



Neighbors
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RE: Redevelopment of the Government Center Garage - Expanded Project Notification Form
WP-B1 Residential Tower & WP-B2 Office Building

Dear Mr. McGuire:

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 Expanded Project Notification Form (EPNF) dated November 16, 2015 for the Redevelopment of the Government Center Garage (the "Project") submitted by the HYM Investment Group, LLC on behalf of Bulfinch Congress Holdings, LLC (together, the "Proponent").

There is much support in Beacon Hill for a major transformation of the Government Center Garage. Given its critical downtown location, its potential for connecting neighborhoods and its function as a major transportation hub, the Government Center Garage Project can and should enhance the quality of life in the surrounding residential areas, further the public's enjoyment of the city's downtown, and promote broader economic growth.

Design Review Process

Fundamentally, we have concerns about the design review process. We find it difficult to assess the designs for these two towers without also assessing a design for any other proposed building on the remaining portion of the West Parcel site along Congress and New Sudbury Streets. The building-by-building review of the Project hampers a proper review of pedestrian and traffic conditions, as discussed below.

We are concerned that there are no elevations that adequately detail the interim conditions of the West Parcel during the period when the WP-B1 and WP-B2 towers have been constructed and most of the parking garage demolished. We would ask that more information and detailed elevations and plans be supplied that describe this interim condition at the corner of Congress and New Sudbury streets. Many of the Project's benefits relating to enhancement of at-grade public areas, including pedestrian safety and convenience, retail/dining opportunities, and MBTA passenger access and waiting, will come with the completion of Phases 3A and 3B of the Project, yet there appears to be no requirement, required schedule or commitment to build these two phases. We believe that the greatest impacts of the Project are associated with the office tower. Further, the financial benefits of the project to the Proponent will mainly accrue before commencement of Phases 3A and 3B. Additionally, it is unclear what the timeframe and the physical/operational conditions of the roads and sidewalks and access to the MBTA station and busway will be following deconstruction of the eastern portion of the garage and prior to construction of Phases 3A and 3B.

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The EPNF states that timeframes for future Phases will depend upon market conditions. The Proponent should provide information regarding the Project's plans for the East Parcel during and following deconstruction of the garage in the event that construction of Phases 3A and 3B does not commence immediately. At the same time, we ask that construction of Phases 3A and 3B be required to begin within a reasonably short time after removal of the garage.

Size, Scale and Density

A primary concern continues to be that the WP-B1 and WP-B2 towers in the West Parcel are of a size, scale and density that are inappropriate and burdensome for the Project's site. Please see our previous comment letters for specifics (comments on PNF, 7-9-2013; comments on DPIR 11-6-2013). We continue to believe that in order to realize public benefits, minimize impacts, and ensure the livability and viability of the downtown area for residents and visitors alike, the size, scale and density of the Project should be reduced. We agree with the determination by the Massachusetts Historical Commission (MHC) that the "size, scale and massing of the proposed new towers appear to be inappropriate for the surrounding area" (Brona Simon to Secretary Sullivan, 24 January 2014) and that the Project may have an "adverse effect" on three State Register listed historic districts adjacent to the Project site.

Although the office tower has been reduced in height from the 600 feet proposed in the PNF to 528 feet in the DPIR, it was disclosed by the Proponent at the December 2, 2015 public meeting on the EPNF that the proposed ellipsoid design, including a shield to cloak mechanicals on the roof, brings the height of the office tower back up to almost 600 feet. The exact height of the building, including the mechanicals shield, is not disclosed in the EPNF. It is not clear that shadow studies and other environmental impact assessments account for this additional height. We ask that the Proponent clarify that the height used to determine environmental impacts includes the additional 65' represented by the mechanicals shield or provide impact studies that reflect the maximum height of the building (including the 65' mechanicals shield).

Building Design

We applaud the proponent's interest in presenting an iconic design for the WP-B2 office tower and a more restrained "quieter" design for the WP-B1 residential tower, but we are concerned that the scale of both buildings overwhelms the benefits of their otherwise excellent designs. We believe that designs incorporating setbacks and/or reducing the height of the WP-B1 residential tower will have no adverse effect on the design's integrity. Stepping the building down toward Cambridge Street will have the additional benefit of positioning the tower in a manner that responds to the buildings and neighborhoods to the west of the parcel. For the WP-B2 office tower, we believe that a reduction in the building's height would have no impact on the design's integrity.

