



March 17, 2017

Brian Golden, Director
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201

RE: 1000 Boylston Street Project Notification Form (PNF)

Dear Brian:

In the seventeen years since the City of Boston issued the Civic Vision for Air Rights Development, not one project has been successful working through the Article 80 process and gone on to actual development. The Back Bay Association has had the tremendous benefit of serving on various CACs and IAGs for Air Rights Parcels, including the Columbus Center, Fenway Center, The Viola Back Bay, and the Copley Tower. Throughout all of these lengthy public processes, the community was concerned about “height” and “density.” The City of Boston spent three years fully vetting the “Civic Vision,” yet, alas, nothing has been built using this planning document. The project that preceded the planning process, the Millennium Tower (also called Boylston Square), proposed a 52 story project on Parcels 12-15, and was not supported by the community. In a Northeastern University study published in 2013, the failure of Air Rights development in Boston was ascribed to three top issues: 1. The Community, 2. Technical Issues, 3. Financial Issues.

Today, more than 20 years after Millennium Partners proposed a 52-story project for Air Rights, we review 1000 Boylston Street, which proposes building a 40-story building with a 23-story building to fill in the long-neglected Prudential Air Rights parcel...yet many in the public process believe that, too, is too tall and dense for the area.

The Back Bay Association has long sought to make the important case that the City of Boston created dramatic zoning limitations for the neighborhoods of Back Bay, Beacon Hill, the South End and Fenway. Parks along the Emerald Necklace benefit from a variety of protections. Yet, the City of Boston must continue to grow. More recently, planners have embraced the critically important issues related to climate change, and have established criteria establishing “smart growth” elements, including the following 10 principles to guide smart growth strategies suggested by the pre-Trump Environmental Protection Agency: Principles to Guide Smart Growth Strategies:

- Mix land uses.
- Take advantage of compact building design.
- Create a range of housing opportunities and choices.
- Create walkable neighborhoods.
- Foster distinctive, attractive communities with a strong sense of place.
- Preserve open space, farmland, natural beauty, and critical environmental areas.
- Strengthen and direct development towards existing communities.
- Provide a variety of transportation choices.
- Make development decisions predictable, fair, and cost effective.
- Encourage community and stakeholder collaboration in development decisions



We also know that development in the City of Boston is extraordinarily expensive, challenging, and in great demand. Recently buildings have been constructed to maximize the rare development opportunity in our urban core, also yielding the benefits of Smart Growth. The Millennium Tower in Downtown Crossing is 60-stories, the Carpenter and Company tower is 61-stories. Numerous approved projects include the Bullfinch Crossing Office tower, 43-stories, the South Station tower, 51 stories, and proposed buildings, such as One Bromfield, 59-stories and Winthrop Square at 55-stories.

At 40-stories for an Air Rights project, one might ask, why is this project not taller?

It is with this in mind that, on behalf of the Back Bay Association, I am writing to express our support for the 1000 Boylston Street Article 80 Project Notification Form (PNF) design proposed by Weiner Ventures, LLC, and to encourage the BPDA to proceed with the Article 80 process for the development into the next phase (DPIR). The PNF provides a clear vision for Parcel 15+Pru Parcel, that seeks to dramatically improve a vacant and neglected part of Back Bay. The size in height and bulk of the project is in line with the neighboring Prudential and Sheraton/Convention Center developments, not to mention One Dalton and 30 Dalton. Many elements of the project meet the goals of the Civic Vision for Turnpike Air Rights prepared by the BPDA and Turnpike Authority (Department of Transportation) and finalized in 2000, but since no projects have been successfully completed based on the Vision, 1000 Boylston Street incorporates critical elements that propel it from a “vision” to a feasible “vision.” Also, by following the Urban Spine concept for developing underutilized turnpike air rights this project strikes the right balance with a mean height that is compatible with the much taller buildings along the center “spine” along Boylston Street, with lower height, historically protected buildings in the nearby residential districts.

This project is the result of over 20 years of civic and community engagement and represents the best of what a modern youthful Boston should be. This transit oriented project will bring significant housing in the form of home ownership and rental to one of Boston’s most desirable neighborhoods. Given this projects access to public transit and its walkability, the height and density is justified as part of the urban environment of the Back Bay and is line with the city’s Go Boston’s 2030 Transportation Plan.

This development will repair the damage and disconnect to the neighborhood that was created when the Turnpike expansion cut this area off from the vibrant Massachusetts Avenue corridor and the bustling Boylston and Newbury Street districts. In addition, the project improves on the public realm by providing new retail & restaurant amenities, the addition off street parking, the covering a noisy section of the Mass Turnpike, and the cleanup of a neglected and long ignored corner of Back Bay.

The Back Bay Association strongly believes that the City of Boston must provide tremendous support and leverage in order to successfully orchestrate a public process that results in successful Air Rights projects. We know from the very few air rights projects that were successfully constructed in the 1960’s and 1970’s, The Prudential Center and Copley Place, how critically important air rights projects can be to the City. In fact, we have grown so used to the way these projects knit-together our City that we don’t consider them “air rights” any more.



Some in the public process have suggested that the Prudential air rights parcel either be left uncovered, or covered into a park. It is our understanding that Prudential must maintain ownership of the site in order to maintain the name of the “Prudential Center” of the “Prudential Center.” I would find it highly unlikely that this private company would build and donate an air rights park to Boston. I believe the inclusion of rental housing on this site is the best possible location and use. The CAC/IAG felt that the filling in of this street corner should be a priority, and the Back Bay Association strongly agrees. The building will fit in well with other residential rental towers in the Back Bay, including the Exeter Tower at 28-stories, and the three AvalonBay towers at the Pru, 26-stories; “The Point” in Fenway is 30-stories. The proposed apartment building at 23-stories seems the exact right massing as we seek to develop this long-neglected part of Back Bay.

I urge you and the BPDA Board to fast-track this project to the DPIR phase, and approve it with all of the density and height that Weiner Ventures is proposing. By covering a portion of the turnpike and allowing Parcel 15+ Pru Parcel to be woven back into the fabric of the Back Bay we will on the right path to revitalizing a dead zone in Back Bay and helping to realize the vision of a vibrant urban spine.

What is now a windswept view down to a graffiti filled pit, will one day provide homes for people to live in, stores for people to shop in, a restaurant for people to dine in. Imagine that!

Sincerely,

Meg Mainzer-Cohen
President
Back Bay Association