Susan D. Prindle

Boston, MA 02116

February 20, 2017

Phil Cohen, Project Manager

Boston Planning and Development Agency

1 City Hall Square

Boston, MA 02201

Re: 1000 Boylston St.

Dear Mr. Cohen:

As I have indicated at several public meetings, I have grave concerns about the appropriateness of the new proposal for 1000 Boylston St. While I am sympathetic to the need to rebuild the corner of Massachusetts Avenue and Boylston Street, I am concerned that the price of that improvement is at this point far too high. I am hopeful that through the Article 80 process a solution that is more compatible with the Boylston Street and the abutting Architectural District can be achieved. As part of that process, I would like to raise some questions that I feel need further study.

**Compatibility with A Civic Vision for Turnpike Air Rights in Boston**

While there has been an effort to respect the recommendations of the Civic Vision, the project falls short in many areas. The developer should be asked to explain how he plans to address the goals expressed in this document, specifically:

**Scale and Massing: Tower height**

1. “Only one taller building (15+ stories) is to be located on these parcels; all additional buildings should be less than 15 stories.” (p. 71)

“Only one taller building above 15 stories should be allowed on either Parcel 12 or Parcel 15. No other building on these parcels should exceed 14 stories… 49 stories is substantially higher than what should be the maximum allowable of the taller building constructed on these parcels.” (p.72)

*The current proposal adds a second tower where only one (of 378’) had been proposed. Both towers are taller than anticipated in the Civic Vision – 566’ and 301’, respectively.*

**Scale and massing: Street wall and setback**

1. “Buildings facing directly onto Massachusetts Avenue and Boylston Street should reinforce the existing visual vitality and diversity of these streets. Appropriate street wall heights in these areas generally range between four and six stories (50-75’). (p. 71)
2. “Reflect the prevailing scale and character of nearby buildings—including traditional rhythm created by a variety of building widths (25-100’) building bays (16-25’) and variety of design details. (p. 72)

*The current proposal presents a street wall that extends beyond the Hynes Auditorium setback, rises to 99’, and offers little articulation above the retail floors.*

1. “To reinforce the visual integrity of these street walls and maintain an appropriate scale relationship to other nearby buildings, additional massing above this base should be set back at least one building bay (approximately 20’) from the building’s street wall. (p. 72)

*The east tower, because it is set back only 8’ and is oriented east-west, is in direct conflict with this guideline. The taller tower, although set back more above the 8th floor, leans closer to Boylston Street as it rises.*

**Uses**

5. “Parking should not face directly onto Massachusetts Avenue or Boylston Street at any level” (p. 68) *Four floors of parking dominate the Boylston Street frontage.*

1. “A diverse mix of independent businesses should predominate, rather than large chain businesses.” (p. 68) *The retail mix is unclear.*
2. “Parking ratios for these parcels are: residential .75 to 1 space per unit. Retail none if possible. Target more than 30% transit use, less than 30% auto use... reflect detailed inventory of all public spaces within walking distance and their availability. Allocate a portion of new parking for use by the community. Include other major traffic generators in study.” (p. 69) *The developer is seeking over 300 parking spaces for the condominium and the apartment building*.

8. “A minimum of 24’ (sidewalk width) is suggested, animated with outdoor dining or other activities.” (p. 71) *The sidewalk width on Boylston Street is 18’.*

**Environment**

1. “There must be minimal adverse transportation, shadow, wind and other environmental impacts, as determined by environmental studies, on the residential portions of the Back Bay, Fenway, and Kenmore Square, and such impacts must be mitigated to the greatest extent possible. Shadow impacts shall include the impacts on the tops and sides of buildings.” (p. 72) *More thorough studies of shadow and transportation impacts are needed. Wind studies are not yet available.*

The revised proposal that the developer put forth in March of 2012 was much more respectful of the recommendations of the Civic Vision. The 2012 proposal states clearly on page 8 that there will be a single tower: “The tower will have elegantly slender proportions and be primarily oriented north-south to minimize its visual and shading impact on the pedestrian experience along Boylston Street…Our building will occupy the entire site footprint along St. Cecilia Street, from Boylston Street to Scotia Street. We will maintain a 20 foot sidewalk on Boylston Street…” The current proposal is nearly 50% larger than the one that was previously reviewed. The developer should be required to study the 2012 option as well as the current “preferred option.” Studies should include the wind, shadow, and traffic impacts of both proposals, so that the BPDA, the CAC, and the public can evaluate the relative costs and benefits of the two proposals.

**Urban Design Issues**

On page 2-2 of the PNF, the developer states that “This east-west zone, along the southern edge of the Back Bay, is part of what has become known as the “High Spine.” This zone is characterized by a continuous urban edge and a number of buildings over 250’ in height, including but not limited to the two Hancock Towers, the Prudential Tower, and 111 Huntington Avenue.” The High Spine in fact runs from Stuart Street through the Prudential Center, not down Boylston Street. The Hancock Towers front on Stuart Street, the Prudential Tower is in the center of its site, set back significantly from both Boylston and Huntington, and 111 Huntington fronts on Huntington Avenue. The residential buildings in the Prudential Center are also carefully buffered by low-rise structures on north and south, as is the more recent Exeter Tower building. Newer high-rise buildings on Boylston Street are set back from the street edge to allow sunlight on Boylston and Newbury Streets (500 Boylston is set back 125’, 888 Boylston 75’). The developer should explain why he cannot comply with this precedent; specifically, why it is not possible to use more of the air rights over Scotia Street to address this concern.