Pedestrian Experience

We are concerned about the pedestrian experience along New Sudbury Street and in the Bowker Street Pedestrian Connection. The EPNF delineates an 8' sidewalk in front of the residential lobby and retail space of the WP-B2 building. At the Boston Civic Design Commission meeting on December 8, 2015, the Proponent presented an alternative that includes a drop-off lane for the residential tower lobby. This drop off lane reduces the sidewalk width. This narrowed sidewalk coupled with incorporation of planters and trees and the provision of café seating in front of the retail space and opening doors will result in a congested pedestrian experience, especially at peak hours given the high volume of pedestrian traffic at weekday peak hours in a no-build condition. In addition, the proposed cantilever of the residential tower over the sidewalk will further restrict the pedestrian experience by blocking light and views of the sky. Opening up the sidewalk, by pulling the tower's cantilevered façade back from New Sudbury Street to a position flush with the ground floor space and widening the sidewalk in front of the residential lobby and retail space will ensure a positive pedestrian experience.

The Project's proposed improvements to the Bowker Street Pedestrian Connection are a welcome change to an inaccessible and neglected part of the area's streetscape. While we applaud the inclusion of accessibility ramps and landscaping, we are concerned about the condition between the Bowker Street garage entrance and the point at which the southern edge of the WP-B2 office building meets the existing garage. Under the current proposal, pedestrians travelling north on Bowker Street will descend the steps/ramps (approx. 80' wide), cross the garage

entrance, and squeeze onto an approx. 8' wide sidewalk on the east side of which will rise the ten-story façade of the parking garage. This 150' stretch of Bowker Street will serve as the "Back of House" for the WP-B2 office tower. We believe that the narrowing of the pedestrian access, the high façade of the parking garage, and the use of this space for loading, trash removal, etc., will produce an unattractive and possibly unsafe condition for pedestrians, particularly at night. The Bowker Street Pedestrian Connection will only work as an effective streetscape if efforts are made to mitigate this condition, through landscape, design, or programming that enlivens the streetscape.

Traffic Demands and Impacts

We question the usefulness of separate transportation studies determining the impact of each building in the Project rather than the Project as a whole. Only a comprehensive study determining the impact of the whole Project will properly analyze the impacts of the Project and the effects of removing a traffic lane on New Sudbury Street. At a minimum, the joint impacts of the WP-B1 and WP-B2 towers should be addressed now. We see from the EPNF that the expected impact of the office tower alone, with an anticipated addition of 1,484 daily vehicle trips, will cause the Cambridge Street/Bowdoin Street intersection to experience an average additional 27-second delay during afternoon peak hours and reduce the intersection condition to LOS F (Ex. 4.13). We question the use of the 1993 Central Artery Tunnel study to estimate only six truck deliveries per day to the office tower (p. 4-42). More mitigations are needed in addition to the proposed relocation of the New Chardon Street Garage Driveways to Bowker Street and the geometric, signal timing, and pavement marking improvements. The approach undertaken here is especially concerning given the lack of an updated, comprehensive traffic study by the City that includes an assessment of the cumulative impacts of background projects, as well as the planned replacement of the North Washington Street Bridge and reconfigurations of Rutherford Avenue and Sullivan Square.

Affordable Housing

We are pleased with the Proponent's commitment to onsite affordable housing within the Project and understand that 64 of the 486 units in the WP-B1 building will be designated as affordable housing. We ask that the Proponent make a commitment to a mix of studio, 1, 2, and 3 bedroom affordable units and that the affordable units be of the same design quality and character as the market-rate units. We ask that the EPNF include information about the proposed unit size, character, and location of the proposed 64 affordable housing units.

We thank you for the opportunity to submit these comments.

Sincerely,



Keeta Gilmore, Chair
Beacon Hill Civic Association

cc: Mayor Martin J. Walsh
State Representative Jay Livingstone
State Representative Aaron M. Michlewitz
Council President William Linehan
Councilor Michael Flaherty
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