

BOSTON PRESERVATION ALLIANCE

February 22, 2019

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Mr. Michael Sinatra
Boston Planning and Development Agency
Boston City Hall
Via email: michael.a.sinatra@boston.gov
Re: Dock Square Garage

Dear Mr. Sinatra,

The Boston Preservation Alliance is Boston's primary, non-profit advocacy organization that protects and promotes the use of historic buildings and landscapes in all of the city's neighborhoods. With 40 Organizational Members, 125 Corporate Members, and a reach of 35,000 friends and supporters we represent a diverse constituency advocating for the thoughtful evolution of the city and celebration of its unique character. We appreciate the opportunity to offer comments on projects that impact the historic character of the city.

The Alliance has participated in a number of design review and public meetings as this proposal has evolved. We have provided feedback at those meetings and we submitted formal comments to the BPDA last April strongly opposing the project. We see little in the revised proposal that addresses our previously stated concerns. Though the proposal has been changed, we feel it remains an inappropriate and unacceptable intrusion into this most historically significant area. Indicative of how our organization feels is the fact that when the most recent renderings were shown to our Board of Directors there was a collective gasp and unanimous shaking of heads, even from many architects highly active in new construction in the city. It's inconceivable how such an egregious affront to the central and character-defining historic assets of this city could even be considered by the BPDA.

Let me be clear, we are not advocating to protect a 1970s parking garage. No one particularly likes the garage, but it is relatively innocuous in its historic context -- certainly not contributing to the urban environment but its negative aspects are relatively contained. And down the road, if many predictions hold true and parking demands are less, it can go away and be replaced with something fitting in scale and massing for its historic environment. This proposal, on the other hand, expands a blemish to an outright neighborhood-wide plague, visible from throughout one of the most touristed and photographed areas of the city. It mars iconic views to and from Faneuil Hall and Quincy Market, the North End, the Custom House Tower, the Greenway, and looms over the highly preserved Blackstone Block. And for what gain? What is the public benefit? The debatable, minor enhancements this may make to the public realm over the existing garage are no match for the negative attributes of the

proposal. Additionally, by placing high end housing atop the garage and encasing the garage in screens and new glass, the proponent would effectively remove an opportunity to do something wonderful in this space when the garage reaches the end of its lifespan. We will entomb effectively forever the volume of that garage plus a conspicuous addition – new and old both grossly inappropriate for this location.

At a time when the City of Boston has claimed a commendable new vision for a future that reduces carbon emissions by encouraging walking, bicycling, and mass transit, this proposal is diametrically opposed to the City's broader messaging. Rejecting this proposal is the right thing to do for the Boston's history and environment. If there is insistence of new construction at this location, this garage should be razed, like others around the city, and a new building designed in deference to this historic context, perhaps with parking below. The short-sighted need for uninterrupted parking today should not drive a poor solution Boston will live with for a century, particularly when such a strategy violates the City's own goals of carbon-neutrality and "contextually sensitive development... to affirm each neighborhood's distinct identity", as stated in the *Imagine Boston 2030* document.

The argument that a project of such out-of-place scale and massing is the only proposal that makes economic sense is a false construct that is used to justify far too many projects that negatively impact the unique aspects of the city. What that often really means is that a project of this scale is necessary to support an erroneous assumption by a purchaser of what could be constructed. However it isn't the city's role to facilitate what may have been a poor business decision. It is not the city's responsibility to rectify what may be a financial loss predicated on approval before such approval was given, especially at the expense of some of the city's most valuable historic resources.

While Boston must continue to evolve and grow, abandonment of the city's identity and duty to steward the most central aspects of what makes Boston unique by allowing this project to forward will be a sure sign that we have lost our way. It will be a sign not just to Boston but to the nation. America looks to Boston as a steward of some of the nation's earliest history. This project will indicate our focus is short-sighted and favors the interests of one developer over the good of the city, its residents and visitors, and future Bostonians.

The BPDA has a responsibility to not simply usher projects through to approval but to reject proposals that fail to benefit the greater good. The tower proposal for One Bromfield, for example, was rejected because it was inappropriate for the context of its surroundings. Similarly inappropriate, the Dock Square Garage proposal does not forward the City's environmental goals, adhere to the zoning guidelines, provide substantial affordable housing, or protect one of Boston's most valuable assets- its historic character. If any proposal moves forward at this sensitive site it should be one that can be supported by residents, advocates like the Alliance, and BCDC. This proposal does not have that support.

We strongly urge the BPDA to reject this proposal.

Thank you,



Greg Galer
Executive Director

CC:

Mayor Martin Walsh, City of Boston
Andrea Campbell, Boston City Council
Annissa Essaibi George, Boston City Council
Michael Flaherty, Boston City Council
Althea Garrison, Boston City Council
Michelle Wu, Boston City Council
Lydia Edwards, Boston City Council
Ed Flynn, Boston City Council
Lynn Smiledge, Boston Landmarks Commission
Rosanne Foley, Boston Landmarks Commission
Elizabeth Stifel, Boston Civic Design Commission
Brona Simon, Massachusetts Historical Commission
Victor Brogna, North End/Waterfront Residents' Association