



Citizens' Advisory Committee
for
MassDOT Turnpike Parcels 12-15
in its capacity as
1000 Boylston Street Impact Advisory Group

Appointed

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Valerie Hunt
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William Brownsberger
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Byron Rushing
Representative
Jay Livingstone
Representative
William Linehan
City Councilor
Josh Zakim
City Councilor

March 17, 2017

By Email

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

Re: Comments relating to 1000 Boylston Street Scoping Determination

Dear Mr. Golden:

Introduction

The 1000 Boylston Street Impact Advisory Group ("IAG") has reviewed the Project Notification Form ("PNF") submitted by ADG Scotia II LLC c/o Weiner Ventures LLC (the "Proponent") for the project proposed to be located at 1000 Boylston Street (the "Project"). The Impact Advisory Group met with the Proponents on February 14th, 2017 (the "February IAG Meeting") and March 7, 2017 (the "March IAG Meeting") to review the PNF. IAG members and the constituencies they represent have a variety of opinions, questions, and concerns related to the Project, but the goal of this letter is to assist the Boston Planning and Development Agency ("BPDA") in making its scoping determination detailing which Project impacts require more detailed study in the forthcoming Project Impact Report ("PIR"). This comment letter reflects the collected comments of the IAG members and the constituencies they represent. Where significant disagreements or multiple viewpoints exist among IAG members, those are noted.

Urban Design / Project Development – Chapters 1 & 2

The Project has changed considerably from that which was originally proposed and presented to the IAG when it sat as the Community Advisory Committee (CAC) for the Air Rights Parcels 12-15. There have been changes to the height, massing, uses, footprint, and even the development team. The original concept, as updated by the Proponent prior to the CAC's recommended designation (the "2012 Proposal"), was to be a joint venture of the Weiner team and the Samuels team. The parties have since divided responsibility, with Samuels taking the lead on Parcel 12 and Weiner taking the lead on Parcel 15.

Height, Size, and Massing

Compared to current proposal, the 2012 Proposal was significantly shorter (398') and smaller (465,000 gfa); included fewer parking space (240); and included both hotel and residential uses within its single tower. The current version of the Project is taller (566' and larger (689,000 gfa); includes more parking spaces (303); eliminates the hotel component in favor of residential apartments and condominiums; and adds a second tower. The gross floor area provided by the Proponent in Table 1-1 of the PNF is difficult to compare to the 2012 Proposal, because the 2012 Proposal included parking within the GFA of approximately 465,000 sf. Table 1-1 does not include any square footage for parking. Since the project shows four floors of parking at nearly the entire site footprint, we can estimate that we have roughly 160,000 square feet of parking (Four floors times 40,000 GSF). That yields a total project size of 849,000 GSF, and a project that is approximately 82% larger than the 2012 Proposal.

Table 1-1 of the PNF is similarly unclear about the height of the Project, making an apples-to-apples comparison difficult. For example, Table 1-1 lists the top of the highest occupiable floor at 566', with mechanicals reaching another 20' for a total of 586'. This height is measured from 'average grade' between Boylston / Dalton / St. Cecilia / Scotia and Cambria Streets. As the grade change is significant, the building would appear significantly taller than the average height from some abutting streets. In addition, the Proponent represented at the March IAG Meeting that there is an additional 35' screen on top of the 20' enclosed mechanical penthouse, placing the total average height at least 611'. Some IAG members expressed concern that scaling the drawing included at Figure 2.7b indicates the west tower would actually be closer to 635'. One IAG member noted that if this were the case, that would place this building among one of the 10 tallest in the City of Boston. At minimum, it appears that the Project represents at least a 47% increase over the height of the 2012 Proposal. The IAG requests additional clarification on the height of the towers and the podium.