The developer should justify the fact that the front façade of the podium extends into the Boylston Street sidewalk further than the façade of the Hynes Auditorium.

Additional perspectives from nearby historic properties should be shown. Specifically, I would like to see perspectives from the north side of the Commonwealth Avenue Mall on the Hereford-Massachusetts Avenue block, the Saint Cecilia Church, the Boston Architectural College on Boylston Street, the Ayers Mansion, the Massachusetts Historical Society, Fenway Studios, and the northeast corner of Massachusetts Avenue and Boylston Streets. These perspectives should be shown without the proposed Berklee Tower building.

**Environmental Protection Issues**

**Wind**

The Huntington Avenue/Prudential zoning (41.16) establishes standards for pedestrian safety and comfort in Table A: “Buildings shall be designed to avoid excessive and uncomfortable downdrafts on pedestrians. Each Proposed Project shall be shaped, or other wind-baffling measures shall be adopted, so that the Proposed Project will not cause ground-level ambient wind speeds to exceed the standards in Table A of this section.” Will the project comply with these standards?

Will the developer commit to a followup verification study that will be shared with the City and the neighborhood?

Does the twisting design of the tower have an effect on pedestrian level winds? How much?

My experience has been that increased building height increases pedestrian level wind speeds on the north-south streets of the residential district. I would like to see the wind studies include more points to the north of the project; specifically Hereford and Beacon, Hereford and Commonwealth, Commonwealth and Massachusetts Avenue, and Beacon and Massachusetts Avenue.

**Shadow**

The developer has admitted that the majority of the shadow impact will be concentrated to the north of the building on Boylston and Newbury and in the Back Bay residential district. He predicts 3-4 hours of new shadow on Boylston, 2 on Newbury and Mass Ave, 1 in the residential district. What measures will they take to minimize these impacts?

The shadow criteria in article 41-16 states that “Each Proposed Project shall be arranged and designed in a way to assure that it does not cast shadows for more than two 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 that either (a) is not cast in shadow during such period on such days by structures existing as of the effective date of this article or (b) would not be cast in shadow during such period on such days by structures built to the as-of-right limits allowed by this article, whichever structures cast the greater shadow. In addition, shadow studies shall be conducted in connection with any Proposed Project demonstrating that shadows will be minimized to the extent practicable in public open spaces created as part of the Proposed Project.” Will this project comply with this standard at all locations?

I am particularly concerned about impacts on the Commonwealth Avenue Mall. A more detailed analysis of shadows on the Mall should be required, including the number of days and the number of hours each day it will be shadowed. Several points should be studied – the eastern and western ends of the shadow area, as well as the center point. The shadows for projects not yet approved should not be included in the study, and it should be clearly explained (graphically or verbally) which tower is causing which shadow.

**Historic Resources**

Page 7-8 states that the “project is not expected to introduce materials that are incompatible with the current streetscape and skyline, as visible from these properties.” Graphic evidence should be produced to support this statement.

Page 7-9 states: “All shadow impacts have been minimized to the maximum extent practicable to avoid any noticeable effect on pedestrian use patterns and historic resources. Most new shadows will be concentrated to the north; therefore, proposed shadow impacts to historic properties are limited to the Back Bay National Register and Architectural Districts. Generally, the contributing buildings located directly across Boylston Street from the project site would receive approximately 3-4 hours daily of new shadows throughout the year. The majority of shadow impacts to the district would be limited to one additional hour of new shadows daily, with some buildings on Newbury Street and Massachusetts Avenue projected to have two additional hours. The extent of the one-hour shadow impacts increases northward as the year progresses.” (p. 7-8) The developer should show evidence supporting these statements. Elevations showing the shadow impacts on the facades of Boylston and Newbury Streets should be included in the DPIR.

**Transportation and Parking**

The garage capacity exceeds the recommendations of the Huntington Avenue/Prudential zoning, which recommends .7 parking spaces per unit. The Fenway Urban renewal plan recommends .75 parking spaces per unit. The developer should explain why exceeding these standards is necessary.

The developer should study the possibility of screening the four floors of parking along Boylston Street with retail or other uses. A night-time elevation should be prepared to assess the impact of lighting from the garage and the retail establishments on the Boylston streetscape.

The traffic counts and mode splits should include trips to the proposed 160 seat restaurant, which may impact evening peak hour traffic.

The developer assumes that 18-26% of the new vehicle trips will utilize Storrow Drive. As the Berkeley Street entrance to Storrow is already failing, a study should be made of the Berkeley/Beacon and Charlesgate/Beacon access points to see if additional cars can be accommodated and whether additional traffic will exceed EPA standards.

The developer should be asked to explain the impact on air quality of covering the Turnpike in this area. Will additional fans or vent stacks be required and if so, where will they be located?

Thank you for the opportunity to comment.

Sincerely,

Susan D. Prindle

Cc:

Senator Will Brownsberger,

Representative Jay Livingston,

Representative Byron Rushing

Councilor Josh Zakim,

Councilor Bill Linehan

David Carlson, Deputy Director for Urban Design, Boston Planning and Development Agency

Greg Galer, Boston Preservation Alliance,

Bob Sloane, Walk Boston