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February 17, 2017

Phil Cohen, Project Manager
Boston Planning and Development Agency
1 City Hall Square
Boston, MA 02201

Re: 1000 Boylston St. Project Notification Form

Dear Mr. Cohen:

We have reviewed plans for the proposed development at 1000 Boylston Street, and are pleased to submit these comments. The Friends of the Public Garden has worked in partnership with the City since 1970 to preserve and enhance the Boston Common, Public Garden, and Commonwealth Avenue Mall. While we support the goals of eliminating a hole in the urban fabric caused by the turnpike, linking neighborhoods, and activating Boylston Street, we have a number of concerns about the project as currently proposed.

The proposed project is within the Huntington Avenue/Prudential Area and is subject to Boston Zoning Code Article 41-16, *Planned Development Area: General Design and Environmental Impact Standards*. The Shadow criteria established in this Article states that a project should be designed to "assure that it does not cast shadows for more than 2 hours from 8:00 a.m. through 2:30 p.m. on any day from March 21 through September 21 in any calendar year on any portion of dedicated public parkland." New shadows exempted are those cast on structures existing as of 5/9/1996 (effective date of this zoning code section) or cast by an as-of-right building, whichever is greater.

After reviewing the PNF, the Friends finds that the shadow analysis provided in Chapter 5.3 is inadequate. The PNF provides data for only one day during the period of March 21 to September 21 and therefore fails to meet the requirements of the zoning code to demonstrate shadow impacts on ANY day within that period. The project proponent should be required to provide a shadow analysis in the Draft Project Impact Report that shows new shadows every day between March 21 and September 21 for the hours between 8 a.m. and 2:30 p.m. In addition to the graphic showing the extent of the shadows on the neighborhood receptors, the proponent should also present the Shadow Overlap Study for

each day so that the reviewer can determine the duration of shadows. In addition to shadows cast by existing structures, the graphics should also include shadows cast by an as-of-right building.

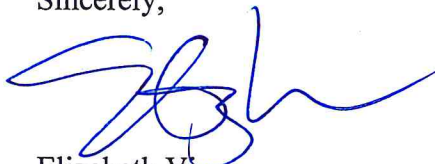
The data provided in Chapter 5.3 shows that the shadows cast by the proposed project will impact the Commonwealth Avenue Mall, public parkland. This is of great concern for us. We ask that the DPIR explains in detail what design measures need to be taken to “assure” that the project does not cast shadows for more than 2 hours from March 21 to September 21 during the hours of 8 a.m. to 2:30 p.m. should the day by day analysis indicates shadows of that duration. We would also urge that as the process continues, the buildings can be modified and reduced in scale to limit shadow impacts on the Mall.

Another great concern is the enormous amount of planning and community engagement that went into the Civic Vision for Turnpike Air Rights in Boston. The original proposal for this site was one tower 398’ high. This proposal is much larger, requiring, in the words of the PNF “density of development to mitigate cost premiums.”

We would expect that the Article 80 process can result in a development solution that realizes a return on investment and creates a development that has value for the community while being well integrated into its surroundings and causing no adverse impact to the Commonwealth Avenue Mall.

Thank you for your consideration of our comments.

Sincerely,



Elizabeth Vizza
Executive Director

Cc: Brian Golden, Director, Boston Planning and Development Agency
Senator William Brownsberger
Neighborhood Association of the Back Bay
Representative Byron Rushing