At the February and the March IAG Meeting s, members expressed a variety of viewpoints. Some favored the size of the Project, expressing the view that allowing more height here would help preserve low-rise development elsewhere in the neighborhood and the city of Boston. Some called the size an appropriate tradeoff for needed infrastructure improvements and for knitting together the seams of the Back Bay and the Fenway. Others noted that they liked both the height and the two-tower approach. Some noted that the height on this parcel fits in with the "high spine" concept.

Some expressed a mixed view, liking the two-tower approach, but objecting to the height and related environmental impacts, including shadow and wind. The increase in size and related environmental impacts created concern for some members. Some feel that the project is simply too tall or too dense, creating too much congestion along Boylston and Dalton. These members noted that the significant increase in massing. They objected to the second tower, noting that the "high spine" concept, when originally developed, was not endorsed by all neighborhood groups and, at least by some accounts, placed the "spine" well south of Boylston Street. They criticized the East Tower for appearing to be a vertical extension of the street wall and blocking the view corridor between the Berklee's 160 Mass. Ave. building and the Christian Science Center. They asked whether the need for a second tower could be revisited, and wondered whether an analysis might

show that the East Tower may not be financially essential to completely cover the Turnpike and train tracks below. Access to the Proponent's financial model for the Project would be needed to complete that analysis.

Some members noted that the Proponent had stated in Component I of its response to MassDOT's Request for Proposals that the 2012 Proposal would comply with the Air Rights Civic Vision in part by "creating no more than one taller building." Other IAG members pointed out the Civic Vision is dated and does not have a good track record of producing successful projects since no projects have been completed based on the Civic Vision in the 17 years since it was finalized.

Architecture

The design of the revised Project includes the new East Tower (consisting of rental residences) and the West Tower (a new design consisting of condominiums), both set atop a 6-7 story podium that faces Boylston Street and Dalton Streets. The podium defines the street wall, with the towers set back at varying distances from the podium. The Project will include retail space on the first two levels, parking on the next four, and residential amenities on the seventh.

Some members expressed enthusiasm for the design. Others liked the overall approach, but found it overdesigned – meaning that there was too much variation between the architectural languages of the towers, the base of the building and the podium. Some recommended changes that would make it feel more as though the entire project was designed by a single hand and speaks a single language – with more restraint and commonality between the base and the towers. There was a recommendation for a simplified skin and a reconsideration of the twisting feature of the West Tower, which might lessen the feeling that it looms over the street. The twisting feature also diminishes the tower's setback from Boylston Street, since the corner of the tower moves closer to the property line as the building gets taller, as Figure 2.8b shows. There was a recommendation to modify the base, which emphasizes the horizontal, as opposed to a more vertical rhythm that reflects the series-of-bays articulation seen throughout the Back Bay.

Some IAG members expressed concern about the four levels of visible parking that will rise above the two retail levels. While the parking cannot be placed underground for obvious reasons, some members requested that the Proponent consider design alternatives that would reduce the amount of space required for parking and/or wrap the Boylston-facing parking in another use. If these options are not feasible, members recommended consideration of treatments that make the garage levels more visually interesting. One member suggested using the skin of the parking levels as a canvas for public art or artistic lighting.

One member expressed concern about how the Project will relate to the 29-story Berklee Crossroads project to be located nearby as well as the other adjacent buildings. This member expressed a request for an enhancement of the urban design discussion to address the relationship of the Project to this building and the other buildings in the immediate vicinity.

Another member expressed concern regarding the representation that the podium level of the Project is aligned (vertical and horizontal) with the Hynes Auditorium. This member requested visual renderings showing that alignment.

Pedestrian Realm

The Project proposes to improve the pedestrian realm with new sidewalks, street lighting, and other improvements along Boylston, Dalton, St. Cecilia and Scotia streets. The layout of these improvements differs from the 2012 Proposal in that Project now wraps around to Dalton Street, adding a residential entrance for the second tower on Boylston Street and a garage entrance/exit on Dalton Street. IAG members recognized the valuable improvements to the pedestrian realm that the Project intends to implement.

