sensor locations. The wind study presented in the DPIR assumed these approved sensor locations. The extent of the wind tunnel test included surrounding buildings within a 1,600 foot radius of the project. The wind data included a more recent time period (1981 to 2011). The meteorological data used for the analysis included wind speeds of 30, 40 and 50 mph. A gust speed of 1.5X the root mean square wind speed was considered.

Comment 3.2

“The shadow impact analysis must include net shadow from the Proposed Project as well as existing shadow and clearly illustrate the incremental impact of the Proposed Project. For purposes of clarity, new shadow should be shown in a dark, contrasting tone, distinguishable from existing shadow. The shadow impact study area shall include, at a minimum, the entire area to be encompassed by the maximum shadow expected to be produced by the Proposed Project. The build condition(s) shall include all buildings under construction and any proposed buildings anticipated to be completed prior to the completion of the Proposed Project. Shadows from all existing buildings within the shadow impact study area shall be

shown. A North Arrow shall be provided on all figures. Shadows shall be determined by using the applicable Boston Azimuth and Altitude data."

Response

Shadow studies have been updated and included in Chapter 5, *Environmental Protection* of this DPIR, as requested. Refer to Appendix B for the full set of shadow diagrams.

Comment 3.3

"The Proposed Project is located immediately adjacent to the new Rose Kennedy Greenway park system, a condition that raises significant concerns about the aggregated environmental impacts on this sensitive public amenity, which was the result of a multi-billion dollar public investment....As a result of the unique environmental sensitivity of the Proposed Project's immediate context, the Proponent must complete the following scope of shadow studies and impact mitigation analysis and publish the results of these studies in the DPIR:

- (#1) *A comprehensive shadow study showing net new shadow created by the Proposed Project for the following dates and times:
 - o *The 21st day of each Calendar month, January through December;*
 - o *Analysis of shadow impacts at every daylight hour, on the hour, of each day required above;*
 - o (#2) *Shadow diagrams should show how each period of new shadow will move across the existing sidewalks and pedestrian walkways within, adjacent to, and in the vicinity of the Proposed Project and the existing and proposed plazas, historic resources, the Rose Kennedy Greenway and other open space areas within the vicinity of the Proposed Project in 15 minute intervals.**
- (#3) *A summary of the total time for each of the above-referenced days that the Proposed Project casts net new shadow on the Rose Kennedy Greenway parks.*
- (#4) *An analysis of the maximum height of the Proposed Project that would cast no net new shadow on the Rose Kennedy Greenway parks.*
- (#5) *With the assistance of a qualified horticulturalist or botanist, provide an analysis of the potential impacts on existing plantings along the Rose Kennedy Greenway caused by the net new shadow that would be created by the Proposed Project.*
- (#6) *The Proponent must propose specific measures designed to mitigate the specific impacts caused by net new shadow created by the Proposed Project on the Rose Kennedy Greenway parks."*

Response

(#1) Shadow studies have been updated to show shadows on the 21st day of each Calendar month, at every daylight hour, on the hour.

(#2) Where the building casts shadow on Rose Kennedy Greenway Parks, shadow studies have been conducted for every 15 minutes and included.

(#3) Summary of the total time of shadow on Rose Kennedy Greenway Parks is provided in Chapter 5, *Environmental Protection* of the DPIR.

(#4) Given that the existing garage already casts shadow on Rose Kennedy Greenway Parks, any building of the same size or taller will cast shadow on the Rose Kennedy Greenway Parks.

(#5) Having observed the type of plantings currently found within the North End Parks of the Rose Kennedy Greenway, we believe that there would be no adverse impacts to those plantings caused by the net new shadow created by the Government Center Development. The planting mix in those parcels includes evergreen shrubs and a mix of flowering perennials. The species represented within these zones, such as *Perovskia*, *Buxus*, and *Rosa* spp. and are ones that are classified as full-sun species. Full-sun is typically understood as 6 hours or more of daylight per day. Even at its most extreme, June 21, the net new shadow on the longest day would still allow for nearly nine hours of daylight, more than enough to maintain those plants.

(#6) As it is, the new design eliminates the tower on EPB1 and reduces the height of the office tower in WPB2 by 72', both of which further reduce the summer shadows on Rose Kennedy Greenway Parks.

Unusual, however, for new development in Boston, the Project will, starting in Phase 2A, provide periods of sunlight on streets now covered or shaded by the existing garage structure throughout the year. Because the eastern half of the Garage will be removed and replaced with three smaller buildings and a public open space, shadow is actually eliminated on parts of Congress Street and the East Parcel. Coupled with the new public space on the East Parcel, this will make Rose Kennedy Greenway Parks more accessible and attractive.

Comment 3.4

"The Proponent shall demonstrate that the glass selected will avoid the creation of a visual nuisance and/or a hazard, as it interferes with vision and concentration. A solar glare analysis shall be required. The analysis shall measure potential reflective glare from the buildings onto potentially affected streets and public open spaces and sidewalk areas in order to determine the likelihood of visual impairment or discomfort due to reflective spot glare. Mitigation measures to eliminate any adverse reflective glare shall be identified."

Response

As stated in the PNF, the proposed buildings will be designed to minimize solar glare that could have an adverse safety impact on traffic near the Project and to minimize solar heat gain in nearby buildings. The exterior building materials have not yet been selected; however, as a design standard it is unlikely that highly reflective glass will be employed in any of the building facades. As the exterior design and potential façade details are further defined, specific solar glare and heat gain impacts will be studied for each Project Component as part of each Component's Article 80 review.

Comment 3.5

"A future air quality (carbon monoxide) analysis shall be required for any intersection (including garage entrance/exits) where the level of service (LOS) is expected to deteriorate to D and the Proposed Project causes a 10 percent increase in traffic or where the level of service is E or F and the Proposed Project contributes to a reduction in LOS.

The study shall analyze the existing conditions, future No-Build and future Build conditions. The methodology and parameters of the air quality analysis shall be approved in advance by the BRA and the Massachusetts Department of Environmental Protection (DEP). Mitigation measures to eliminate or avoid any violation of air quality standards shall be described."

Response

The methodology for the mobile source air quality analysis presented in Chapter 5, *Environmental Protection* of this DPIR was developed in coordination and confirmed with the Boston Environment Department (BED) by representatives of the Proponent on July 18, 2013. The air quality assessment analyzed the Carbon Monoxide (CO) and Particulate Matter (PM₁₀ and PM_{2.5}) for the intersections that meet the above-referenced criteria for the 2013 Existing, 2028 No-Build, and 2028 Build Conditions (i.e., full-build out). Additionally, while to date, there is no state or federal standard established for Ultra-Fine Particulates (UFP), nor is there any EPA or DEP recommended modeling procedures for assessing UFPs, the air quality assessment also includes a discussion of potential increases in UFPs given they are a concern of the BED.

Comment 3.6

"A description of the Proposed Project's heating and mechanical systems including location of buildings/garage intake and exhaust vents and specifications, and an analysis of the impact on pedestrian level air quality and on any sensitive receptors from operation of the heating, mechanical and exhaust systems, including the building's emergency generator as well as the parking garage, shall be required. Measures to avoid any violation of air quality standards shall be described."

Response

An analysis of the potential impacts to pedestrian level air quality associated with the ventilation fans for the Garage was conducted using EPA's air quality model AERMOD and is presented in Chapter 5, *Environmental Protection* of this DPIR. Because the Project is currently designed at a master planning level, the size and number of the other stationary sources, such as heating boilers, hot water heaters, and emergency generators have not yet been finalized. As mentioned in Chapter 2, *General Information and Regulatory Context* of this DPIR, as the design of each Project Component progresses, the Proponent will obtain operating permits for appropriate equipment under DEP's regulations (310 CMR 7.02), as required. The DEP regulatory process will ensure that these emission sources meet the National Ambient Air Quality Standards.

Comment 3.7

"The Proponent shall establish the existing noise levels at the Proposed Project site and vicinity and shall calculate future noise levels after project completion, thus demonstrating compliance with the Interior Design Noise Levels (not to exceed day-night average sound level of 45 decibels) established by U.S. Department of Housing and Urban Development, as well as applicable City, State and Federal noise criteria."

Response

Chapter 5, *Environmental Protection* of this DPIR provides a comprehensive noise evaluation, which establishes interior noise levels the Project must meet in order to comply with the interior noise level criteria established by the U.S. Department of Housing and Urban Development (HUD). Additionally, the Project is not expected to generate sound levels that exceed applicable City or State noise standards.

Comment 3.8

"The Proponent has stated that mechanical equipment such as chillers, garage exhaust fans, and emergency generators have the potential to cause nuisance levels of noise. Due to the Proposed Project's proximity to an adjacent residential neighbors appropriate low-noise mechanical equipment and noise control measures will be required in accord with the Regulations for Control of Noise in the City of Boston and the Commonwealth of Massachusetts. The Proponent shall also describe any other measures necessary to minimize and/or eliminate adverse noise impacts from the Proposed Project."

Response

As presented in Chapter 5, *Environmental Protection* of the DPIR, based on recent noise monitoring, the existing sound levels are greater than the City's nighttime standard of 50 dB(A) and the sound levels projected by the Project's building

mechanical equipment range from 39 dB(A) to 48 dB(A) resulting in an overall sound level change (increase) by one decibel at only two of the 12 sensitive receptor locations, which is in compliance with the City of Boston noise standards. The building mechanical equipment will likely be located within mechanical penthouses on the rooftops of each building.

Comment 3.9

“The Proponent shall provide a list of any known or potential contaminants on the Proposed Project site, and if applicable, a description of remediation measures to ensure their safe removal and disposal, pursuant to the M.G.L., Chapter 21E and the Massachusetts Contingency Plan.”

Response

As stated in the PNF, there are no known contaminants on the Project Site.

Comment 3.10

“Any potential hazardous wastes to be generated by the Proposed Project site must be identified. In addition, potential waste generation must be estimated and plans for disposal indicated and measures to promote reduction of waste generation and to promote recycling in compliance with the City’s recycling program described.”

Response

As stated in the PNF, the Project will not generate hazardous wastes. In conjunction with the sustainability goals, all Project Components will comply with LEED Prerequisite regarding appropriate recycling facilities. Furthermore, as stated in the PNF, recycling/reuse programs will be implemented by building contractors and future managers to reduce the amount of waste that is sent to landfill throughout construction and operations, including potential reuse/recycling of the concrete associated with the removal of the existing garage structure over Congress Street. Recycling collection areas and programs that promote recycling will consist of glass, plastics, metals (aluminum and steel), paper, wood and cardboard.

Comment 3.11

“The Proponent shall be required to provide an evaluation of the Proposed Project site’s existing and future stormwater drainage and stormwater management practices. A narrative of the existing and future drainage patterns from the Proposed Project site and shall describe and quantify existing and future stormwater runoff from the site and the Proposed Project’s impacts on site drainage. The Proposed Project’s stormwater management system, including best management practices to be implemented, measures proposed to control and treat

stormwater runoff and to maximize on-site retention of stormwater, measures to prevent groundwater contamination, and compliance with the Commonwealth's Stormwater Management Policies, also shall be described. The Proponent shall describe the Proposed Project area's stormwater drainage system to which the Proposed Project will connect, including the location of the stormwater drainage facilities and ultimate points of discharge."

Response

Refer to Chapter 6, *Infrastructure* of this DPIR for a discussion of the proposed stormwater management strategies for the Project.

Comment 3.12

"A description and analysis of the existing sub-soil conditions, including the potential for ground movement and settlement during excavation and potential impact on adjacent buildings and utility lines shall be required. This analysis shall also include a description of the foundation construction methodology, the amount and method of excavation, and the need for any blasting and/or pile driving and the impact on adjacent buildings and infrastructure. A Vibration Monitoring Plan shall be developed prior to commencing construction activities to ensure that impacts from the project construction on adjacent buildings and infrastructure are avoided. Mitigation measures to minimize and avoid damage to adjacent buildings and infrastructure must be described."

Response

As stated in the PNF, no major subsurface excavation is anticipated, which would disturb these subsurface conditions. An analysis of existing sub-soil conditions, groundwater levels, the amount and method of excavation, potential for ground movement and settlement during excavation as well as the potential impact on adjacent buildings and utilities will be evaluated and provided for each Project Component as part of a future review process. A description of measures to ensure that groundwater levels are maintained during and after construction will also be provided for each Project Component. Additionally, the Proponent will implement a Vibration Monitoring Plan during construction.

Comment 3.13

"The existing Government Center Parking Garage site is not located in the Groundwater Conservation Overlay District ("GCOD") and therefore not required to comply with the requirements of Article 32 of the Boston Zoning Code. However, the Proposed Project site may include adjacent underutilized and overly-wide sidewalks created by the Big Dig, sections of which are located in the Bulfinch Triangle District."

Response

The Project is expected to have a beneficial impact on groundwater levels through the introduction of ground level landscaping, which is not currently present on the Project Site. As currently proposed, the Project does not have deep excavations that would potentially impact groundwater levels.

Comment 3.14

“The Proponent must commit to long-term sustainability performance standards and a system of performance indicators and metrics to track performance as each component building of the Proposed Project is completed and begins operation. The DPIR should include a proposed tracking system.”

Response

As presented in the PNF, the Proponent is committed to continued exploration of practical ideas for creating a sustainable development that contributes to urban resilience in Boston. The PNF presented a description of the comprehensive approach to sustainability for the Project, which includes obtaining LEED certification for all Project Components exceeding Article 37 requirements. Project design will be goal-oriented generally focused on reduced environmental impact and improved occupant comfort as well as contribution to the community. The Proponent is committed to incorporating many key aspects of sustainability and high performance building design, where applicable and feasible.

The ‘Sustainable Design/Green Building’s section of Chapter 5, *Environmental Protection* of this DPIR, builds on and provides an update to the ongoing sustainability design process by introducing the development of specific targets and metrics, and strategies in the form of a preliminary sustainability plan for the Project, such as an energy benchmarking and tracking system through the use of tenant sub-metering. Furthermore, the Proponent is committed to meeting the applicable requirements of the future City of Boston Building Energy Reporting and Disclosure Ordinance.

BRA MEMORANDUM

TO: John Fitzgerald

FROM: Katie Pedersen

DATE: July 1, 2013

RE: Government Center Garage
Boston, Massachusetts
Comments on Institutional Master Plan Notification Form

I have reviewed the Project Notification Form (PNF) dated June 2013 and submit the following comments for the Environmental Protection Component. Bullfinch Congress Holdings, LLC (“BCH”), the owner and the HYM Investment Group, LLC (“HYM”) (the “Proponent”) are proposing to redevelop the site of the Government Center Parking Garage at One Congress Street (the “Proposed Project”). The Proponent proposes the construction of six new buildings and reuse of a portion of the existing parking garage in order to create a residential and retail mixed use project. The Proposed Project will consist of 771 housing units (both apartments and condominiums) and 204 hotel rooms, 1.3 million gross square feet of office and 82,500 gross square feet of retail. The remaining portion of the parking garage will continue to provide commercial parking and overnight resident parking.

Wind

In general, the Boston Redevelopment Authority (“BRA”) has adopted two standards for assessing the relative wind comfort of pedestrians. First, the BRA wind design criterion states that an effective gust velocity of 31 mph should not be exceeded more than one percent of the time. The second set of criteria used by the BRA to determine the acceptability of specific locations is based on the work of Melbourne. The placement of wind measurement locations shall be based on an understanding of the pedestrian use of the Proposed Project and the surrounding area. This set of criteria is used to determine the relative level of pedestrian wind comfort for activities such as sitting, standing or walking.

The Proposed Project is located adjacent to new Rose Kennedy Greenway park system. This sensitive public amenity makes the wind analysis and impact mitigation component of the Proposed Project especially important and worthy of extraordinary study by the Proponent.

To this end, the Proponent must conduct complete a wind tunnel analysis of the Proposed Project to evaluate the Pedestrian Level Wind (PLW) impacts of each extending a minimum of 1,500 feet from the base of the Proposed Project. Measurement points for this PLW analysis should be placed at all building entrances, entrances to public transportation stations, crosswalks and public sidewalks, public plazas and gathering

areas, parks and green spaces, and at regular intervals along the Greenway. These PLW studies must conform to the following specifications:

- Customary Wind Roses based on aggregated Boston Wind data from Logan Airport 1945-1996
- Special test cases for conditions with sustained wind speeds of 30, 40, and 50 MPH; with gusts up to 1.5X sustained wind speed.

Shadow

3.2

The shadow impact analysis must include net shadow from the Proposed Project as well as existing shadow and clearly illustrate the incremental impact of the Proposed Project. For purposes of clarity, new shadow should be shown in a dark, contrasting tone, distinguishable from existing shadow. The shadow impact study area shall include, at a minimum, the entire area to be encompassed by the maximum shadow expected to be produced by the Proposed Project. The build condition(s) shall include all buildings under construction and any proposed buildings anticipated to be completed prior to the completion of the Proposed Project. Shadows from all existing buildings within the shadow impact study area shall be shown. A North Arrow shall be provided on all figures. Shadows shall be determined by using the applicable Boston Azimuth and Altitude data.

Particular attention shall be given to existing or proposed public open spaces and pedestrian areas, including, but not limited to, the existing sidewalks and pedestrian walkways within, adjacent to, and in the vicinity of the Proposed Project and the existing and proposed plazas, historic resources, the Rose Kennedy Greenway and other open space areas within the vicinity of the Proposed Project.

The Proposed Project is located immediately adjacent to the new Rose Kennedy Greenway park system, a condition that raises significant concerns about the aggregated environmental impacts on this sensitive public amenity, which was the result of a multi-billion dollar public investment.

3.3

As a result of this condition, the Proponent must complete a detailed shadow study that examines shadow conditions throughout the calendar year, not just on cardinal dates as is customary for development projects not located at sites with such extraordinary environmental sensitivity as is the Proposed Project site.

As a result of the unique environmental sensitivity of the Proposed Project's immediate context, the Proponent must complete the following scope of shadow studies and impact mitigation analysis and publish the results of these studies in the DPIR:

- A comprehensive shadow study showing net new shadow created by the Proposed Project for the following dates and times:
 - o The 21st day of each Calendar month, January through December;
 - o Analysis of shadow impacts at every daylight hour, on the hour, of each day required above;
 - o Shadow diagrams should show how each period of new shadow will move across the existing sidewalks and pedestrian walkways within, adjacent to, and in the vicinity of the Proposed Project and the existing and proposed plazas, historic resources, the Rose Kennedy Greenway and other open space areas within the vicinity of the Proposed Project in 15 minute intervals.

- A summary of the total time for each of the above-referenced days that the Proposed Project casts net new shadow on the Rose Kennedy Greenway parks.

- An analysis of the maximum height of the Proposed Project that would cast no net new shadow on the Rose Kennedy Greenway parks.

- With the assistance of a qualified horticulturalist or botanist, provide an analysis of the potential impacts on existing plantings along the Rose Kennedy Greenway caused by the net new shadow that would be created by the Proposed Project.

- The Proponent must propose specific measures designed to mitigate the specific impacts caused by net new shadow created by the Proposed Project on the Rose Kennedy Greenway parks.

Daylight

(Please see Urban Design comments)

Solar Glare

The Proponent shall demonstrate that the glass selected will avoid the creation of a visual nuisance and/or a hazard, as it interferes with vision and concentration. A solar glare analysis shall be required. The analysis shall measure potential reflective glare from the buildings onto potentially affected streets and public open spaces and sidewalk areas in order to determine the likelihood of visual impairment or discomfort due to reflective spot glare. Mitigation measures to eliminate any adverse reflective glare shall be identified.

Air Quality

The Proponent shall provide a description of the existing and projected future air quality in the Proposed Project vicinity and shall evaluate ambient levels to determine conformance with the National Ambient Air Quality Standards (NAAQS). Careful consideration shall be given to mitigation measures to ensure compliance with air quality standards.

A future air quality (carbon monoxide) analysis shall be required for any intersection (including garage entrance/exits) where the level of service (LOS) is expected to deteriorate to D and the Proposed Project causes a 10 percent increase in traffic or where the level of service is E or F and the Proposed Project contributes to a reduction in LOS.

3.5

The study shall analyze the existing conditions, future No-Build and future Build conditions. The methodology and parameters of the air quality analysis shall be approved in advance by the BRA and the Massachusetts Department of Environmental Protection (DEP). Mitigation measures to eliminate or avoid any violation of air quality standards shall be described.

A description of the Proposed Project's heating and mechanical systems including location of buildings/garage intake and exhaust vents and specifications, and an analysis of the impact on pedestrian level air quality and on any sensitive receptors from operation of the heating, mechanical and exhaust systems, including the building's emergency generator as well as the parking garage, shall be required. Measures to avoid any violation of air quality standards shall be described.

3.6

Noise

The Proponent shall establish the existing noise levels at the Proposed Project site and vicinity and shall calculate future noise levels after project completion, thus demonstrating compliance with the Interior Design Noise Levels (not to exceed day-night average sound level of 45 decibels) established by U.S. Department of Housing and Urban Development, as well as applicable City, State and Federal noise criteria.

3.7

The Proponent has stated that mechanical equipment such as chillers, garage exhaust fans, and emergency generators have the potential to cause nuisance levels of noise. Due to the Proposed Project's proximity to an adjacent residential neighbors appropriate low-noise mechanical equipment and noise control measures will be required in accord with the Regulations for Control of Noise in the City of Boston and the Commonwealth of Massachusetts. The Proponent shall also describe any other measures necessary to minimize and/or eliminate adverse noise impacts from the Proposed Project.

3.8

Solid and Hazardous Waste

The Proponent shall provide a list of any known or potential contaminants on the Proposed Project site, and if applicable, a description of remediation measures to ensure

3.9

their safe removal and disposal, pursuant to the M.G.L., Chapter 21E and the Massachusetts Contingency Plan.

Any potential hazardous wastes to be generated by the Proposed Project site must be identified. In addition, potential waste generation must be estimated and plans for disposal indicated and measures to promote reduction of waste generation and to promote recycling in compliance with the City's recycling program described.

3.10

Stormwater Management

3.11

The Proponent shall be required to provide an evaluation of the Proposed Project site's existing and future stormwater drainage and stormwater management practices. A narrative of the existing and future drainage patterns from the Proposed Project site and shall describe and quantify existing and future stormwater runoff from the site and the Proposed Project's impacts on site drainage. The Proposed Project's stormwater management system, including best management practices to be implemented, measures proposed to control and treat stormwater runoff and to maximize on-site retention of stormwater, measures to prevent groundwater contamination, and compliance with the Commonwealth's Stormwater Management Policies, also shall be described. The Proponent shall describe the Proposed Project area's stormwater drainage system to which the Proposed Project will connect, including the location of the stormwater drainage facilities and ultimate points of discharge.

Geotechnical Impacts

3.12

A description and analysis of the existing sub-soil conditions, including the potential for ground movement and settlement during excavation and potential impact on adjacent buildings and utility lines shall be required. This analysis shall also include a description of the foundation construction methodology, the amount and method of excavation, and the need for any blasting and/or pile driving and the impact on adjacent buildings and infrastructure. A Vibration Monitoring Plan shall be developed prior to commencing construction activities to ensure that impacts from the project construction on adjacent buildings and infrastructure are avoided. Mitigation measures to minimize and avoid damage to adjacent buildings and infrastructure must be described.

Sustainable Design/Green Buildings

(Please consult the Interagency Green Building Committee comment letter)

Groundwater Conservation Overlay District

The existing Government Center Parking Garage site is not located in the Groundwater Conservation Overlay District ("GCOD") and therefore not required to comply with the requirements of Article 32 of the Boston Zoning Code. However, the Proposed Project site may include adjacent underutilized and overly-wide sidewalks created by the Big Dig, sections of which are located in the Bulfinch Triangle District.

3.13

The GCOD was expanded to include the North End Waterfront Subdistrict, the North End Local Business Subdistrict and Fort Point Waterfront Subdistrict, all within the Harborpark District, and also in the North End Neighborhood District, Bulfinch Triangle District, Central Artery District, and South Boston, per an amendment on April 25, 2007. In addition to the expansion, the Amendment set the standards to be applied to the newly added areas: Section 32-6 (b), Standards, is only applicable subsection required to demonstrate compliance- *“provision that any Proposed Project result in no negative impact on groundwater levels within the lot in question or adjacent lots, subject to the terms of any (i) dewatering permit or (ii) cooperation agreement entered into by the Proponent and the Boston Redevelopment Authority, to the extent that such agreement provides standards for groundwater protection during construction.”*

Performance Standards and Indicators

The Proponent must commit to long-term sustainability performance standards and a system of performance indicators and metrics to track performance as each component building of the Proposed Project is completed and begins operation. The DPIR should include a proposed tracking system.

3.14

Letter 4

The Beacon Hill Civic Association

Comment 4.1

“Our primary concern is the proposed height and density of the West Parcel development, which we consider to be excessive in light of its relationship to Government Center, Beacon Hill and the as-yet under-developed abutting area along the north side of Cambridge Street. The current PNF fails to address these areas that will be most immediately impacted, dealing only with potential impacts on the Greenway.”

Response

Overall, the Project was designed to be consistent with the Greenway Guidelines, which encompasses the entire Project Site, both in terms of height and massing. The height strategy on the West Parcel is consistent with Boston Greenway Design Guidelines where the taller, denser buildings are proposed for the West Parcel (specifies building heights of up to 600 feet) and the lower buildings and active public spaces are proposed closest to the Greenway on the East Parcel. However, as discussed in Chapter 1, *Project Description* of this DPIR, in response to community feedback, the height of the office building (WP-B2) has been reduced to 528 feet and the condominium/hotel building (EP-B1) has been reduced to 157 feet with an overall reduction in gross square footage of new uses by approximately 122,000 gross square feet, which reduction is predominantly office use. Consistent with the previous development program presented in the PNF, the revised Project will have minimal or no shadow impacts to the west side and, with the proposed changes to site vehicle access, traffic is generally diverted away from Cambridge Street.

Comment 4.2

“The PNF is essentially silent regarding potential impacts upon the blocks that lie between the West Parcel and Cambridge Street/Beacon Hill and gives only cursory mention of the project's impacts on Government Center and Beacon Hill. ... Consequently, we request that studies be undertaken of alternative allocations of FAR (square footage?) to the various individual buildings proposed for the project, in order to reduce the height & density of the excessively large structures of the West Parcel, in particular the 600' high office tower. ”

Response

Refer to the response to Comment 4.1 above.

Comment 4.3

“Our other concerns relate to traffic (vehicular and pedestrian) and parking. We ask that the developer consider the impact of the project on the already-heavily-congested Cambridge Street and Charles Circle. Future traffic studies should incorporate the impact of the proposed MEEI 1,000 car underground garage, particularly as the combined effects of both projects' traffic generation (including both vehicles that park and those that drop-off/deliver) are considered.”

Response

The impact study area was defined in consultation with the Boston Transportation Department and includes 37 key area intersections. Three study intersections are located along Cambridge Street at New Sudbury Street, New Chardon Street, and Staniford Street. As presented in PNF Section 3.4.2.4., Cambridge Street is expected to process about 8% of project traffic; 5% more regional in nature via Storrow Drive and 3% more local across the Longfellow Bridge.

The study team consulted with the City of Boston to determine which future projects should be included in the future year analyses. The MEEI 1,000 car garage was not identified as a future project since it has not been filed with the BRA. Note that it is standard procedure to only include projects that have received permitting approvals, or are well into the permitting process, and have developed a transportation study.

Comment 4.4

“Many residents from abutting neighborhoods depend on the Government Center Garage for monthly and overnight parking, but do not seem to be accommodated in the current proposal. We note that many of the public parking spaces described in the tables of the PNF are, in fact, already leased long-term and therefore offer no capacity for monthly parkers displaced from the Government Center Garage.”

Response

By instituting a managed shared parking arrangement in the Project garage, all current transient parking and the vast majority of the overnight parking use is expected to be accommodated, as well as a certain level of monthly leased parking. As presented in Chapter 4, *Transportation and Parking* of this DPIR, it is projected that up to 570 parking spaces will be available during a typical weekday and weeknight period and about 733 spaces will be available during weekends.

Current peak weekday occupancy of the Government Center Garage is about 1,050 vehicles with transient parkers accounting for about 220 spaces and monthly leases for about 830 spaces. While the current 220 transient parkers and about 330 monthly leases – or commuter parking – will be able to be accommodated in the future at the

Project garage during a typical weekday, about 500 daytime commuter parkers will be displaced. Based on current actual surveyed occupancy rates at the largest area public commercial parking garages (those over 300 spaces) as documented in Section A2.3.2.5, there is availability to accommodate all of these displaced commuter parkers.

Comment 4.5

“The BHCA is committed to the vision of Boston as a pedestrian-friendly city. Complete analysis of pedestrian usage will be important and is also requested. We seek comfortable sidewalks on all borders of the project, however, we note a particular scarcity of pedestrian accommodations on the Greenway edge of the proposed project. A path through the interior of the East Parcel is no substitute for a sidewalk along the Surface Artery. In addition, we ask that the intersections of Cambridge/Bowdoin/New Chardon, Cambridge/Stamford, Cambridge/New Sudbury, and Surface Artery/New Chardon Streets be included in the pedestrian analyses.”

Response

The Proponent is committed to improving pedestrian safety and convenience in and around the site and will continue to work with BTM, PWD, and the community to improve all pedestrian crossings connecting to the Project Site.

The focused pedestrian study area was defined in consultation with BTM and includes the following three key locations near the site where Project related pedestrian activity will be heaviest: New Sudbury Street/Congress Street; New Chardon/Canal Street; and New Chardon Street/Congress Street/Merrimac Street.

Comment 4.6

“Finally, we agree with the concerns raised by our neighbors in the Downtown North Association regarding the sequencing of the project. The prospect of absorbing the increased density of the West Parcel structures in the near term while waiting twenty years for the promise of the public benefits associated with the East Parcel is hard to swallow.”

Response

The Proponent has heard from several community groups voicing concerns over the timing of when the eastern portion of the Government Center Garage would be demolished given the overall project timeframe of 15-20 years stated in the PNF. Given these concerns the Proponent has agreed to the following:

1. Move up the demolition of the garage from Phase 3A to Phase 2A,
2. Commit to a demolition start date no later than 1st quarter of 2023 for the eastern portion of the garage,

3. Proponent would be prohibited from obtaining a certificate of occupancy for any new proposed buildings, except for the Phase 1A building (the apartment building, or WP-B1), until demolition of the eastern portion of the existing garage structure is substantially complete or well underway.

This is a material change in the project phasing, which will bring the public benefits sooner to the overall community. Also, it has the additional benefit of demolishing the garage before the majority of density is brought on-line which should further mitigate construction impacts to the area.

DRAFT #2

BHCA Letterhead

7/6/13

Mr. John Fitzgerald
Boston Redevelopment Authority
One City Hall Square, 9th Floor
Boston, MA 02201

**Re: Redevelopment of the Government Center Garage
 Project Notification Form**

Dear Mr. Fitzgerald:

The Beacon Hill Civic Association (“BHCA”) has, since 1922, strived to enhance and protect the quality of life of residents of Beacon Hill. We appreciate this opportunity to comment on the proposed plans for redevelopment of the Government Center Garage as presented by the HYM Investment Group in the Project Notification Form (“PNF”).

We offer the following observations and comments based upon our review of the PNF for the proposed project and our attendance at several public meetings where the proponents and the BRA have responded to our questions and clarified their general intentions. We are grateful to the proponents for presenting their plans to the Beacon Hill community at a neighborhood meeting, broadening the conversation between the neighborhood and HYM.

The BHCA enthusiastically supports the concept of a mixed-use project on the site of the existing garage. The emphasis on residential uses and in particular the inclusion of 3 BR family-scale rental units is broadly supported, as is the mix of retail business to address local needs.

Scale of Development

Our primary concern is the proposed height and density of the West Parcel development, which we consider to be excessive in light of its relationship to Government Center, Beacon Hill and the as-yet under-developed abutting area along the north side of Cambridge Street. The current PNF fails to address these areas that will be most immediately impacted, dealing only with potential impacts on the Greenway. It cites the Greenway Planning Study to justify excessive heights and densities, thus: “While the eastern edge should retain the scale of the adjacent context in the Bulfinch Triangle and Parcel 7

4.1

Garage, the western portions of the site appear capable of supporting much greater density and heights up to 600' without affecting the Greenway Parks environmentally", without providing the context of the next sentence from the Guidelines: **"Given the potential scale of the development here, and the complexities of phasing and other planning considerations, further study will be required in order to prescribe specific massing and uses"** (bold face in original).

The BHCA, in our letter of June 17, 2010 commenting on the Greenway Planning District Study, objected to the inclusion of the area west of Congress Street in the Greenway Study. Despite concern from the abutting neighborhoods, no comprehensive planning for this area was done before the BRA approved the Greenway Planning District Guidelines and no comprehensive planning has been done in the years since. The significant, massive development proposed by the Raymond Company that was reflected in the Greenway Study and the proposed 150% increase in heights proposed by HYM now should not be endorsed in the vacuum of the parcel, without consideration of the urban fabric of the abutting areas.

The PNF is essentially silent regarding potential impacts upon the blocks that lie between the West Parcel and Cambridge Street/Beacon Hill and gives only cursory mention of the project's impacts on Government Center and Beacon Hill. The tallest of the surrounding buildings (the Saltonstall, JFK Federal, and Longfellow Place buildings) are all just under 400' in height. The Beacon Hill Historic District (the northeastern corner of which is only 600' from the southwestern corner of the proposed 600' high office tower) is zoned for 65' heights.

