March 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 (PNF) Additional Comments

Dear Mr. Cohen:

Members of NABB have attended several meetings about this project and have reviewed key project documents. While we are sympathetic to the need to rebuild the corner of Massachusetts Avenue and Boylston Street, we continue to have grave misgivings about the appropriateness of this new proposal for 1000 Boylston St. as outlined in our March 7, 2017 comments on the PNF.

This letter identifies additional questions and requests for further clarification and specificity on critical topics that we feel need considerable further study and explanation. We continue to seek responses to our previous comments.

A.  Urban Design and Consistency with the Civic Vision (NABB letter pages 1 & 2)

NABB requests that Proponent include additional view corridor impacts drawings, particularly the Boylston Street corridor, Massachusetts Avenue corridor, as well as, Belvidere Street from St. Cecilia Parish, including:

         A perspective showing both sides of Boylston Street looking east from Mass Ave down the center of Boylston St., to Arlington St. showing in particular the setback of the towers. The view should include the north and south sides of the street.

         Views from the following locations looking to the project with full height buildings (do not cut the tops of the buildings off): looking north on Dalton from in front of the Hilton, and south on Dalton from Boylston St.

         Northeast corner of Hereford and Boylston, showing the relationship of the Fire Station and the project

         Three locations (each end and middle) on north side of Newbury Street between Herefordand Mass Ave

         North side of Boylston on the approximate lot line between the fire station and the former police station (now the architectural college). Since the Massachusetts Historical Commission called out these buildings as important, this view will show why.

         The Proponent asserts that the proposed podium aligns with the front of the Hynes Auditorium, both vertically and horizontally.  The BPDA should require documentation verifying this assertion.

B. Environmental Impact (NABB letter page 2)

This project will remove the St. Cecilia Park from the community. This area has many people, too many for the dearth of open space. Please show how a public pedestrian-level park could be provided using the Prudential air rights parcel and/or Parcel 15.

Wind – what can this project learn from the Berklee dorm project wind tests, the Christian Science Center wind tests? Include a qualitative explanation in the DPIR.  Testing now could correlate the study with actual built conditions. Request start monitoring wind now.

         The location of any sensor point with a wind increase, should be studied further, even if it is below “Dangerous,” because we feel many dangerous locations exist now that may not be evident in the wind tunnel test results.

         What will the wind be like on the top floor? On top of the podium, on the PrudentialCenter site?

         Include points at the entries to the T station,

-       All bus stops within 300 feet radius,

-       Each corner of each intersection north along Massachusetts Ave, south from the site to the River and from the site to Huntington Ave.

-       Each doorway and intersection east on Boylston to Dartmouth, for example 888 Boylston

-       Each corner and intersection on Hereford to the river

-       Each corner and intersection on Dalton to the Christian Science Center

Shadow/Sunlight –

         The project submitted in the Draft Project Impact Report should show no shadow on any public open space specifically:

-       The Dartmouth Street Mall

-       The Commonwealth Avenue Mall

-       The Boston Public Library, including the Courtyard or interior spaces

-       The Esplanade or the Charles River

         The historic buildings in the Back Bay, homes, institutions, businesses, fire station, etc. will suffer when in shadow. Shadows should be avoided by the shape of the building. Darkening the Comm. Ave. Mall, Esplanade, the Fens and other parks is a negative impact on a historic park that should be avoided.

         The shadow studies included in the Project Notification Form PNF give a general indication of the shadow impacts. We seek additional studies in the Draft Project Impact Report to fully explain the shadow impacts, including very detailed studies to show all shadow impacts.

-       It is important to understand for how many days in a year there will be shadows at the locations studied attributable to the 1000 Boylston St. project that have or exceed specified durations, e.g. 15, 30 and 45 minutes, I hour, 2 hours etc,

-       The information provided should accurately reflect all of the impact of shadows cast by the proposed building regardless of what they cover: the ground, the walls of historic buildings, and building roofs so individuals can make decisions about what is important. As the Mass Historic Commission letter to MEPA pointed out, the Back Bay neighborhood is a historic resource.