The 2012 Proposal touted the project's 40-foot setback from the street edge to the tower component as a benefit for the pedestrian experience. Some members of the IAG expressed a view that setbacks, wide sidewalks, and plaza spaces are important to accommodating the heavy foot traffic in the area. Some members of the IAG would like to better understand the setback that is proposed for the new iteration of the Project and its towers. The original proposal included a setback for 40' from the street edge to the tower component. IAG members would like to know is the depth of the setback from building edge and street edge for each of the towers that are currently proposed, and how that setback changes as one follows the stories of the twisting tower. One member noted that, even though the setback dimensions were unknown, the renderings suggest that the East Tower is set back only slightly from the podium's Dalton Street frontage and would likely be perceived as essentially one wall. Furthermore, while the East Tower is set back from the podium's Boylston Street frontage in varying distances (owing to the shape of the tower), the Proponent's renderings appear to show a minimal setback for the northern-most edge of the tower, at least when viewed from the west. Some IAG members noted that while the twisting form is dynamic, it appears to have the effect of reducing the setback from Boylston Street. These members asked whether additional design options could be explored that would maximize the setback from Boylston Street.

Other IAG members have focused on the experience of pedestrians on the Boylston Street sidewalk in front of the Project. They have recommended installing street furniture, including benches, so as to give elderly and mobility-challenged residents a place to rest. Others asked whether the proponent would consider an atrium that would be accessible to the public, providing a sheltered form of respite and a break from the glass wall. Others asked whether street trees would be installed, and whether their installation would leave sufficient space for an ample sidewalk. Comments on street-level wind appear in the discussion of Environmental impacts, below; generally, IAG members expressed concern about creating more wind at street level.

One IAG member notes that St. Cecilia Park will be removed from the public realm in conjunction with the development of the Project. Noting the high and increasing population density in this area, this IAG member requests analysis of whether the Proponent could incorporate a park into the development.

Residential Use

The use of the Project is now entirely residential, apart from retail and parking in the podium levels.

The IAG generally supports the change in use from hotel to residential. The neighborhoods adjacent to the Project suffer from an inadequate supply of housing, and home ownership opportunities are rare. Many IAG members have asked for details about how the Proponent intends to comply with the City's Inclusionary Development Policy ("IDP"). The Proponent has stated that it is too early to make such a determination. IAG members hold a range of strong viewpoints on the provision of affordable housing. Some members advocate for creating such housing on-site, with the benefits for community diversity and affordability preservation that will bring to the neighborhoods. Others advocate for off-site creation, where lower land values could increase the amount of housing created and the number of individuals impacted per dollar spent. Still others advocate for off-site creation within the neighborhood, a compromise for which there is no clear pathway under the IDP. The IAG will remain keenly interested in this issue as the design development progresses, and expects that the Proponent will engage with the IAG on the issue.

Some members expressed a preference for a green space or pocket park in the location of the "Prudential Parcel"; others did not see this as an appropriate location for a park, reinforcing the notion that greater definition of Boylston Street should be the goal of an enhanced public space.

Views

The PNF presented views of the Project from certain vantage points. Additional views were generated and shared with the IAG at the March IAG Meeting. IAG members would like to see renderings from these additional viewpoints to get a better sense of how pedestrians will experience the Project:

Looking towards Project from the following locations:

- Back Bay Fens – War Memorial
- Back Bay Fens – Rose Garden
- Back Bay Fens – Victory Gardens
- Boylston Street at Park Drive
- Newbury Street from Sonsie
- Christian Science Plaza
- Prudential Center Plaza (greenspace)
- Northeast corner of Hereford and Boylston
- Boylston Street at Massachusetts Avenue (north sidewalk)
- Boylston Street at halfway point down block (north sidewalk)
- Boylston Street at Hereford (north sidewalk)
- Boylston Street at approximate lot line between fire station and former police station (now the architectural college)

View Corridors:

- Boylston St at Fire Station looking down Dalton Street
- Dalton St at Hilton looking north down Dalton Street
- Belvidere Street from St. Cecilia Parish
- Boylston St corridor (from north and south sides of Boylston looking east towards downtown)
- Massachusetts Avenue corridor

Zoning Relief

The Proponent has said it will seek zoning relief in the form of a Planned Development Area (“PDA”) Special Purpose Overlay District designation. The Project site spans two zoning districts and the City will have to amend one of them (the Huntington Avenue/Prudential Center (“HAPC”) District) to permit a PDA at the Project site. At the March IAG Meeting, the Proponent stated an intent to seek an amendment of the boundary of the HAPC District to encompass the entire Project site. The Proponent has also indicated that the Project will likely exceed the maximum permitted floor area ratio and height in both districts, and may not meet some of the design requirements in the HAPC District.

The neighborhoods adjacent to the Project have experience with projects that rewrite underlying zoning through the PDA process in order to permit the projects to proceed as proposed – experience that leaves some IAG members wary of this process. When not executed in the appropriate order, text and map amendments can legally authorize a proposed project (through the PDA approval process) prior to the project’s impacts being analyzed and mitigated through the Article 80 process. Some IAG members have requested a clear timeline for all zoning and planning approvals. IAG members also requested clarification of precisely which requirements of underlying applicable zoning the Project would fail to meet (and to the degree to which the Project would exceed any numerical requirements.)

Project Agreements

The Proponent has stated that a modification to the 2014 Development Agreement with MassDOT will be required for the Project to proceed. Some IAG members expressed concern that the addition of the Prudential component has been too costly in terms of the height and massing it has added to the 2012 Proposal. IAG members asked whether some of the value generated from this additional development will return to MassDOT through the amended Development Agreement. Other IAG members asked what value the City of Boston will realize from the sale of the Cambria Street air rights. The Proponent stated that no legislation is pending to change the conveyance of the parcel from a 99-year lease to fee simple ownership; the IAG wants to be apprised of any change in the form of conveyance.

Sustainability – Chapter 3

The Proponent has prepared an analysis of anticipated sustainability design components and says the Project will be able to achieve LEED certification.

Some IAG members expressed the view that LEED certification is a very low bar and fairly easy to obtain. Others recommended that the Proponent look to create a highly sustainable project, act with more ambition on energy efficiency and sustainability, and aim to achieve better than 12% above energy code. Some encouraged the Proponent to identify what items on the LEED sustainability checklist the Proponent had not checked as feasible and identify how they might achieve them. Others encouraged the Proponent to design to achieve Gold certification and to complete the certification and commissioning process.

Some members recommended the Proponent incorporate bird-safe building design components, which are the subject of a LEED pilot credit. The Project's location near the Back Bay Fens, an important stopover for migratory birds, and its primarily glass cladding, which by reflecting the sky can cause birds to fly into the building in low light, both suggest the importance of exploring this option carefully.

Other IAG members raised concerns about the potentially premature dismissal of nearly all clean and renewable energy options explored. In particular, IAG members asked questions about combined heat and power. Has the Proponent investigated what would be required to connect the Project to a portion of the grid that can support the sale of electricity back to the grid?

One IAG member requested that the Proponent commit to further analysis of the viability of air source heat pumps and solar rather than natural gas to heat and cool the buildings.

Transportation and Parking – Chapters 2 (Design) & 4 (Impact)

The Project is expected to generate a significant number of new trips per day in an area where the roadway network is already heavily congested and where public transportation is often at capacity during peak commuting hours. The Project is larger than and will generate more trips than the 2012 Proposal would have. The Project is now proposed to have entrances and exits on Dalton Street, where previously no such access was proposed because the project did not have frontage on Dalton Street. The Proponent must take care to minimize impacts through thoughtful design and programming.