4.2

Consequently, we request that studies be undertaken of alternative allocations of FAR (square footage?) to the various individual buildings proposed for the project, in order to reduce the height & density of the excessively large structures of the West Parcel, in particular the 600' high office tower.

We are aware of the many benefits to our neighbors that would be generated through removal of the eastern portion of the garage structure and revitalization of the entire project area. However, there is also a substantial risk of negative impact to the zone between the project site and Cambridge Street, where the BRA has repeatedly failed to respond favorably to requests from the BHCA, from the Downtown North Association and from the West End to undertake critically needed planning activities.

We believe that Beacon Hill is particularly vulnerable to future out-of-scale development unless measures are taken to ensure that a harmonious relationship of scale between the Hill and the redeveloped garage has been established. It is essential that the project planning process fully address these issues.

Traffic and Parking

Our other concerns relate to traffic (vehicular and pedestrian) and parking. We ask that the developer consider the impact of the project on the already-heavily-congested Cambridge Street and Charles Circle. Future traffic studies should incorporate the impact of the proposed MEEI 1,000 car underground garage, particularly as the combined effects of both projects' traffic generation (including both vehicles that park and those that drop-off/deliver) are considered.

4.3

Many residents from abutting neighborhoods depend on the Government Center Garage for monthly and overnight parking, but do not seem to be accommodated in the current proposal. We note that many of the public parking spaces described in the tables of the PNF are, in fact, already leased long-term and therefore offer no capacity for monthly parkers displaced from the Government Center Garage.

4.4

The BHCA is committed to the vision of Boston as a pedestrian-friendly city. Complete analysis of pedestrian usage will be important and is also requested. We seek comfortable sidewalks on all borders of the project, however, we note a particular scarcity of pedestrian accommodations on the Greenway edge of the proposed project. A path through the interior of the East Parcel is no substitute for a sidewalk along the Surface Artery. In addition, we ask that the intersections of Cambridge/Bowdoin/New Chardon, Cambridge/Staniford, Cambridge/New Sudbury, and Surface Artery/New Chardon Streets be included in the pedestrian analyses.

4.5

Project Sequencing

Finally, we agree with the concerns raised by our neighbors in the Downtown North Association regarding the sequencing of the project. The prospect of absorbing the increased density of the West Parcel structures in the near term while waiting twenty years for the promise of the public benefits associated with the East Parcel is hard to swallow.

4.6

We appreciate the opportunity to submit these comments.

Sincerely,
BEACON HILL CIVIC ASSOCIATION

Stephen Young, Chairman

cc:

Mayor Thomas Menino
Councilor Michael Ross
Councilor Sal LaMattina
Council President Stephen Murphy

John Connolly

Felix Arroyo

Ayanna Pressley

Peter Meade

Kairos Shen

Should we list the state folks? I think so---there's an impact on nearby DoT property--the Greenway/Parcels 7 and 9 etc

Senator Sonia Chang-Diaz

Senator Andrew Petrucci

Representative

Representative Aaron Michlewitz

and it should be sent to all the mayoral candidates (not on the cc list though)

Letter 5

North End/Waterfront Residents' Association

Comment 5.1

"We are unsure of the plan for further Boston Redevelopment Authority ("BRA") and public review by which the BRA will approve the Project or elements of the Project under Article 80 and also propose major zoning changes necessary to allow the Project to be constructed and operated."

Response

Upon receipt of the Adequacy Determination of the Project (i.e., Article 80 approval for the master plan) and Planned Development Area (PDA) approval anticipated to be requested, the Proponent will then initiate separate Article 80 reviews for each Project Component. These individual submittals will outline primarily urban design and architecture issues and will identify what, if anything, has changed in terms of environmental or community impacts from the initial approvals.

Comment 5.2

"We are concerned that the greatest impacts of the project could occur long before the greatest public realm benefits. We are also concerned with the condition of the East Parcel during the time between the razing of the east end of the Garage and the construction of new buildings proposed on this parcel."

Response

The Project Proponent has heard from several community groups voicing concerns over the timing of when the eastern portion of the Government Center Garage would be demolished given the overall project timeframe of 15-20 years stated in the PNF.

Given these concerns the Proponent has agreed to the following:

1. Move up the demolition of the garage from Phase 3A to Phase 2A,
2. Commit to a demolition start date no later than 1st quarter of 2023 for the eastern portion of the garage,
3. Proponent would be prohibited from obtaining a certificate of occupancy for any new proposed buildings, except for the Phase 1A building

(Apartment Building), until demolition of the eastern portion of the existing garage structure is substantially complete or well underway.

This is a material change in the phasing of the project which will bring the public benefits sooner to the overall community. Also, it has the additional benefit of demolishing the garage before the majority of density is brought on-line which should further mitigate construction impacts to the area.

Regarding the condition of the East Parcel, after garage demolition but before completion of the buildings on the East Parcel, the Proponent has the following responses:

- The Project Site will be fenced from pedestrian walkways and roadways for safety purposes at all times.
- The construction of the East Parcel buildings would likely commence shortly after the completion of garage demolition.
- The Haymarket Bus Station will need to be relocated during the demolition of the eastern portion of the garage and also during the construction of the East Parcel office building.
- The existing Haymarket station entrance and elevator under the existing Government Center Garage will also need to be closed at times during garage demolition and construction of the East Parcel buildings. Access to Haymarket will continue to be available from the existing entrance in the adjacent Parcel 7 Garage parcel.

The Proponent will work with the City of Boston, MBTA and the community to coordinate this effort and seek to minimize the impact from demolition of the garage and construction of new buildings on the East Parcel.

Comment 5.3

“There has been little public discussion to date about the Project and its impacts, no public discussion about the cumulative impacts of the several projects proposed in the Haymarket and North Station areas...”

Response

As described in Chapter 1, *Project Description* of this DPIR, there have been significant public discussion opportunities concerning the Project, including numerous IAG and public meetings. In addition to the IAG and public meetings, the Proponent has met with over two dozen groups that have expressed interest in learning more about the Project.

Comment 5.4

“The Developer has stated that the Project and its demands on roadways and other infrastructure fulfill or are consistent with several planning documents and guidelines developed by the BRA and conform to highway and roadway improvements that were implemented with the Central Artery Project. This general statement of assurance would also argue that all of the other projects proposed in the area can also be accommodated by existing roadways and other infrastructure, with relatively minor traffic signal changes listed in the PNF. But how can that be when we already have serious traffic congestion, traffic pollution, confusing traffic configurations and unsafe pedestrian crossings along Cross Street, North Washington Street, Causeway Street and Cambridge Street and their many intersections?”

Response

The various roadway and infrastructure improvements to the area, and specifically those completed by the Central Artery/Tunnel project, were planned, designed, and built assuming the advent of significant future development in downtown Boston.

The Project’s traffic study follows standard guidelines established by BTD and uses accepted principles and methodologies established by the Institute of Transportation Engineer’s (ITE) for estimating new trips and evaluating existing and future intersection operations. The transportation study was prepared following standard and accepted practices and guidelines used to assess new projects, including the number of the new trips from the Project itself and other proposed developments and the associated impact of those trips. The methodology is sound, accepted traffic engineering practice and has not been questioned by the regulatory agencies.

Comment 5.5

“In addition, the traffic capacity and structural condition of the North Washington Street/Charlestown Bridge has been compromised for decades, and the project to replace or rehabilitate the bridge has been delayed for all that time. What is the necessary capacity of the bridge to support the demands of the Project and other major redevelopment projects in the area, and what are the consequences of an additional or full shutdown of the bridge if the bridge improvements are further delayed leading to an emergency situation? The bridge should be replaced or rehabilitated to full capacity and safe long-term structural condition before the redevelopment projects in the Haymarket and North Station areas are completed.”

Response

The North Washington Bridge is included in the State’s Transportation Improvement Program (TIP), a program of capital improvements that reflect the needs of the regional transportation system. The new bridge is currently in design, with construction scheduled to start in the winter of 2015/2016. The design of the bridge

will take into account long-term trends in transportation and development in Boston in order to properly meet future demands along this transportation corridor.

The Proponent anticipates that construction of the Government Center Garage Project will occur in three general phases over a period of approximately 15 to 20 years. The North Washington Street Bridge replacement will be complete before final phases of this Project. Based on census data and both regional and local travel patterns, it is expected that the transportation corridor served by the North Washington Street Bridge will serve about 5 percent of Project related vehicle trips.

Comment 5.6

“The Draft EIR should describe the current or proposed capacities of water, sewer, electricity, gas and other utilities that will service these projects, and how the performance of these utilities will be affected by them. We are well aware of the problems that have affected the residents and businesses in the Back Bay and The Fenway due to recent electrical station explosions, fires and shutdowns. Residents in the North End are also well aware of the longstanding gas leaks from major lines crossing the North Washington Street/Charlestown Bridge and traveling up Prince Street. How will these facilities be affected by build-out in the Haymarket and North Station areas, and will existing problems be addressed before the major projects come on-line? We also know that we share the same sewer systems with some of the major projects now proposed or under construction, including the Government Center Garage Project, and that the existing demands can and do exceed capacity in large storms.”

Response

Chapter 6, *Infrastructure* of this DPIR provides additional information concerning utility systems including assessments of system capacities and information resulting from coordination with utility providers.

Comment 5.7

“The Project Impact Report should also describe the needs and demands of the Project's populations (residential, office and hotel) for open space and recreational resources, and how these demands will be met. The North Station area, the North End and other surrounding neighborhoods have limited amounts of open space and recreational resources for the existing population and demand. What plans are in place to augment the existing publicly funded and maintained resources to better serve the current demand and meet the additional demands from a greatly increasing population in the Haymarket and North Station development areas?”

Response

The Project will be adding a significant amount of usable open space where currently little exists today. The Project has the following key open space areas and amenities:

- An approximate 18,000 square foot public plaza on the East Parcel that will provide a significantly improved pedestrian connection between Canal Street and the North End Greenway Parks and the Market District along Congress Street. This plaza, appropriately shielded by new buildings from the adjacent Haymarket Bus Station and Congress Street, will have new ground level retail uses, outdoor seating opportunities, incorporate the existing Haymarket Station entrance and have a mix of uses (hotel, office, residential) which will provide 18/7 activity in an area of the city that is dominated by 9 AM to 5 PM government uses. (Note: Based on community input this public plaza was also increased from the PNF submission to this DPIR submission. This increase was achieved through expanding the width of the proposed plaza around the existing Haymarket Station subway entrance. This will provide for additional seating areas and public circulation space in the proposed plaza.)
- The West Parcel will incorporate a generous landscaped roof deck area that will be shared and utilized by the three West Parcel buildings. This area is currently being programmed into zones for the future tenants and employees of these West Parcel Buildings. The ability to create this extensive amount of usable open space roof area is unique in the City of Boston. This will allow the Proponent to provide open space to its residents and tenants in the urban core of Boston which traditionally relies only public open space for area residents and employees.
- The East Parcel hotel and office buildings will also be incorporating roof decks and terraces, allowing hotel guests and employees additional open space opportunities. These areas were shown on the submitted plans and will be further designed when the East Parcel buildings go through their individual article 80 permitting process.
- The Proponent will also be reconstructing all major road segments around the site which include new streetscape, landscaping and lighting improvements.

Overall, the proposed project is incorporating a significant amount of open space, in excess of 50,000 square feet of plaza and roof deck areas. This is significantly more than most recent development projects in the City of Boston, many of which have provided little or no additional open space in the very dense urban core of Boston.

Comment 5.8

"We support the removal of the portion of the Government Center Garage proposed by the developer as part of the Project, so long as a detailed study is conducted which produces solid evidence that the remaining 1100 parking spaces in the garage will be sufficient to serve not only the customers currently served by the 2300 spaces now in the garage, but by the parking customers who will be added by the residential, office and retail components of the proposed development, as well as the parking customers who will be added by the nearby developments at Parcels 7 and 9 proposed by the Massachusetts Department of Transportation ("MassDOT")."

Response

As documented in Section 3.3.3.2 of the PNF, the Government Center Garage is currently heavily underutilized with only about 45% of available parking supply (1,050 spaces) occupancy at peak times on a typical weekday. Weeknight and weekend use is much lower. The high vacancy rates are reflective of many local and societal factors and trends that affect travel choices in Boston. Increased transit and bicycle use, a higher proportion of younger residents, a declining auto ownership rate, and other social/environmental issues, contribute to the current under-capacity operation of the Garage and will continue to influence how Boston commuters and residents make travel decisions in the future.

By instituting a managed shared parking arrangement in the Project garage, all current transient parking and the vast majority of the overnight parking use is expected to be accommodated, as well as a certain level of monthly leased parking. As presented in Chapter 4, *Transportation and Parking* of this DPIR, it is projected that up to 570 commercial public parking spaces will be available during a typical weekday and weeknight period and about 733 spaces will be available during weekends.

Current peak weekday occupancy of the Government Center Garage is about 1,050 vehicles with transient parkers accounting for about 220 spaces and monthly leases for about 830 spaces. While the current 220 transient parkers and about 330 monthly leases – or commuter parking – will be able to be accommodated in the future at the Project garage during a typical weekday, about 500 daytime commuter parkers will be displaced. Based on current actual surveyed occupancy rates at the largest area public commercial parking garages (those over 300 spaces) as documented in Section A2.3.2.5, there is availability to accommodate all of these displaced commuter parkers.

Comment 5.9

“...further review of the mitigation commitments regarding the availability of parking to the general public, including long-term parking for area residents, as well as the pricing of parking, is needed. There must be an assurance that the Project will not worsen parking problems in the North End and other area neighborhoods and will not cause an escalation of garage pricing in the neighborhoods, which could add to the already diminishing ability of the current residential population to afford to remain in these neighborhoods.”

Response

The Proponent included a detailed parking assessment in its PNF submission which detailed and demonstrated that the garage could continue to provide overnight /weekend parking to nearby residents of the North End, Beacon Hill and West End neighborhoods. This analysis included in Chapter 3 of the PNF showed that the

reduced garage at 1,159 spaces could continue to accommodate for overnight/weekend parkers. This number has increased slightly to 570 spaces, as presented in Chapter 4, *Transportation and Parking* of this DPIR. Also, please note the following:

- The Proponent has reduced the overall project by approximately 122,000 GSF, the majority of which is office uses, but is still maintaining the 1,159 proposed spaces.
- Future residents of the on-site buildings will not have the ability to obtain parking stickers for the adjacent neighborhoods of the North End, Beacon Hill or West End.
- Parking demand in the area has been falling due to cutbacks by State & Federal agencies and a demographic change in that many younger people have been forgoing car ownership in Boston.
- Zipcar and Enterprise, alternative options to individual car ownership, are already located at the Government Center Garage.
- Since the garage was originally built in 1969, more than 12,000 additional parking spaces have been built in the area.
- The mix of proposed uses will more effectively utilize the 1,159 spaces than the current uses, which are predominantly 9 AM to 5 PM government office users.

At 1,159 spaces, the Government Center Garage will continue to be one of the largest garages in the City of Boston.

Regarding pricing of parking, this is dictated by the market and not typically impacted by one individual garage, one which is repurposing vacant parking spaces. Also, as stated in the PNF, the proposed 1,159 spaces can park all of its on-site users plus accommodate the existing transient daytime parkers and overnight/weekend area resident parkers who currently park at the Government Center Garage. Last, parking demand has been dropping due to i) State & Federal cutbacks, ii) increased cost of gasoline and car ownership, iii) decreased car ownership among the younger demographic, and iv) additional alternative transportation options (Hubway, Zipcar, etc.)

Comment 5.10

"We support transit-oriented development, but only when there is an assurance that development and population growth will be accompanied with transit system improvements and growth necessary to support the new demand, at a minimum so as not to worsen already existing problems. We are unable to measure the project's impacts and certainly unable to support the project until we have information obtained in part from MassDOT regarding the present accommodations, demands and operating conditions of the Haymarket subway station, Green and Orange line service at Haymarket Station, the operating condition of the bus waiting areas, any plans to improve these facilities and how the additional demands

brought by the Project will be accommodated. Such analyses must be based on recent data and should not use MBTA bus schedules, for instance, which are often not followed. As one example, large crowds often form at the bus station now, waiting for the #11 bus through as many as three or four scheduled bus arrival times."

Response

A discussion of transit impacts is presented in Section A2.3.2.6 of the PNF and further discussed in Chapter 4, *Transportation and Parking* of the DPIR. These statistics are based on currently published MBTA ridership data. . Also, please note the following key items:

A discussion of transit impacts is presented in Section A2.3.2.6 of the PNF and further discussed in Chapter 4, *Transportation and Parking* of the DPIR. These statistics are based on currently published MBTA ridership data. Also, please note the following key items:

- The Proponent has added an additional 10 feet of width/depth of waiting areas for the Haymarket Bus Station. In addition, per the request of the MBTA, the Proponent is also providing space for Charlie Card Pay Stations.
- With the reduction in the DPIR program by approximately 122,000 GSF and additional shifting of office use to residential use, the overall Project transit trips during the AM and PM peak hours will decrease by about 7 percent and 9 percent, respectively.
- Updated DPIR analysis by the Project's transportation engineer, Howard Stein Hudson, of the additional MBTA riders during peak hours added by the proposed Project continues to show that the MBTA subway lines and the existing platforms at Haymarket Station can accommodate the additional MBTA riders.
- Long-term service planning is undertaken by the Central Transportation Planning Staff (CTPS) whose ridership forecast models include all potential development in the downtown core. These transit ridership forecasts include the Bulfinch Triangle/North Station area development projects that are either recently completed, currently under construction, or in the permitting and planning stages, including the redevelopment of the Government Center Garage.
- The Proponent has held on-site meetings with Director of Bus Operations and Deputy Director of Bus Operations to discuss design plans for the reconfiguration of the bus way including MBTA requested improvements and construction related impacts to passengers and pedestrians..
- The Proponent has also met with Subway Operations / Light Rail Operations and all supporting departments to provide a project overview including scope of work and schedule. The meeting included discussions with each department to answer specific questions and concerns.

- Coordination meetings with MBTA Bus Operations and MBTA Subway Operations/Light Rail Operations will continue during the design and construction phases.

Comment 5.11

"We are especially concerned with the proposed rearrangement of the Haymarket MBTA bus station which we believe provides inadequate and unsafe waiting area and removes the little protection (a building cover and enclosed seating area) from weather impacts currently provided to waiting riders. Why is this major public transit-oriented project not improving the comfort and safety of public transit riders?"

Response

After hearing community concerns and meeting with MBTA Bus Operations, the Proponent is making a number of improvements to Haymarket Bus Station and the adjacent East Parcel Plaza, including:

- Adding an additional approximately 10 feet of depth along the majority of the bus station waiting area. This additional depth will increase the capacity of passengers to wait for the Route 111 Bus and the 400 Series Commuter Bus.
- The East Parcel Plaza has also been widened from 60 feet to 85 feet providing additional waiting area capacity outside the Haymarket Bus Station area.
- The Proponent has committed to providing electronic displays within the East Parcel Plaza that will provide real time information of the arrival of the buses as well as the green and orange lines.
- The Proponent will also be providing space for the Charlie Card Pay Stations at the Haymarket Bus Station so bus patrons will not have to go down into the Subway Station to purchase or replenish Charlie Cards.
- In addition, the Proponent has committed to provide a new Hubway Station at the southern end of the Eastern Parcel which will allow a new mode choice for Haymarket Bus Station riders.

The Proponent will continue to meet with the MBTA and the community on both facility and operational improvements to the Haymarket bus facility.

Comment 5.12

"We are concerned that the public accommodations provided by the project may be grossly inadequate. The developer touts the project as reconnecting the historical neighborhoods that surround it and bringing residents of these neighborhoods together. This goal and the Developer's commitment seem hollow, with less than 85,000 square feet of the 2.4 million square foot development allocated for retail use. We question the adequacy of

82,500 square feet of retail to support the development itself, with its nearly 1,000 new residents, thousands of the new office workers and hundreds of hotel guests, let alone the thousands of T riders using Haymarket Station and residents from the surrounding neighborhoods. Other developments of this size in Boston seem to provide greater public accommodations through extensive retail areas, public pass-through and public restrooms, to name a few."

Response

The Proponent has already sought to maximize the ability to provide retail space within the redevelopment. The majority of ground-floor uses of all new buildings are currently proposed as retail. In addition, on the East Parcel, the second floors of the buildings are also retail use. The West Parcel also has retail uses on all major street frontages, but depth of the retail is more limited due to the existing garage which remains behind the retail. Also, it should be noted that the proposed retail has been concentrated to reinforce the important connection and expansion of the Market District to Canal Street.

As each individual phase of the project goes forward the Proponent will continue to seek ways to maximize retail opportunities.

Comment 5.13

"We are also concerned that the proposed size and configuration of the "retail square" surrounding the entrance to Haymarket Station may not be adequate to accommodate a lively retail presence, including outdoor patios and cafes, comfortable passage for pedestrians traveling from the North Station/Bulfinch Triangle area to Government Center, the Market District and beyond, and dozens or more MBTA riders waiting for their buses (the Developer has stated that crowds waiting for buses will be able to wait in the retail square in addition to the proposed bus station sidewalks)."

Response

We have attempted to further develop the plaza concept with a landscape consultant to ensure that it can accommodate a lively retail presence. In process, we have reshaped the buildings to further enhance the size of the plaza and have widened the new public plaza from 60 feet to 85 feet. In addition, an additional approximately 10 feet of depth has been added to the waiting areas of the Haymarket Bus Station.

The East Parcel and its associated public plaza will go through a more detailed review with the BRA and the community when this phase of the overall Project goes through its individual Article 80 Large Project Review process.

Comment 5.14

“The proposed condition of Bowker Street is also a concern. The project as proposed not only ignores any opportunity to recreate Bowker Street into a comfortable and active pedestrian passage, but does harm by, in essence, turning it into a heavily used, operational extension of the Project. Without any amenities or retail opportunities for Bowker Street in the proposed design, it will become a more unsafe, more uncomfortable and darker alley with the adjacent 600 foot high wall of the proposed office tower, the relocation of the primary garage ingress/egress to it, and the addition of the loading entrances serving the Project.”

Response

The proposed Project does improve the existing conditions on Bowker Street, which today encompass a continuous blank concrete wall on the garage side, the police station loading dock, a major NSTAR electrical substation with concrete/brick wall enclosure and two smaller existing buildings closer to New Chardon Street. The proposed improvements by the Project to Bowker Street include:

- New retail at the corner of Bowker and New Chardon Street which extends down Bowker Street bringing retail windows and activity onto Bowker Street.
- A new crosswalk across New Chardon at Bowker Street allowing Bowker Street to be better utilized as a midblock connection over to New Sudbury Street.
- Bowker Street will be reconstructed allowing for new landscape and street trees. In addition, the Proponent will be improving the landscaping at the end of Bowker Street next to New Sudbury Street.

Also, it should be noted that the relocation of the garage entrances to Bowker Street allows for a significant and material improvement to the New Chardon and Merrimac Street intersection, which is a very intensive pedestrian area with a more significant volume of vehicular traffic. The Proponent will continue to explore ways to improve the pedestrian experience on Bowker Street but again the proposed plans are improving Bowker Street from its existing condition.

Comment 5.15

“The existing Zoning Code allows buildings heights of up to 100 feet and floor-area-ratio (FAR) of 7.0 with Article 80/Large Project review and approval. The Developer proposes building heights of up to six times the current height limit and FARs that will likely exceed the existing limit by a factor of three or more. ”

Response

Comment noted. . The proposed Project, as further modified and reduced in this DPIR, is consistent with the Greenway Guidelines, which calls for additional height and density in this area.

Comment 5.16

“The expansive footprint of the proposed development provides for little or no additional public space compared to existing conditions. Further evaluation of the height and massing, including alternatives, is necessary to understand how height and massing changes may mitigate impacts and provide public realm possibilities.”

Response

The Proponent believes that the Project provides more opportunity for quality public spaces than the existing garage provides. As discussed in the PNF, the public spaces created by the Project will activate and considerably improve the streetscape from its current condition. See response to Comment 5.7 for additional information on the public space and open space provided.



NORTH END/WATERFRONT RESIDENTS' ASSOCIATION

P.O. Box 130319
Boston, MA 02113
www.newra.org

July 8, 2013

Peter Meade
Director and Chief Economic Development Officer
Boston Redevelopment Authority
Attn: John Fitzgerald, Senior Project Manager
One City Hall Square, 9th Floor
Boston MA 02201

Subject: Government Center Garage Project Notification Form

Dear Mr. Meade:

North End/Waterfront Residents' Association ("NEWRA") submits the following comments on the Project Notification Form (the "PNF") on the proposal by HYM Investment Group, LLC (the "Developer") to redevelop the Government Center Garage site on behalf of the investor and property owner, Bulfinch Congress Holdings, LLC. The "Project" as proposed in the PNF would replace portions of the existing garage with 771 residential apartments and condominiums, 204 hotel rooms, 1.3 million square feet of offices and 82,500 gross square feet of retail space. This mix and scale of uses is proposed to be accomplished with construction west of Congress Street of a 48-story, 600-foot high office tower on New Chardon Street; a 45-story, 470-foot high apartment tower on New Sudbury Street; and a 24-story, 275-foot high apartment tower on Congress Street, along with a portion of the existing parking garage that will remain; and construction east of Congress Street (between Congress Street and the Rose Fitzgerald Kennedy Greenway) of a 23-story, 275-foot high hotel and condominium tower; a 9-story, 125-foot office building; and a 4-story, 60-foot high retail building.

NEWRA supports the removal of a portion of the Government Center Garage and replacement and build-out with a transit-oriented, mixed use development that will bring new residential, commercial and retail opportunities. Mixed use, especially with the provision of considerable new housing, will bring greater economic vitality to the commercial and institutional activities in the surrounding areas.

The site is enormous by development standards in our area, offering great opportunities not only from the Project elements, but also from broader public realm and public infrastructure improvements that should accompany a project of this size. This is an opportunity that comes once in many decades, at best, and therefore demands careful planning, a vision for the area established through public consensus and implemented with appropriate zoning, detailed impact review, and associated public amenities and infrastructure enhancements created by the Developer or by others to support the project and other area growth, while mitigating impacts.

Public Review, Approvals, Zoning Changes and Construction Sequencing

5.1

We are unsure of the plan for further Boston Redevelopment Authority (“BRA”) and public review by which the BRA will approve the Project or elements of the Project under Article 80 and also propose major zoning changes necessary to allow the Project to be constructed and operated. No elements of the project requiring zoning changes should be reviewed for impacts or approved until zoning decisions are made for the entire Project site in the context of comprehensive area planning. Zoning should not be done on a project or parcel level. We have been dismayed for years as we have watched zoning in and around our neighborhood – the North End/Waterfront – be the product only of developer and building owner proposals on a parcel by parcel basis despite regulations and laws requiring comprehensive planning and neighborhood plans¹. Zoning based on comprehensive planning helps to ensure quality of life and neighborhood sustainability. How else can these important goals be assured and protected?

During review of an earlier redevelopment proposal for the site, by Ted Raymond, the public demanded a comprehensive planning study of the entire Government Center area, in part to provide public assurance that whatever is built at the Government Center Garage would fit into an appropriate urban context and would not itself, and by itself, drive development of the surrounding area. The BRA responded by proposing the Green Growth District Study of the Government Center area, which the BRA has not even begun to do, despite the several years of economic downturn when its resources could and should have shifted from development to planning.

The public has so far been given little opportunity to review the Project and its impacts and to determine whether the layout, massing and uses are appropriate for the area. The PNF includes a lot of information, much more than is typically included at this stage of review. But the public has been given no more than the minimum review period for a Project Notification Form, and some of the meetings that will introduce the Project to the public have not yet been held. The Developer will make an introductory presentation to NEWRA on July 11, three days after the public comment period on the PNF ends. We urge the BRA not to segment the Project now into separate Article 80 filings, but to require a comprehensive Project Impact Report and associated public process that will provide for ample opportunity for public review of the impacts of the entire project and necessary mitigation measures.

We agree with the concerns raised by the Downtown North Association and the Beacon Hill Civic Association regarding the Developer’s construction sequencing plan. Most of the impacts from the excessive project massing will come from earlier development west of Congress Street, while most of the public realm benefits of the project will occur with development east of Congress Street. It is also in the East Parcel where the transit related

¹ For instance, under Article 54, Section 1, of the Boston Zoning Code, a North End Neighborhood Plan was to have been adopted by the BRA as the General Plan for the North End Neighborhood. Article 54 was added to the Code in 1993. Twenty years have passed and the BRA has yet to prepare and adopt the required plan.

components of this transit oriented project will occur. We are concerned that the greatest impacts of the project could occur long before the greatest public realm benefits. We are also concerned with the condition of the East Parcel during the time between the razing of the east end of the Garage and the construction of new buildings proposed on this parcel.

5.2

Greenway District Zoning

We understand that the BRA has commenced a process to rezone the so-called Greenway District using the recommendations of the Greenway District Planning Study. We joined with other neighborhoods in opposing the inclusion of the West Parcel of the Government Center Garage in the Greenway District study. While it is understandable that the BRA would want to consider the impacts of Government Center Garage project height and massing, particularly shadow impacts, on the Greenway parks, this evaluation should have been conducted in the context of master planning for the entire Government Center area. We must conclude that the BRA's inclusion of the West Parcel in the Greenway District study was intended to expedite rezoning of the parcel to accommodate the developer's proposal at that time. While it may be appropriate that a zoning overlay be created to add a level of Greenway protections onto the zoning for each of the districts lying along the Greenway, it is entirely inappropriate to rezone any part of any district, especially with the effect of relieving height and FAR limits, based solely on protecting and promoting the Rose Fitzgerald Kennedy Greenway, which was the narrow purpose and scope of the study.

Adequacy of Infrastructure

The Project likely will have, by itself or certainly together with several other major redevelopment projects in the Haymarket and North Station areas of downtown Boston², major implications for traffic, energy consumption, public and private utilities and infrastructure, public realm amenities and impacts, housing, open space, massing and skyline changes, groundwater resources, shadow and wind (which may affect our homes and street environments as well as open spaces), and impacts (beneficial or adverse) to residential quality and residential and business economies in the North End and other adjacent historical neighborhoods. There has been little public discussion to date about the Project and its impacts, no public discussion about the cumulative impacts of the several projects proposed in the Haymarket and North Station areas, and apparently no opportunity by the BRA for any master planning leading to appropriate district zoning.

5.3

The Developer has stated that the Project and its demands on roadways and other infrastructure fulfill or are consistent with several planning documents and guidelines developed by the BRA and conform to highway and roadway improvements that were implemented with the Central Artery Project. This general statement of assurance would also argue that all of the

5.4

² Including the four approved projects at Bulfinch Triangle, Nashua Street Residences and Lovejoy Wharf, now or soon to be in construction; the proposed redevelopment at the Garden/West End Garage; redevelopment or reuse on Parcels 7 and 9, and the proposed redevelopment of the Government Center Garage.

other projects proposed in the area can also be accommodated by existing roadways and other infrastructure, with relatively minor traffic signal changes listed in the PNF. But how can that be when we already have serious traffic congestion, traffic pollution, confusing traffic configurations and unsafe pedestrian crossings along Cross Street, North Washington Street, Causeway Street and Cambridge Street and their many intersections? While some traffic analysis is presented in the PNF, insufficient opportunity has been provided for the public to review and understand the information and raise questions.

In addition, the traffic capacity and structural condition of the North Washington Street/Charlestown Bridge has been compromised for decades, and the project to replace or rehabilitate the bridge has been delayed for all that time. What is the necessary capacity of the bridge to support the demands of the Project and other major redevelopment projects in the area, and what are the consequences of an additional or full shutdown of the bridge if the bridge improvements are further delayed leading to an emergency situation? The bridge should be replaced or rehabilitated to full capacity and safe long-term structural condition before the redevelopment projects in the Haymarket and North Station areas are completed.

5.5

We also question the adequacy of utilities that will serve the Project and other major redevelopment projects in the area. The Draft EIR should describe the current or proposed capacities of water, sewer, electricity, gas and other utilities that will service these projects, and how the performance of these utilities will be affected by them. We are well aware of the problems that have affected the residents and businesses in the Back Bay and The Fenway due to recent electrical station explosions, fires and shutdowns. Residents in the North End are also well aware of the longstanding gas leaks from major lines crossing the North Washington Street/Charlestown Bridge and traveling up Prince Street. How will these facilities be affected by build-out in the Haymarket and North Station areas, and will existing problems be addressed before the major projects come on-line? We also know that we share the same sewer systems with some of the major projects now proposed or under construction, including the Government Center Garage Project, and that the existing demands can and do exceed capacity in large storms.

5.6

The Project Impact Report should also describe the needs and demands of the Project's populations (residential, office and hotel) for open space and recreational resources, and how these demands will be met. The North Station area, the North End and other surrounding neighborhoods have limited amounts of open space and recreational resources for the existing population and demand. What plans are in place to augment the existing publicly funded and maintained resources to better serve the current demand and meet the additional demands from a greatly increasing population in the Haymarket and North Station development areas?

