Mr. Phil Cohen, Project Manager

Boston Planning and Development Agency

1 City Hall Square

Boston, MA 02201

Subject: 1000 Boylston Street

Dear Mr. Cohen:

Thank you for the opportunity to comment on the Project Notification Form for 1000 Boylston St. This project is strategically located in the Back Bay close to the Fenway neighborhood. The foreseeable durable consequences of new large structures built on this site for these neighborhoods, and even further in some respects, are substantial. They include undesirable and harmful effects as well as claims of desirable and beneficial outcomes.

At this stage it is very dubious whether the potentially positive outweigh the potentially negative impacts of this project. Equally if not more important there are, as outlined below, feasible alternatives that would deliver a better outcome for the City and the neighborhood in preserving the best of the present while delivering highly desirable improvements to the sites involved as well as enhancing the quality of life experiences of residents, commuters, and visitors.

In this letter I would like to offer a few comments and observations about matters that must be carefully assessed and alternative ideas that should be considered before a decision is taken on whether this project should be approved in essentially its current configuration or replaced by an alternative, significantly different concept.

QUESTIONS TO BE ADDRESSED

There is a clear benefit from covering the hole in the streetscape created by the Massachusetts Turnpike and the CSX tracks. However, under the current proposal this benefit will only be achieved at a very and arguably unjustifiably high price, given the project’s shadow, wind, and traffic effects, among other impacts not discussed here.

*Shadows*

Shadow impacts that stretch to the Commonwealth Avenue Mall and beyond (even to the Esplanade) for extended periods can cause a significant loss of the already very limited wintertime sunlight in the residential district, and even more so on Boylston and Newbury Streets. These shadows will diminish the attractiveness of the public spaces of the Mall and the Esplanade that are used year round by residents and visitors and are one of Boston’s well known attractions. These valuable and scarce spaces are supported and partly maintained by private donations and the efforts of many volunteers. Any impairment they may suffer that would be solely attributable to a new development of high end residential housing units and retail space, in a location that already has an abundance and diversity of such space, would raise serious misgivings about the vision and priorities underlying, or the criteria used by the City in the evaluation of specific development proposals. Accepting these impairments would raise serious doubts about whether the interests of all those who live and work in the neighborhood are being weighed appropriately and fairly together with interests that are directly tied to and hence in favor of this proposed development.

*Wind*

Wind impacts of a building so close to Boylston Street can be disruptive in ways that sometimes are not evident from the wind tunnel projections. For example, the wind impacts across Boylston Street from the Mandarin Oriental have been more negative than was anticipated when that project went through the public review process. For this reason, it would be extremely helpful if the consultant who developed the wind data (and has done so for virtually all recent major Boston projects) would furnish estimates of the margins of error in their projections.

*Traffic*

While incremental traffic generated by the proposed 1000 Boylston Street project may be quite small, recent data generated for the DPIR for the Back Bay South End Gateway project currently undergoing review raises great concern about the continued functionality of the Massachusetts Turnpike exit onto Stuart Street at both morning and evening peaks in 2023 even without the construction of that project. Delays will more than triple from current levels and the lengths of queues will be vastly extended. If these forecasts are reasonably close to accurate[[1]](#footnote-1), they indicate that the only direct access from the Turnpike to the Back Bay, already rated as failing, will break down during rush hours. Queuing theory tells us that there is a tipping point at which a system breaks down with only a small increase in the load (or in this case the traffic) it has to handle. So it is valid to question whether a specific development, even one with small incremental traffic impact, may preclude any further development in an area (in this case Back Bay, South End, Bay Village) absent a fundamental change in travel practices and patterns which is not envisaged in the context of the project.

ALTERNATIVE SOLUTIONS

The developer has stated that the size and massing of this project is a response to the CAC’s suggestion of 2012 that the Prudential parcel be included and the hole be completely covered, since the costs of building on air rights sites are so high that only a project of this magnitude is viable. I cannot comment on the cost side since relevant financial information has not been disclosed. However, the CAC’s letter or suggestion also referred to a “low rise structure.” This project is not a “low rise structure,” and therefore cannot legitimately be characterized as a response to the CAC’s suggestion. It is at most a partially compliant, which also means a partially noncompliant proposal.

In light of major objections to the height and massing of this project as outlined above, because of their durable harmful impacts, alternative structures in both size and purpose that avoid these detriments should be pursued that will be fully compliant or as close as possible in letter and completely in spirit to the CAC’s suggestion. Further analyses are needed to produce specific details for the ideas sketched out as follows, and moreover other commenters may produce additional ideas I have not identified at this stage.

Two possibilities with different implications for costs are:

* Build structures of an acceptable size adjacent to the hole, with improvements to the surroundings of the hole itself, such as a circumferential wall;
* Establish a pocket or mini-park on a deck over the hole, again with structures of an acceptable size in the adjoining parcels.

The second alternative will require additional ventilation. There are many examples of mini- or pocket parks in cities throughout the US and abroad that can be used as models for this alternative, and technologies have been developed to make them practical and attractive even on air rights sites.

Both the BPDA and MassDOT could and should play valuable roles in pursuing the realization of the idea of a mini-park on the Prudential parcel site, whether by the current designated developer or by another organization selected after a new RFP.

**In short, radically different alternatives should be evaluated and compared to the current proposal and any of its modifications that do not fundamentally alter its configuration in terms of height, massing, and number of towers.**

CONCLUDING REMARKS

There is considerable public awareness and concern about the future of public spaces in the City of Boston. As noted above they are enjoyed by many residents, workers and visitors year round. Moreover they generate substantial value to the economy of the city and sustain the value of its properties. These observations are confirmed by a recent article about another “treasured asset,” “*Could the state pull the* *plug on Greenway Funding?*”[[2]](#footnote-2)

It would send a strong unwelcome and confusing signal about the City’s priorities if despite evident harm to the public interest a project such as 1000 Boylston Street in its current form were to be approved. It would indicate that foreseeable significant and durable adverse consequences for two “treasured assets” and multiple locations in a neighborhood were outweighed by a development primarily involving additional high end residential housing units targeted at the few.

Very truly yours,



Martyn Roetter

1. I understand that these data are not claimed to be accurate but the margin of error has not been estimated [↑](#footnote-ref-1)
2. <http://www.bostonglobe.com/metro/2017/03/02/could-state-pull-plug-greenway-funding/73SwMZQ1EsBUiSHiS2hpWI/story.html?s_campaign=email_BG_TodaysHeadline&s_campaign>= [↑](#footnote-ref-2)