Automobile Garage Parking

The Proponent proposes to build 303 parking spaces, up from the 240 in the 2012 Proposal. These spaces, located on levels 3-6, would serve only the building's residents, according to the Proponents representations at the March IAG Meeting.

Some IAG members questioned whether the Project really requires 303 spaces occupying four levels. Some felt that the provision of more parking spaces would just encourage more automobile traffic. Others encouraged the BPDA to require the Proponent to develop strategies to encourage bicycle and transit use

instead of automobile use. The IAG members appreciate the fact that the design of the garage floors would allow their conversion to other uses in the future. However, many members requested that the Proponent re-evaluate whether such a significant amount of parking is truly required – particularly when the Proponent's own analysis shows that only than 1/3 of expected Project-related trips are expected to occur in a personal automobile. The Proponent can amend underlying parking requirements through its already-planned request for a PDA designation. The HAPC district requires a minimum of .7 parking spaces per residential unit, for a total of 240 spaces based on the Project program. The Fenway Urban renewal plan recommends 0.75 spaces per dwelling unit and one parking space per 400 square feet of retail, for a total of 345 spaces based on the Project Program. As was discussed at the March IAG meeting, many feel that these parking requirements are already outdated.

Bicycle Parking and Access

The Proponent plans to provide bicycle parking equivalent to the number of anticipated residents. The Proponent has also stated that it will provide shared bicycles for the Project's residents. Bike racks will be available in front of the building on Boylston Street for public use.

Some members of the IAG strongly applauded the anticipated number of bike parking spaces. Members requested clarification on where the bicycle parking spaces would be located and how cyclists would access them. Using steep garage-style ramps to reach parking levels may not be safe and certainly would discourage some users. Bicycle infrastructure should be easily and safely accessed, so that both experienced and less-confident riders will feel comfortable choosing this mode of transportation.

In response to the proposed resident-only bikeshare program, some members of the IAG recommend that the Project sponsor a Hubway station as part of its reconstruction of the site's sidewalks. This would make the bikeshare benefit available to all, including those who might want to visit restaurants or retail at the Project site. One IAG member requested that the Proponent consider a design for a Hubway station that is usable year-round.

Boylston Street Changes: On-Street Parking and Valet

The Proponent proposes removing all existing metered parking in front of the Project along Boylston Street, replacing these spaces with valet parking spots and two drop-off areas near the residential entrances. The Proponent proposes installing a bike line adjacent to these functions. Some members of the IAG questioned whether the Project needs so many valet spots and suggested a single drop off area located between the two residential entrances could suffice. Some members expressed concern that the valet/drop-off uses, given their rapid turnover, would reduce safety along Boylston Street. The intersection of Boylston Street and Dalton Street already poses multiple problems for cyclist. Cars waiting to turn right on Dalton are often unaware of cyclists attempting to travel straight through the intersection heading east on Boylston. Equipment entering and exiting the fire station create additional complications. In the Proponent's January 12, 2012 written response to CAC questions, the Proponents suggested that if it were able to acquire rights in the Prudential parcel, it "could more effectively address potential improvements to [the Boylston/Dalton

intersection.]” Some members of the IAG believe the PIR provides a good forum for creative proposals for improving the operation of this intersection.

Dalton Street Changes: Garage Entrance and Exit

The Proponent proposes to have vehicles enter and exit the garage from Dalton Street. Vehicles will enter from both the northbound and southbound lanes of Dalton Street. Vehicles will exit and be permitted to turn both left (north) and right (south) onto Dalton Street.

Some IAG members appreciated that the garage entrance would now be on Dalton Street, instead of on side streets. Other members expressed concern that Dalton Street is already congested, particularly at peak hours. Some members expressed concern that vehicles queuing to enter and trying to make left turns while exiting the garage will create further congestion. Some urged the Proponent consider making the garage exit right-turn-only, thereby allowing southbound traffic on Dalton Street to proceed unimpaired. The Proponent could also consider making the entrance a right-in only, thereby preventing a backup of northbound drivers waiting to turn left against traffic into the garage. Extending the existing median further down along Dalton would accomplish this.