5.7

Parking

We support the removal of the portion of the Government Center Garage proposed by the developer as part of the Project, so long as a detailed study is conducted which produces solid evidence that the remaining 1100 parking spaces in the garage will be sufficient to serve not only

5.8

the customers currently served by the 2300 spaces now in the garage, but by the parking customers who will be added by the residential, office and retail components of the proposed development, as well as the parking customers who will be added by the nearby developments at Parcels 7 and 9 proposed by the Massachusetts Department of Transportation (“MassDOT”). The removal of parking spaces by the developer at the same time as the contemplated addition of users by this and other nearby projects must not be permitted to exacerbate the fight for parking spaces presently existing in the North End.

In addition, further review of the mitigation commitments regarding the availability of parking to the general public, including long-term parking for area residents, as well as the pricing of parking, is needed. There must be an assurance that the Project will not worsen parking problems in the North End and other area neighborhoods and will not cause an escalation of garage pricing in the neighborhoods, which could add to the already diminishing ability of the current residential population to afford to remain in these neighborhoods.

5.9

Public Transportation

In addition to traffic and pedestrian movement impacts, there is also the added burden on already overburdened subway and bus systems at Haymarket Station. The subway platforms, the station lobby and gates, the cars on both the Green Line and the Orange Line, and the bus waiting areas are often crowded. Instead of having information showing what impacts the development will have on these localized services, the developer has instead compared the development's additional demand to system-wide demand, which provides no real information at all.

We support transit-oriented development, but only when there is an assurance that development and population growth will be accompanied with transit system improvements and growth necessary to support the new demand, at a minimum so as not to worsen already existing problems. We are unable to measure the project's impacts and certainly unable to support the project until we have information obtained in part from MassDOT regarding the present accommodations, demands and operating conditions of the Haymarket subway station, Green and Orange line service at Haymarket Station, the operating condition of the bus waiting areas, any plans to improve these facilities and how the additional demands brought by the Project will be accommodated. Such analyses must be based on recent data and should not use MBTA bus schedules, for instance, which are often not followed. As one example, large crowds often form at the bus station now, waiting for the #111 bus through as many as three or four scheduled bus arrival times.

5.10

We are especially concerned with the proposed rearrangement of the Haymarket MBTA bus station which we believe provides inadequate and unsafe waiting area and removes the little protection (a building cover and enclosed seating area) from weather impacts currently provided to waiting riders. Why is this major public transit-oriented project not improving the comfort and safety of public transit riders?

5.11

Public Accommodation

We are concerned that the public accommodations provided by the project may be grossly inadequate. The developer touts the project as reconnecting the historical neighborhoods that surround it and bringing residents of these neighborhoods together. This goal and the Developer's commitment seem hollow, with less than 85,000 square feet of the 2.4 million square foot development allocated for retail use. We question the adequacy of 82,500 square feet of retail to support the development itself, with its nearly 1,000 new residents, thousands of the new office workers and hundreds of hotel guests, let alone the thousands of T riders using Haymarket Station and residents from the surrounding neighborhoods. Other developments of this size in Boston seem to provide greater public accommodations through extensive retail areas, public pass-through and public restrooms, to name a few.

5.12

We are also concerned that the proposed size and configuration of the "retail square" surrounding the entrance to Haymarket Station may not be adequate to accommodate a lively retail presence, including outdoor patios and cafes, comfortable passage for pedestrians traveling from the North Station/Bulfinch Triangle area to Government Center, the Market District and beyond, and dozens or more MBTA riders waiting for their buses (the Developer has stated that crowds waiting for buses will be able to wait in the retail square in addition to the proposed bus station sidewalks).

5.13

The proposed condition of Bowker Street is also a concern. The project as proposed not only ignores any opportunity to recreate Bowker Street into a comfortable and active pedestrian passage, but does harm by, in essence, turning it into a heavily used, operational extension of the Project. Without any amenities or retail opportunities for Bowker Street in the proposed design, it will become a more unsafe, more uncomfortable and darker alley with the adjacent 600 foot high wall of the proposed office tower, the relocation of the primary garage ingress/egress to it, and the addition of the loading entrances serving the Project. Why should the public give up Bowker Street to this project?

5.14

Project Massing

The existing Zoning Code allows buildings heights of up to 100 feet and floor-area-ratio (FAR) of 7.0 with Article 80/Large Project review and approval. The Developer proposes building heights of up to six times the current height limit and FARs that will likely exceed the existing limit by a factor of three or more. While the Developer promotes the Project for the benefit of opening up Congress Street, the proposed project massing, both height and footprint, will create a greater barrier between the North End, West End, Beacon Hill and the Market District than the existing garage. Nowhere in the city have towers not created obstructions between neighborhoods. The proposed 600-foot height is also unacceptable because it will increase shadows on the Greenway and on our historical neighborhood, precisely at times of day and times of year when sunlight is most important.

5.15

The expansive footprint of the proposed development provides for little or no additional public space compared to existing conditions. Further evaluation of the height and massing, including alternatives, is necessary to understand how height and massing changes may mitigate impacts and provide public realm possibilities. The potential for benefits to Bowker Street, the sizing and programming of the retail square in the East Parcel, and retail activity surrounding the development should not be overlooked or ignored.

5.16

We urge the BRA to consider project massing alternatives that will reduce shadows on the Greenway and in the surrounding historical neighborhoods, enhance the benefit of removing a part of the obstruction that is the existing garage while avoiding replacing it with another, possibly worse, structural barrier (with the caveat that this benefit not be outweighed by the impacts of increased traffic and parking demand), and providing improved, adequately designed and programmed public spaces around and through the project.

Very truly yours,



Jim Salini
President

cc: Mayor Thomas M. Menino
State Senator Anthony Petrucci
State Representative Aaron Michlewitz
Councilor Salvatore LaMattina
Councilor Michael P. Ross
City Council President Stephen J. Murphy
At-Large City Councilors Ayanna Pressley, Felix G. Arroyo, and John R. Connolly
Commissioner Thomas Tinlin, Boston Transportation Department
Stephen Passacantilli, President, North End/Waterfront Neighborhood Council
Donna Freni, President, North End Chamber of Commerce
Members of the Impact Advisory Group

Letter 6

Downtown North Association

Comment 6.1

“Delayed Garage Demolition: The demolition of the portion of the existing garage that spans and extends east of Congress Street is arguably the single most visible and dramatic urban design and community benefit of the entire GCG development; and that is not now planned to occur until the third of four development phases, following completion of the major residential and office buildings on the West Parcel. While the economic rationale for this sequence from the perspective of the developer is obvious, its community and urban design appeal clearly leaves something to be desired.”

Response

The Proponent has heard from several community groups voicing concerns over the timing of when the eastern portion of the existing garage structure would be demolished given the overall project timeframe of 15-20 years stated in the PNF.

Given these concerns the Proponent has agreed to the following:

1. Move up the demolition of the garage from Phase 3A to Phase 2A,
2. Commit to a demolition start date no later than 1st quarter of 2023 for the eastern portion of the garage,
3. Proponent would be prohibited from obtaining a certificate of occupancy for any new proposed buildings, except for the Phase 1A building (Apartment Building), until demolition of the eastern portion of the existing garage structure is substantially complete or well underway.

This is a material change in the phasing of the project which will bring the public benefits sooner to the overall community. Also, it has the additional benefit of demolishing the garage before the majority of density is brought on-line which should further mitigate construction impacts to the area.

Comment 6.2

“Delayed Congress Street and East Parcel Redevelopment: Directly related to the garage demolition schedule is redevelopment of the East Parcel and the Congress Street perimeter of the West Parcel, which are now planned to occur in the last of four development phases. These much later elements of the proposal contain the overwhelming share of the retail and restaurant activities planned for the site, as well as the most significant of the planned

streetscape, pedestrian, transit facility and public realm improvements, all of which are exceptionally beneficial and most important to the surrounding downtown communities.”

Response

See response to Comment 6.1 above

Comment 6.3

“An Extended Development Schedule: Although community discussions of both the current and the previous GCG development proposals have suggested an overall development schedule that is likely to extend over a decade, the current PNF (p. 1-12) indicates that the development period could require as much as twenty years. While a more conservative written estimate is understandable and even prudent, the effect of any such more prolonged development schedule is further delay of the most beneficial community aspects of the proposal as described immediately above.”

Response

See response to Comment 6.1 above

Comment 6.4

“West Parcel Permeability: ...Left largely unaddressed in the PNF, however, was whether and how the permeability of the West Parcel development in the first two development phases might be expanded and enhanced through increased public accessibility and utility of the podium created by the retained garage around which the new buildings are arrayed -- and perhaps through increased public accessibility and utility of those buildings themselves.”

Response

The West Parcel, due to the retention of the existing garage, does not lend itself to additional permeability. The Proponent is providing significant improvements to the streetscapes along all four sides of the existing garage, including Bowker Street.

Overall, the Project is creating a significant amount of open space at the street level, particularly through the creation of a new public plaza on the East Parcel. (See response to Comment 5.7 regarding open space) As noted above, some members of the community have also expressed a desire for general public access to the proposed roof deck areas. At this time the Proponent is unable to commit to public access to the roof decks given access would need to be through either a residential or office building which creates serious security and safety concerns for residents and employees of those buildings. However, the Proponent is willing to provide contributions, as part of its 1% mitigation fee, to enhance or expand existing nearby neighborhood parks and open space.

Comment 6.5

“With Respect to the GCG Site Itself: What other height and massing options were considered and why was the proposed option selected? Would it be possible, for example, to reduce the height of the taller buildings by reallocating some required density to some of the smaller buildings? Since the realignment of the streets has effectively precluded the possibility of actually restoring the East Parcel as the apex of the Bulfinch Triangle, should thought be given the somewhat more density on that parcel to associate it more with the West Parcel than with the Bulfinch Triangle itself – without sacrificing the critical view and pedestrian corridors that now make crucial north/south connections through this space?”

Response

As presented in Chapter 1, *Project Description* of this DPIR, the height of office building (WP-B2) has been reduced in response to feedback from the community. Some of this space was redistributed along with an overall reduction of development area by approximately 122,000 gross square feet. WP-B2 has been lowered from 600’ to 528’ and the East Parcel hotel/condo building (EP-B1) has been lowered from 275’ to 157’.

Comment 6.6

“With Respect to the Planned Redevelopment of the Surrounding Area: How does the height and massing of the proposed buildings relate to the height and massing of the buildings in the surrounding area? How does this project relate to that larger architectural, topographical and community context? How does it compare to what else is already planned, permitted or in process for this area? How does this project advance the larger urban design and development vision of which it would be so critical and visible a part?”

Response

The Project Site is a unique location in the city with its nodal character between multiple neighborhoods and access to a major transportation network. The focus of this development would be to become the best practice example for transit-oriented development with great public spaces and high quality architecture.

Comment 6.7

“With Respect to the Potential Redevelopment of the Surrounding Area: What is the possible precedential effect of the height and massing proposed for this project on the possible future redevelopment of the area beyond what is already in plan or progress? Within the West End community, for example, this would clearly include the adjacent EDIC and other properties that were a part of the 2009 GCG redevelopment proposal, but are not a part of the current one. These properties are relatively underdeveloped by comparison with the area as a whole;

and they likely be perceived as even more so with the realization of this GCG redevelopment plan.”

Response

The Project presents an extraordinary opportunity that provides great public benefits by removing a portion of the existing garage structure and reopening Congress Street creating great public spaces and pedestrian environment as well as introducing a substantial amount of housing. Projects that provide such range of public benefits are unique in the area.

The specific sites referred to are not part of the proposed Project nor are they controlled by the Proponent. These specific sites and concerns regarding their potential future development should be addressed by the BRA.

Comment 6.8

“Expanded Public Accessibility and Use of Project Amenities: ... And in our view, more serious consideration could/should be given in the DPIR/DEIR process to whether and how these above-grade amenities might be made more available for public enjoyment and use.”

Response

Overall, the Project is creating a significant amount of open space at the street level, particularly through the creation of a new public plaza on the East Parcel. (See response to Comment 5.7 regarding open space) As noted above, some members of the community have expressed a desire for general public access to the proposed roof deck areas. At this time the Proponent is unable to commit to public access to the roof decks given access would need to be through either a residential or office building which creates serious security and safety concerns for residents and employees of those buildings. However, the Proponent is willing to provide contributions, as part of its 1% mitigation fee, to enhance or expand existing nearby neighborhood parks and open space.

Comment 6.9

“A Better Balance of Retail/Restaurant Uses between the East and West Parcels: As now proposed in the PNF, the West Parcel accommodates less than one-third of the retail/restaurant space that is projected for the much smaller East Parcel – i.e., 19.8Ksf v. 62.7Ksf. If some significant portion of the West Parcel podium were devoted to such purposes, that would not only expand such desirable community uses for the project as a whole, but also create a better balance of retail/restaurant uses between the East and West Parcels.”

Response

The Proponent has already sought to maximize the ability to provide retail space within the redevelopment. The majority of ground floor uses of all new buildings are currently proposed as retail. In addition, on the East Parcel, the second floors of the buildings are also retail use. The West Parcel also has retail uses on all major street frontages, but depth of the retail is more limited due to the existing garage which remains behind the retail. Also, it should be noted that the proposed retail has been concentrated to reinforce the important connection and expansion of the Market District to Canal Street.

The Proponent will continue to seek ways to maximize retail opportunities as each individual Project Component goes forward through design.

Comment 6.10

“Acceleration of Community Benefits: As described in the phasing schedule outlined in the PNF, the development of the East Parcel, as well as the activation of most of the planned retail/restaurant uses on the West Parcel, are all planned for the latter stages of the development sequence. If the enhanced public use of the West Parcel podium were a focus of the project development plan from the outset, the availability of such retail/restaurant and other facilities of public accommodation could be expanded and accelerated to significant community benefit.”

Response

The commitment by the Proponent to move up the demolition of the garage from Phase 3A to Phase 2A, will also have the added benefit of advancing the development of the East Parcel and the podium of the West Parcel sooner than previously proposed in the PNF. This will bring the community benefits and access to new retail/restaurants earlier in the redevelopment.

Comment 6.11

“... we recommend and request that the parking pricing policy and practice of the developer for various categories of potential parkers be identified and evaluated as timely and relevant variables in the discussion of the parking supply and demand projections for this project, with specific regard to the critical functions that this facility now serves for large and small businesses and other organizations in the surrounding neighborhoods.”

Response

As described in the detailed parking analysis in Chapter 3 of the PNF, the proposed redevelopment will be able to provide parking for the following three key groups:

- ▶ Proposed on-site uses,

- Overnight/weekend neighborhood parking,
- Daytime transient users.

In addition, the Proponent has committed to continuing to provide its overnight/weekend discounted parking program which is popular with adjacent neighborhoods.

Comment 6.12

“... given the complexity and the schedule for multiple parcel development, 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.”

Response

The Proponent supports the concept of a single entity coordinating construction traffic management between the various private and public developments. The BRA and/or BTD are potential lead agencies which could coordinate such effort. The Proponent would cooperate and coordinate with such an effort to minimize overall impacts. Also, the moving up of garage demolition to Phase 2A, will allow the removal of the garage, which does require some interim street closures and Haymarket bus station relocation, to take place before the majority of new uses come on-line at the Project Site.

Comment 6.13

“Likewise commendable is the commitment to provide all of the affordable units on-site, which is also the preference of the community wherever possible. And we would also encourage the developer to follow the lead of Nashua Street Residences in another respect: providing a significant number of smaller units as well.”

Response

The Proponent will be providing a range of units from studio units (including micro units) to three bedrooms units. The Proponent has found that both smaller units, such as micro units and larger three bedroom units are underserved in the market and is including both unit types in the first building which will be an apartment building.

Comment 6.14

“A proactive developer effort to incorporate some retail and restaurant elements from these surrounding communities would not only reinforce its connectivity to those communities, but it would also minimize the possibility and perception of unwelcome competition with those existing communities. And we recommend and request that such a course of action should be pursued through the DPIR/DEIR process, whether or not it is required by it.”

Response

At this time the Proponent has not started to approach any potential retail tenants regarding locating at the Project Site. This process typically starts as each individual building advances. However, the Proponent will be looking for a retail mix that complements the surrounding neighborhoods and will also be approaching existing local retailers and restaurants interested in locating at the Project Site.

Comment 6.15

“The Role of Public Art & Architecture: Among the urban design and development advantages that taller structures afford is the opportunity to create elegant and iconic architecture, which makes a distinctive and distinguished contribution both to the city skyline and to the urban streetscape. Given the expressed community concerns about the potential adverse effects of height on this site, which will surely be further considered in the DPIR/DEIR process that should be viewed as not just an opportunity but an obligation in this case. Without question, whatever space project structures occupy in their visible segment of the sky-plane must be beautiful to behold at all times of day and night; and whatever space those buildings occupy in their crucial sector of the ground-plane must be active and attractive, safe and secure, functional and contextual, reflecting and reinforcing the social and economic variety and vitality of the surrounding communities. And these essential values and goals could/should be effectively incorporated into the scoping and implementation of the DPIR/DEIR process and product.”

Response

The Proponent agrees that the design of the proposed buildings both in the air and at the ground plane play a crucial role in the immediate area and the city as a whole. Each proposed building will be going through its individual Article 80 Large Project Review where the Proponent will present to the neighborhoods and the BRA, for review and comment, detailed plans and images of the particular building being advanced at that time.

Comment 6.16

“That should also include a prominent role for public art, which can enhance and enliven the special character of this project as at once a new urban district and crossroads. Such an opportunity clearly exists on and around the East Parcel as currently configured in the PNF; but it could also exist on the West Parcel as well, particularly if the garage podium is designed and used as previously suggested. Both art and architecture could/should play complementary and coordinated roles in establishing this project as both a striking new focal point on the horizon and a new city destination in which to live, work, play and stay. And for that reason, they should be an important, and even indispensable, element of the DPIR/DEIR scope.”

Response

The Proponent agrees that public art should be incorporated into the redevelopment, particularly on the East Parcel. Incorporation and placement of public art can be evaluated as each building goes through its individual Article 80, Large Project Review. It is at that time, when the individual building’s architecture and surrounding ground plane have been sufficiently designed, that the community, the City and the Proponent can work together to incorporate public art appropriately into that portion of the redevelopment.

Comment 6.17

“... it should be noted that the West End community includes one of the foremost international advocates and practitioners of universal design in the Institute for Human Centered Design (IHCD) on Portland Street in the Bulfinch Triangle. IHCD has worked with CBT on universal design initiatives in the past; and they could provide invaluable input and feedback on the GCG and others major projects as their planning and permitting proceeds. And we would certainly encourage that.”

Response

The Proponent and its architect are willing to meet with IHCD. The Proponent will reach out to IHCD as it advances its first building through the Article 80, Large Project Review

Comment 6.18

“... whether as a requirement of the DPIR/DEIR scope or as a voluntary initiative of the GCG developer, it would be quite timely and most appreciated if the development team would devote some its professional and creative expertise to whether and how Parcel 6, and perhaps even Parcel 12, might be improved for the benefit of all concerned.”

Response

The Proponent is willing to devote some of its and its consultant's team's expertise and time on the potential use of Parcel 6.

Comment 6.19

"The Option of New Neighborhood Nomenclature: Although it is beyond the purview of the project developer, the GCG Project affords the opportunity to rectify some roadway nomenclature that dates back to an era of urban renewal and transportation planning that dates back more fifty years ago and, with a few notable exceptions, did not treat the West End very well."

Response

The Proponent will work with the City of Boston and adjacent neighborhoods on the existing street names and potential modification to them. The Proponent's understanding is that this is in particular reference to the following:

- Confirm and show the street segment under the garage as Merrimac and not Congress Street.
- The potential removal of "New" from "New Chardon" and "New Sudbury" streets.

The Proponent does not have an issue with the above proposed changes but this will required involvement with the City of Boston, other landowners on New Chardon and New Sudbury Streets and the surrounding neighborhoods.

Comment 6.20

"To the extent that those same variable are also present in this case, a PDA could/should also be considered and would not be without precedent."

Response

The Proponent agrees that a PDA should be considered and would not be without precedent.

Page Intentionally Left Blank

downtown north association

July 8, 2013

John FitzGerald, Senior Project Manager
Boston Redevelopment Authority
City Hall Plaza
Boston, MA 02201

RE: June 2013 Project Notification Form for Redevelopment of the Government Center Garage and Related Recommendations Regarding the Scoping of a Draft Project Impact Report and a Draft Environmental Impact Report for this Project

Dear John,

What follows are the comments of the Downtown North Association (DNA), which is also a member of the Government Center Garage (GCG) Project Impact Advisory Group (IAG), regarding the Project Notification Form (PNF) filed by HYM Investment Group on June 5, 2013, with particular attention to the recommended scope of an expected DPIR/DEIR for this project.

The more than one hundred DNA member organizations encompass all aspects of the diverse and growing residential, recreational, commercial, institutional and professional community historically known as 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 includes the site of the Government Center Garage. And among our valued DNA members is HYM Investment Group, a leader of the GCG development team.

These comments are intended to reflect a consensus view of DNA as a whole, although individual DNA member organizations, some of which also IAG members, may be offering their own comments on the GCG project. Such individual DNA member comments may have a somewhat different emphasis or focus; but hopefully they will not be either substantially inconsistent or incompatible with the views expressed herein. In any event, these comments are not meant to replace or obviate any other comments by individual DNA members.

It should be noted that this is not the first time that DNA has offered its opinions on this project. In April of 2009 we commented quite extensively and generally favorably on a previous redevelopment proposal for this site, which had been advanced by the Raymond Property Company pursuant to a prior series of community meetings on that proposal. Those 2009 written comments are attached hereto for reference, in part because many of those initial observations comments remain relevant and timely, since in some respects these two project iterations are quite comparable.

We continue to support this GCG project for the same fundamental reasons as its previous iteration: it fully and finally replaces the last remaining barrier between the West End and Downtown Proper with a mixed-use development that reflects and reinforces the surrounding neighborhoods and restores the historical connections among downtown neighborhoods in the West End, North End and Beacon Hill and with the emerging new Market District.

In other important respects, however, the current project and its previous version are quite different, most particularly in terms of their scope, strategy and sequencing:

- ❖ **Scope:** The 2009 development proposal contemplated redevelopment of not only the site of the GCG, but also as the adjacent properties on Bowker and Hawkins Street, including the BPD Area A-1 District Station; whereas the current development proposal is confined to the site of the GCG itself.
- ❖ **Strategy:** The 2009 proposal contemplated the initial and complete demolition of the GCG as it now stands; whereas the current project will continue all of the parking garage in full operation throughout most of the construction period, eventually demolishing only the portion of the garage that spans and extends east of Congress Street and permanently retaining the half of the existing garage that lies west of Congress Street, around which planned redevelopment will take place.
- ❖ **Sequencing:** The 2009 proposal contemplated continuous and generally contemporaneous redevelopment of the cleared GCG sites both east and west of Congress Street; whereas the current project contemplates a redevelopment process and product that would be phased over time, commencing west of Congress Street and concluding east of Congress Street.

It is generally agreed that the nature and scope of the current redevelopment strategy offers several economic, environmental, logistical and other advantages over the 2009 proposal, all of which make the approach described in the current PNF a more viable and reliable approach, particularly in the current real estate market. Among other things, it avoids the sudden and initial elimination of hundreds of existing off-street parking spaces that have been a major functional element of the neighborhood transportation infrastructure for many years.

But this phased redevelopment approach also comes at a notable price to the community in at least four important and related respects, each of which could/should be addressed in and through the ensuing DPIR/DEIR process:

- ❖ **Delayed Garage Demolition:** The demolition of the portion of the existing garage that spans and extends east of Congress Street is arguably the single most visible and dramatic urban design and community benefit of the entire GCG development; and that is not now planned to occur until the third of four development phases, following completion of the

major residential and office buildings on the West Parcel. While the economic rationale for this sequence from the perspective of the developer is obvious, its community and urban design appeal clearly leaves something to be desired.

- ❖ **Delayed Congress Street and East Parcel Redevelopment:** Directly related to the garage demolition schedule is redevelopment of the East Parcel and the Congress Street perimeter of the West Parcel, which are now planned to occur in the last of four development phases. These much later elements of the proposal contain the overwhelming share of the retail and restaurant activities planned for the site, as well as the most significant of the planned streetscape, pedestrian, transit facility and public realm improvements, all of which are exceptionally beneficial and most important to the surrounding downtown communities. **6.2**

- ❖ **An Extended Development Schedule:** Although community discussions of both the current and the previous GCG development proposals have suggested an overall development schedule that is likely to extend over a decade, the current PNF (p. 1-12) indicates that the development period could require as much as twenty years. While a more conservative written estimate is understandable and even prudent, the effect of any such more prolonged development schedule is further delay of the most beneficial community aspects of the proposal as described immediately above. **6.3**

- ❖ **West Parcel Permeability:** Since the existing garage structure west of Congress Street is being retained in the current GCG redevelopment proposal, to obvious economic and environmental advantage, that precludes the kind of potential permeability that was an inherent option in the 2009 proposal, which had then been quite favorably described as the conversion of a barrier to a crossroads. That places an additional burden on the streetscape and public realm improvements around the West Parcel, as well as those on, around and through the East Parcel, to achieve this desirable crossroads effect; and the PNF addresses those issues and opportunities quite directly and explicitly in the final two phases of the overall project. Left largely unaddressed in the PNF, however, was whether and how the permeability of the West Parcel development in the first two development phases might be expanded and enhanced through increased public accessibility and utility of the podium created by the retained garage around which the new buildings are arrayed -- and perhaps through increased public accessibility and utility of those buildings themselves. **6.4**

As previously noted, all of these matters could/should be addressed and potentially resolved in the DPIR/DEIR process. That should include particular attention to whether and how the development sequence could/should be revised and the development schedule could/should be accelerated to accomplish more of the community benefits of the project sooner rather than later. And to that end, some of the observations that follow suggest in part how and why that might be done.

In that context, the following are among other issues and opportunities raised by the current PNF that could and should be addressed in the DPIR/DEIR:

❖ **The Proposed Height and Massing of the Six Planned Buildings:** As is pointed out in the PNF itself, the height and massing of the various buildings encompassed within the overall GCG site redevelopment plan are in all respects less than what was outlined in the 2009 GCG Project PNF, which featured a tallest building height of approximately 700 feet and a density of 4.0Msf, albeit on a somewhat larger development footprint. The tallest building height proposed in the current PNF is 15% smaller at 600 feet, with a development density of 2.4Msf. And those development parameters explicitly intended to be consistent with the use and development guidelines included in the recent BRA Greenway District Planning Study. Within what is permitted by those BRA guidelines, however, a number of urban design/development questions arise that could/should be further addressed through the DPIR/DEIR process as part of the continuing discussion of project height and massing:

- **With Respect to the GCG Site Itself:** What other height and massing options were considered and why was the proposed option selected? Would it be possible, for example, to reduce the height of the taller buildings by reallocating some required density to some of the smaller buildings? Since the realignment of the streets has effectively precluded the possibility of actually restoring the East Parcel as the apex of the Bulfinch Triangle, should thought be given the somewhat more density on that parcel to associate it more with the West Parcel than with the Bulfinch Triangle itself – without sacrificing the critical view and pedestrian corridors that now make crucial north/south connections through this space? **6.5**

- **With Respect to the Planned Redevelopment of the Surrounding Area:** How does the height and massing of the proposed buildings relate to the height and massing of the buildings in the surrounding area? How does this project relate to that larger architectural, topographical and community context? How does it compare to what else is already planned, permitted or in process for this area? How does this project advance the larger urban design and development vision of which it would be so critical and visible a part? **6.6**

- **With Respect to the Potential Redevelopment of the Surrounding Area:** What is the possible precedential effect of the height and massing proposed for this project on the possible future redevelopment of the area beyond what is already in plan or progress? Within the West End community, for example, this would clearly include the adjacent EDIC and other properties that were a part of the 2009 GCG redevelopment proposal, but are not a part of the current one. These properties are relatively underdeveloped by comparison with the area as a whole; and they likely be perceived as even more so with the realization of this GCG redevelopment plan. **6.7**

But it would also include the nearby Lindemann/Hurley State Services Block, which has long been suggested for potential reuse and/or redevelopment; and of most critical interest to our Beacon Hill neighbors, it would could well include significant portions of Cambridge Street, for which institutional and other development plans have yet to be determined for some very visible properties.

In most respects, these considerations are well beyond the purview of the GCG project proponents; and it is not their obligation to address in their DPIR/DEIR the potential consequences of their plans for properties beyond their custody and control. But is the role and responsibility of the BRA; and the BRA scoping of the DPIR/DEIR is a timely and appropriate opportunity for to do so. Not to do so would risk complicating and confusing the individual review process for this and other major projects.

This is not a new problem, but it is an increasingly urgent one. The precedential effect of any single development project on the development of other proposed or potential projects and on the community as a whole has long been an understandable source of serious and continuing community concern. In the absence of normative and reliable public policy guidance, the community is left to speculate on the nature and scope of any such implications in a manner that can well often be ill informed, inaccurate and counterproductive.

For that reason, the Downtown North Association, among others, have long requested the BRA to formulate an overall West End Plan that would consider and coordinate the many individual and worthy project plans already in place with expectations for major properties yet to be developed. The result would be a comprehensive and integrated community design and development strategy, which could/should still be flexible and pragmatic, but would fit each project into its larger and longer context. That obviously has not yet been done; but in its absence, we would again recommend and request that the BRA address the issue of whether or not the height and massing approved for the GCG project is expected or intended to have any implications for the planning and development of the surrounding area, and most particularly, for the West End, North End and Beacon Hill neighborhoods.

- ❖ **Expanded Public Accessibility and Use of Project Amenities:** The PNF outlines a number of design/use initiatives involving green roofs and other amenities on both the East and West Parcels, all of which are thoroughly commendable. But as currently proposed, such amenities are primarily, if not exclusively, available for the benefit of project residents and office tenants. And in our view, more serious consideration could/should be given in the DPIR/DEIR process to whether and how these above-grade amenities might be made more available for public enjoyment and use.

Of particular relevance in this regard is the design and use of the podium created by the retention of the existing garage on the West Parcel. If this rather substantial and potentially very attractive space could be devoted in whole or in large part to some combination of commercial and recreational uses, such facilities of public accommodation could quite substantially address three perceived deficiencies of the current development proposal:

➤ **Enhanced West Parcel Permeability:** If public access to the West Parcel podium were designed to be visible, attractive, convenient and welcoming, the ability of the public to use this space would greatly enhance the actual and the perceived permeability of this important element of the project; and if access points were located to link with critical streetscape elements, it could serve the desirable community crossroads function that would not be possible as current proposed.

➤ **A Better Balance of Retail/Restaurant Uses Between the East and West Parcels:** As now proposed in the PNF, the West Parcel accommodates less than one-third of the retail/restaurant space that is projected for the much smaller East Parcel – i.e., 19.8Ksf v. 62.7Ksf. If some significant portion of the West Parcel podium were devoted to such purposes, that would not only expand such desirable community uses for the project as a whole, but also create a better balance of retail/restaurant uses between the East and West Parcels.

6.9

➤ **Acceleration of Community Benefits:** As described in the phasing schedule outlined in the PNF, the development of the East Parcel, as well as the activation of most of the planned retail/restaurant uses on the West Parcel, are all planned for the latter stages of the development sequence. If the enhanced public use of the West Parcel podium were a focus of the project development plan from the outset, the availability of such retail/restaurant and other facilities of public accommodation could be expanded and accelerated to significant community benefit.

6.10

Obviously, expanded public access and use of the West Parcel podium space would involve additional issues of building security, maintenance and management that would have to be addressed and resolved. But the DPIR/DEIR process provides the opportunity to do so; and the potential benefits of this approach would appear to warrant an effort to mitigate its potential burdens. The result would be a project more fully integrated into the fabric of the surrounding community and in which that community would have a more vested, substantial and self-sustaining interest.

❖ **Height as a Public Amenity:** In a similar vein, as DNA has also suggested in other such high-rise developments, the DPIR/DEIR for this project could/should explore ways in which the proposed building height might be devoted to some public purposes, at least in part.

One of the problems with significant height in a community context is that the burdens of height – e.g., any adverse wind, shadow, and view corridor effects, all of which will continue to be addressed – are 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 of the upper floors in the taller buildings.

This might include restaurant, fitness and/or viewing pavilions at or near the top of these taller buildings, as is already being done in office and residential buildings elsewhere in Boston; and it could also include shared meeting spaces for community organizations and activities, as is also becoming increasingly common here and elsewhere. Such common amenities would be equally beneficial to project residents and tenants and to the public alike; and they could become an integral element of the type of shared office/conference facilities that are becoming typical and attractive in centers of innovation of the type that the GCG could/should well become. Such community-oriented building uses would also involve the kinds of building security, maintenance and management issues alluded to above; but those issues are likely to be ameliorated if the goal of expanded and enhanced public access is embraced as both a public value and a project priority from the outset.

- ❖ **Long-Term Traffic and Transportation Issues & Opportunities:** Based on the initial presentation in the PNF, as well as the discussions to date in the public agency scoping session and in the IAG process to date, we are confident that traffic and transportation issues and opportunities relevant to this project will be fully and finally addressed in the DPIR/DEIR process. That is not meant to minimize the quite central importance of these multimodal challenges, but only to suggest that the procedural precedent is quite well established as to how these critical matters – particularly including adequate parking, transit and transit capacity, relocation of parking/loading access points, and bus facilities improvements -- will be addressed and resolved through the balance of the planning and permitting process.