-         The shadows from each building in the project should be identified on the plan by using contrasting colors, so that a determination can be made as to which tower is casting which shadow. We note that the height in a shadow study is not the “zoning height”.  It is the actual height, including all mechanical structures. The developer should be clear that he is using the correct height in his calculations.

-        The study should be replicable. The source media file should be provided.

C.      Review of Alternative Reduced-Build Structures (NABB letter page 3)

If the Proponent continues to pursue two towers and the increased density on this site, we believe they are obligated to share financial information, particularly to show evidence of the increased expenses used to justify the additional height and volume of the new proposal. These costs should be compared to the costs of a reduced-build proposal that screens or otherwise masks the Prudential parcel without building a structure on it.

D.     Transportation and Parking (NABB letter page 4)

Vehicular Traffic – In addition to the usual times for which modes of traffic are studied, traffic on weekends, and Red Sox game times, as well as in times of emergencies at the fire station on Boylston should be studied.

         Pedestrian flows deserve as much planning and mitigation as the vehicular and cycle traffic. A separate pedestrian analysis section should be included in the DPIR.

         Bicycle traffic and safety is notably important given the worry already raised concerning the valet parking arrangement proposed on Boylston St.  For this and other questions, it would be extremely helpful to understand the mix and routes planned for each type of vehicle traveling in and around the site.

         Show the circulation of all vehicular traffic – private automobiles, taxis, delivery, fire and safety vehicles, etc.

         We request peak hour analyses (morning and afternoon, Red Sox game days, and normal days) for the Green Line

         Back Bay and other neighborhoods have for years advocated for an eastbound ramp to the Turnpike.  Does the amount of air rights construction anticipated over the next several years open the door to a feasible way of doing that?

         We urge the Proponent and the BPDA to correlate the findings for this project with the City traffic overall and with anticipated additional development projects, such as Christian Science and Stuart Street, including the Back Bay Station.

         Study the additional intersections of Commonwealth and Berkeley, and Stuart and Huntington

         The current access requires entering and exiting on a bridge on a very congested street. Alternatives should be investigated.

         NABB believes that the Garage is far too large. The garage should be sized to encouraging transit use, not automobiles with Zipcar, bike parking spaces encouraged. A similar transit oriented development project uses a ratio of .4.

E.      Affordable Housing Options (NABB letter page 5)

         At the earliest point in the process, the developer should be specific about how they propose to meet the affordable housing obligation of this project, so that the neighborhoods can comment on this important aspect of the project.

F.      Other

         NABB requests that the CAC be notified immediately in the event the Proponent, BPDA, City of Boston, MassDOT, the Turnpike Authority or any other state or municipal agency learns that any legislation is being promoted that would change the ownership rights of Parcel 15 from a 99-year lease.

         More than many projects, this is a Public-Private Venture. Many of the assets necessary to accomplish the project are assets owned by the public, such as the air rights, the underlying zoning space, sidewalk, and Cambria Street. Please provide detailed information on any public funding required (or to be sought) making the project possible, such as the transfer of a public street to either the MassDOT or the developer.

         NABB's March 7th letter mentions the importance of the Civic Vision guidelines. The Civic Vision has been called “dated”, but it is an actual plan developed through a formal Planning process and adopted by the community and the City. It is the current plan for the site, along with the underlying zoning. The guidelines articulate an important vision for the community.

         On the other hand the "high spine" has been mentioned at public meetings (for this and many other projects in the Back Bay). “High spine” is a term that may be erroneously attributed to a Kevin Lynch napkin sketch in the 1950's. The “High Spine” concept has never been developed or formally adopted. Nor should it. This is hardly a plan, and the use of this term is irrelevant today.

Thank you for the opportunity to comment.

Sincerely,

*Vicki C. Smith*

Vicki C. Smith, Chair

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