Cambria Street Changes: Loading Access

Some members expressed appreciation for relocating the loading from Scotia Street (in the 2012 Proposal) to Cambria Street (in the current Project), and the resulting reduction of impact on St. Cecilia’s church. Some members of the IAG wanted more detail on how the loading would operate on Cambria Street. For example, would restaurant deliveries or trash removal occur there?

Public Transportation

The Project is located close to the Hynes Convention Center T stop as well as stops for multiple bus routes. Since approximately 25% of projected trips (approximately 1,000 of those trips) are expected to occur on transit, some members of the IAG recommend the Proponent consider ways to mitigate the impact of those additional trips on the already stressed public transportation network.

One member suggested creation of a new stop for the 55 bus heading inbound in front of the Project Site. The current bus stop closest to the project sits on a less-than-fully-accessible traffic island, and appears to be included within Berklee’s redevelopment plans for Parcel 14. The bus stop could be moved to the block in front of the Project. Bus traffic might create less hazard for bicycle travel than valet parking and drop-off.

One IAG member requested that the impact of the Project on peak hour public transportation capacities be provided.

Traffic Impact Analysis

The Proponent will conduct a traffic impact analysis in the PIR. The proposed Study Area intersections are shown on Figure 4.3.

IAG recommendations for additional specific intersections to be analyzed include: Stuart Street at Huntington Avenue; Commonwealth Avenue at Berkley St; all Charlesgate (East and West) intersections.

IAG members expressed an overall preference that planning and mitigation for pedestrian and cyclist flow and safety be given as much attention as that given to vehicle traffic. Given the high percentage of project trips expected to occur by walking, some IAG members also recommend that a baseline pedestrian count be conducted along with the baseline vehicle counts and that a pedestrian impact analysis be conducted along with a vehicle impact analysis

IAG members also expressed concern about the significant number of special events that occur in the vicinity of the Project that impact traffic flow during off-peak but high-volume hours. IAG members recommended that baseline vehicle and pedestrian counts be conducted during these special events, and that the traffic impact study include an analysis of how the Project would impact conditions during these special events.

The special events identified by IAG members include: the hours before and after a Red Sox home game, event-day traffic when major conventions are taking place at the Hynes Convention Center, event-day traffic when major events are taking place at Berklee, and emergencies at the Fire Station. The Traffic Impact Analysis should project the impact during these peak events as well as normal days.

Environmental Protection – Chapter 5

The PNF discusses environmental impacts in the areas of wind, shadow, daylight, solar glare, air quality, water quality, flood hazard, noise, solid/hazardous waste, groundwater/geotechnical, construction, and rodent control. Some analyses are complete, while others are to be studied further in the PIR.

Wind

The Proponent will prepare a quantitative wind tunnel analysis for the PIR.

Figure 5.1 of the PNF shows preliminary wind sensor locations. As discussed at the February IAG Meeting, the area of wind impact analysis will be expanded. The Proponent represented that an area from 888 Boylston Street to Hemenway Street would be studied. IAG members also specifically request that the wind impacts on side streets be analyzed and that the wind study area be expanded generally. IAG members requested that the following locations be analyzed:

- Highest outdoor space on each tower in the Project;
- Podium level outdoor spaces;
- Eataly proposed outdoor eating space at Prudential;

- MBTA station entrances and bus stops within 300 feet radius of Project;
- Each corner of all Massachusetts Avenue intersections between Huntington Avenue and Charles River;
- Each corner of all Boylston Street intersections between Massachusetts Avenue and Dartmouth Street;
- Each corner of all Hereford Street intersections between Boylston Street and Charles River;
- Each corner of all intersections on Dartmouth Street between Boylston Street and the Christian Science Center.