In anticipation of that process, however, we would commend the thoughtfulness and sophistication of the parking supply and demand evaluation that was presented in the PNF. That includes the analysis of the shared-parking options that would result in the most efficient use of the reduced number of parking spaces that will be available on-site. It is worthy of note that, in the public process related to the 2009 GCG/PNF, parking was among the most controversial and contentious neighborhood concerns – particularly as to whether the reduced number of on-site parking spaces would be adequate to address both the existing public parking demand and the additional private parking demand created by the project itself. In our view, the initial PNF presentation on this matter makes a persuasive initial case that the reduced number of on-site parking spaces can and will be adequate for these purposes, as this matter is further evaluated in the DPIR/DEIR process.

That balanced parking supply/demand outcome, however, is much more likely to be achieved and sustained if the costs of project parking to residents, tenants and the public alike are determined in a manner that provides economic incentives to the types of parking that should be encouraged at various times and economic disincentives to the types of parking that should be discouraged at various times. To that end, we recommend and request that the parking pricing policy and practice of the developer for various categories of potential parkers be identified and evaluated as timely and relevant variables in the discussion of the parking supply and demand projections for this project, with specific regard to the critical functions that this facility now serves for large and small businesses and other organizations in the surrounding neighborhoods.

We would finally acknowledge and applaud the continued and expanded use of an affordable off-peak parking program – overnight, weekends, holidays --- that is described and reaffirmed in the PNF. This approach makes economic use of commercial parking spaces that would otherwise be unused during those periods; and the example of this project should be seriously considered for other projects similarly situated. Such off-peak parking programs are especially attractive to neighborhood residents who work outside of the immediate area; and they should be encouraged wherever and whenever possible.

- ❖ **Construction Period Traffic Management & Mitigation:** As has been made clear in our oral comments to date, both in the initial public agency scoping session and in the IAG process thus far, we are much less confident about the ability of the project to address and resolve the more complicated and acute problems of traffic management and mitigation during a lengthy period of project construction of at least ten years and possibly more. This has nothing to do with our confidence in the technical and professional expertise or experience of the development team – quite the contrary. Rather it reflects the nature and scale, the urgency and complexity, of the traffic management and mitigation challenges that this and every other construction project in this crucial area will have to face.

Consider the larger and longer context in and around the West End alone. During all or some significant part of the projected period of GCG Project construction, the following ten other major development projects will likely also be under construction as well -- not counting the possibility of redevelopment activity in the Nashua Street Quadrant or the State Services Block:

- *Parcel 9* redevelopment immediately to the south in the Market District.
- *The One Canal, Merano and Forecaster* projects in the adjacent Bulfinch Triangle.
- *The Lovejoy Wharf, Nashua Street Residences, Boston Garden, Garden Garage and the new public elementary school* projects immediately north of Causeway Street.
- *The Massachusetts Eye and Ear Infirmary* development on and around Cambridge and Charles Streets.

At the same time, the following five major and multi-year transportation infrastructure projects will also be under way in this same area:

- *Longfellow Bridge reconstruction*, including the related Red Line transit right-of-way and Storrow Drive improvements, reconstruction of other upstream Charles River bridges and installation of a new pedestrian bridge at Leverett Circle.
- *The Causeway Street Crossroads Initiative*, including the design and reconstruction of Causeway Street and Lomasney Way, Lowell and Keany Squares, and adjacent parts of Staniford and North Washington Streets and related 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. Effective projection and monitoring of their interactive and changing traffic and transportation implications is clearly well beyond the purview, let alone control, of any single project proponent. Even if it were not, requiring each 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, not to mention adverse public health and safety effects, in a district such as our, which is densely populated with major medical institutions.

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 development, 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 was guided and monitored by BTM. 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 far 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 BTM and others, to proactively address the interactive problems of construction-period traffic management and mitigation for this and other relevant projects in the scoping of this DPIP/DEIR. That would specifically include the continuing need for public leadership as well as communication, coordination and possibly consolidation of the efforts of various public and private developers to achieve that goal. That might also include, but need not be limited to, the kind of consolidated/collaborative approach taken in the case of the Bulfinch Triangle parcels.

- ❖ **The Proposed Mix of Housing:** The PNF describes the first phase of the overall GCG Project as the development of a 45-story 403-unit residential apartment building in the southwest corner of the West Parcel. It further indicates that most or all of the upper floors will each contain one three-bedroom unit, repeating the strategy that was so well received for the recently approved Nashua Street Residences project. That will create a substantial additional number of the types of larger residential units that are lacking in surrounding communities and for which the downtown neighborhoods have long advocated. Such units are especially desirable for the increasing number of families with children, who would be within walking distance of the new public elementary school on Commercial Street, as well as for those in a live/work situation. And the project proponent should be commended for this development strategy.

Likewise commendable is the commitment to provide all of the affordable units on-site, which is also the preference of the community wherever possible. And we would also encourage the developer to follow the lead of Nashua Street Residences in another respect: providing a significant number of smaller units as well. Smaller units are inherently more affordable and would appeal to another aspect of the West End demographic: younger professionals who work in the many medical, academic, entrepreneurial and governmental organizations in the surrounding area and who want the convenience of a residence within working distance of their employment, recreational, cultural and creative pursuits. And in that regard, similar to the emerging Innovation District, this project could provide another appropriate opportunity to consider including some of the residential micro-units that are becoming increasingly popular in Boston and elsewhere and might also be economically, geographically and functionally suitable to this particular urban environment.

- ❖ **The Nature and Project Retail, Restaurant & Other Hospitality Uses:** The development attractiveness of the GCG site is due in no small part to the success of the surrounding communities. These not only include the adjacent West End, Beacon Hill and North End End/Waterfront neighborhoods, but also the civic and commercial sectors in and around Government Center, the emerging Market District and the well-established Faneuil Hall Marketplace. These are the districts that have given this development site its history, its context and its unique and renowned contemporary character; and in our view, these are the communities that should be first considered and explored for at least some of the retail, restaurant and other hospitality activities that will animate the commercial aspects of the GCG project and activate its streetscape and other public spaces.

A proactive developer effort to incorporate some retail and restaurant elements from these surrounding communities would not only reinforce its connectivity to those communities, but it would also minimize the possibility and perception of unwelcome competition with those existing communities. And we recommend and request that such a course of action should be pursued through the DPIR/DEIR process, whether or not it is required by it.

6.14

- ❖ **The Role of Public Art & Architecture:** Among the urban design and development advantages that taller structures afford is the opportunity to create elegant and iconic architecture, which makes a distinctive and distinguished contribution both to the city skyline and to the urban streetscape. Given the expressed community concerns about the potential adverse effects of height on this site, which will surely be further considered in the DPIR/DEIR process, that should be viewed as not just an opportunity but an obligation in this case. Without question, whatever space project structures occupy in their visible segment of the sky-plane must be beautiful to behold at all times of day and night; and whatever space those buildings occupy in their crucial sector of the ground-plane must be active and attractive, safe and secure, functional and contextual, reflecting and reinforcing the social and economic variety and vitality of the surrounding communities. And these essential values and goals could/should be effectively incorporated into the scoping and implementation of the DPIR/DEIR process and product.

6.15

That should also include a prominent role for public art, which can enhance and enliven the special character of this project as at once a new urban district and crossroads. Such an opportunity clearly exists on and around the East Parcel as currently configured in the PNF; but it could also exist on the West Parcel as well, particularly if the garage podium is designed and used as previously suggested. Both art and architecture could/should play complementary and coordinated roles in establishing this project as both a striking new focal point on the horizon and a new city destination in which to live, work, play and stay. And for that reason, they should be an important, and even indispensable, element of the DPIR/DEIR scope.

6.16

- ❖ **Other Interior/Exterior Design Opportunities:** The GCG Project, among others, provides a compelling opportunity to incorporate not only state-of-the art environmental, electronic and communications technology, for which CBT Architects has shown a notable facility in recent projects like LEED Platinum Atlantic Wharf project in Boston, but also to reflect the most advanced and contemporary principles of universal design. Among its many cost-effective benefits, universal design and enhances the character of all elements as the project as attractive, accessible and useful to their full range of possible users, but it specifically allows residents to age in place, an increasingly timely, relevant and practical goal for an aging population.

In this regard, it should be noted that the West End community includes one of the foremost international advocates and practitioners of universal design in the Institute for Human Centered Design (IHCD) on Portland Street in the Bulfinch Triangle. IHCD has worked with CBT on universal design initiatives in the past; and they could provide invaluable input and feedback on the GCG and others major projects as their planning and permitting proceeds. And we would certainly encourage that.

6.17

The Relevance and Potential of the Adjacent Parcel 6: The eastern perimeter of the GCG Project is the unattractive, inhospitable and virtually impenetrable confluence of highway ramps known as Parcel 6. Along with Parcel 12, it is one of two CAT ramp parcels within sight of each other, bracketing the attractive parkland that has already been developed on CAT Parcels 8 & 10. Although the improvement of Parcel 6 is a public responsibility, and not the obligation of the GCG project developer, there is no doubt that such improvement would not only enhance the GCG Project but also the surrounding communities.

For that reason, whether as a requirement of the DPIR/DEIR scope or as a voluntary initiative of the GCG developer, it would be quite timely and most appreciated if the development team would devote some its professional and creative expertise to whether and how Parcel 6, and perhaps even Parcel 12, might be improved for the benefit of all concerned. A practical vision for a more potentially useful, active and attractive future for this anomalous space could have physical, functional, aesthetic and perhaps even cultural benefits; and in any case, it would greatly ameliorate the pedestrian and transit conditions in the vicinity and facilitate the neighborhood connectivity that is a fundamental focus of the GCG Project.

6.18

If the talented GCG Project development team could formulate such a conceptual plan as part of the planning and design for its own adjacent property, that would provide impetus and guidance to the ongoing public process that is addressing these matters pursuant to the Greenway District Planning Study. And that in turn would expedite the possibility that something positive and meaningful can and will be done in this problematic space sooner rather than later.

- ❖ **The Option of New Neighborhood Nomenclature:** Although it is beyond the purview of the project developer, the GCG Project affords the opportunity to rectify some roadway nomenclature that dates back to an era of urban renewal and transportation planning that dates back more fifty years ago and, with a few notable exceptions, did not treat the West End very well. As we now continue the process of removing and redeveloping many of the remaining vestiges of that era, starting with the Central Artery and now moving to the Government Center Garage, it would be symbolically significant and thoroughly appropriate to consider renaming some of the surrounding roadways more accurately and historically. These might include:
 - *Merrimac Street:* As the PNF acknowledges, the roadway beneath the garage that will separate the East and West Parcels is Merrimac Street, not Congress Street; and that should be at long last acknowledged.
 - *Sudbury and Chardon Streets:* The “New” prefix for these roadways marked their effective conversion from a city street to a regional arterial. Now that that process is being reversed by the GCG Project with the downsizing and redesign of these roadways, they could/should be returned to their historical designations.
 - *The John F. FitzGerald Boulevard:* The so-called Surface Artery is actually named in honor and memory of Honey Fitz, North End native son, former Boston Mayor and now best known as JFK’s grandfather. This major roadway should be rebranded and celebrated for its distinguished lineage and a fitting two-way pair with the more suitably named Atlantic Avenue.

The combination of redeveloping the GCG site and rebranding its surrounding streets would put a fitting end to a dubious ear resonant of the 20th Century and symbolize the continuing progress of our downtown communities both back and forward to our 21st Century future.

- ❖ **The Option of a Planned Development Area:** The PNF suggests the possible use of a Planned Development Area (PDA) strategy for the redevelopment of the GCG site; and this strategy has also been suggested for other major development sites in the West End. It should be noted that a PDA strategy was also contemplated for the redevelopment of the MassDOT parcels Bulfinch Triangle. The design and use guidelines for that process were formulated and implemented by the city, state and community in concert; and they explicitly invited consideration of a PDA permitting option. That possibility was intended to reflect the scale and complexity of that development process as well as the breadth and depth of community participation in the entire enterprise. To the extent that those same variable are also present in this case, a PDA could/should also be considered and would not be without precedent.

In conclusion, we hope that these comments from the Downtown North Association, as well as those of other interested parties, will contribute to the refinement and improvement of the GCG Project. This project tremendous potential for our community as well as many issues and opportunities yet to address and resolve; and to that end, we look forward to working with all concerned through the DPIR/DEIR and IAG processes that will ensue. If past is prologue, this public processes will result in a better project for all concerned, as has clearly been the case with all of the many neighborhood development projects that have preceded it.

Sincerely,

Robert B. O'Brien, DNA Executive Director and
Member of the GCG Project Impact Advisory Group,
Co-Chair of the Bulfinch Triangle Citizens Advisory Committee,
Member of the Parcel 7 & 9 Advisory Committee

cc: District City Councilor Salvatore LaMattina and State Representative Aaron Michlewitz
Peter Meade, Heather Campisano, Jon Greeley, Lauren Shurtleff and David Carlson of the BRA
Thomas Tinlin & Vineet Gupta of the Boston Transportation Department
Nicole Leo of the Mayor's Office of Neighborhood Services Community
Other Members of the Government Center Garage Impact Advisory Group
DNA Officers, Directors and Members
Other Interested Parties

Letter 7

West End Civic Association

Comment 7.1

"WECA opposes a change in zoning that would open the way for building a 600 foot tower.. The West End community supports buildings consistent with the existing character of this mixed use neighborhood."

Response

Overall, the proposed project was designed to be consistent with the Greenway Guidelines, which encompasses the entire project site, both in terms of height and massing. The Greenway Guidelines, which specified heights up to 600' for this area, were adopted after a comprehensive community process. However, after considering the additional community feedback from this process, the Proponent has agreed to reduce the height of the office building from 600 feet to 528 feet and reduce the overall gross square footage of new uses on the site by approximately 125,000 GSF, which reduction is predominantly office use.

Comment 7.2

"WECA has been favorably impressed by the procedure of first approving a plan for the zoning of a multi-block area, to be followed at intervals by approval of each building in the block. This follows the precedent set for the four block area east of Haverhill Street which has led to a phased construction cycle which minimized the construction impact and moderated the cycle of labor shortage/unemployment. We urge the BRA to adopt this two-step plan wherever possible."

Response

The Proponent agrees with a permitting approach that allows the City to initially understand the Project (i.e., the conceptual master plan) with a subsequent step of understanding each Project Component's design details as they develop.

The PNF submitted on June 5, 2013 presented details about the Project and provided information and/or preliminary analysis of transportation, environmental protection, infrastructure, and other components of the Project, in order to inform the City agencies and neighborhood residents about the Project and its potential impacts and proposed mitigation (i.e., for review and approval of the conceptual master

plan). Following review of public and agency comments on the PNF, more detailed analysis and information addressing public comments are presented this DPIR, in accordance with the Scoping Determination issued by the BRA on August 9, 2013.

Because the Project is a phased project for which design development will proceed sequentially, it is anticipated that any required Article 80B, Large Project Review will occur at different times for separate Project Components. The intent of these filings will be to update, as needed (i.e., due to changes in design), the analyses conducted as part of the June 2013 PNF and/or this DPIR as individual Project Components are designed in more detail and submitted for BRA review and approval as part of future Article 80, Large Project Review. These documents will include more specific measures intended to mitigate, limit, or minimize impacts, where appropriate, as required by local, state, and federal regulation.

Comment 7.3

“WECA is very pleased with the plans for the three residence buildings, but, again, these buildings should not exceed the heights of existing buildings in the Bullfinch Triangle sub-district.”

Response

The Project would not be possible if none of the proposed residential buildings were allowed to exceed the heights of existing buildings in the Bullfinch Triangle district. In addition, the Greenway Guidelines specifically calls for heights between 400-600 feet on the western portion of the Government Center site.

However, the Proponent understands the community concerns about heights, particularly on the East Parcel. Given this the Proponent has agreed to lower the hotel/condominium building on the East Parcel from 275 feet to 157 feet, which lower height is consistent with the Bullfinch Triangle area. In addition the buildings on the East Parcel will further step down as they approach the Parcel 7 garage and the North End Greenway Parks.

Comment 7.4

“The inclusion of three-bedroom units and the retention of all the affordable units on site is what WECA has requested. All of these units should receive adequate sunlight and similar views to other units. The division of the residences into three distinct units will also facilitate the conversion into condominium units if mortgage conditions change during the next twelve years.”

Response

As presented in the PNF, the inclusion of 3-bedrooms and retention of affordable units on-site is an objective the Proponent shares with WECA. Specifically the Proponent has committed to:

- Meeting the 13 percent affordable requirement of the total units,
- Providing those affordable units on-site,
- Allocating the affordable % to each unit type (i.e. 13 percent of each unit type will be affordable),
- Distributing the affordable units throughout the building, (i.e. not congregated in one area),
- Having the same level of finishes as the typical market rate apartment unit,
- Having the same access to common amenities as the typical market rate apartment unit,
- The first apartment building will also have three bedroom units and 13 percent of these three bedroom units will be affordable.

Overall, once complete, the redevelopment of the Government Center Garage will contain more than 800 units of new housing, of which over 100 will be designated as affordable. This will be a major community benefit in a part of Boston where limited affordable housing currently exists.

Comment 7.5

“One problem area we foresee involves the waiting area strip along the bus lanes. While this is lengthened, it is only about 20% of its previous width, and has no room for the glass enclosed seating area. During the period 5 P.M. to 6:30P.M. on weekdays, this area is not adequate for the waiting commuters. If they are to be accommodated in the shops, it will necessitate retail food stores, which cater to takeaway fast food until 7 P.M. and upscale sit-down meals thereafter. It would be far better if the bus lanes were reduced to one, and the space saved, be available to standing commuters. We urge consideration of this change.”

Response

Figure 1.6 of this DPIR shows the updated ground floor plan, which reflects improvements to the proposed pedestrian plaza on the East Parcel. Key improvements include widening of the plaza to further enhance the quality of the space and enlarged Haymarket MBTA bus facility platforms for better functionality.

Comment 7.6

“We applaud the addition of a massive indoor bike parking facility and bicycle (and helmet) rental shop. The effect on automobile traffic, however, creates problems because the main entry point to the garage changes from a main street to a side street. The study states that 92% of

the entry traffic will pass through the New Chardon/Bowker streets intersection (with new traffic signal lights). At present each of the four entry roads (north on Congress/south on Merrimac/east and west on New Chardon) has immediate entry when its light is green. Henceforth all entry will be limited by the New Chardon/Bowker light. The entry from Merrimac will be especially hazardous as traffic must transfer from the right lane of New Chardon to the left within just four car lengths. We request the traffic department study carefully whether a turn from Merrimac onto Bowker is possible under morning rush hour conditions."

Response

The current Garage entrance and exit driveway, as well as the loading dock driveway along New Chardon Street at the Congress Street/Merrimac Street intersection, is problematic for both vehicle-to-vehicle conflicts and vehicle to pedestrian and bicycle conflicts. The combined driveways are within the intersection proper and cause confusion for many entering drivers; exiting drivers frequently conduct unsafe illegal right turn maneuvers. The sheer width of the combined driveway and its proximity to the intersection proper make it difficult for pedestrians traverse. Relocating both the parking garage and loading dock driveways to Bowker Street will mitigate these poor, and sometimes unsafe, existing conditions.

The new signal at New Chardon Street/Bowker Street will operate on the same signal controller as the existing intersection of New Chardon Street/Merrimac Street/Congress Street, a standard design practice for closely spaced intersections. Operating these two intersections together will ensure that drivers have safe and efficient passage through both intersections and that pedestrians are protected. As is standard practice, BTD will review all proposed improvements to the intersection.

Comment 7.7

"There are six utility lines running under Bowker Street (Figure 5.1). Any utility work on this narrow Street runs the risk on blocking either the entrance or exit of the Garage. A major loading dock is also positioned on Bowker. Any blockage would require the use of Hawkins Street, but there has been no study of whether Hawkins Street could handle this emergency use. A study is needed."

Response

As is standard practice in any urban setting, utility repair is fully coordinated with adjacent property owners/businesses to maintain proper, safe, and convenient access/egress. This unpredictable and temporary activity, should it ever occur, will therefore not affect the day-to-day operations of the Project.

Comment 7.8

“We approve of the redesign of the garage roof with its grass cover. The BRA should ask for a study on whether the public could be given access to this relaxing green space via a designated elevator, at least from April to August, 11 A.M. to 4 P.M. (the only hours when sunlight is likely).”

Response

Overall, the Project is creating a significant amount of open space at the street level, particularly through the creation of a new public plaza on the East Parcel. (See response to Comment 5.7 regarding open space) As noted above, some members of the community have expressed a desire for general public access to the proposed roof deck areas. At this time the Proponent is unable to commit to public access to the roof decks given access would need to be through either a residential or office building which creates serious security and safety concerns for residents and employees of those buildings. However, the Proponent is willing to provide contributions, as part of its 1% mitigation fee, to enhance or expand existing nearby neighborhood parks and open space.

Comment 7.9

“Sections 1.6 and 2.4 of the PNF appear to be written either by a committee or by an individual who does not understand what a neighborhood is. The Government Center is variously described as a neighborhood, district, and sub-district. It is given boundaries (in 1.6.1.1) which are contradicted on the maps (Figure 2.1). The same sloppy language/cartography is used for the Bulfinch Triangle. Sloppy language leads to sloppy thinking.”

Response

The Government Center’s definition in relationship to various neighborhoods, districts, and sub-districts changes depending on the zoning or district boundaries established under various City definitions. One of the Project’s objectives is to provide a Project that helps create an identity of its own with mixed uses that create a vibrant area of the City.

Page Intentionally Left Blank



WEST END CIVIC ASSOCIATION

Committed to Enhancing the Quality of Life in Our Community

July 8, 2013

Mr. John Fitzgerald
Senior Project Manager
Boston Redevelopment Authority
1 City Hall Plaza
Boston, MA 02111

SUBJECT: Government Center Garage

Dear Mr. Fitzgerald,

The West End Civic Association (WECA) has reviewed the 5 June 2013 Project Notification Form (PNF) for the Government Center Garage. We are delighted that this proposal has corrected many of the defects of the proposal submitted eight years ago to which we responded unfavorably. This site is on the far southeastern boundary of the West End neighborhood and has acted as a barrier for forty years. If the project is developed well, it has the potential to reopen the connection of the West End neighborhood to the Downtown neighborhood.

WECA opposes a change in zoning that would open the way for building a 600 foot tower.. The West End community supports buildings consistent with the existing character of this mixed use neighborhood. We are proud of the heritage and architecture and want to maintain as much of that look and feel as possible with future changes and development. **7.1**

WECA has been favorably impressed by the procedure of first approving a plan for the zoning of a multi-block area, to be followed at intervals by approval of each building in the block. This follows the precedent set for the four block area east of Haverhill Street which has led to a phased construction cycle which minimized the construction impact and moderated the cycle of labor shortage/unemployment. We urge the BRA to adopt this two-step plan wherever possible. **7.2**

The development of the Government Center Garage site will have only minimal impact on the Charles River Park sub-district in regards to wind and shadow, but will block the treasured view of the Custom Tower for many homeowners in the Charles River Park sub-district of the West End. In conjunction with the proposal for the West End/North Station area it will, in its proposed configuration, detrimentally change the Bulfinch Triangle sub-district of the West End Neighborhood.

WECA is very pleased with the plans for the three residence buildings, but, again, these buildings should not exceed the heights of existing buildings in the Bullfinch Triangle sub-district. The inclusion of three-bedroom units and the retention of all the affordable units on site is what WECA has requested. All of these units should receive adequate sunlight and similar views to other units. The division of the residences into three distinct units will also facilitate the conversion into condominium units if mortgage conditions change during the next twelve years. **7.3** **7.4**

We realize that the proposals for the block east of Merrimac Street, which is planned for 2020-2023 are likely to be changed in the intervening years. The plans as presented should create a delightful pedestrian mall, which will be linked to Canal Street so as to create a very long upscale avenue. One problem area we foresee involves the waiting area strip along the bus lanes. While this is lengthened, it is only about 20% of its previous width, and has no room for the glass enclosed seating area. During the period 5 P.M. to 6:30 P.M. on weekdays, this area is not adequate for the waiting commuters. If they are to be accommodated in the shops, it will necessitate retail food stores, which cater to takeaway fast food until 7 P.M. and upscale sit-down meals thereafter. It would be far better if the bus lanes were reduced to one, and the space saved, be available to standing commuters. We urge consideration of this change. **7.5**

The reduction in garage spaces from 2310 to 1159 has caused some concern. The PNF indicates this causes no problem because the peak usage is never more than 1050 and that the expected demand from residents will be matched by the reduction in contract spaces (mainly governmental/hospital). The BRA should give the community assurances that these contracts will expire--and not be renewed--before the destruction of the east garage about 2020.

WECA believes that the proposal will greatly improve the safety and convenience of the pedestrians at the adjacent crossings. It will do the same for the bicyclists if the new proposed bike lanes are linked by the city to new lanes beyond the proposal boundaries.

We applaud the addition of a massive indoor bike parking facility and bicycle (and helmet) rental shop. The effect on automobile traffic, however, creates problems because the main entry point to the garage changes from a main street to a side street. The study states that 92% of the entry traffic will pass through the New Chardon/Bowker streets intersection (with new traffic signal lights). At present each of the four entry roads (north on Congress/south on Merrimac/east and west on New Chardon) has immediate entry when its light is green. Henceforth all entry will be limited by the New Chardon/Bowker light. The entry from Merrimac will be especially hazardous as traffic must transfer from the right lane of New Chardon to the left within just four car lengths. We request the traffic department study carefully whether a turn from Merrimac onto Bowker is possible under morning rush hour conditions. **7.6**

There are six utility lines running under Bowker Street (Figure 5.1). Any utility work on this narrow Street runs the risk on blocking either the entrance or exit of the Garage. A major loading dock is also positioned on Bowker. Any blockage would require the use of Hawkins Street, but there has been no study of whether Hawkins Street could handle this emergency use. A study is needed. **7.7**

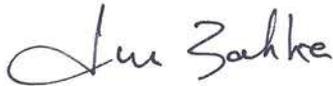
We approve of the redesign of the garage roof with its grass cover. The BRA should ask for a study on whether the public could be given access to this relaxing green space via a designated elevator, at least from April to August, 11 A.M. to 4 P.M. (the only hours when sunlight is likely). All the many efforts to save on energy/water are admirable. **7.8**

Sections 1.6 and 2.4 of the PNF appear to be written either by a committee or by an individual who does not understand what a neighborhood is. The Government Center is variously described as a neighborhood, district, and sub-district. It is given boundaries (in 1.6.1.1) which are contradicted on the maps (Figure 2.1). The same sloppy language/cartography is used for the Bulfinch Triangle. Sloppy language leads to sloppy thinking. **7.9**

A "neighborhood" is not an area of only one type of land use. It is an area which has all the necessities of life, but used by the same people: residences, stores, offices, churches, banks, a cultural center. The Post Office in the 1920's (when the Post Office was vital to life) made a great effort to identify and map neighborhoods based on these criteria. These postal zones are what all Boston citizens (except realtors) use in everyday speech.

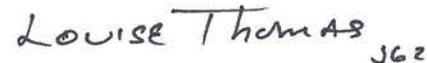
A sub-neighborhood usually has only one or two functions. The Government Center and the Bulfinch triangle are examples for they lack the range of activities. This project is a great effort to link the West End Neighborhood to the Downtown Neighborhood and should not be denigrated verbally to linking the Bulfinch Triangle to the Government Center.

Mr. Jim Zahka



Co-Chair
West End Civic Association
Zoning and Planning Committee

Ms. Louise Thomas



Co-Chair
West End Civic Association
Zoning and Planning Committee

Cc: Mayor Thomas Menino
Mr. Peter Meade, BRA Director
State Representative Jay Livingstone
City Councilor Michael Ross
City Councilor Sal Lamattina
Ms. Sarah Hinton
Ms. Nicole Leo
Mr. Tom O'Brien, HYM Investments

Letter 8

Save the Harbor Save the Bay

This letter is in support of the Project; therefore, there are no comments that require direct responses.

Page Intentionally Left Blank



Mr. Peter Meade
Chief Economic Development Officer
Boston Redevelopment Authority
Boston City Hall, 9th Floor
One City Hall Square
Boston, MA 02201

July 11, 2013

RE: Redevelopment of the Government Center Garage

Dear Mr. Meade,

I am writing to you today in support of the proposed redevelopment of the Government Center Garage.

As you know, Save the Harbor / Save the Bay is an environmental advocacy organization made up of thousands of citizens, scientists, and civic, cultural, corporate and community leaders whose shared mission is to restore and protect Boston Harbor and Massachusetts Bay – and share them with the public for everyone to enjoy.

Though I have fond memories of the many hours I spent in the EPA's office at the garage during the early days of the Boston Harbor project, the garage is an eyesore, a dinosaur from another era when cars were as important – or more important – than people.

With the removal of the elevated central artery and the creation of the pedestrian friendly greenway, today all this has changed. We are looking forward to the proposed redevelopment of the garage, which we are confident will transform the area into a transit oriented and pedestrian friendly place.

We understand that it is a fairly large and complicated project, however we are confident that phased approach will mitigate its short-term impacts on the neighborhood. We also understand that it will have other impacts as well, creating a sliver of shadow on the Harbor in the winter and a bit of shade on the Greenway parks in the summer when we could certainly use some relief from the sun. However, we are absolutely convinced that the enormous benefits of this project far outweigh any short or long-term impacts.

We support the project for three important reasons: It is in the right place. It is happening at the right time, and it is the right project for the site.

We are confident that the proposed redevelopment:

- Is a truly transit oriented development, with two subway lines, a major bus station and a new Hubway Station and 850 space bike parking facility that will give residents and workers better options than simply driving to this location.
- Will provide easy and direct access to I-93 which, compared to other area developments, will have significantly less traffic going through the residential neighborhoods. This project is in the right place.
- Will reconnect the North End to the Bulfinch Triangle, opening up of Congress Street to light and air.
- Includes sustainability measures including LEED Silver and LEED Gold buildings, as well as the net zero energy public square.
- Will bring new residents to an area of Government Center that is pretty desolate after business hours, helping the surrounding business and retailers and the adjacent public market on the Parcel 7 garage. The new residents and employees that come to the site will be an added benefit to the surrounding business and retailers and strengthen the adjacent public market on the Parcel 7 garage.
- Will add needed construction jobs and new permanent jobs and new tax revenue to Boston.

We are familiar with the project, the site, the planning efforts and context. We are also familiar with the project team, which has earned a great reputation as a developer that cares about our city and its future.

All of us have lived with the massive, ugly, and outdated Government Center Garage for a very long time. We are eagerly anticipating the proposed redevelopment at the site that we are certain will strengthen the neighborhood and the city for years to come.

We respectfully urge you to permit it to proceed without delay.

Sincerely,

Bruce Berman

Bruce Berman
Director of Strategy, Communications and Programs
Save the Harbor / Save the Bay

Letter 9

Councilor Salvatore LaMattina

This letter is in support of the Project; therefore, there are no comments that require direct responses.

Page Intentionally Left Blank



The Office of
SALVATORE LaMATTINA
Boston City Councilor - District One

July 8, 2013

Mr. John M. FitzGerald
Senior Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201

RE: Redevelopment of the Government Center Garage

Dr. Mr. FitzGerald:

I am writing in regards to the solicitation of my opinion about the current plans to redevelop the Government Center Garage.

For far too long, the garage has served not only as an eyesore but also as a barrier between important downtown neighborhoods. Therefore, I fully support the plan to tear down the portion of the garage that covers Congress St. as well as restore the areas across from the Brooke Courthouse and the Rose Kennedy Greenway.

I appreciate that the plan respects the Bostonians who currently rely on the garage by ensuring that it stays open during construction. Furthermore, I applaud the developer, HYM Investment Group, for committing to environmentally sustainable construction and to installing green roofs.

Currently, the garage has a capacity far higher than is necessary. Tearing down the portion of the garage that cover Congress St. will not only get rid of unnecessary spaces, but also introduce sky and daylight into the portion of the street currently covered by the garage.

Finally, the plan will urbanize the area surrounding the garage, create over 6,000 permanent jobs, attract residents and tourists, provide 771 new housing units and bring in approximately \$11 million in new annual tax income.

I am in full support of this plan as it will redevelop and revitalize the Government Center Garage.

Sincerely,

Councilor Salvatore LaMattina
Boston City Councilor, District One
One City Hall Square
Boston, MA 02201

Letter 10a

Aaron Michlewitz, State Representative

Comment 10a.1

"While I'm delighted to see The HYM Investment Group's diligent efforts to address the defects of the proposal submitted eight years ago and I support the project going forward; I subsequently must express concern regarding the open community process, which has been articulated to my office by an overwhelming number of constituents and members of the community concerned about the lack of transparency."

Response

As noted in Representative Michlewitz's second comment letter, the Proponent has engaged in a highly public and transparent process to inform elected officials, community representatives, and the general public about the Project. To date, the Proponent has engaged in dozens of meetings held in different locations. Refer to Chapter 1, *Project Description* for additional information on the ongoing community outreach and agency coordination process.

Also, in response to community comments and concerns the Proponent has agreed to the following key changes to the proposed Project:

- Reduction of the height of the West Parcel Office Tower from 600 feet to 528 feet.
- Reduction of the height of the East Parcel Hotel/Condominium Building from 275 feet to 157 feet.
- Overall, reduction of 122,000 square feet of project density and additional conversion of some proposed office use to residential use.
- Move up the demolition of the garage from Phase 3A to Phase 2A.