Some members noted that the sidewalks in and around the project site carry significant pedestrian traffic. Some IAG members expressed concern that the height proposed will create significant adverse wind impacts at the ground level. They note that new development projects in the West Fens that are shorter than the proposed Project have created unpleasant sidewalk conditions for all pedestrians, but especially those who are elderly or mobility-challenged.

Some expressed concern that the west-facing façade has no setbacks, and that the lack of setback would create adverse wind impacts. There was a suggestion that if a setback were created, it might minimize the wind impact on St. Cecilia Street. One IAG member asked whether changing the shape and orientation of the towers might affect wind flow and wind velocity. Another member expressed an ongoing concern that the BPDA continues to accept wind studies using a methodology that has never been validated for these purposes.

At the February IAG Meeting, the Proponent described a plan to conduct the wind analysis to reflect a build condition that includes the development of Parcels 12 and 13. Because this is the first air rights parcel to move forward, and because air rights development in Boston has proceeded slowly, IAG members requested that the Proponent conduct an analysis that does not include the buildout of these parcels. This analysis would reflect the interim condition that pedestrians would actually experience for what could be a number of years. At the March Meeting, the Proponent and the IAG discussed preparing a three-level analysis for the wind study: no-build, the interim build-condition, and the build-condition with all permitted and proposed development.

Some members of the IAG expressed an intent to pursue modifications of the design if the wind studies show significant adverse wind impacts at street level.

Shadow

The Proponent has prepared a shadow analysis to meet both the general requirements of both BPDA Development Review under Article 80 and specific HAPC District shadow criteria. The analysis shows net new shadow created by the Project and compares the impacts of the Project and the 2012 Proposal. The additional 150-plus feet of height would extend shadows to areas not affected by the 2012 Proposal. Wider swaths of the Commonwealth Mall will now experience shadow from the Project, as will the Prudential Center

Plaza and the Esplanade. The Proponent has represented that the shadow analysis is complete. At the March IAG meeting, a question was asked as to whether the shadow analysis used “zoning height” or the actual height of all buildings including mechanicals. The Proponent confirmed that the actual building heights were used. One IAG member requested that this be documented in writing in an expanded shadow analysis.

Some IAG members requested that the shadow analysis be expanded to cover additional dates and times. An IAG member requested a December 21 overlap study be generated and the Proponent indicated that data were available to do so. Another IAG member requested that shadow studies be generated covering the November through January time periods. Another IAG member requested that the hours 6 pm and sunset (which varies by season) be analyzed.

Members of the IAG expressed concerns regarding the impact of the shadows on the historic Commonwealth Mall and how those shadows may impact the park experience. Others requested analysis of the impact on other public open spaces including the Dartmouth Street Mall, the Boston Public Library (including the Courtyard and interior spaces), the Esplanade and the Charles River.

One member requested that the overlapping shadow analysis included in the ENF be expanded to include the hours of dawn to dusk and to include the month of December (as well as March, June, and September).

One member recommended that an expanded shadow analysis should accurately reflect all of the impact of shadows cast by the proposed building regardless of what it hits: the ground, the walls of historic buildings, and building roofs so individuals can make decisions about what is important. This member also requested that the visualizations illustrate the existing shadows and the incremental shadow cast by the proposed structure (in outline form) at each of the times studied.

Daylight

The Proponent prepared an analysis of the percentage of skydome obstructed by the Project. Skydome obstruction will increase substantially from viewpoints along Boylston Street (from 0% to 77%), St. Cecilia Street (from 0% to 96.1%), and Dalton Street (from 30.5% to 59.2%). The Proponent has represented that the shadow analysis is complete.