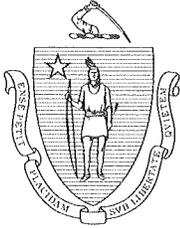
The Proponent will continue to meet and work with the community as the proposed Project and its individual components move forward.

Comment 10a.2

"I would request that we continue to facilitate the dialogue concerning issues such as traffic, parking, infrastructure, open space, shadow and wind impacts and most importantly, the impacts to the residents' quality of life, both during construction and after the project has been completed."

Response

The Proponent is looking forward to continuing to engage with the appropriate public agencies and private utilities to identify the potential impacts on traffic, parking, infrastructure, etc. The PNF provided a full traffic study and significant detail concerning other potential impacts of the Project.



Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON, MA 02133-1054

AARON MICHLEWITZ
STATE REPRESENTATIVE
3RD SUFFOLK DISTRICT

Chair
Public Service

ROOM 156, STATE HOUSE
TEL: (617) 722-2240

July 11, 2013

Peter Meade
Director & Chief Economic Development Office
Boston Redevelopment Authority
Attention: John Fitzgerald, Senior Project Manager
One City Hall Square, 9th Floor
Boston, MA 02201

RE: Redevelopment of the Government Center Garage

Dear Mr. Meade,

In a community where we are tirelessly looking to grow, strengthen and improve, it remains evident that our construction projects of yesterday have impaired our growth and development into the future. The Government Center Garage, erected in the 1960's serves as a key example of construction ultimately creating an unnecessary barrier that has stunted the growth of the communities which surround it. With an opportunity to confront and address the impacts of this preexisting structure, it is crucial that we as surrounding community members join together in embracing constructively the replacement and development of this parcel.

While I'm delighted to see The HYM Investment Group's diligent efforts to address the defects of the proposal submitted eight years ago and I support the project going forward; I subsequently must express concern regarding the open community process, which has been articulated to my office by an overwhelming number of constituents and members of the community concerned about the lack of transparency. The transitioning of this garage into a mixed use project including new residential, commercial and retail opportunities has the potential to enhance economic vitality and stability while closing the preexisting dead space. While I have the ability to see the immense potential this project possesses, I would respectfully request that we offer the utmost inclusive process with the hopes of navigating towards complete community support. **10a.1**

I would request that we continue to facilitate the dialogue concerning issues such as traffic, parking, infrastructure, open space, shadow and wind impacts and most importantly, the impacts to the residents' quality of life, both during construction and after the project has been completed. **10a.2**

Additionally, I would like to suggest that a portion of this project be allotted towards student residences for a local university. With space at a premium in downtown Boston and the direct need for more student housing, it is imperative that any project of this size fully examine the demand to address this serious issue that has continued to grow in our neighborhoods. With a steady influx of students eager to move in, we are currently unable to accommodate the demand.

In close, I would like to thank you and your staff for embarking on this ever evolving project. I am eager to continue the conversation and look forward to the development of this revitalization. If you should have any further questions, please do not hesitate to contact my office.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Michlewitz". The signature is fluid and cursive, with a long horizontal stroke at the end.

AARON MICHLEWITZ

State Representative

Third Suffolk District

Letter 10b

Aaron Michlewitz, State Representative

This letter is in support of the Project; therefore, there are no comments that require direct responses.

Page Intentionally Left Blank



Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON, MA 02133-1054

AARON MICHLEWITZ
STATE REPRESENTATIVE
3RD SUFFOLK DISTRICT

Chair
Public Service
ROOM 156, STATE HOUSE
TEL: (617) 722-2240

July 12, 2013

Peter Meade
Director & Chief Economic Development Office
Boston Redevelopment Authority
Attention: John Fitzgerald, Senior Project Manager
One City Hall Square, 9th Floor
Boston, MA 02201

RE: Redevelopment of the Government Center Garage

Dear Mr. Meade,

Upon further discussion between myself and the HYM Investments, I would like to reiterate my support for the redeveloping the Government Center Garage. I stand by my July 11, 2013 letter supporting their efforts in replacing and developing this sight. I would however, like to amend my comments about the community process as stated in that letter. Since the publishing of that letter, I have been informed that the developers has met with the following neighborhood groups and community leaders...

Downtown North Association
Beacon Hill Civic Association
West End Civic Association
Boston Harbor Association
Save the Harbor- Save the Bay
Greenway Conservancy
Friends of North End Parks (Nathan Swain)
NEWRA
State Representative Jay Livingstone
City Councilor Salvatore LaMattina
City Council President Stephen Murphy
City Councilor Mike Ross's Office (Sarah Hinton)
Senator Anthony Petrucci
President of NEWNC (Stephen Passacantilli)
Nancy Caruso
Bob O'Brien
Dave Kubiak
Victor Brogna

Joanne Fantasia

Dan Wilson

Karen Cord Taylor

Mayor's Office of Neighborhood Services (Jay Walsh, Nicole Leo & Shaina Auborg)

MBTA Bus Operations

MBTA Subway Operations

With these meetings the developer has attempted to conduct a community process that was inclusive and as engaging as possible. I appreciate HYM's efforts in doing so and apologize for any belief to the contrary. If you should have any further questions or concerns in this regard, please feel free to contact my office.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Michlewitz". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

AARON MICHLEWITZ

State Representative

Third Suffolk District

Letter 11

Senator Anthony Petruccelli

Comment 11.1

“Not only must this project remain consistent with the vision for the area, but it must also address economic, public amenity, growth and infrastructure concerns while also mitigating the impact on the communities affected. While the Developer has provided assurances that the project's effect on roadways and other infrastructure are consistent with project documents and guidelines, it is important that the Developer and the community have a detailed understanding of the adequacy of infrastructure in the area. We are required to understand not only how the effect on traffic capacity but also the adequacy of utilities affected by the project. ”

Response

The Project is looking forward to continuing to engage with the appropriate public agencies and private utilities to identify the potential impacts on traffic, parking, infrastructure, etc. The PNF provided a full traffic study and significant detail concerning other potential impacts of the Project.

Comment 11.2

“... the projects impact on public transit and accommodation also remain a concern. To understand the full impact of this project, consideration must be given to all other development projects existing in this area and the combined impact on the community.”

Response

The PNF provided a full transportation study that city and state agencies can refer to in wider, regional planning efforts.

Page Intentionally Left Blank



COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS SENATE
STATE HOUSE, BOSTON, MA 02133-1053

Room 424
BOSTON, MA 02133
TEL. (617) 722-1634
FAX (617) 722-1076

SENATOR
ANTHONY PETRUCCELLI
FIRST SUFFOLK AND MIDDLESEX DISTRICT

ANTHONY.PETRUCCELLI@MASENATE.GOV
WWW.MASENATE.GOV

CHAIR, JOINT COMMITTEE ON
FINANCIAL SERVICES
VICE CHAIR, JOINT COMMITTEE
ON CONSUMER PROTECTION AND
PROFESSIONAL LICENSURE
JOINT COMMITTEE ON HEALTH CARE
FINANCING
SENATE COMMITTEE
ON WAYS AND MEANS
JOINT COMMITTEE
ON WAYS AND MEANS

July 12, 2013

Mr. John Fitzgerald
Senior Project Manager
Boston Redevelopment Authority
One City Hall Square, 9th Floor
Boston, Ma 02201

Re: Redevelopment of the Government Center Garage.

Dear Mr. Fitzgerald,

Mixed-use development will provide new residential, commercial and retail opportunities to our communities and with that will bring greater economic growth to the surrounding areas. Based on the HYM Investment Group's efforts to address the defects in the original project and with the promise of continued economic prosperity, I write today to express my support for this project; however, I would also like to take this opportunity to address my concerns. Therefore, I submit the following comments on the Project Notification Form ("PNF") on the proposal put forth by Bullfinch Congress Holdings Group, LLC to redevelop the Government Center Garage at One Congress Street Boston, MA.

The project consists of six new buildings and reuses a portion of the existing parking garage in order to create a mix of uses with the goal of revitalizing the surrounding area. This project would replace portions of the existing garage with 771 residential apartments and condominiums, 204 hotel rooms, 1.3 million square feet of offices and 82,500 gross square feet of retail space. The large scale of this project, while promising economic vitality, requires careful planning and review to ensure that it remains consistent with the vision of further connecting the North End and downtown neighborhoods.

Not only must this project remain consistent with the vision for the area, but it must also address economic, public amenity, growth and infrastructure concerns while also mitigating the impact on the communities affected. While the Developer has provided assurances that the project's effect on roadways and other infrastructure are consistent with project documents and guidelines, it is important that the Developer and the community have a detailed understanding of the adequacy of infrastructure in the area. We are required to understand not only how the effect on traffic capacity but also the adequacy of utilities affected by the project. Further, the projects impact on public transit and accommodation also remain a

11.1

11.2

concern. To understand the full impact of this project, consideration must be given to all other development projects existing in this area and the combined impact on the community.

It is important that we continue to have an open conversation about the impact of this project on infrastructure, transportation and the residents in the affected communities. Still, The HYM Team has been responsive to the communities involved by conducting an open and transparent outreach program. The HYM Team is committed to remain accessible and continue their outreach program through the design and construction phases of this project. I look forward to continuing to work with the BRA, the Developer and our communities on this project and toward the goal of further economic growth and revitalization in our neighborhoods. If you have any further questions please feel free to contact my office.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony Petrucelli". The signature is fluid and cursive, with a prominent initial "A" and a long, sweeping underline.

ANTHONY PETRUCCELLI
State Senator

Letter 12

Building and Construction Trades Council

This letter is in support of the Project; therefore, there are no comments that require direct responses.

Page Intentionally Left Blank

Building and Construction Trades Council of the Metropolitan District

Affiliated with the Building and Construction Trades Department
AFL-CIO

Brian Doherty
Sec.Treas./Gen. Agent

Mark C. Fortune
President

July 12, 2013

Mr. Peter Meade
Chief Economic Development Officer
Boston Redevelopment Authority
Boston City Hall, 9th Floor
One City Hall Square
Boston, MA 02201

Dear Mr. Meade,

I am writing to support the Government Center Garage redevelopment that is being proposed by Tom O'Brien and The HYM Investment Group ("HYM"). The residents of the city of Boston, particularly the neighborhoods immediately adjacent to Government Center, will benefit from the economic development, community development and career opportunities this project will bring to Boston through the Building and Construction Trades Council of the Metropolitan District unions. In addition, the hard-working men and women of the Building and Construction Trades Council of the Metropolitan District will build a more attractive, stronger, safer city and also reinvest in the City of Boston by supporting the local and city-wide economy.

As General Agent/Secretary Treasurer of the Building and Construction Trades Council of the Metropolitan District, I am pleased to know that the redevelopment project will create approximately 2,600 union construction jobs. The project will also create 6,000 permanent jobs, and several millions of dollars in tax revenue for the City of Boston. Furthermore, HYM's project will also create a sense of place, and a vibrancy that has not existed in the Government Center area for a long time.

HYM and the project team has considered all major impacts of the development, and has demonstrated a willingness to meet with community members and other key stakeholders to discuss all topics of the project.

HYM has assembled a team to make this complicated project feasible, and, with the use of 100% Union labor, one that will be built in a safe manner. I look forward to the project being approved by the BRA, and to seeing the garage replaced with something that will further benefit and beautify the City of Boston.

Thank you,



Brian Doherty
General Agent/Secretary-Treasurer

Letter 13

Iron Workers Local 7

This letter is in support of the Project; therefore, there are no comments that require direct responses.

Page Intentionally Left Blank

INTERNATIONAL ASSOCIATION OF BRIDGE, STRUCTURAL, ORNAMENTAL & REINFORCING IRON WORKERS

MASSACHUSETTS • MAINE

Local 7
A.F.L.-C.I.O.

NEW HAMPSHIRE • VERMONT

DIRECT ALL CORRESPONDENCE TO:

195 OLD COLONY AVENUE • P.O. BOX 7 • SOUTH BOSTON, MASSACHUSETTS 02127 • 617-268-4777 • FAX 617-268-7878

John Fitzgerald
Senior Project Manager
Boston Redevelopment Authority
One City Hall Square, 9th Floor
Boston, MA 02201

BUSINESS MANAGER
PAUL F. LYNCH

PRESIDENT
JOHN F. O'BRIEN, JR.

FINANCIAL
SECRETARY-TREASURER
WILLIAM P. HURLEY

BUSINESS AGENTS
SHAWN NEHILEY
KEVIN COLLINS
NEIL CONLEY

BUSINESS AGENT
INDUSTRY ANALYST
STEPHEN WILLIAMS
DANIEL MORGANELLI
KEVIN McKINNON
FIORE GRASSETTI
REGINALD L. MUNSON
STEVEN BURK

July 10, 2013

Dear Mr. Fitzgerald:

I write in support of the prospective **Government Center Garage Redevelopment** project. I respectfully submit we are facing a defining moment and a crossroads for what is, without equivocation, a blighted building in what could be one of the most vibrant sections of the greatest city in the United States.

I envision being able to drive up Congress Street without having to drive under the after-effects (in some, yet not all realms) of a different and oft-unsightly era of architecture, development, and construction. I'm conflicted because I have a difficult time reconciling that Boston could build iconic and attractive structures such as the Hancock Building—in the midst of a truly historic area of Boston—while simultaneously assembling ugly concrete structures on some of the most valuable lots of land throughout the City.

Over time, many of these similar and unsightly concrete structures have been replaced with thoughtful projects, and that brings me full-circle. Connecting Government Center, the North End, and the Bullfinch Triangle into a truly contiguous and vibrant area is the primary goal of the *Government Center Garage Redevelopment* project, and renders it worthy of your careful consideration and ultimate approval.

From my perspective, as the representative of over 3,000 ironworkers, it is the thousands of construction jobs that will be created, as my members create a vital tax base when employed; as well as a boon to locally located businesses, large and small, which rely on the reinvestment of earned income from construction-industry workers temporarily plying their trade in any given area.

This month, we took over 100 men and women into our apprenticeship program, many of them Boston residents. We need bold jobsites to assist them to earn while they learn. It adds a significant supply to the fuel that primes the Commonwealth's tax engine and, upon completion, its flow is eventually replaced by the full-time workers who will be needed to facilitate the myriad needs of these new structures. The alternative is leaving an ugly concrete block in place and keeping the aforementioned neighborhoods separated.

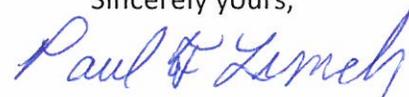
As is the case with any project, some people inevitably view it with a jaundiced eye. Fear of disruption, height, shadows (or shade on a hot summer day if you are an optimist), parking, wind, etc., will, and should, all be raised. It is the job of the proponents to adequately mitigate these concerns.

What I would like to see people consider is that, at minimum, in an entire generation, the building trades get one shot at any construction footprint. My experience is owners will not move forward if they do not calculate a profitable endeavor. If they refuse to move forward they simply move on to another project. *We are the victims left in the wake of this fight.* We are also the face of Boston's diverse community; the coaches on the youth sports' teams; the sponsors of said teams and organizations; the people who reinvest in the local non-profits; the people who have invested into the city by purchasing homes and keeping local businesses profitable through income reinvestment; the people who create careers for men and women who are disinclined to attend college and, resultantly, find themselves without any viable career path; the people who embrace returning military veterans through our nationally renowned *Helmets to Hardhats* program; and the people who offer our respective buildings to local community groups who need a place to assemble (at no cost), just to name a few of the positive byproducts of our success, which can only result from projects such as the *Government Center Garage Redevelopment* coming to fruition.

While I cannot speak for any other trade, I would be remiss were I not to mention that a tall building may seem self-serving for iron workers, as we erect the steel or place the rebar for each and every floor, but this is a misguided conclusion. All the trades—save for the roofers—prosper in direct proportion to a building or buildings' height. Boston's skyline is each generation's gift to future generations. When you view Boston, circa 1950, and then juxtapose it against the same view circa 2010, you are witnessing the gifts of previous generations as they endeavor to improve Boston and keep it at the top of the list when it comes to places people *must* visit during their lifetime. These buildings are also a huge tax base, allowing the City to spread its obligations as far and as wide as possible.

The *Government Center Garage Redevelopment* project is a worthy addition for all future generations and a perfect offset to the spectacular Rose Kennedy Greenway, which allows the general public to seamlessly traverse the City and enjoy its never-ending treasures. It is designed with height in the appropriate locations, and steps down dramatically onto the Greenway and an MBTA facility for public transportation where the crowds will undoubtedly be gathered. It is extremely well thought out and I am seeking your support of this project. Thank you for your consideration. With best wishes, I am

Sincerely yours,



Paul F. Lynch

Letter 14

Sprinklerfitters Local 550

This letter is in support of the Project; therefore, there are no comments that require direct responses.

Page Intentionally Left Blank

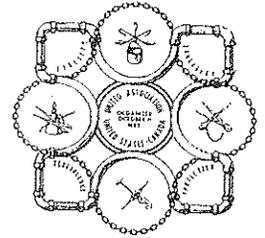


LOCAL UNION 550 U.A.
SPRINKLER FITTERS and APPRENTICES OF BOSTON
AND VICINITY

46 ROCKLAND STREET • BOSTON, MASSACHUSETTS 02132
TELEPHONE 617-323-0474
FAX 617-323-1373



PETER GIBBONS
BUSINESS MANAGER
SECRETARY-TREASURER



MATT JONES
ORGANIZER

MARK FORTUNE
BUSINESS AGENT

July 12, 2013

Mr. Peter Meade
Chief Economic Development Officer
Boston Redevelopment Authority
Boston City Hall, 9th Floor
One City Hall Square
Boston, MA 02201

Dear Mr. Meade,

I am writing support for the Government Center Garage redevelopment that is being proposed by Tom O'Brien and the HYM Investment Group ("HYM"). The entire city of Boston, particularly the neighborhoods immediately adjacent to Government Center, will benefit from the removal of the unsightly garage and the creation of an active and vibrant transit-oriented development.

As Business Manger representing 650 members, I am pleased to know that the redevelopment project will create approximately 2,600 union construction jobs. The project will also create 6,000 permanent jobs, and several millions of dollars in tax revenue for the City of Boston. Furthermore, HYM's project will also create a sense of place, and a vibrancy that has not existed in the Government Center area for a long time.

HYM and the project team has considered all major impacts of the development, and has demonstrated a willingness to meet with community members and other key stakeholders to discuss all topics of the project.

HYM has assembled a team to make this complicated project feasible, and, with the use of 100% Union labor, one that will be built in a safe manner. I look forward to the project being approved by the BRA, and to seeing the garage replaced with something that will further benefit and beautify the City of Boston.

Thank you,

Peter Gibbons
Business Manager
Sprinklerfitters Local 550

Letter 15

Kimberly A. Paikos

This letter is in support of the Project; therefore, there are no comments that require direct responses.

Page Intentionally Left Blank

HNGORIN

H.N. GORIN, INC.

101 HUNTINGTON AVENUE
BOSTON, MA 02199
TEL 617/482-8700
FAX 617/482-4021

BERYL DAVID GORIN
HARRY N. GORIN
ROSALIND E. GORIN

July 10, 2013

Mr. John Fitzgerald, Senior Project Manager
Boston Redevelopment Authority
City Hall Plaza
Boston, MA 02201

Re: Project Notification Form for the Redevelopment of the Government Center
Garage

Dear Mr. Fitzgerald:

Please know that H.N. Gorin, Inc. is a member of the Impact Advisory Group for the Government Center Garage Redevelopment. As the owner of two properties located on Merrimac Street, one of which is located directly across from the Government Center Garage site, we are in support of the project as proposed by HYM Investment Group, LLC in the Project Notification Form date June, 2013.

This proposal includes removing a long standing barrier between the Bulfinch Triangle and Boston's Financial District. The addition of residential, office, hotel and retail will bring people, businesses and vitality to the area. As a member of the community we look forward to these benefits to be realized as the project phases are completed.

Our two major concerns during this ongoing project are the impact that the construction will have on the traffic flows of the area and the impact on the pedestrians that pass by this site each day. We realize that the project is proposed to be undertaken in stages. This proposal, despite the length of time it will take to complete, is much more preferable than undertaking this entire project at once. The impacts can be better managed in smaller stages. During each stage the developer and construction team will become more aware of and understand the best way to handle the neighborhood impacts

HNGORIN

Mr. John Fitzgerald, Senior Project Manager
Boston Redevelopment Authority

Page 2 of 2

July 10, 2013

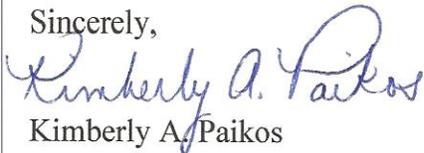
as far as traffic and pedestrians are concerned. These lessons will be applied to each subsequent stage of the development. The safety of the many pedestrians and vehicles which pass this site on a daily basis should be a priority at all times. I am confident that the developer will be working closely with all of the neighbors, including ourselves, to minimize impacts as much as possible.

The proposed placement of the loading dock and parking entrance and exit on the Bowker Street side of the project will help to keep the trucks and deliveries confined to the property during construction and after completion when the property is operational. The proposed loading dock must be large enough to accommodate the needs of all of the buildings it will service. The traffic flow on either New Chardon or New Sudbury Street should not be impacted by either the parking garage entrance/exit or the entrance/exit of the loading dock.

I look forward to reviewing the traffic and pedestrian studies for the project as we move forward as the development process will impact our properties directly.

This project poses a wonderful potential for our community. We are confident that when this project is complete, it will be a positive addition to the area.

Sincerely,

Handwritten signature of Kimberly A. Paikos in blue ink.

Kimberly A. Paikos

KAP/mnf

Letter 16a

Miriam H. Kanter

Comment 16a.1

“The Project Notification Form does not include full information explaining the data presented, such as information on how often measurements were taken, at what time of year and under what weather conditions, and what events were/were not occurring at those times in the surrounding area in either the afternoon or evening. While some intersections in the area are chronically backed up regardless of these matters, others are significantly impacted by the presence of events at the Boston Garden, on City Hall Plaza or on the Esplanade. The Green line on the T routinely operates under crush conditions from Haymarket to Kenmore Square when there is a Red Sox game at Fenway Park at least from 5:30 PM to 6:00 PM (the period in which I have taken it often enough to be sure of my observation) and quite possibly earlier. In addition to these problems, no data or analysis is presented concerning impacts during the construction period.”

Response

Documentation of traffic data and data collection methods is presented in Section A2.2.3 of the PNF. Accepted traffic engineering practice has been followed in the collection and analysis of traffic, pedestrian, and bicycle data. The actual count data is contained in Attachment 2 of the PNF (available upon request), which identifies the actual dates of data collection. Following standard engineering practice, data was collected during typical weekday morning and evening peak periods of commuter traffic. Data was not collected during events.

Chapter 4, *Transportation and Parking* of this DPIR provides additional and updated information regarding construction staging. The Project is required to complete a detailed Construction Management Plan (CMP) that will be reviewed and approved by BTM. In terms of traffic, the CMP will include work areas and access points, work area protection methods, lane and sidewalk closures if any, temporary pavement marking and signing for both traffic and pedestrians, pedestrian protect methods (i.e. cover walkways, etc.), location and number of police details, and construct truck traffic routing.

Comment 16a.2

“Despite the limitations of the information presented, the traffic data given indicates a serious problem that is not adequately addressed by the proposed mitigation. Note that the table show

“average delays” but not the range of problems observed or to be expected under full build conditions. It also does not address the plight of the driver who encounters unacceptable conditions at one intersection after another, as one would going through Lowell Square up Staniford Street to Cambridge Street, at multiple points on New Chardon Street (including at the ramps to both tunnels and at Cambridge Street) and on North Washington Street.”

Response

Section A.2.2.5 of the PNF provides a discussion of standard traffic engineering practices and methodology that were used for the assessment of intersection operations for the Project. The Synchro traffic model is field calibrated and represents an accurate depiction of existing conditions intersection operations.

The metric of “average delay” is the basic standard measure of intersection operations which is used to compare existing conditions, no-build conditions, and build conditions. Other standard metrics include level of service, volume to capacity ratio, and queuing (usually the 95th percentile queue). Average delay and level of service indicators are provided in Chapter 3, *Transportation and Parking* of the PNF, while volume to capacity and queuing metrics can be found in Attachment 2 (available upon request).

The average delay metric is an estimate of the average delay a motorist would expect at an intersection, or intersection approach, over the course of the peak hour period analyzed. Some peak hour delays can be longer and some can be shorter, but the average delay is the standard metric from which intersection level of service and the comparison of alternative conditions are assessed.

The progression of traffic through multiple adjacent intersections is part of the analysis process modeled by the Synchro traffic model. Average delays and intersection level of service are reflective of traffic progression, or lack of progression in some cases, along an analyzed roadway corridor.

Comment 16a.3

“If any of the proposed mitigation measures can improve the situation they should be implemented now, not wait for the proposed project (or any of the other projects planned in the area) to be built. This should be done first and foremost in the interests of public safety, but also because traffic in the area is already bad enough to impact the willingness of people to live in the area and the willingness of people in surrounding communities to come into the city.”

Response

The Project will implement traffic mitigation, and other mitigation efforts, as components of the PDA are implemented. Certain improvements may, however, be

implemented during the construction period to assist in management of vehicular and pedestrian traffic. The moving up of the garage demolition from Phase 3a to Phase 2a is a material change in the overall phasing. It will also allow for the demolition, one of the more complicated elements of the proposed Project, to take place before most of the new uses come on-line.

Comment 16a.4

“... if the garage project is to be allowed to go forward in phases at all, the first phase should include the garage demolition and construction of apartments (including affordable units) on the east parcel.”

Response

The Proponent has heard from several community groups voicing concerns over the timing of when the eastern portion of the Government Center Garage would be demolished given the overall project timeframe of 15-20 years stated in the PNF. As stated earlier the Proponent has agreed to move up the demolition of the garage to Phase 2A. Also, Phase 1 is the construction of an apartment tower that will include 13% affordable housing, which will be included on-site.

Comment 16a.5

“The proposal (see section 1.4.3) is for construction to begin in 2016 and continue for the next 17 years, a total of 20 years including the so-called enabling phase – and that is if there are no unplanned delays or difficulties. This duration of traffic impacts, noise and air pollution is unacceptable. No one will want to move into such an area, and residents with better options will move out.”

Response

As presented in Chapter 1, *Project Description*, with the revised phasing and a portion of the existing garage structure now being demolished in Phase 2A, the overall project timeframe will likely also reduce. Also, moving up the garage demolition will allow it to be completed prior to the majority of the new on-site FAR coming on-line, helping to further mitigate construction impacts over the course of the Project.

Comment 16a.6

“If you allow this project to go forward in the manner proposed in the PNF I predict you will be responsible for the demise of existing small businesses in both the Bulfinch Triangle and the North End and the resulting losses of jobs and vitality in our communities. You will also make the area much less desirable to live in, thereby undermining the prospects of the various new residential developments you have permitted.”

Response

The Project seeks to replace an obsolete auto centric 11-story above grade parking garage that today acts as major physical and visual barrier on the adjoining Bulfinch Triangle, North End and Government Center areas. Also, the existing garage and surrounding area is dominated by government users and adds little vitality to the area or adjoining neighborhoods outside of 9 AM to 5 PM on weekdays. The proposed redevelopment will demolish the eastern portion of the garage and replace it with two vibrant mixed use blocks that will also bring new residents and workers to this area. These new residents and workers will support the existing retailers in the area. In addition, the new public plaza will create a more pedestrian friendly environment between the Bulfinch Triangle and the North End further fostering 18/7 activity that will enhance the area and further support local retailers.

Comment 16a.7

"The developer offers no support for the contention that the either the mass or the mix of uses on the west parcel is appropriate. It is far taller and bulkier than anything in the vicinity, promising to loom unpleasantly over the surrounding neighborhoods and detract from their character and appeal. The city does need housing, particularly affordable housing. Neither the city nor our neighborhoods has any need to extend the downtown office district into our residential areas. Further, if the proposed office tower is built with anything approaching the height (and thus the views) requested, the likely effect would be to take tenants from existing buildings in the financial district rather than adding to the total economic activity. Revoing the downtown area is one of the city's goals and this project is counterproductive to it.

The amount of housing proposed for the west parcel is probably at least double what there is space for if that development were to be consistent with the West End, the most comparable of the neighborhoods surrounding the project. If, however, the office use is eliminated it might be possible to include a large part of the desired number of housing units."

Response

Overall, the proposed project was designed to be consistent with the Greenway Guidelines, which encompasses the entire project site, both in terms of height and massing. The Greenway Guidelines, which specified heights up to 600' for this area, were adopted after a comprehensive community process. However, after considering the additional community feedback from this process, the Proponent has agreed to reduce the height of the office building from 600 feet to 528 feet and reduce the overall gross square footage of new uses on the site by approximately 122,000 GSF, which reduction is predominantly office use. The proposed project is also adding over 800 residential units, of which over 100 will be designated as affordable units, which will bring new activity and vibrancy to an areas that has little activity after 5 PM.

Comment 16a.8

"We get highly unpleasant wind conditions on each street that ends at the river (Lomasney Way, Blossom Street, Fruit Street, Cambridge Street, Arlington Street, etc.) and wherever there is a large open area (City Hall plaza, in front of the Hancock tower, etc.)."

Response

A wind tunnel test has been conducted per BRA's requirements and the results are presented in Chapter 5, *Environmental Protection* of this DPIR.

Comment 16a.9

"Shadows: I find the PNF rather cavalier in its statements that various shadow impacts are "only in the morning" or only for a few hours. In many instances those may be most of the time the area in question receives sunlight.

The reduction in sunlight on any green space, such as the courtyard of the Lindemann building, will make it difficult for grass to grow. The affected areas will either become barren or be much more difficult to landscape and maintain.

Reduction of sunlight on various streets makes it more likely they will be icy in winter and less likely that small patches of ice will be seen by pedestrians or bicyclists. For approximately 25 years I worked in the financial district and walked to work each day, irrespective of weather, because that was the only exercise I would get regularly. Each winter I fell at least once when I skidded on ice that was not clearly visible. Nowadays I cope by not walking in such weather. That choice does not aid your effort to animate the streets, and in any case is not an option for many people. The more shadow you permit, the more accidents there will be."

Response

Chapter 5, *Environmental Protection* of this DPIR presents an updated shadows study based on the revised Project, including the identification of the amount of shadows that have been reduced due to the reduction in height of the office building (WP-B2) and the hotel/condominium building (EP-B1).

Comment 16a.10

"Skyline: The suggestion in the PNF that the project enhances the Boston skyline is without merit. Unfortunately, with or without this project, our skyline is basically uninteresting, a collection of boxy buildings (albeit in some cases with silly-looking "hats") that have no relationship to each other, no sense of place, and no ability to attract, let alone inspire, a viewer. The one recent project that has real merit is the Zakim Bridge, which succeeds not only because of its intrinsic beauty but because of the way it replicates the shape of the Bunker

Hill Monument. To relate to Boston in a comparable way the project's tallest building might take its inspiration from the Custom House tower. Such a design, with its various setbacks, would also have the merit of allowing more light to reach the streets."

Response

We agree that any proposed high-rise building should be carefully designed and shaped to create an interesting, positive and lasting impression that is distinct to Boston's skyline. In the current process we are only dealing with massing volumes. However, shaping of the buildings is absolutely critical to enhance the skyline. During the future Article 80, Large Project Review of individual Project Components, the proposed design of each building will be presented and discussed with the community and the BRA.

Miriam H. Kanter
9 Hawthorne Place
Boston, MA 02114-2331

July 3, 2013

Boston Redevelopment Authority
One City Hall Square
Boston MA 02201-1007

Attention: John Fitzgerald, Project Manager

Re: Government Center Garage Redevelopment

Dear Sirs:

My husband and I have lived at Hawthorne Place in the West End for over 40 years. We purchased our home here when it first became a condominium and I served as one of its original owner-elected trustees. Thus we have deep roots in the community and would be reluctant to leave. However, it is increasingly less liveable and I am extremely concerned that the proposed Government Center Garage redevelopment project will have a major adverse impact on quality of life, and in some instances, on safety, for those who live here.

My most pressing concerns are as follows:

Traffic and Transportation

The Project Notification Form does not include full information explaining the data **16a.1** presented, such as information on how often measurements were taken, at what time of year and under what weather conditions, and what events were/were not occurring at those times in the surrounding area in either the afternoon or evening. While some intersections in the area are chronically backed up regardless of these matters, others are significantly impacted by the presence of events at the Boston Garden, on City Hall Plaza or on the Esplanade. The Green line on the T routinely operates under crush conditions from Haymarket to Kenmore Square when there is a Red Sox game at Fenway Park at least from 5:30 PM to 6:00 PM (the period in which I have taken it often enough to be sure of my observation) and quite possibly earlier. In addition to these problems, no data or analysis is presented concerning impacts during the construction period.

Despite the limitations of the information presented, the traffic data given **16a.2** indicates a serious problem that is not adequately addressed by the proposed mitigation. Note that the table show "average delays" but not the range of problems observed or to be expected under full build conditions. It also does not address the plight of the driver who encounters unacceptable conditions at one intersection after another, as one would going through Lowell Square up Staniford Street to Cambridge Street, at multiple points on New Chardon Street (including at the ramps to both tunnels and at Cambridge Street) and on North Washington Street.

These problems should receive a much higher level of scrutiny in our community than they might in another area because of the presence of Mass, General Hospital. I have observed a number of instances in which ambulances en route to the hospital, with sirens blaring, have been stuck in traffic on Cambridge Street, blocked by cars that could not move out of the way because they had no place to go. Each of these instances was in mid-afternoon in pleasant weather and continued for the few minutes I was there and an unknown additional amount of time. I don't know why the traffic is so much worse at some times than others; I do know I would be outraged if it were my family member whose critical care was delayed because somewhere along the way a consultant underestimated traffic problems.

There should also be special attention paid to traffic on Lomasney Way and at Lowell Square because of the location of the Amy Lowell House. The elderly or disabled residents of that property are more likely than the general population to need quick access to medical care.

If any of the proposed mitigation measures can improve the situation they should be implemented now, not wait for the proposed project (or any of the other projects planned in the area) to be built. This should be done first and foremost in the interests of public safety, but also because traffic in the area is already bad enough to impact the willingness of people to live in the area and the willingness of people in surrounding communities to come into the city.

16a.3

Phased Construction

As will be discussed below, the developer seeks to construct massive buildings on the west parcel during phases 1 and 2, which contrary to the assertion of the PNF are in no way appropriately scaled. The primary public benefit will come later, when the section of the garage over Congress Street is demolished and the more attractive new buildings are developed on the east parcel. As the city has learned through painful experience at the Filene's site, the city has limited ability to compel a reluctant developer to complete what it has started, which may be why in the case of the Suffolk Downs proposal the mayor demanded that the beneficial components not be delayed to a later phase. Similarly, if the garage project is to be allowed to go forward in phases at all, the first phase should include the garage demolition and construction of apartments (including affordable units) on the east parcel.

16a.4

The proposal (see section 1.4.3) is for construction to begin in 2016 and continue for the next 17 years, a total of 20 years including the so-called enabling phase – and that is if there are no unplanned delays or difficulties. This duration of traffic impacts, noise and air pollution is unacceptable. No one will want to move into such an area, and residents with better options will move out.

16a.5

The surrounding communities, and especially the Bulfinch Triangle and North End, have already endured years of disruption from the Big Dig, compounded by the demolition of the elevated green line and other projects in the area. I would like to give

you a concrete example of how severe the impact was. In 2009 I became executrix of an estate owning Hilton's Tent City, a retail store in the Bulfinch Triangle. A review of its financial records demonstrated in painful detail what the owner had told me informally – that during the years of construction sales at the store sank so low that the store survived only because it established a web site. However, the combined sales of the Friend Street store and web site were (and so far as I know continue to be) substantially lower than those enjoyed by the store alone before the construction impeded its business. Further, the customers who continue to shop online rather than coming into Boston do nothing to animate our streets or support the local restaurants and other stores as they once did.

If you allow this project to go forward in the manner proposed in the PNF I predict you will be responsible for the demise of existing small businesses in both the Bulfinch Triangle and the North End and the resulting losses of jobs and vitality in our communities. You will also make the area much less desirable to live in, thereby undermining the prospects of the various new residential developments you have permitted. **16a.6**

Mass and Uses

The developer offers no support for the contention that the either the mass or the mix of uses on the west parcel is appropriate. It is far taller and bulkier than anything in the vicinity, promising to loom unpleasantly over the surrounding neighborhoods and detract from their character and appeal. The city does need housing, particularly affordable housing. Neither the city nor our neighborhoods has any need to extend the downtown office district into our residential areas. Further, if the proposed office tower is built with anything approaching the height (and thus the views) requested, the likely effect would be to take tenants from existing buildings in the financial district rather than adding to the total economic activity. Reviving the downtown area is one of the city's goals and this project is counterproductive to it. **16a.7**

The amount of housing proposed for the west parcel is probably at least double what there is space for if that development were to be consistent with the West End, the most comparable of the neighborhoods surrounding the project. If, however, the office use is eliminated it might be possible to include a large part of the desired number of housing units.

Wind

Since I have never had a car I have extensive experience walking all around the area. We get highly unpleasant wind conditions on each street that ends at the river (Lomasney Way, Blossom Street, Fruit Street, Cambridge Street, Arlington Street, etc.) and wherever there is a large open area (City Hall plaza, in front of the Hancock tower, etc.). The developer acknowledges wind is a problem in the proposed development which is liable to impede the desired animation of the area. Thus one of the supposed public benefits of the project is hardly assured. Indeed, it is only common sense that **16a.8**

people will not choose to spend their time strolling, shopping or dining in a wind tunnel rather than an area with a human scale.

Shadows

I find the PNF rather cavalier in its statements that various shadow impacts are “only in the morning” or only for a few hours. In many instances those may be most of the time the area in question receives sunlight.

16a.9

The reduction in sunlight on any green space, such as the courtyard of the Lindemann building, will make it difficult for grass to grow. The affected areas will either become barren or be much more difficult to landscape and maintain.

Reduction of sunlight on various streets makes it more likely they will be icy in winter and less likely that small patches of ice will be seen by pedestrians or bicyclists. For approximately 25 years I worked in the financial district and walked to work each day, irrespective of weather, because that was the only exercise I would get regularly. Each winter I fell at least once when I skidded on ice that was not clearly visible. Nowadays I cope by not walking in such weather. That choice does not aid your effort to animate the streets, and in any case is not an option for many people. The more shadow you permit, the more accidents there will be.

Skyline

The suggestion in the PNF that the project enhances the Boston skyline is without merit. Unfortunately, with or without this project, our skyline is basically uninteresting, a collection of boxy buildings (albeit in some cases with silly-looking “hats”) that have no relationship to each other, no sense of place, and no ability to attract, let alone inspire, a viewer. The one recent project that has real merit is the Zakim Bridge, which succeeds not only because of its intrinsic beauty but because of the way it replicates the shape of the Bunker Hill Monument. To relate to Boston in a comparable way the project’s tallest building might take its inspiration from the Custom House tower. Such a design, with its various setbacks, would also have the merit of allowing more light to reach the streets.

16a.10

These problems need to be addressed, notwithstanding the accelerated schedule given to the project.

Very truly yours,

Miriam H. Kanter

Letter 16b

Miriam H. Kanter

Comment 16b.1

"This letter will supplement my letter of July 3, 2013 to raise an additional issue, namely disaster planning. The PNF says, in effect, the project backup systems will address the issue. I suggest a broader analysis is needed."

Response

In the PNF, the Proponent outlined some measures to address climate change, including the careful location of critical mechanical system and the reduction in storm water runoff, which will also address some of the City's disaster planning issues raised in the comments.

Comment 16b.2

"Traffic issues were specifically addressed by reviewing the consultant's methodology and reiterating the claim that project impacts (upon completion) will not be excessive in scope. This ignores the data in the PNF documenting that traffic at various points in the area is already unacceptably bottlenecked. Further the consultant's conclusion depends on projections of increasing bicycle usage, which may be too optimistic, particularly in bad weather. With respect I would point out that the developer anticipates substantial profits from the project that justify taking significant risks of project actual impacts differing from its projections, but that doesn't mean those risks make sense for either the communities affected or the city."

Response

Please refer to response to comment 16a.2 for a discussion of traffic analysis methodology used in the PNF. The methodology is sound, accepted traffic engineering practice and has not been questioned by the regulatory agencies.

The mode splits used for project vehicle trip generation are based on the most recently available U.S. Census data as provided by BTM. Future vehicle trip projections are not reduced by assuming a higher percentage of trips made by bicycle or any other alternative travel mode. As such, project vehicle trip estimates, and thereby traffic operations analyses, are conservative and it is expected that with shifts

to alternative modes of travel from the automobile which have been evident in recent years, overall Project impacts would be lessened over time.

Miriam H. Kanter
9 Hawthorne Place
Boston, MA 02114-2331

July 12, 2013

Boston Redevelopment Authority
One City Hall Square
Boston MA 02201-1007

Attention: John Fitzgerald, Project Manager

Re: Government Center Garage Redevelopment

Dear Sirs:

This letter will supplement my letter of July 3, 2013 to raise an additional issue, **16b.1** namely disaster planning. The PNF says, in effect, the project backup systems will address the issue. I suggest a broader analysis is needed.

I am focused particularly on the possibility of a Hurricane Sandy type event because there has been wide publicity of the opinion of responsible and knowledgeable experts that such a storm could occur here. Indeed, I remember reading at the time that with a slight change of wind direction, Sandy itself could have hit here.

If there were such a storm, one would expect flooding of the following: the Thomas P O'Neill Tunnel, each of the harbor tunnels, Storrow Drive, every line on the T, every underground garage, and many local streets. Utility service from various providers might or might not be interrupted; the experience in New York, not to mention recent problems in the Back Bay, is not encouraging in this regard. While residents of the new residences in the subject project might be able to shelter in place for some time (if the building systems are sufficient and the residents are prepared with adequate food, etc.), workers in the office and/or commercial space, along with residents of less well-equipped buildings and other workers in the community, are likely to need to evacuate. Those lucky souls having cars parked in upper level garage spaces might be able to find a safe route out of the area. As contemplated in the PNF many residents would not have cars and would need assistance. Does the city have a plan for how it would assist those in need, and especially its most vulnerable citizens, as a world-class city should? Would Boston be forever linked with New Orleans as a city incapable of fulfilling its responsibilities? I suggest that before more people are crammed into an already congested area the city should have fully developed plans to accommodate foreseeable contingencies.

More generally I would note that I attended the IAG meeting last night and the developer's response to every concern, while polite and gently phrased, amounted in substance to a claim that the team is capable and experienced (agreed), the project will be beautiful (a matter on which opinions differ) and that we should trust to their expertise and not worry. Traffic issues were specifically addressed by reviewing the **16b.2**

consultant's methodology and reiterating the claim that project impacts (upon completion) will not be excessive in scope. This ignores the data in the PNF documenting that traffic at various points in the area is already unacceptably bottlenecked. Further the consultant's conclusion depends on projections of increasing bicycle usage, which may be too optimistic, particularly in bad weather. With respect I would point out that the developer anticipates substantial profits from the project that justify taking significant risks of project actual impacts differing from its projections, but that doesn't mean those risks make sense for either the communities affected or the city.

In recent years Boston has done an admirable job of attracting new businesses and residents. Continued success in that regard cannot be assumed. The consistent opinion of residents I hear from (all urban people who are accustomed to dealing with the usual challenges of city life) is that it has become progressively more difficult to live in our community, that the multiplicity of current projects in the area is a nightmare, and that the garage project in particular, with its 17-20 years of disruption, noise and dirt, is likely to be intolerable. Leaders of businesses that the city would like to attract are not immune to such considerations, nor are their employees. When the area is made less pleasant by the construction, when they and their visitors cannot count on arriving at their destinations when planned or on finding a parking space, when their day to day commuting time grows, they may conclude they are better off siting their new operations in Watertown or Somerville or wherever the next innovation district may develop. Similar considerations could cause existing facilities to re-locate. These potential detriments could offset all the perceived advantages of the project.

Many thanks for your consideration of these matters.

Very truly yours,

Miriam H. Kanter

Letter 17

William Georgaqui

This letter is in support of the Project; therefore, there are no comments that require direct responses.

From: parisbill [parisbill@rcn.com]
Sent: Tuesday, July 02, 2013 7:21 AM
To: Fitzgerald, John BRA
Cc: Meade, Peter
Subject: Fw: GOVERNMENT CENTER GARAGE BRA

Importance: High

Subject: GOVERNMENT CENTER GARAGE REDEVELOPMENT PROJECT - BRA COMMENT LETTER

William Georgaqui

150 Staniford Street

Boston, Massachusetts 02114

July 2, 2013

SENT VIA ELECTRONIC MAIL

John Fitzgerald, Project Manager

Boston Redevelopment Authority

One City Hall Square

Boston, MA 02201

RE: Government Center Garage (GCG) Project

Dear Mr. Fitzgerald:

I am writing to offer my comments on the proposed Government Center Garage Redevelopment Project..

I was born and grew up in in the West End.

My family returned to the West End's Charles River Park after the West End redevelopment .

I am presently a resident, cooperative shareholder of West End Place and Chairperson of the West End Place Neighborhood Relations Committee

I am also on the Board of Directors of the West End Community Center, a Board member of Downtown North Association and founder of the West End Residents Association..

I totally support the HYM Investment Group's proposal redevelopment to replace the massive parking garage with new office, commercial and residential uses along with inviting attractive pedestrian paths and new open space.

The existing massive garage structure cleared residential and commercial buildings and this allowed for the construction of local, state, and federal government offices.

The reality is that massive Government Center parking garage also divided our West End, Beacon Hill and North End neighborhoods.

I am especially thankful that the HYM Investment group developers have proposed a long term, multi-phased plan for replacing the massive garage with a pedestrian friendly streets, public plaza and mixed-use buildings on two urban blocks spread among almost 5 acres.

Taking down portions of the massive garage over Congress Street will invite a rebirth of daylight and sun to finally return to Congress Street.

The West GCG section of the project is planned to include an apartment building (New Sudbury Street) followed by an office building (New Chardon Street); and a building on Congress Street that will offer apartments /condominiums.

The East GCG section is planned to include an office building facing the Greenway; a boutique retail building; and hotel/condominium building (Congress Street).

I sincerely trust that the BRA will carefully study and address West End residents concerns via the important BRA's Article 80 review process.

Many of these specific concerns have been addressed by the HYM Investments group at various West End community meetings that I have attended.

I suggest that Government Center Garage can be a positive game changing project for downtown Boston and our West End, Beacon Hill and North End residents, business and workers.

Thank you for this opportunity to comment.

Sincerely,

William Georgaqui

Resident - West End Place

Page Intentionally Left Blank

Letter 18

David Roderick

Comment 18.1

“My only concerns for now are the height of the office tower and that the pedestrian circulation not interfering with the commuters who are not living or working at the proposed project site.”

Response

In response to community concerns the height of the proposed office tower has been reduced from 600 feet to 528 feet. In addition, due to input from the community, the Proponent has widened both the East Parcel public plaza and the depth of the waiting areas for passengers in the Haymarket Bus Station, which will provide better overall pedestrian circulation through and around the Project site.

Page Intentionally Left Blank

From: davidroderick@comcast.net
Sent: Monday, July 08, 2013 5:36 PM
To: Fitzgerald, John BRA
Subject: Re: One Congress IAG meetings Summer Schedule

John,

I think that it might be too late to add to the July comment period. My only concerns for now are **18.1** the height of the office tower and that the pedestrian circulation not interfering with the commuters who are not living or working at the proposed project site.

David Roderick
 IAG GROUP
 Government Center Garage Project.

From: "John BRA Fitzgerald" <John.Fitzgerald.bra@cityofboston.gov>
To: "tad.stahl@earthlink.net" <tad.stahl@earthlink.net>, "ratty.michael@gmail.com" <ratty.michael@gmail.com>, "davidroderick@comcast.net" <davidroderick@comcast.net>, "rbobrien@rbobrien.com" <rbobrien@rbobrien.com>, "francine.gannon@state.ma.us" <francine.gannon@state.ma.us>, "ljonash@rosekennedygreenway.org" <ljonash@rosekennedygreenway.org>, "jmforrestall@gmail.com" <jmforrestall@gmail.com>, "mgmaguire@rcn.com" <mgmaguire@rcn.com>, "junie626@aol.com" <junie626@aol.com>, "Mark.Paul@jacobs.com" <Mark.Paul@jacobs.com>, "kimpaikos@hngorin.com" <kimpaikos@hngorin.com>, "joemcdonald.westend@verizon.net" <joemcdonald.westend@verizon.net>, "Sarah Hinton" <Sarah.Hinton@cityofboston.gov>, "blake.webber@mahouse.gov" <blake.webber@mahouse.gov>, "dmanz@hyminvestments.com" <dmanz@hyminvestments.com>, "dbracken@hyminvestments.com" <dbracken@hyminvestments.com>, "Shaina Aubourg" <Shaina.Aubourg@cityofboston.gov>, "Nicole Leo" <Nicole.Leo@cityofboston.gov>, "lmehp@rcn.com" <lmehp@rcn.com>, "kmryan1@partners.org" <kmryan1@partners.org>, "Richard McGuinness" <Richard.McGuinness.bra@cityofboston.gov>, "Lauren Shurtleff" <Lauren.Shurtleff.bra@cityofboston.gov>, "Jonathan Greeley" <Jonathan.Greeley.bra@cityofboston.gov>, "Michael Sinatra" <Michael.Sinatra@cityofboston.gov>
Sent: Wednesday, June 19, 2013 5:07:44 PM
Subject: One Congress IAG meetings Summer Schedule

Good afternoon all,

As you know there is the BRA sponsored Public Meeting here at the 9th Floor of City Hall tonight at 6:00.

I also wanted to give you the schedule going forward for the working sessions of the Impact Advisory Group (IAG) so that you can begin to put them into your calendar. So after tonight's more broad all-encompassing meeting with the community, the IAG schedule is as follows, and all members of the public are welcome to attend these as well:

ALL DATES AND TIMES ARE SUBJECT TO CHANGE:

June 26th @ 6:00pm, City Hall 8th or 9th Floor- Environmental and Project Zoning

July 8th- End of 30 Day Comment period

Letter 19

Jane Forrestall

Comment 19.1

"While I appreciate the redevelopment of the Government Center Garage, I am concerned with the scale of the West properties in relationship to the three abutting residential neighborhoods. The 600' height (plus approximately 30' mechanicals) of the office building may be in keeping with Boston's Financial District but not with the historic aspects of Beacon Hill and the North End. Nor is it in keeping with the height of the new development properties in the West End/Bulfinch Triangle."

Response

Overall, the proposed project was designed to be consistent with the Greenway Guidelines, which encompasses the entire project site, both in terms of height and massing. The Greenway Guidelines, which specified heights up to 600' for this area, were adopted after a comprehensive community process. However, after considering the additional community feedback from this process, the Proponent has agreed to reduce the height of the office building from 600 feet to 528 feet and reduce the overall gross square footage of new uses on the site by approximately 122,000 GSF, which reduction is predominantly office use.

In addition, the Proponent has also heard the community concerns about height on the East Parcel. Given this the Proponent has agreed to lower the hotel/condominium building on the East Parcel (EP-B1) from 275 feet to 157 feet, which lower height is consistent with the Bulfinch Triangle area. Also, the buildings on the East Parcel will further step down as they approach the Parcel 7 garage and the North End Greenway Parks.

Comment 19.2

"...the Haymarket Station is a busy station with people using buses and the subway. There needs to be clear definition of the access points to the station waiting areas and amenities that will make the station more user-friendly. Use of the station should not interfere with the safety of residents going to and from their homes, particularly those in the East parcel. Additionally, residents need to be protected from the noise and odors associated with buses and trains, and from the activities associated with them."

Response

The Proponent will continue to work with the community, the MBTA and the BRA to ensure the reconfiguration of the Haymarket Bus Station provides well defined access points, waiting areas and amenities. The Proponent will also incorporate appropriate design measures to protect the new public plaza and residences of the East Parcel from bus noise and odors.

In addition, after hearing community concerns and meeting with MBTA Bus Operations, the Proponent is making a number of improvements to Haymarket Bus Station and the adjacent East Parcel public plaza, including:

- Adding an additional 10 feet of depth along the majority of the bus station waiting area. This additional depth will increase the capacity of passengers to wait for the Route 111 Bus and the 400 Series Commuter Bus.
- The East Parcel Plaza has also been widened from 60 feet to 85 feet providing additional waiting area capacity outside the Haymarket Bus Station area.
- The Proponent has committed to providing electronic displays within the East Parcel Plaza that will provide real time information of the arrival of the buses as well as the green and orange lines.
- The Proponent will also be providing space for the Charlie Card Pay Stations at the Haymarket Bus Station so bus patrons will not have to go down into the Subway Station to purchase or replenish Charlie Cards.
- In addition, the Proponent has committed to provide a new Hubway Station at the southern end of the Eastern Parcel which will allow a new mode choice for Haymarket Bus Station riders.

The Proponent will continue to meet with the MBTA on both facility and operational improvements to the Haymarket bus facility.

Comment 19.3

"The Haymarket subway station, as well as the stations at Government Center and North Station, has limited space and capacity. A comprehensive plan needs to be looked at to determine if the number of people added to the public transportation system (particularly the Green Line) would negatively impact the abilities of these services or would impair the safety of users."

Response

A discussion of transit impacts is presented in Section A2.3.2.6 of the PNF and further discussed in Chapter 4, *Transportation and Parking* of the DPIR. These statistics are based on currently published MBTA ridership data. Also, please note the following key items:

- The Proponent has added an additional 10 feet of width/depth of waiting areas for the Haymarket Bus Station. In addition, per the request of the MBTA, the Proponent is also providing space for Charlie Card Pay Stations.
- With the reduction in the DPIR program by approximately 122,000 GSF and additional shifting of office use to residential use, the overall Project transit trips during the AM and PM peak hours will decrease by about 7 percent and 9 percent, respectively.
- Updated DPIR analysis by the Project's transportation engineer, Howard Stein Hudson, of the additional MBTA riders during peak hours added by the proposed Project continues to show that the MBTA subway lines and the existing platforms at Haymarket Station can accommodate the additional MBTA riders.
- Long-term service planning is undertaken by the Central Transportation Planning Staff (CTPS) whose ridership forecast models include all potential development in the downtown core. These transit ridership forecasts include the Bulfinch Triangle/North Station area development projects that are either recently completed, currently under construction, or in the permitting and planning stages, including the redevelopment of the Government Center Garage.
- The Proponent has held on-site meetings with Director of Bus Operations and Deputy Director of Bus Operations to discuss design plans for the reconfiguration of the bus way including MBTA requested improvements and construction related impacts to passengers and pedestrians..
- The Proponent has also met with Subway Operations / Light Rail Operations and all supporting departments to provide a project overview including scope of work and schedule. The meeting included discussions with each department to answer specific questions and concerns.
- Coordination meetings with MBTA Bus Operations and MBTA Subway Operations/Light Rail Operations will continue during the design and construction phases.

Comment 19.4

"Employees within both parcels need to be discouraged from bringing their vehicle to work. Public transportation is readily available at the three nearby stations. Employers should encourage participation in the tax-deductible Corporate CharlieCard program as well as one of the shared car programs, such as Zipcar or Enterprise, or the shared bicycle program, Hubway."

Response

The Project is intended to be, and has been designed as, a multi-use development with significant access mode alternatives to driving. An effort to constrain parking availability, especially for office use which is the highest land use generator of parking demand and thereby vehicle trips, has been made by providing lower

parking ratios than normally seen in office developments in downtown Boston of this class. As part of the commitment to developing the Site as a “mobility hub”, shared-car and shared-bicycle services as well as a significant commitment to commuter bicycle parking will be available on-site.

As individual PDA components are further developed through the Article 80 Large Project Review process, the Proponent will work with BTM to develop transportation demand management measures appropriate for each building and/or land use. For example, the Corporate CharlieCard program is well suited for office tenants but not for residential development. Specific TDM measures for each building or development phase will be codified in the Transportation Access Plan Agreement (TAPA) as required for all developments subject to Article 80 Large Project Review.

Comment 19.5

“The demolition of the Government Center Garage needs to be carefully and thoughtfully undertaken so as not to cause additional undue hardship to the residents of these neighborhoods.”

During the demolition and construction, there will be significant inconvenience to the surrounding area. Noise, removal of debris, delivery of materials and traffic need to be carefully planned and well communicated. By the nature of the area, coordination and communication will be vital to the success of this development.”

Response

Detailed Construction Management Plans (CMP’s) will be engineered & developed for each phase of the project before construction begins. Plans will include site access & control points and pedestrian as well as truck routes to and from the site. Meetings with community groups will be facilitated; information systems and communication channels will be proactively established to keep the local community informed of construction activities. Refer to Chapter 5, *Environmental Protection* and Appendix E of this DPIR for additional information.

Comment 19.6

“There will be heavy truck traffic during the project timeframe that will impact the surrounding neighborhoods. Trucks should be staged away from the congested surrounding area and they should not be parked on any local streets. Engines must be turned off when the truck is not moving.”

Response

An expanded construction management section has been provided in Chapter 5, *Environmental Protection* and Appendix E of this DPIR, including coordinated construction traffic routes and potential staging plans.

Comment 19.7

“While the Construction Management Plan will address the hours of operation for both demolition and construction over the years of the project, it needs to be noted that sound travels in unusual ways within the city. Noise may be amplified by surrounding buildings. It is important that construction and set-up not start before 7:00AM during the week, and 8:00AM on weekends if work needs to be done then.

Conversely, work should end no later than 4:00PM unless there are unusual and well-communicated circumstances. Additionally, truck drivers need to be mindful of how loud their back-up alarms sound and should lower the volume, particularly during weekend and evening work hours. If night work is to be done, the volume should be shut off completely and a flagman put in place to warn others of a vehicle backing up.”

Response

The Proponent will do as much work as possible during the standard working hours as commented. Any work done off-hours will be coordinated with (or required by) the City of Boston. The Project’s Contractor’s will be asked to minimize noises such as back-up alarms to the lowest levels required by OSHA.

Comment 19.8

“If work needs to be done in the evening or on weekends, there needs to be ample notification to abutting residents, businesses, and government agencies in the surrounding community.”

Response

The Proponent will do as much work as possible during the standard working hours as commented. Any work done off-hours will be coordinated with (or required by) the City of Boston.

Comment 19.9

“The pedestrian studies for the project need to include pedestrian traffic during weekday hours and on weekends going to and from the Brooke Court, the entire West End community including the Garden Garage and Nashua Street proposed apartments, Mass General Hospital, the O’Neill Government building, North Station, The TDGarden, Haymarket

Station, and the new residential and the other retail properties within the Bulfinch Triangle. This area is not only a residential/retail/business area, but it is a heavily pedestrian-trafficked entertainment area."

Response

The Project has proposed improvements to pedestrian crossings at all site adjacent locations along New Chardon Street and New Sudbury Street, including new signalized crosswalks to the Brooke Court House. The Proponent is committed to improving pedestrian safety and convenience in and around the site and will continue to work with BTM, PWD, and the community to improve all pedestrian crossings connecting to the site.

A focused pedestrian study area was defined in consultation with BTM and includes the following three key locations near the site where Project related pedestrian activity will be heaviest: New Sudbury Street/Congress Street; New Chardon/Canal Street; and New Chardon Street/Congress Street/Merrimac Street.

Comment 19.10

"There are other plans being developed for the downtown area of Boston including the development of the Greenway Parcels 7 and 9, the Equity Residential Garden Garage project on Lomasney Way, the Merano on Causeway Street, the One Canal Street project, the Lovejoy Wharf project, and the Boston Properties/Delaware North project at the old Boston Garden site. There needs to be a comprehensive plan that can be reviewed by the public which incorporates all of these to ensure that there will be little or no conflict with street and/or sidewalk closings."

Response

This comment has been directed to the City of Boston, which has already completed numerous area-wide planning efforts. The Proponent will work with the City of Boston to provide the information necessary for the City to continue its efforts.

Comment 19.11

"Parklands are protected from excessive shadows when new properties are developed. While HYM has gone through great pains to minimize shadow on the Greenway, the same consideration needs to be given to the surrounding neighborhoods. The North End residential community in particular will have significant shadow from the taller office tower on the West parcel, particularly in the fall and winter when sunlight is so important to residents. This is one reason that the height of the 600'-plus office tower should be reconsidered."

Response

Chapter 5, *Environmental Protection* of this DPIR presents an updated shadows study based on the revised Project, including the identification of the amount of shadows that have been reduced due to the reduction in height of the office building (WP-B2) and the hotel/condominium building (EP-B1).

Comment 19.12

“Although the removal of the Garage over Congress Street will significantly improve the views and sightlines of many residential and business properties in the West End and the Bulfinch Triangle, the proposed height of the towers will have an adverse effect on many residential units in the West End. Currently, many residents have views of the Custom House Tower, Boston Harbor, and other parts of downtown. It is well known that a favorable view can help to sell a property. If there is significant disruption in current views, residents will be concerned with the effect on the value of their property from loss of views.”

Response

The current view corridor from West End residential towers to Customs House towers is in the area between Bowker Street and JFK Building. The Project aims to preserve this view where the West Parcel office building (WP-B2) has been setback from Bowker Street allowing for these views to be preserved. This setback was increased further and the height of the proposed office tower has been reduced from the 600 feet to 528 feet. Also, the height of the proposed hotel/condominium building has been reduced from 275 feet to 157 feet. In addition, following approval of the conceptual master plan (i.e., height and massing), the project design team will begin shaping the design of the office building, which may further open the aperture and also improve the visual quality of the building.

Comment 19.13

“It would be beneficial to know that the majority of office space within this project will not be leased to large institutions such as Mass General Hospital/Partners and Suffolk University.”

Response

The Proponent has not started discussions with any potential office tenants at this time. In general, the proposed office building would be a multi-tenanted building and not dominated by a single tenant. Also, it likely would include new economy tenants such as high-tech and design firms, which have been moving into the area. The proposed office building is also targeting LEED Gold which would give an opportunity to a number of nearby companies to locate into a modern and more energy efficient office building. As for Partners Healthcare and Suffolk University,

they are two of the largest employers in this area and already occupy a number of nearby buildings and typically seek to be located within buildings they own.

Comment 19.14

“During demolition and construction, care has to be taken so that the few street parking spaces that are available in the West End and Bulfinch Triangle are not jeopardized. Contractors will need to use public transportation and have a secure on-site location to store their equipment. If parking is needed for construction vehicles, it should be within the construction site, not on the street.”

Response

Construction workers will be encouraged to use local public transportation to the extent possible. Due to the limited site area, parking on-site for construction staff will be extremely limited and workers will be encouraged to use existing parking garages, surface lots and not local streets. Equipment used for construction will be located within the fenced in construction area. Refer to Chapter 5, *Environmental Protection* and Appendix E of this DPIR for additional information.

Comment 19.15

“The entrance/exit to the parking garage is proposed to be at Bowker Street. The configuration of Bowker Street as well as Hawkins Street needs to be looked at to accommodate the loading dock for the office/retail aspect of the West parcel project as well as services such as trash and recycle removal. The developer and BTM should consider keeping Bowker and Hawkins Streets one-way to allow for delivery trucks to back into the loading dock without disrupting traffic entering or exiting the parking garage. In my opinion, Hawkins Street should be one-way traveling south and Bowker Street one-way traveling north.”

Response

The current entrance and exit driveways of the Garage, as well as the loading dock driveway along New Chardon Street at the Congress Street/Merrimac Street intersection, is problematic for both vehicle-to-vehicle conflicts and vehicle to pedestrian and bicycle conflicts. The combined driveways are within the intersection proper and cause confusion for many entering drivers; exiting drivers frequently conduct unsafe illegal right turn maneuvers. The sheer width of the combined driveway and its proximity to the intersection proper make it difficult for pedestrians traverse. Relocating both the Garage and loading dock driveways to Bowker Street will mitigate these poor, and sometimes unsafe, existing conditions for vehicles, pedestrians, and bicyclists.

The traffic analysis indicates that Bowker Street will operate under acceptable conditions as a two-way facility with the removal of parking. BPD parking along Bowker Street will be relocated into the Garage, as shown on Figure 1.6. Bowker Street will not be widened. The proposed new signal at New Chardon Street/Bowker Street will improve vehicle operations and pedestrian safety at this location and is shown to operate under acceptable conditions during the a.m. and p.m. peak hour periods.

While it has been demonstrated that modifying Bowker Street to two-way operations will overall function better than maintaining the one-way loop of Hawkins Street to Bowker Street, the Proponent will continue to work with BTM and the community on this topic. Access to the proposed relocation of both the Garage and loading dock to Bowker Street is viable under both circulation scenarios. As is standard practice, BTM and PWD will review, comment on, and eventually approve all proposed roadway and intersection improvements.

Page Intentionally Left Blank

July 8, 2013

SENT VIA EMAIL

Mr. Peter Meade
Chief Economic Development Officer
Boston Redevelopment Authority
One City Hall Plaza
Boston, MA 02201

RE: Government Center Garage Project Notification Form Comments

Dear Mr. Meade:

I am writing as a resident of West End Place, a mixed-income residential property located at 150 Staniford Street, and as a member of the Impact Advisory Group for the redevelopment of the Government Center Garage as proposed by HYM Investment Group LLC.

It is well known that in the era that the Government Center Garage was originally built, most considered the West End as a blighted area. For that reason, the neighborhood was demolished and large structures, including the Government Center Garage, were built blocking the West End from the rest of the downtown Boston area. However, in the past fifty years, the West End has reemerged as a vital, vibrant and active neighborhood with several thousand new residents, many businesses, entertainment venues, and some retail stores. The West End is also a community that is home to government agencies, a world-class hospital, and a transportation hub. I am delighted that this physical barrier will be removed and that the West End will again be an integral part of the downtown area.

With this proposal to redevelop the Government Center Garage, we are given the opportunity to integrate the West End into this attractive and active area that will include much-needed residential, retail, hotel and office space as well as maintain the parking garage aspect. This will be an enormous undertaking and there are several areas that need to be given careful consideration.