Solar Glare

The Proponent will prepare a solar glare analysis to identify potential visual impairment or discomfort as the Project is viewed from key roadways, public open spaces, and pedestrian areas. The IAG recommends that the scope require analysis of solar glare from these specific areas:

- Key Roadways: Massachusetts Avenue approaching the Project from both east and west; Boylston Street from both east and west
- Public Open Spaces: Back Bay Fens, Fenway Park, Commonwealth Avenue Mall; Christian Science Plaza
- Pedestrian Areas: Boylston Street sidewalks; Massachusetts Avenue sidewalks

Air Quality

The Proponent included a microscale analysis of air quality impacts in the PNF. The Proponent found that Project will not cause or contribute to violations of the NAAQS. The Proponent has represented that the air quality impact analysis is complete.

One topic of discussion at CAC meetings about air rights development has been the “tunnel effect” and the need to ensure that emissions from automobiles travelling through the Turnpike tunnel do not escape in significant concentrations at the tunnel entrances. The Project will deck over additional portions of the tunnel, potentially enhancing any existing “tunnel effect” and creating new focal points for emissions. IAG members have requested an explanation of what the Proponent and/or MassDOT will do to address this issue. Others asked whether extra ventilation will be created. If so, where will that ventilation system be located? Where will the captured air be ventilated to? Who will be responsible for funding, building, operating and maintaining the ventilation? Who will be responsible for monitoring the quality of the air ventilated?

Water Quality

The Proponent has represented that the Project will collect and treat stormwater to comply with MassDEP standards and will recharge clean runoff to replenish groundwater. One IAG member asked whether the Project was being constructed over a water main and, if so, how that the conflict with existing infrastructure would be addressed.

Noise

The Proponent analyzed existing and future noise conditions near the Project site. The Proponent found that noise already exceeds City of Boston Residential District Noise Criteria in each measured location during both daytime (64-66 dB(A) vs. standard of 60) and nighttime (56-62dB(A) vs. standard of 50). The Proponent has represented that the Project will not create any appreciable increase in noise levels.

Solid and Hazardous Waste

The Proponent notes in the PNF that it has completed environmental due diligence for the Scotia parcel, but not for the air rights parcel, due to a lack of access.

Some members of the IAG requested clarification on when such diligence will be conducted and how the Project will proceed if conditions required reporting to MassDEP or remediation are encountered on the air rights parcels.

Groundwater/Geotechnical

The Proponent has described the subsurface soil and groundwater conditions and planned construction methods for the Project. The Proponent notes that there is a layer of organic soils approximately 4 – 10 feet thick at the Project site.

Given the Project's location in former filled tidelands and the depth of organic soils at the site, some IAG members recommended that the Proponent develop a plan to address potential odors resulting from release of hydrogen sulfide. At nearby construction sites where soils included fibrous peat mixed with organic soils, excavation activities that disturbed this mix produced a hydrogen sulfide odor, commonly noted as a rotten-egg smell experienced in swamps or at low tide. Hydrogen sulfide has a very low odor threshold, with its smell being easily perceptible at low concentrations. At construction sites without advance planning, the smell lingered for weeks before it could be controlled. The PIR scope should call for the Proponent to outline an odor control plan.

Construction

The Proponent has described expected construction period impacts and intends to develop a detailed construction management plan ("CMP") for approval by the Boston Transportation Department and MassDOT prior to construction.

The Proponent has stated that it will "temporarily" divert pedestrian foot traffic on Scotia Street and Dalton Street. The Proponent has not stated whether foot traffic along Boylston will also be diverted, but has noted that staging will occur from Boylston. Noting the high daily volume of foot traffic that travels Boylston in front of the site every day, the IAG recommends making every effort to interfere with this flow as little as possible. The IAG also notes that during Red Sox home games, the volume of pedestrian traffic along this stretch is even higher.

Other IAG members recommended active and regular communication with the community during construction through the establishment and upkeep of a website.

Chapter 7 – Historic Resources

Members of the IAG expressed concerned about the impact of shadows that may be cast by the Project on the Commonwealth Avenue Mall and other historic open spaces.

Sincerely,

Members of the Impact Advisory Group

Impact Advisory Group
1000 Boylston Street
March 17, 2017