Height and Massing:

While I appreciate the redevelopment of the Government Center Garage, I am concerned with the scale of the West properties in relationship to the three abutting residential neighborhoods. The 600' height (plus approximately 30' mechanicals) of the office building may be in keeping with Boston's Financial District but not with the historic aspects of Beacon Hill and the North End. Nor is it in keeping with the height of the new development properties in the West End/Bulfinch Triangle.

The PNF concentrates on the height of the proposed towers as being in keeping with those in the Financial District. However, there is little comparison to the height of the properties in the abutting residential properties of the West End, North End or Beacon

Hill. Even figure 2.9 shows the proposed office tower as being out of place along the skyline of the city. Even the control tower at Logan International Airport is 200' lower than this tower.

Lowering the height of the towers in the West parcel would create a more natural integration of the new buildings into the fabric of the historic neighborhoods that are adjacent to it - the West End's Bulfinch Triangle, the North End, and Beacon Hill.

When the West End was redeveloped in the 1960's, residential towers were built to create a vertical neighborhood allowing for a significant amount of ground-level open green space and sunlight, and view lines - amenities that are not available in much of Boston - but their heights were limited to being well under 400'. The height of the proposed office tower shown by the developer in the West parcel is more than twice the height of the residential towers in the West End and 200' taller than the Avalon Bay Nashua Street Residences will be when completed. As such, the height of the proposed new towers at the Government Center's West parcel site would create a harsh divide between the West End and the rest of the City, something that the demolition of the present Government Center Garage is anticipated to eliminate.

Building Usage:

The buildings proposed for the East parcel are planned to house retail space, a hotel, and an up-graded Haymarket MBTA station. The scale of these structures is well suited for this site as it abuts the Greenway district.

Also, the Haymarket Station is a busy station with people using buses and the subway. There needs to be clear definition of the access points to the station waiting areas and amenities that will make the station more user-friendly. Use of the station should not interfere with the safety of residents going to and from their homes, particularly those in the East parcel. Additionally, residents need to be protected from the noise and odors associated with buses and trains, and from the activities associated with them.

19.2

The residences in both the East and West Parcels could be a mixture of ownership and rental units, and could, therefore, increase the number of affordable units and family units on the site. Residential units would encourage families to remain in Boston and would be significantly helpful in the blending of the property into the surrounding neighborhoods.

Transportation:

The Haymarket subway station, as well as the stations at Government Center and North Station, has limited space and capacity. A comprehensive plan needs to be looked at to determine if the number of people added to the public transportation system (particularly the Green Line) would negatively impact the abilities of these services or would impair the safety of users.

19.3

Employees within both parcels need to be discouraged from bringing their vehicle to work. Public transportation is readily available at the three nearby stations. Employers should encourage participation in the tax-deductible Corporate CharlieCard program as well as one of the shared car programs, such as Zipcar or Enterprise, or the shared bicycle program, Hubway.

19.4

Demolition of Current Garage:

The West End and the North End residents have endured significant turmoil for more than twenty years with the Big Dig and the removal of the Green Line overhead trolley tracks, as well as with several new development projects. The demolition of the Government Center Garage needs to be carefully and thoughtfully undertaken so as not to cause additional undue hardship to the residents of these neighborhoods.

19.5

During the demolition and construction, there will be significant inconvenience to the surrounding area. Noise, removal of debris, delivery of materials and traffic need to be carefully planned and well communicated. By the nature of the area, coordination and communication will be vital to the success of this development

There will be heavy truck traffic during the project timeframe that will impact the surrounding neighborhoods. Trucks should be staged away from the congested surrounding area and they should not be parked on any local streets. Engines must be turned off when the truck is not moving.

19.6

While the Construction Management Plan will address the hours of operation for both demolition and construction over the years of the project, it needs to be noted that sound travels in unusual ways within the city. Noise may be amplified by surrounding buildings. It is important that construction and set-up not start before 7:00AM during the week, and 8:00AM on weekends if work needs to be done then.

19.7

Conversely, work should end no later than 4:00PM unless there are unusual and well-communicated circumstances. Additionally, truck drivers need to be mindful of how loud their back-up alarms sound and should lower the volume, particularly during weekend and evening work hours. If night work is to be done, the volume should be shut off completely and a flagman put in place to warn others of a vehicle backing up.

If work needs to be done in the evening or on weekends, there needs to be ample notification to abutting residents, businesses, and government agencies in the surrounding community.

19.8

Other Concerns:

- The pedestrian studies for the project need to include pedestrian traffic during weekday hours and on weekends going to and from the Brooke Court, the entire West End community including the Garden Garage and Nashua Street proposed

19.9

apartments, Mass General Hospital, the O'Neill Government building, North Station, The TDGarden, Haymarket Station, and the new residential and the other retail properties within the Bulfinch Triangle. This area is not only a residential/retail/business area, but it is a heavily pedestrian-trafficked entertainment area.

- The safety of pedestrians of all ages and abilities needs to be a priority at all hours.
- There are other plans being developed for the downtown area of Boston including the development of the Greenway Parcels 7 and 9, the Equity Residential Garden Garage project on Lomasney Way, the Merano on Causeway Street, the One Canal Street project, the Lovejoy Wharf project, and the Boston Properties/Delaware North project at the old Boston Garden site. There needs to be a comprehensive plan that can be reviewed by the public which incorporates all of these to ensure that there will be little or no conflict with street and/or sidewalk closings. **19.10**
- Parklands are protected from excessive shadows when new properties are developed. While HYM has gone through great pains to minimize shadow on the Greenway, the same consideration needs to be given to the surrounding neighborhoods. The North End residential community in particular will have significant shadow from the taller office tower on the West parcel, particularly in the fall and winter when sunlight is so important to residents. This is one reason that the height of the 600'-plus office tower should be reconsidered. **19.11**
- Although the removal of the Garage over Congress Street will significantly improve the views and sightlines of many residential and business properties in the West End and the Bulfinch Triangle, the proposed height of the towers will have an adverse effect on many residential units in the West End. Currently, many residents have views of the Custom House Tower, Boston Harbor, and other parts of downtown. It is well known that a favorable view can help to sell a property. If there is significant disruption in current views, residents will be concerned with the effect on the value of their property from loss of views. **19.12**
- It would be beneficial to know that the majority of office space within this project will not be leased to large institutions such as Mass General Hospital/Partners and Suffolk University. **19.13**
- During demolition and construction, care has to be taken so that the few street parking spaces that are available in the West End and Bulfinch Triangle are not jeopardized. Contractors will need to use public transportation and have a secure on-site location to store their equipment. If parking is needed for construction vehicles, it should be within the construction site, not on the street. **19.14**
- The entrance/exit to the parking garage is proposed to be at Bowker Street. The configuration of Bowker Street as well as Hawkins Street needs to be looked at to accommodate the loading dock for the office/retail aspect of the West parcel project as well as services such as trash and recycle removal. The developer and BTD should consider keeping Bowker and Hawkins Streets one-way to allow for delivery trucks to back into the loading dock without disrupting traffic entering or exiting the parking garage. In my opinion, Hawkins Street should be one-way traveling south and Bowker Street one-way traveling north. **19.15**

I look forward to being part of the continued work of the IAG and the development team in the removal of the barrier that the Government Center Garage creates over Congress Street. Just as the North End residents acquired light, views and a visual connection with the rest of the City with the depression of the Central Artery, West End residents are also looking forward to having a visual connection with Government Center and downtown. We will no longer feel separated from the rest of Boston.

Sincerely,

Jane Forrestall

Jane Forrestall
150 Staniford Street, #900
Boston, MA 02114

cc: Mayor Thomas Menino
Tom O'Brien, HYM Investment Group
John FitzGerald, BRA Project Manager
Michael Ross, Boston City Council
Salvatore LaMattina, Boston City Council
John Linehan, Boston City Council
Nicole Leo, Mayor's Office of Neighborhood Services
Members of the West End Place Condominium Association Managing Board
Members of the Impact Advisory Group
Members of the Downtown North Association

Letter 20

Linda Ellenbogen

Comment 20.1

“The proposed buildings on the west side of the parcel are far too tall for the area. Regardless of whether the Greenway guidelines permit these heights, they are introducing heights consistent with the financial district. I do not share the view, notwithstanding the many buildings being proposed in or near the West End and the Bulfinch Triangle, that it is appropriate to extend the financial district spine into this area.”

Response

The proposed redevelopment is not an extension of the Financial District. It is a redevelopment of an outdated above grade garage into a vibrant mixed use development that incorporates residential (apartments & condos), office, hotel and retail uses. It is also located on a unique site that has extensive access to transportation infrastructure including two subway lines, a major MBTA bus station, and entrances/exits to I-93. Also, as you note the overall redevelopment is consistent with the Greenway Guidelines.

However, after considering the additional community feedback from this process, the Proponent has agreed to reduce the height of the office building from 600 feet to 528 feet and reduce the overall gross square footage of new uses on the site by approximately 122,000 GSF, which reduction is predominantly office use.

In addition, the Proponent has agreed to lower the hotel/condominium building on the East Parcel from 275 feet to 157 feet, which lower height is consistent with the Bulfinch Triangle area. Also, the buildings on the East Parcel will further step down as they approach the Parcel 7 Garage and the North End Greenway Parks

Comment 20.2

“The need for 1.3 million square feet of new office space and 771 housing units is not supported. While there will be some “affordable” units, these will not likely serve families. There is no open space or sufficient amenities on-site to support family use.”

Response

Overall, the Project will provide 13% affordable units on site, including two and three bedroom units which can serve families. In addition, the West Parcel will contain approximately 30,000 square feet of a roof deck open space area for use by residents of the two apartment buildings on the West Parcel. This area, which will be programmed as the residential projects go through their individual Article 80 Large Project Review process, will contain amenities (indoor and outdoor) that will be suitable for families.

Comment 20.3

“The major public benefit of this project is the removal of the unsightly Government Center Garage straddling Congress Street. It is unclear that any uses proposed for the west portion of the project have any real public benefit, especially considering the many other projects being proposed in the area, which are offering well over 1000 new luxury apartments and hundreds of thousands of new square feet of first class office space.”

Response

The Project seeks to replace an obsolete auto centric 11-story above grade parking garage that today acts as major physical and visual barrier on the adjoining Bulfinch Triangle, North End and Government Center areas. Also, the existing garage and surrounding area is dominated by government users and adds little vitality to the area or adjoining neighborhoods outside of 9 AM to 5 PM on weekdays. The proposed redevelopment will demolish the eastern portion of the garage and replace it with two vibrant mixed use blocks that will also bring new residents, workers and visitors to this area. In addition, the new public plaza will create a more pedestrian friendly environment between the Bulfinch Triangle and the North End further fostering 18/7 activity that will enhance the vibrancy and safety of the area. A complete list of public benefits from the redevelopment were listed in the original PNF submission and are also listed in Chapter 1, *Project Description* of the DPIR.

Comment 20.4

“It is recommended that the phasing be reconsidered so that the attractive and friendly uses on the east portion of the development can be realized much sooner.”

Response

The Project Proponent has heard from several community groups voicing concerns over the timing of when the eastern portion of the Government Center Garage would be demolished given the overall project timeframe of 15-20 years stated in the PNF. Given these concerns the Proponent has agreed to the following:

1. Move up the demolition of the garage from Phase 3A to Phase 2A,
2. Commit to a demolition start date no later than 1st quarter of 2023 for the eastern portion of the garage,
3. Proponent would be prohibited from obtaining a certificate of occupancy for any new proposed buildings, except for the Phase 1A building (Apartment Building), until demolition of the eastern portion of the existing garage structure is substantially complete or well underway.

This is a material change in the phasing of the project which will bring the public benefits sooner to the overall community. Also, it has the additional benefit of demolishing the garage before the majority of density is brought on-line which should further mitigate construction impacts to the area.

Comment 20.5

“The use of Bowker Street as a new entrance/exit for the garage also seems problematic. It is difficult to see its viability as a two-way street, even with the proposed widening. Housing police cars on the Bowker Street end of the garage, replacing the former on-street parking, will also add to the new Bowker Street usage and potentially impact traffic on both New Chardon and New Sudbury Streets.”

Response

The current entrance and exit driveways of the Garage, as well as the loading dock driveway along New Chardon Street at the Congress Street/Merrimac Street intersection, are problematic for both vehicle-to-vehicle conflicts and vehicle to pedestrian and bicycle conflicts. The combined driveways are within the intersection proper and cause confusion for many entering drivers; exiting drivers frequently conduct unsafe illegal right turn maneuvers. The sheer width of the combined driveway and its proximity to the intersection proper make it difficult for pedestrians traverse. Relocating both the parking garage and loading dock driveways to Bowker Street will mitigate these poor, and sometimes unsafe, existing conditions for vehicles, pedestrians, and bicyclists.

The traffic analysis indicates that Bowker Street will operate under acceptable conditions as a two-way facility with the removal of parking. BPD parking along Bowker Street will be relocated into the Garage. Bowker Street will not be widened. The proposed new signal at New Chardon Street/Bowker Street will improve vehicle operations and pedestrian safety at this location and is shown to operate under acceptable conditions during the a.m. and p.m. peak hour periods. As is standard practice, BTM and PWD will review, comment on, and eventually approve should they be viable all proposed roadway and intersection improvements.

Page Intentionally Left Blank

LINDA ELLENBOGEN
TWO HAWTHORNE PLACE – APT 6E
BOSTON, MA 02114

July 8, 2013

John FitzGerald, Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007

Re: Government Center Garage Redevelopment

Dear Mr. FitzGerald:

I have lived at Hawthorne Place in the West End for over 40 years. I have served as a trustee of the Hawthorne Place Condominium for over 20 years. During this period I have been involved in forming the West End Council and have served as a Director of Downtown North. I have been an active participant in community affairs and served on the Impact Advisory Groups for the Emerson Place Project, the Charles Street Jail/Liberty Hotel Project, the proposed Equity project for the Garden Garage, and the Delaware North/Boston Properties Project.

I am disappointed that there has been no representation from either the Hawthorne or Whittier Place condominium associations which comprise the West End Council. I believe that when the Government Center Garage proposal was resurrected after several years, a new IAG should have been formed or added to, given that the current proposal is from a new developer and has been dramatically modified from the earlier proposal. The timetable for the public process has been so attenuated as to prevent any meaningful input by the neighborhood abutters.

Having said that, I agree that the Government Center Garage should be removed and the area redeveloped. I do, however, have numerous concerns with the proposed redevelopment:

PROJECT HEIGHT AND MASSING

The proposed buildings on the west side of the parcel are far too tall for the area. Regardless of whether the Greenway guidelines permit these heights, they are introducing heights consistent with the financial district. I do not share the view, notwithstanding the many buildings being proposed in or near the West End and the Bulfinch Triangle, that it is appropriate to extend the financial district spine into this area.

PROJECT USES

The need for 1.3 million square feet of new office space and 771 housing units is not supported. While there will be some “affordable” units, these will not likely serve families. There is no open space or sufficient amenities on-site to support family use. More and more of these developments are attracting the very rich or people in roommate situations, as is the case with the new Equity buildings. To quote the British author Simon Kuper (as cited in the Boston Globe), the world’s top cities are becoming “gated citadels” where the “one percent” reproduces itself. The middle and upper middle classes, as well as small companies are driven out.

20.2

The project does propose retail uses which are sorely needed, but only in the east portion of the project and not until the final phase which is many years down the road.

PUBLIC BENEFITS

The major public benefit of this project is the removal of the unsightly Government Center Garage straddling Congress Street. It is unclear that any uses proposed for the west portion of the project have any real public benefit, especially considering the many other projects being proposed in the area, which are offering well over 1000 new luxury apartments and hundreds of thousands of new square feet of first class office space.

20.3

On the other hand, the uses proposed for the east portion of the project will provide a public benefit by creating a new public plaza and a pedestrian promenade connecting to the Bulfinch Triangle. A new hotel and retail uses are also being proposed. The height and massing of the proposed buildings in this area appear to be attractive and appropriately designed for the area along the Greenway. Unfortunately, this portion of the project is the last one to be undertaken under the developer’s phasing plan so that the major public benefits are almost twenty years away. It is recommended that the phasing be reconsidered so that the attractive and friendly uses on the east portion of the development can be realized much sooner.

20.4

TRAFFIC

The traffic in the area of the project is already unacceptable. It is naïve to think that the existence of several public transit lines and bicycles will have a real minimizing effect on traffic given the densities of housing and offices being proposed.

The use of Bowker Street as a new entrance/exit for the garage also seems problematic. It is difficult to see its viability as a two-way street, even with the proposed widening. Housing police cars on the Bowker Street end of the garage, replacing the former on-street parking, will also add to the new Bowker Street usage and potentially impact traffic on both New Chardon and New Sudbury Streets.

20.5

I also urge the Boston Redevelopment Authority to consider the points raised by my neighbor Miriam Kanter in her comprehensive letter of July 3, 2013. I have addressed some of these issues in this letter and ask that you also address her concerns as they relate to safety, shadows, and wind impacts.

Thank you for the opportunity to comment on the Project Notification Form for the Government Center Garage Project.

Sincerely,

Linda Ellenbogen

Cc: Nicole Leo, Mayor's Office
City Councilor Michael Ross
Robert O'Brien, Downtown North
Hawthorne Place Board of Trustees
Whittier Place Board of Trustees
West End Civic Association

Letter 21

Michael Ross

Comment 21.1

“While the developer has addressed many of the safety concerns and made efforts towards improving pedestrian traffic as well as explored similar interests of cyclists, there needs to be a comprehensive traffic mitigation plan put in place to address the development of not only this parcel, but of the projects planned on the surrounding parcels as well. I would request that the developer continue to work with the BRA and the Department of Transportation to further conduct traffic studies incorporating the impacts of the development occurring simultaneously in surrounding areas. I encourage the developers to continue to work with the community throughout this process around traffic management and address a long-term traffic plan and ongoing transportation concerns.”

Response

The PNF included a full transportation study per a scope of study provided by the City of Boston. The Proponent will continue to work with the community to provide information as construction progresses and potential traffic impacts are identified.

Comment 21.2

“While it appears that appropriate measures have been taken to consider construction impacts and to minimize unemployed laborers through project phasing, the sequencing itself needs to be seriously reconsidered. The project phasing delays the most beneficial impacts for the community, postponing the public improvement and retail for close to 20 years.”

Response

The Project Proponent has heard from several community groups voicing concerns over the timing of when the eastern portion of the Government Center Garage would be demolished given the overall project timeframe of 15-20 years stated in the PNF. Given these concerns the Proponent has agreed to the following:

- Move up the demolition of the garage from Phase 3A to Phase 2A,
- Commit to a demolition start date no later than 1st quarter of 2023 for the eastern portion of the garage,
- Proponent would be prohibited from obtaining a certificate of occupancy for any new proposed buildings, except for the Phase 1A building (Apartment Building),

until demolition of the eastern portion of the existing garage structure is substantially complete or well underway.

This is a material change in the phasing of the project which will bring the public benefits sooner to the overall community. Also, it has the additional benefit of demolishing the garage before the majority of density is brought on-line which should further mitigate construction impacts to the area.



MICHAEL P. ROSS
BOSTON CITY COUNCIL

July 17, 2013

Mr. John Fitzgerald
Senior Project Manager
Boston Redevelopment Authority
One City Hall Plaza
Boston, MA 02201

RE: Redevelopment of the Government Center Garage Project Notification Form

Dear Mr. Fitzgerald:

I am writing today to comment on the Project Notification Form for the Government Center Garage filed by HYM Investment Group on June 5, 2013, with the Boston Redevelopment Authority.

While the developer has addressed many of the safety concerns and made efforts towards improving pedestrian traffic as well as explored similar interests of cyclists, there needs to be a comprehensive traffic mitigation plan put in place to address the development of not only this parcel, but of the projects planned on the surrounding parcels as well. I would request that the developer continue to work with the BRA and the Department of Transportation to further conduct traffic studies incorporating the impacts of the development occurring simultaneously in surrounding areas. I encourage the developers to continue to work with the community throughout this process around traffic management and address a long – term traffic plan and ongoing transportation concerns.

21.1

I would request that the project phasing itself be expedited in order to achieve the redevelopment of the government center area as quickly and effectively as possible. While it appears that appropriate measures have been taken to consider construction impacts and to minimize unemployed laborers through project phasing, the sequencing itself needs to be seriously reconsidered. The project phasing delays the most beneficial impacts for the community, postponing the public improvement and retail for close to 20 years.

21.2

DISTRICT 8

BOSTON CITY HALL, ONE CITY HALL PLAZA, BOSTON, MASSACHUSETTS 02201
(617) 635-4225 FAX: (617) 635-4203 MICHAEL.ROSS@CI.BOSTON.MA.US

This project has the potential to become the gateway of unification for people working and living in downtown neighborhoods and should be built as quickly as possible in order not only improve our streetscape, but the entire city itself.

Thank you for your time and consideration of these comments. Please contact my office with any further questions.

Best regards,

A handwritten signature in black ink, appearing to read "Michael P. Ross", with a long horizontal flourish extending to the right.

Michael P. Ross

Boston City Councilor

DISTRICT 8

**BOSTON CITY HALL, ONE CITY HALL PLAZA, BOSTON, MASSACHUSETTS 02201
(617) 635-4225 FAX: (617) 635-4203 MICHAEL.ROSS@CI.BOSTON.MA.US**

Letter 22

Boston Public Works Department

Comment 22.1

“During construction the project proponent shall ensure that there is an ADA compliant pedestrian management plan created to ensure safe passage of pedestrians around the project site during construction.”

Response

We will comply with the Boston Public Works Department’s requirements for an ADA compliant pedestrian path during construction.

Comment 22.2

“When the developer is reconstructing City owned sidewalks at the project location, we requests that a strip of pavers with porous joints be constructed along the curb line to collect rain water with the purpose of reducing stormwater runoff from entering the harbor.”

Response

The Project will incorporate porous pavements along the curb line or other equivalent strategies to collect rain water. As noted in the PNF, the Project will be capturing rain water with the purpose of reducing stormwater runoff and improving stormwater quality.

Comment 22.3

“It is anticipated through previous discussions with Public Work s, that the developer will service and maintain the sidewalks and other pertinent public improvements around this development.”

Response

The Proponent has agreed to service and maintain the sidewalks adjoining the project, the new public plaza created on the East Parcel and other pertinent public improvements associated with the proposed redevelopment.

Comment 22.4

“PWD requests that the Project Proponent follow our Standard Policy and Procedures for the Construction of Article 80 Projects in the City of Boston.”

Response

We will comply with Boston’s Public Works Department and other City of Boston permit requirements during construction.

July 26, 2013

John FitzGerald, Senior Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201

Reference: Redevelopment of the Government Center Garage

Dear Mr. FitzGerald:

Thank you for the opportunity to comment on the PNF for the Government Center Parking Garage dated June, 2013. We look forward to working with the developer to ensure a successful completion of this much needed project.

The Public Works Department has reviewed the document and has the following comments:

1. The Government Garage is a large structure that spans Congress Street and sits above an MBTA head house and bus stop. Because the garage is to be demolished in stages and the complexities involved in that endeavor, we request that the developer ensure that all applicable demolition requirements are followed and that all appropriate parties review the demolition procedure.
2. During construction the project proponent shall ensure that there is an ADA compliant pedestrian management plan created to ensure safe passage of pedestrians around the project site during construction. **22.1**
3. When the developer is reconstructing City owned sidewalks at the project location, we requests that a strip of pavers with porous joints be constructed along the curb line to collect rain water with the purpose of reducing stormwater runoff from entering the harbor. **22.2**
4. All specific repairs shall be reviewed and approved by Public Works Public Improvement Commission.
5. It is anticipated through previous discussions with Public Works, that the developer will service and maintain the sidewalks and other pertinent public improvements around this development. **22.3**
6. PWD requests that the Project Proponent follow our Standard Policy and Procedures for the Construction of Article 80 Projects in the City of Boston. Attached is a copy. **22.4**



PUBLIC WORKS DEPARTMENT / Boston City Hall / City Hall Square 02201
Joanne P. Massaro, Commissioner of Public Works
617-635-4900 Fax 617-635-7499

Boston Redevelopment Authority
John FitzGerald

July 26, 2013
Page 2 of 2

The PWD looks forward to working with the proponents of this project and the BRA to ensure successful review and approval. If you have any comments please do not hesitate to contact the Engineering Section of Public Works Department at 617-635-4968.

Very Truly Yours,
Public Works Department



William R. Egan, PE
Chief Civil Engineer

attachments

cc: Para Jayasinghe, PE, City Engineer

Letter 23

C. Forbes Dewey, Jr.

Comment 23.1

"We need a statement from the MBTA that they can and will provide that service without adding to the fare burden of existing customers."

Response

A discussion of transit impacts is presented in Section A2.3.2.6 of the PNF and further discussed in Chapter 4, *Transportation and Parking* of the DPIR. These statistics are based on currently published MBTA ridership data. Also, please note the following key items:

- Due to community concerns, the Proponent has added an additional approximately 10 feet of width/depth of waiting areas for the Haymarket Bus Station. In addition, per the request of the MBTA, the Proponent is also providing space for Charlie Card Pay Stations.
- With the reduction in the DPIR program by approximately 122,000 GSF and additional shifting of office use to residential use, the overall Project transit trips during the AM and PM peak hours will decrease by about 7 percent and 9 percent, respectively.
- Updated DPIR analysis by the Project's traffic engineer, Howard Stein Hudson, of the additional MBTA riders during peak hours added by the proposed Project continues to show that the MBTA subway lines and the existing platforms at Haymarket Station can accommodate the additional MBTA riders.
- The Proponent has held on-site meetings with Director of Bus Operations and Deputy Director of Bus Operations to discuss design plans for the reconfiguration of the bus way including MBTA requested improvements and construction related impacts to passengers and pedestrians..
- The Proponent has also met with Subway Operations / Light Rail Operations and all supporting departments to provide a project overview including scope of work and schedule. The meeting included discussions with each department to answer specific questions and concerns.
- Coordination meetings with MBTA Bus Operations and MBTA Subway Operations/Light Rail Operations will continue during the design and construction phases.

Comment 23.2

“The main concern here is that the parking fees in the new steady--state situation with only 1100 space and clearly demonstrably more demand will be substantially higher than they are today. You are passing that cost on to the current residents of the downtown Boston area, particularly the North End.”

Response

The Proponent included a detailed parking assessment in its PNF submission which detailed and demonstrated that the Garage could continue to provide overnight /weekend parking to nearby residents of the North End, Beacon Hill and West End neighborhoods. This analysis included in Chapter 3 of the PNF showed that the reduced garage at 1,159 spaces could continue to accommodate overnight/weekend parkers by providing over 500 spaces. This number has increased slightly to 570 spaces, as presented in Chapter 4, *Transportation and Parking* of this DPIR. Also, please note the following:

- The Proponent has reduced the overall project by approximately 122,000 GSF, the majority of which is office uses, but is still maintaining the 1,159 proposed spaces.
- Future residents of the on-site buildings will not have the ability to obtain parking stickers for the adjacent neighborhoods of the North End, Beacon Hill or West End.
- Parking demand in the area has been falling due to cutbacks by State & Federal agencies and a demographic change in that many younger people have been forgoing car ownership in Boston.
- Zipcar and Enterprise, alternative options to individual car ownership, are already located at the Government Center Garage.
- Since the garage was originally built in 1969, more than 12,000 additional parking spaces have been built in the area.
- The mix of proposed uses will more effectively utilize the 1,159 spaces than the current uses, which are predominantly 9 AM to 5 PM government office users.

At 1,159 spaces, the Garage will continue to be one of the largest garages in the City of Boston.

**C. Forbes Dewey, Jr.
120 Fulton Street,
Boston, MA 02109**

12 July, 2013

Re: Government Center Garage Development Project

Peter Meade
Director and Chief Economic Development Officer
Boston Redevelopment Authority
Attn: John Fitzgerald, Senior project Manager
One City Hall Square, 9th Floor
Boston, MA 02201

Dear Mr. Meade,

This letter is written in haste as I was only able to attend the HYM presentation at the North End Waterfront Residents Association (NEWRA) last night, July 11. The cutoff date for community comment is July 12.

I applaud HYM and their collaborators for taking on a massive project that will effect significant changes in Boston in terms of the employment of people in the city, the structure of the urban traffic patterns, and the demands on city and regional transportation infrastructure. I would like to see this project succeed. But there are a number of issues that impact existing and future residents that must be addressed in a thorough and forthright way. I will only mention two here: **Public Transportation and Parking.**

Public Transportation. Ten years ago my wife and I moved to the North End to enjoy the privilege of taking public transportation to work and having a "citified" life. Today, in taking the Orange Line to go to Downtown Crossing to take the Red Line to Kendall Square, I am facing packed trains at Haymarket with no additional room basically continuously between 8:00 AM and 9:30 AM. Missing three trains can amount to a 20 minute wait, even longer when you recognize that it is much more difficult to get the doors closed on full trains. And the entire system works more slowly.

The HYM plan claims that they will increase the number of local jobs by 6,000. If all those people choose to use public transportation between 8:00 and 9:30 AM, it would require an additional 8 trains/hour, or roughly a 50% increase in service to the same stretched capacity limit that is being experienced today. **We need a statement from the MBTA that they can and will provide that service without adding to the fare burden of existing customers.**

23.1

Clearly, some of the additional persons will arrive by commuter rail. Others will drive, but with the proposed decrease in parking (see the second item below) that does not look promising. Also, the calculation relative to the Orange line does not

take into account that some of the new employees will be residents of the condos that the project will build. However, with 771 apartments with an average of two persons per apartment, it would be unreasonable to expect more than half to work within walking distance. Thus there would be an **additional** 200-300 persons seeking public transportation at the Haymarket MBTA facilities, or requiring a car to get to their place of employment.

Parking. Anyone who lives in Boston knows what it is like to find a parking space in the North End: impossible without a resident sticker, and nearly impossible with one. The only times when even a resident can find a space is Christmas and the Fourth of July when it is 95 degrees. When all is said and done, there are life-style incentives to have a personal auto that figure into the equation of living in the city, and as great as Zip cars are it is not a solution to reserve one for two weeks a year to go to the Cape versus having my own car that I can use all year including those two weeks per year. Having one's own car is a valuable privilege, and to ask individuals to give that up, **or alternatively pay much more for the opportunity**, is a serious affront.

I challenge any of the public officials who promote the rhetoric that we need to have autoless cities to proclaim in public that they are going to go carless for their families. Some of these pundits don't even live in Boston! There is a great World War I ballad by John McCutcheon that observes "... the ones who call the shots won't be among the dead and maimed". Boston is doing well catering to bicycles and carless twenty-somethings. But that is not the complete demographic of the city. And they do not occupy high-rise condominiums.

If we make any reasonable assumptions about the effects on automobile ownership for Boston residents when we **reduce** the inventory of parking spaces by **1100**, **increase** the potential resident requirements by **771**, and **add** some fraction of the **6,000** new area employees who cannot or will not take public transportation, you have a serious parking mismatch.

The only truly disingenuous part of the HRM presentation on July 11 was to quote parking rates of \$110/month and occupancy rates of half the existing capacity. These numbers are clearly misleading. First, their published contract monthly rates (24/7) are \$350. Since this is only 1/3 of their daily rate of \$35 on a monthly basis (probably 1/4 if you consider that the City and MGH and others write favorable contracts for multiple spaces), it is clear that most working commuters would take the monthly rate and use the lot only during the working day and not every day and most probably not at all on the weekend. Thus, the garage is capable of selling additional "reverse commute" spaces that are good up to 9:30 AM and after 3:30 PM and weekends for \$110 per month, and the overlap between these two groups is statistically marginal.

Thus, I challenge HYM in saying that their occupancy is like 1100 versus 2200 capacity. Their rate structure double dips, in the sense that they sell 24/7 space

knowing that they can resell many of those spaces to people who will not use the space during the work week. And this does not include day parking that is sold on an "as available" basis. Nor does it include revenue of \$25/evening for Boston Garden events. Finally, with all these variables clearly delineated and operating statistics from past years to provide probability data, I leave it as a sophomore homework problem at MIT to optimize revenue. If the present owners did less, I would fire them. The quoted fees on <http://www.governmentcentergarage.com> reflect that optimization. **The 2200 spaces are priced to optimize revenue at the present time.**

The main concern here is that the parking fees in the new steady-state situation with only 1100 space and clearly demonstrably more demand will be substantially higher than they are today. You are passing that cost on to the current residents of the downtown Boston area, particularly the North End. Without a much more detailed analysis and some validated assumptions about the distribution of parkers wanting to subscribe to the remaining half of the currently-available parking at the Government Center garage as well as a more extensive inventory of all of the other available parking facilities, it is hard to come up with a valid number for the inevitable increase in parking fees caused by this new project. Any such calculation would include the impact of the four other major residential projects completed or in the works near the Boston Garden. I would not be surprised to see increases of 40% or more. It will be compounded if the BRA continues to believe all residents are both enthusiastic and capable of forgoing automobiles. Unless HYM can convince the public otherwise, anyone who rents a parking space in Boston can expect this project to **add 40% or more** to their then-current parking costs as soon as this project receives a occupancy permit.

23.2

Please let me know if I can be helpful in resolving these issues. My email is cfdevey@mit.edu. Ideological tensions should be used to sharpen a common goal, not deny appropriate advances. But gross simplifications cannot be accepted when the end result is many innocent people picking up the tab for a private project that receives public approval.

Sincerely,



Letter 24

Boston Fire Department

Comment 24.1

“...the Boston Fire Department requires the following issues addressed by a qualified individual.

1. *Emergency vehicle site access to the new buildings as well as existing buildings that might be affected.*
2. *Impact on availability and accessibility of hydrant locations for new buildings as well as for any existing buildings that might be impacted.”*
3. *Impact on availability and accessibility to siamese connection locations for new buildings as well as for any existing buildings that might be impacted.”*
4. *Impact that a transformer vault fire or explosion will have on the fire safety of the building, particularly as it relates to the location of the vault*
5. *Need for Boston Fire Department permit requirements as outlined in the Boston Fire Prevention Code, the Massachusetts Fire Prevention Regulations (527 CMR), and the Massachusetts Fire Prevention Laws (MGL CH148).*
6. *For projects involving air-supported structures, it is critical that the impact of the design has on fire safety relative to the interaction of the area underneath the structure to the structure as well as to the interaction of the structure to the area underneath the structure.*

These items should be analyzed for all phases of the construction as well as the final design stage.”

Response

7. The Proponent will meet with Boston Fire Department (BFD) during the design of each Project Component to review emergency vehicle site access. With the deconstruction of the existing garage structure over Congress Street, access is expected to be improved.
8. The Proponent will meet with BFD during the design of each Project Component to determine if hydrant access has been impacted.
9. The Proponent will coordinate with BFD to review siamese connection and fire command center locations.
10. The Proponent will evaluate impacts due to potential transformer vault incidents.

11. As listed in Table 1-2 of Chapter 1, *Project Description* of this DPIR, the Proponent is aware of the need for a Fuel Storage Permit and will evaluate the need for additional BFD permits/approvals for each Project Component as design progresses.
12. The Project will be removing the air-supported structure over Merrimac Street. For any proposed air-supported structures, the Proponent will consider the impacts noted.

Boston

John FitzGerald
Senior Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007

June 13, 2013

Dear Mr. FitzGerald:

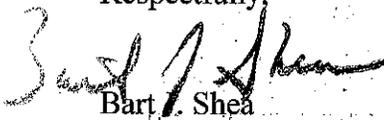
Regarding the Project Notification Form for Redevelopment of the Government Center Garage project submitted to the BRA in June 2013 the Boston Fire Department requires the following issues addressed by a qualified individual.

24.1

1. Emergency vehicle site access to the new buildings as well as existing buildings that might be affected.
2. Impact on availability and accessibility of hydrant locations for new buildings as well as for any existing buildings that might be impacted.
3. Impact on availability and accessibility to siamese connection locations for new buildings as well as for any existing buildings that might be impacted.
4. Impact that a transformer vault fire or explosion will have on the fire safety of the building. Particularly as it relates to the location of the vault.
5. Need for Boston Fire Department permit requirements as outlined in the Boston Fire Prevention Code, the Massachusetts Fire Prevention Regulations (527 CMR), and the Massachusetts Fire Prevention Laws (MGL CH148).
6. For projects involving air-supported structures, it is critical that the impact of the design has on fire safety relative to the interaction of the area underneath the structure to the structure as well as to the interaction of the structure to the area underneath the structure.

These items should be analyzed for all phases of the construction as well as the final design stage. This project will need permits from the Boston Fire Department as well as the Inspectional Services Department.

Respectfully,



Bart J. Shea
Fire Marshal

Cc: Paul Donga, FPE, Plans Unit, BFD



Thomas M. Menino, Mayor / FIRE DEPARTMENT / 115 Southamton Street / Boston, MA 02118

Letter 25

Boston Environmental and Energy Services

Comment 25.1

“Below is a list of overarching policies and goals that the City recommends the Proponent consider:

- *Reduce energy intensity to the maximum extent possible;*
- *Include on-site alternative energy generation to the maximum extent possible;*
- *Strive to achieve LEED Platinum status and offer incentives for retail tenants to maximize their LEED potential;*
- *Conserve, maximize efficiency and reuse water to the greatest extent possible; Seek and showcase innovative green attributes;*
- *Maximize Transportation Demand Management opportunities for all residents, visitors, hotel guests, tenants and employees; and*
- *Set a standard for sustainable, multi-use development.”*

Response

The PNF presented a description of the comprehensive approach to sustainability for the Project, which includes goals related to conserving energy and water, incorporating renewable energy sources on-site (i.e., the proposed Net Zero Energy public plaza through the use of solar panel systems), and maximizing the Project’s proximity to an extensive public transit network. The Proponent recognizes the desire of future tenants for efficient, comfortable, state-of-the-art building space and is committed to incorporating many key aspects of sustainability and high performance building design, where applicable and feasible.

The Proponent is committed to pursuing LEED Silver for apartment buildings and LEED Gold for the office buildings. The Proponent will evaluate the ability to achieve LEED Platinum, particularly for the office buildings, as they advance through their individual Article 80 processes in the future. The office buildings are later in the phasing which will allow for technology and best practices to be further advanced and improve the ability to potentially achieve LEED Platinum buildings. The Proponent has not previously offered incentives to retail tenants to achieve LEED Platinum; however, the Proponent is willing to work with BED on strategies and incentives related to retail tenants.

Comment 25.2

"We encourage beginning integrated design with an intent to construct Platinum buildings. As credits are assessed for implementation from that perspective, the reasons for choosing and not choosing credits can be clearly explained as can a description of the ways in which chosen credits will be implemented. We ask that LEED information be provided from this perspective in the DPIRs and that goal of LEED Gold be set for the entire project."

Response

The Proponent has included in the DPIR individual LEED checklists for each Project Component. Although preliminary, given the proposed redevelopment is in the conceptual master plan stage, the LEED Scorecards show the residential buildings are targeting a LEED Silver rating and commercial buildings targeting a LEED Gold rating. The Proponent is willing to pursue a target of LEED Gold for the residential buildings, but again these are preliminary checklists, which will be updated as the design of each individual Project Component progresses.

Comment 25.3

"We urge the Proponent to give particular attention to credits regarding alternative transportation, stormwater, heat island effect, all energy and atmosphere credits and all water efficiency credits."

Response

As demonstrated by the preliminary LEED Scorecards provided in this DPIR (Figures 5.8a and 5.8b), the Proponent is focused on achieving LEED credits regarding the above mentioned categories where majority of these credits are marked "Yes" or "Maybe."

Comment 25.4

"The potential for the use of anaerobic digestion, combined heat and power (CHP), photovoltaics, building integrated solar, sewer heat recovery, geothermal, solar thermal, district energy using a renewable source and other options should be evaluated with conclusions reported in the PNFs or Draft Project Impact Reports(s)."

Response

As discussed in the PNF section 4.9.3.3, the Project intends to explore energy sharing options at the plant level including potential for CHP. Additional district scale energy solutions can be explored that are appropriate for the project. For instance, given the limited space on the Project Site, which is further reduced to the amount that is on terra-firma and the scale (and energy demand) of the Project, ground

source systems have been assessed as not viable for the Project. Additionally, the Project has already identified areas that are most viable for solar photovoltaics and/or solar thermal systems (i.e., east parcel, and these will be further explored for those project components).

Comment 25.5

“The potential for selling energy to neighboring or area buildings as part of district energy generation should be explored.”

Response

Renewable energy systems that may be implemented on-site would be consumed on-site to reduce the overall energy consumption for the Project. The Project does not anticipate achieving excess energy and, as such, would not be in a position to export energy to the grid, or to neighboring buildings.

As presented in the PNF, the Proponent has evaluated the potential for the installation of solar panel system(s) as part of the Project. It was determined that the East Parcel office building provides the most opportunity for such a system. The energy harvested from the solar panel system will be used to power the lighting and other site amenities within the proposed public plaza on the East Parcel providing for a zero net energy public space. In addition, the Proponent is exploring the use of steam energy, which is an existing district energy source available in downtown Boston. At this time the Proponent is not proposing an on-site district energy facility.

Comment 25.6

“We ask that purchasing green power be considered as part of an overall energy plan that would also exceed the base energy code by 10% or more.”

Response

Purchasing green power via renewable energy certificates (RECs) will be considered for each Project Component as design progresses. The evaluation for and intent of purchasing RECs would be as a contribution to LEED certification and, therefore, would follow the LEED requirement thresholds (e.g., 35 percent of predicted annual building energy consumption for a period of 2 years for LEED-NC projects). This is a LEED point which has been utilized by the Developer on other projects in the Boston/Cambridge area.

Comment 25.7

"We suggest construction that allows for the separate metering of commercial and retail spaces in various configurations as leased. A discussion of sub-metering and separate metering in the residential components should be included in PNFs or DPIRs."

Response

As mentioned in the PNF, each residential unit will have an energy and water meter so that tenants will directly receive those bills. Additionally, office and retail tenants will also directly pay for electricity use. Direct payment and control of use has shown to encourage reduction in consumption of energy and water. The Project will also explore opportunities to further meter end uses controlled by the owner to have a better understanding of the energy profile and, therefore, be able to identify areas and specific systems for energy conservation measures and ongoing improvement. In addition, real-time displays throughout the Project in public areas will be explored so tenants and visitors alike can have an understanding of resource use where they live and/or work.

Comment 25.8

"Green tenancy agreements are planned for the office and retail space to encourage tenants to reduce their environmental impacts. We ask that the PNFs for office and retail components include a draft of the proposed leases."

Response

Draft proposed leases have not been created yet given the Project Components are still years prior to a building opening. However, the Proponent will work with BED to encourage future tenants to reduce their environmental impacts and will share a draft of the proposed tenancy agreements with BED as the office and retail components enter their pre-leasing stage.

Comment 25.9

"By their as a 24-hour service industry, hotels are significant consumers of energy for, but not limited to, HVAC systems, domestic hot water, lighting and elevators. We suggest the evaluation of energy-efficient elevator systems such as the Otis Elevator Company's Gen2 model and Kone's EcoSpace model for mid-rise buildings. Energy management systems that provide data to facility managers and systems that control heat and lighting in vacant rooms are also potential energy and money savers and should be seriously considered."

Response

The project team will evaluate energy efficient equipment and systems for their implementation on a cost-benefit basis for energy savings. Control systems for lighting, HVAC, plug loads, etc. have been identified as a key component of an energy strategy for the hotel uses and intend to be implemented on the project.

Comment 25.10

“As noted previously, sub- metering can be used as a means to provide information to residential and commercial users about the ways in which behavior influences cost and, subsequently, conservation. We urge the Proponent to obtain all LEED Water Efficiency points.”

Response

Refer to the response to Comment 25.7 above regarding sub-metering for future residential and commercial users. The Proponent is committed to fully considering and evaluating all LEED credits, and intends to seek LEED certification for all Project Components for those credits deemed applicable and feasible for the final building and user types.

Comment 25.11

“Each PNF should include a detailed TDM plan that includes, but is not limited to:

- a requirement that the hotel and commercial/retail/restaurant tenants subsidize transit passes for all employees (full-time, part-time, contract workers);*
- showers, changing rooms and lockers for employees who wish to work or bike to work;*
- providing transit information on the hotel Web site and to hotel guests upon booking;*
- offering to conference attendees the information that there are trip-sharing(transportation-sharing) companies that may be useful (e.g. SpaceShare.com)*
- offering for sale at the hotel CharlieCards that have stored value;*
- offering the information that there are trip-sharing (transportation-sharing) businesses that may be useful for conference attendees (e.g. SpaceShare.com); and*
- if offering shuttle service to major transportation hubs, participating in a shared service that uses alternatively-fueled vehicles.”*

Response

As individual PDA components are further developed through the Article 80 Large Project Review process, the Proponent will work with BTM and BED to develop transportation demand management (TDM) measures appropriate for each building

and/or land use. The proposed TDM measures will be presented in each individual PNF. Specific TDM measures for each building or development phase will then be codified in the Transportation Access Plan Agreement (TAPA) as required for all developments subject to Article 80 Large Project Review.

Comment 25.12

"Several intersections are appropriate for "hot spot" dispersion modeling; their locations discussed by Boston Environment Department staff with the Proponent's consultant."

Response

The microscale ("hot spot") air quality analysis presented in Chapter 5, *Environmental Protection* of this DPIR studied intersections in accordance with the criteria stated in Katie Pedersen's letter dated July 1, 2013 as well as follow-up discussions between the Proponent's consultant and BED staff.

Comment 25.13

"A plan should be developed to ensure that there is no idling in violation of the Commonwealth's anti-idling law (MGL 90 s16A and 310 CMR 7.11) at loading and drop-off/pick-up/waiting areas"

Response

The Commonwealth of Massachusetts anti-idling law will be enforced during all construction phases of the Project with the installation of on-site anti-idling signage at loading and drop-off/pick-up/waiting areas.

Comment 25.14

"MassDEP encourages all major construction projects to meet requirements for diesel construction equipment in the MassDEP State Revolving Fund (SRF) requirements (<http://www.mass.gov/dep/water/wastewater/diesel.htm>). These require that all non-road diesel equipment rated 50 horsepower or greater that will be used on a project site meet EPA's Tier 4 emission limits or be retrofitted with appropriate emission reduction equipment. Emission reduction equipment includes EPA-verified, CARB verified or DEP-approved diesel oxidation catalysts or diesel particulate filters. We ask that the Proponent adopt this standard."

Response

The Proponent is committed to complying with the DEP SRF requirements regarding emissions limits on off-road construction vehicles. Diesel equipment rated 50

horsepower or greater used on the construction site will be required to meet EPA's Tier 4 emission limits.

Comment 25.15

"Climate change is expected to result in more frequent high heat days, higher heat and an increase in the frequency and intensity of storms. During project planning and design, the Proponent should conduct vulnerability assessments to identify risk management measures during construction and operation. Sub-basements, basements and below-grade parking structures are of particular concern... The SLR assumptions that should be used for this project are at least three feet by 2050 and six feet by 2100. PNFs for each project element should indicate if and where below-grade space will be, identify the base elevations of first floors Boston City Base and describe mitigation."

Response

The design team has identified climate change impacts as part of the sustainability framework for the project and has already begun to identify strategies to address vulnerabilities, refer to section 4.9.5 of the PNF. Individual Project Components will continue to identify and address vulnerabilities specific to that element and develop strategies to mitigate and/or eliminate the vulnerability.

Comment 25.16

"Massing drawings and elevations in each PNF should take visual impacts on historic resources into consideration. Elevations and renderings should show the heights and massing of surrounding buildings; similar elevations and renderings including the proposed project should also be provided. Potential impacts to historic resources such as construction, vibration, groundwater disturbance, wind and shadow should be assessed and discussed in detail. As previously noted, of particular importance is the potential for shadow to create perpetual damp conditions that can harm historic structures over time."

Response

Massing drawings and elevations for future Project Component PNFs will take visual impacts on historic resources into consideration. Elevations and renderings will show the heights and massing of surrounding buildings; similar elevations and renderings including the Project will also be provided. Potential impacts to historic resources such as construction, vibration, groundwater disturbance, wind and shadow will be assessed and discussed in detail.

Comment 25.17

“As regards the demolition of part of the parking garage - Article 85, Demolition Delay, defines demolition as “...any act of pulling down, destroying, or removing a building, or the commencement of such work with the intent to complete the same.” Therefore, the partial demolition does not appear to trigger review under Article 85. Please check with ISD to confirm that the partial demolition of the garage is exempt from Article 85 review.”

Response

Representatives for the Proponent have contacted ISD and the Boston Landmarks Commission (“BLC”) relative to the impact of a “partial” demolition of the garage and the applicability of Article 85 of the Code (Demo Delay). Although BLC staff has initially indicated that Demo Delay does not apply to the Project, the Proponent intends to formally request a determination from BLC. The Proponent will adhere to all of the applicable requirements of Article 85 as requested or determined by the BLC.

Comment 25.18

“The BLC requests that dated cornerstones be incorporated into all new construction. This element will allow those who are attentive to and value the architecture of the City to appreciate the historical context in which structures were conceived.”

Response

A dated cornerstone will be placed on each new building within the development as requested by BLC.

Comment 25.19

“We suggest noise impact analyses for two scenarios for each phase, a daytime off-peak hour and a nighttime hour. At a minimum, the two scenarios should be: 1) hour of greatest increase over existing background monitored noise level; and 2) hour of highest combined total noise impact. If neither of these occurs during a nighttime hour, a nighttime hour should be added to assess sleep disturbance impact.”

Response

A conservative approach was used to evaluate the Project at the planning level. The noise analysis assumed that all of the buildings mechanical systems were operating at 100 percent load during the nighttime. Typically, the buildings mechanical systems would be operating at less than 100 percent load during the nighttime and would generate lower sound levels. The noise analysis demonstrates that the Project meets the City of Boston’s nighttime criteria with the 100 percent load sound levels.

The Project will also meet the daytime criteria because the Project's mechanical system sound levels do not change and the City of Boston's daytime criteria is higher.

Comment 25.20

"Project equipment noise levels should be compared to MassDEP sound level criteria and compare with total modeled combined noise impacts (equipment, idling buses, other site activity, and increased traffic) at nearby residential sensitive receptors to EPA and HUD day-night residential noise impact criteria."

Response

A comprehensive noise assessment for the Project is provided in Chapter 5, *Environmental Protection* of this DPIR. The noise analysis conservatively evaluated the Project's buildings mechanical systems at a planning level. Chapter 5 discusses that the EP-B2 building structure will act as a screen to mitigate the noise from the Haymarket bus facility, such as, idling buses from nearby existing and future residential receptor locations. Traffic noise is affected by vehicle speeds, traffic volumes, and trucks.

The anticipated increase in vehicular traffic as a result of the Project is not expected to significantly change existing traffic sound levels. The highest increases in Project-generated traffic is less than 400 vehicles during the peak hour, and the traffic speeds and truck percentages will be low; thereby, resulting in small changes in traffic noise. For comparison, the FHWA considers increases of 2,000 vehicles per hour to substantially increase traffic noise.¹

Comment 25.21

"Construction noise impact should be modeled and not be limited to a generic discussion of mitigation measures. Since the clean-up and construction periods will be extensive, the modeling could inform specific mitigation measures."

Response

As discussed in Chapter 5, *Environmental Protection* of this DPIR, the construction activity associated with the Project may temporarily increase sound levels at nearby sensitive receptors due to the use of heavy machinery. Heavy machinery is expected to be used intermittently throughout the Project's construction phases, typically during daytime periods. The City of Boston noise control regulation considers

▼
¹ Source: U.S. Department Of Transportation, Federal Highway Administration, HEV-21/8-80(20M), dated September 1980.

construction sound levels to be an impact to residential land uses if the L10 sound level is in excess of 75 dB(A) or the Lmax sound level is in excess of 86 dB(A).

Construction phase-specific CMPs will be developed in coordination with the City of Boston, which will include a construction noise assessment and identify measures to ensure that the noise regulation is met. The CMPs will be described in further detail as part of future Article 80, Large Project Reviews for each Project Component.

Comment 25.22

“It is important that shadow diagrams be sized to provide detail, including the following:

- *a north arrow;*
- *boundaries of the study area;*
- *street names;*
- *the identification of doorways, bus stops, open space and areas where pedestrians are likely to congregate (e.g. in front of historic resources, at other tourist destinations, in parks or other areas used for active or passive recreation);*
- *clear delineation of shadow on both rooftops and facades; and*
- *clear distinctions between existing shadow and new shadow.*

Diagrams should be oriented and of a scale consistent with diagrams depicting wind monitoring locations, for both the No Build and Build conditions.

Please note that of particular importance from an historic resources perspective, is the potential for shadow to create perpetual damp conditions that can harm historic structures over time.

We ask that the PNFs or DPIRs identify mitigation and the mitigated wind speeds if such areas are expected to have conditions inconsistent with a planned use or in the uncomfortable for”

Response

Chapter 5, *Environmental Protection* of this DPIR presents the findings of the comprehensive wind and shadows analyses conducted for the Project. The full wind and shadow studies can be found in Appendix A and Appendix B of this DPIR, respectively.

Comment 25.23

“We recommend the use of LEED for Existing Buildings: Operations and Maintenance (LEED EBOM) as a resource for institutionalizing sustainable building operations and maintenance best practices. An operations and training manual for staff and a green practices manual for residents can help to ensure efficient operations, reduce environmental impacts and serve as educational tools.”

Response

The design team intends to utilize LEED-EBOM as a resource and reference towards establishing a framework for sustainable operations. This will be used in the design stage to inform the design so as to enable implementation of sustainable policies and procedures, metering and monitoring, tenant engagement and ongoing improvements. Users manuals and/or other resources to provide information on the building design, features and intended operations as well as to encourage resident and tenant behavior will also be included.

Comment 25.24

“Each of the following aspects construction planning should be outlined in PNFs or DPIRs:

- staging area locations and management;*
- marshaling area locations and management;*
- anti-idling enforcement;*
- noise control;*
- dust control;*
- diesel construction vehicle retrofits; and*
- permitting for chemical cleaning and abrasive blasting”*

Response

Each individual Project component will include additional detail on the above items as it advances through its future individual Article 80 Large Project Review. Preliminary construction staging plans have been included in the DPIR. Final construction management plans will be developed on a component by component basis prior to construction. Construction management plans will include site access and control points, pedestrian routes and truck routes in addition to the items listed in the comment.

Page Intentionally Left Blank



**Environmental and Energy Services
CITY OF BOSTON**

THOMAS M. MENINO
Mayor

BRIAN R. SWETT
Chief of Environment and Energy

July 30, 2013

Peter Meade, Director
Boston Redevelopment Authority
Boston City Hall, Room 925
Boston, MA 02201
Attention: John FitzGerald, Senior Project Manager

Re: Redevelopment of the Government Center Garage, One Congress Street
Project Notification Form

Dear Director Meade:

The City of Boston Environmental and Energy Services Cabinet is pleased to have the opportunity to comment on this Project Notification Form (PNF), filed by The HYM Investment Group LLC, on behalf of Bulfinch Congress Holdings LLC, for the Redevelopment of the Government Center Garage. In the manner of a Master Plan, this PNF outlines a four-phase project with an expected build-out of 20 years.

The site of the 2.9 million gsf apartment, condominium, office, hotel and retail project with an extensive public realm is roughly bounded by New Sudbury Street, Bowker Street, New Chardon Street and Surface Road. The project will be constructed in four phases, beginning in 2016. It will include the daylighting of Congress Street between New Chardon Street and New Sudbury Street with the demolition of half of the existing parking garage. This high-profile project will change the character and activation of more than the immediate area, making connections with the Bulfinch Triangle, Rose Kennedy Greenway and beyond.

As this PNF serves as a contextual master plan for the overall project, individual PNFs will be filed for each Phase. We ask that they address the following issues, many of which have been discussed by me, the Proponent and development team. The purpose of the issues we have enumerated is two-fold: they are necessary to both meet the City's goal to reduce Boston's GHG emissions by 25 percent by 2020 and 80 percent by 2050 and to maximize the project's value to the Proponent, residents, hotel guests, office tenants and retail/restaurant patrons by providing a building with desirable green attributes.

City of Boston General Policy Goals

Below is a list of overarching policies and goals that the City recommends the Proponent consider:

- Reduce energy intensity to the maximum extent possible;
- Include on-site alternative energy generation to the maximum extent possible;

25.1

- Strive to achieve LEED Platinum status and offer incentives for retail tenants to maximize their LEED potential;
- Conserve, maximize efficiency and reuse water to the greatest extent possible;
- Seek and showcase innovative green attributes;
- Maximize Transportation Demand Management opportunities for all residents, visitors, hotel guests, tenants and employees; and
- Set a standard for sustainable, multi-use development.

Energy, LEED, Sustainability

The Proponent will seek LEED certification at the Gold level for office components under the Core and Shell rating system. Silver under the New Construction rating system will be the goal for other uses. We encourage beginning integrated design with an intent to construct Platinum buildings. As credits are assessed for implementation from that perspective, the reasons for choosing and not choosing credits can be clearly explained as can a description of the ways in which chosen credits will be implemented. We ask that LEED information be provided from this perspective in the DPIRs and that goal of LEED Gold be set for the entire project. **25.2**

We urge the Proponent to give particular attention to credits regarding alternative transportation, stormwater, heat island effect, all energy and atmosphere credits and all water efficiency credits. **25.3**

As discussed, phasing a large project can present energy-generation challenges. At the same time, the range of potential on-site alternative/renewable energy generation systems available in the market offers options that can serve a single building or be built with the capacity to extend to future construction. The potential for the use of anaerobic digestion, combined heat and power (CHP), photovoltaics, building integrated solar, sewer heat recovery, geothermal, solar thermal, district energy using a renewable source and other options should be evaluated with conclusions reported in the PNFs or Draft Project Impact Reports(s). The potential for selling energy to neighboring or area buildings as part of district energy generation should be explored. We ask that purchasing green power be considered as part of an overall energy plan that would also exceed the base energy code by 10% or more. **25.4**

The sub-metering and separate metering of electricity, water and heat can provide valuable information to residential, commercial and retail tenants and result in conservation above typical levels. We suggest construction that allows for the separate metering of commercial and retail spaces in various configurations as leased. A discussion of sub-metering and separate metering in the residential components should be included in PNFs or DPIRs. **25.5**
25.6

Green tenancy agreements are planned for the office and retail space to encourage tenants to reduce their environmental impacts. We ask that the PNFs for office and retail components include a draft of the proposed leases. **25.7**

By their as a 24-hour service industry, hotels are significant consumers of energy for, but not limited to, HVAC systems, domestic hot water, lighting and elevators. We suggest the evaluation of energy-efficient elevator systems such as the Otis Elevator Company’s Gen2 model and Kone’s EcoSpace model for mid-rise buildings. Energy management systems that provide data to facility managers and systems that control heat and lighting in vacant rooms are also potential energy and money savers and should be seriously considered. **25.8**
25.9

Wastewater/Water

The use of potable water increases the maintenance and life-cycle costs for building operations. Efficiency measures such as using alternative water sources for non-potable applications, the use of Energy Star products in units and building systems, and participation in the WaterSense program are options designed to increase water efficiency and conservation. As noted previously, sub-metering can be used as a means to provide information to residential and commercial users about the ways in which behavior influences cost and, subsequently, conservation. We urge the Proponent to obtain all LEED Water Efficiency points.

25.10

Rainwater harvesting of rooftop runoff is under consideration for reuse in mechanical make-up water. We encourage this measure.

Transportation Demand Management

25.11

Each PNF should include a detailed TDM plan that includes, but is not limited to:

- a requirement that the hotel and commercial/retail/restaurant tenants subsidize transit passes for all employees (full-time, part-time, contract workers);
- showers, changing rooms and lockers for employees who wish to work or bike to work;
- providing transit information on the hotel Web site and to hotel guests upon booking;
- offering to conference attendees the information that there are trip-sharing (transportation-sharing) companies that may be useful (e.g. SpaceShare.com)
- offering for sale at the hotel CharlieCards that have stored value;
- offering the information that there are trip-sharing (transportation-sharing) businesses that may be useful for conference attendees (e.g. SpaceShare.com); and
- if offering shuttle service to major transportation hubs, participating in a shared service that uses alternatively-fueled vehicles.

Air Quality

The project site is proximate to tunnel access, surface streets heavily used at peak times, to the TD Garden and to the sites of numerous development projects that will contribute to area traffic levels. Several intersections are appropriate for "hot spot" dispersion modeling; their locations discussed by Boston Environment Department staff with the Proponent's consultant.

25.12

A plan should be developed to ensure that there is no idling in violation of the Commonwealth's anti-idling law (MGL 90 s16A and 310 CMR 7.11) at loading and drop-off/pick-up/waiting areas.

25.13

MassDEP encourages all major construction projects to meet requirements for diesel construction equipment in the MassDEP State Revolving Fund (SRF) requirements (<http://www.mass.gov/dep/water/wastewater/diesel.htm>). These require that all non-road diesel equipment rated 50 horsepower or greater that will be used on a project site meet EPA's Tier 4 emission limits or be retrofitted with appropriate emission reduction equipment. Emission reduction equipment includes EPA-verified, CARB verified or DEP-approved diesel oxidation catalysts or diesel particulate filters. We ask that the Proponent adopt this standard.

25.14

Climate Change, Sea Level Rise, Storm Surge

25.15

Climate change is expected to result in more frequent high heat days, higher heat and an increase in the frequency and intensity of storms. During project planning and design, the Proponent should conduct vulnerability assessments to identify risk management measures during construction and operation. Sub-basements, basements and below-grade parking structures are of particular concern.

FEMA Flood Insurance Rate Map Number 25025C0081G shows that the project site is in a Zone C, Area of Minimal Flooding. This PNF also notes that the eastern portion of the site is vulnerable to future Sea Level Rise (SLR) and storm surge.

As described in this PNF, “[T]he eastern edge of the Project Site relates directly to the Bulfinch Triangle and the Blackstone Block in scale and character. This end of the Project Site is also directly adjacent to the Greenway and the North End.” The following uses are to be constructed along the eastern part of the site:

- A wedge shaped office building facing the Greenway; and
- A small retail building;
- A hotel/condominium building fronting Congress Street.

The assumptions used by the Proponent are one to two feet of SLR by 2050 and three to six feet by 2100; mitigation measures to be explored will be based upon these assumptions.

The SLR assumptions that should be used for this project are at least three feet by 2050 and six feet by 2100. PNFs for each project element should indicate if and where below-grade space will be, identify the base elevations of first floors Boston City Base and describe mitigation.

Historic and Archaeological Resources

Staff of the Boston Landmarks Commission (BLC) have reviewed the PNF and offer the following comments.

Massing drawings and elevations in each PNF should take visual impacts on historic resources into consideration. Elevations and renderings should show the heights and massing of surrounding buildings; similar elevations and renderings including the proposed project should also be provided. Potential impacts to historic resources such as construction, vibration, groundwater disturbance, wind and shadow should be assessed and discussed in detail. As previously noted, of particular importance is the potential for shadow to create perpetual damp conditions that can harm historic structures over time.

25.16

As regards the demolition of part of the parking garage - Article 85, Demolition Delay, defines demolition as “...any act of pulling down, destroying, or removing a building, or the commencement of such work with the intent to complete the same.” Therefore the partial demolition does not appear to trigger review under Article 85. Please check with ISD to confirm that the partial demolition of the garage is exempt from Article 85 review.

25.17

The BLC requests that dated cornerstones be incorporated into all new construction. This element will allow those who are attentive to and value the architecture of the City to appreciate the historical context in which structures were conceived.

25.18

Noise

It will be important to assess in detail the potential sound effects of this project not only for project residents but for sensitive receptors in the surrounding areas. We suggest noise impact analyses for two scenarios for each phase, a daytime off-peak hour and a nighttime hour. At a minimum, the two scenarios should be: 1) hour of greatest increase over existing background monitored noise level; and 2) hour of highest combined total noise impact. If neither of these occurs during a nighttime hour, a nighttime hour should be added to assess sleep disturbance impact.

25.19

Project equipment noise levels should be compared to MassDEP sound level criteria and compare with total modeled combined noise impacts (equipment, idling buses, other site activity, and increased traffic) at nearby residential sensitive receptors to EPA and HUD day-night residential noise impact criteria.

25.20

Construction noise impact should be modeled and not be limited to a generic discussion of mitigation measures. Since the clean-up and construction periods will be extensive, the modeling could inform specific mitigation measures.

25.21

Shadow and Wind

The shadow diagrams in this PNF demonstrate the Proponent's efforts to depict the potential impacts of the project through the planned phases, a difficult task. Unfortunately, the size of the diagrams and compressed visuals are not useful in grasping the actual locations of expected new shadow and the existing conditions in which they will be cast.

It is important that shadow diagrams be sized to provide detail, including the following:

25.22

- a north arrow;
- boundaries of the study area;
- street names;
- the identification of doorways, bus stops, open space and areas where pedestrians are likely to congregate (e.g. in front of historic resources, at other tourist destinations, in parks or other areas used for active or passive recreation);
- clear delineation of shadow on both rooftops and facades; and
- clear distinctions between existing shadow and new shadow.

Diagrams should be oriented and of a scale consistent with diagrams depicting wind monitoring locations, for both the No Build and Build conditions.

Please note that of particular importance from an historic resources perspective, is the potential for shadow to create perpetual damp conditions that can harm historic structures over time.

We ask that the PNFs or DPIRs identify mitigation and the mitigated wind speeds if such areas are expected to have conditions inconsistent with a planned use or in the uncomfortable for

Operations and Maintenance

Project buildings include a collection plan and space for the storage of organic materials that will be removed from the solid waste stream.

We recommend the use of LEED for Existing Buildings: Operations and Maintenance (LEED EBOM) as a resource for institutionalizing sustainable building operations and maintenance best practices. An operations and training manual for staff and a green practices manual for residents can help to ensure efficient operations, reduce environmental impacts and serve as educational tools.

25.23

Construction

Each of the following aspects construction planning should be outlined in PNFs or DPIRs:

25.24

- staging area locations and management;
- marshaling area locations and management;
- anti-idling enforcement;
- noise control;
- dust control;

- diesel construction vehicle retrofits; and
- permitting for chemical cleaning and abrasive blasting.

Exemplary Green Performance

A considerably high level of performance can distinguish this project from others as a model for sustainability and green building across several realms. Exceeding Code minima, instituting new green measures based upon LEED EBOM and using various opportunities to market a green project are examples of exemplary performance.

Thank you for the opportunity to comment. We look forward to working with the Proponent as design progresses. Please let us know if you have questions or comments.

Sincerely,

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

Brian Swett
Chief of Environment and Energy