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Brona Simon
Executive Director
Massachusetts Historical Commission
220 Morrissey Boulevard
Boston MA 02125

April 15, 2020

Dear Ms. Simon-

I write in response to your letter dated February 25, 2020, regarding the redevelopment of the Hurley Building at 19 Staniford Street in Boston.

This site is a unique asset in the Commonwealth's portfolio of office properties. It is located within a five-minute walk of key government functions at the State House and McCormack State Office Building. It is at a critical juncture in its capital renewal cycle and is underbuilt vis a vis both the original plans for the site, and contemporary best practices for development in the urban core. It also presents unique challenges – notably its unwelcoming frontages along three different City streets that provide very few access points (an issue that would be difficult to address without major alteration given the site's steep slope) and comprise an impenetrable superblock that was originally intended to be accessed only from a central courtyard, further compounding circulation problems. The Hurley Building will also at minimum require significant modification in order to function as an effective work environment for agencies and employees.

Our approach to redeveloping the Hurley Building seeks to capitalize on the site's key opportunities while addressing its biggest challenges. The Commonwealth plans to *increase* the presence of state office workers on the site, while introducing private capital to offset our ongoing costs of occupancy. This increase in utilization – and of state employees in particular – is very much in keeping with the original concept for the Boston Government Service Center (BGSC) as imagined in the Government Center Master Plan by I.M. Pei and Henry Cobb. The ultimate design as overseen by Ed Logue, Paul Rudolph, and others, would have created a concentration of state office workers in a vibrant, publicly accessible Downtown location. As you know, this original plan was significantly compromised by the fact that the third building planned for the BGSC was never built. The incomplete result both diminished the critical density planned for this site and inhibited the full potential of this complex to serve as a nexus for State Government.

Our strategy for the site also recognizes that, at an FAR of 2.0, the Hurley Building is quite underbuilt for Downtown, in contrast both to the original intent for the site and to the State's and City's goals of fostering Transit-Oriented Development (TOD). TOD not only encourages greater vitality and street-level activation than can be achieved within the current configuration of the Hurley site, but also helps mitigate congestion and related greenhouse gas emissions.

The site needs to contain more building square footage for our project to be feasible.

The Commonwealth's plans for the site will require adding square footage beyond the confines of the existing, 327,000 SF Hurley Office Building. Therefore, the first Site Development Alternative that you request in your letter ("retention and rehabilitation of the Hurley Building, potentially leveraged by federal and/or state tax credits" and without any "new construction") – would not be a "feasible and prudent" alternative for this project. This option would not, fundamentally, allow us to achieve our project goals of 1) consolidating state office workers downtown within key Government Center buildings under long-term control (i.e. owned or long-term leased), and 2) introducing private capital to the site in order to offset the Commonwealth's ongoing costs of occupancy. Each of these goals is further explained below.

1. Consolidating Downtown Office Workers Within Key Government Center Assets

Nearly 11,000 Commonwealth employees work in Downtown Boston. Of these, approximately half work in space leased on a short-term basis (typically 10 years)¹. Increasing the amount of space under long-term control will be more cost-effective in the long run, as it will reduce the Commonwealth's exposure to a volatile, expensive lease market in which large blocks of office space offered at reasonable prices are quite rare.

A key component in this consolidation plan is roughly doubling (or more) the number of office workers that could be accommodated at the Hurley Building site, to over 2,000 employees. This could not be done without adding to the 327,000 GSF of the existing building, which currently contains roughly 1,100 seats².

2. Introducing Private Capital to Offset Ongoing Costs of Occupancy

In order to create this space in a cost-effective way we will partner with a private redevelopment partner, who will pursue private uses on the site in addition to building the office space for long-term Commonwealth occupancy. The rights to build new improvements for private use on any site this large in Downtown Boston are quite valuable. The Commonwealth will realize that value in below-market annual costs (i.e. lease rates), maximizing benefit to taxpayers and the public at large. This strategy also updates the original single-use urban design paradigm for the site, enabling an appropriately rich mix of public and commercial uses that will improve the long-term vitality and viability of the site.

Therefore, in addition to the new square footage that will be required on the site for Commonwealth occupancy, more new development will be required to accommodate the introduction of private uses. This also cannot not be done without adding to the 327,000 GSF of the existing building.

¹ Please refer to the attached map for more detail about the Commonwealth's portfolio of owned and leased offices in Downtown Boston.

² Although 1,100 seats are available, approximately 750 employees currently work in the building.

Our RFP will not provide developers with a pre-determined list of Development Alternatives to choose from.

I want to respond to one other request in your letter: that DCAMM provide MHC a draft copy of the RFP for review and comment, and that we “include additional options” in the RFP (beyond options A-D examined in the Preservation Report written by Bruner / Cott). We will, of course, be happy to provide a copy of the RFP to MHC for review and comment prior to issuance, as is our common practice. We will also analyze the second Alternative that you requested in your letter (“retention and rehabilitation of the Hurley Building with new construction”), to better understand its implications for preservation and redevelopment.

However, I want to clarify that it is *not* our intent to prescribe any particular approaches to demolition or retention to RFP respondents. Rather, we intend to invite proposals that strive to preserve all or key portions of the Hurley Building (identified in the Preservation Report) through creative, adaptive reuse, while also introducing new development to the site in a way that is sensitive to historical context and to the surrounding built environment. We do not intend to provide respondents a menu of Alternatives to choose from, because experience has shown that a creative development team working within the constraints of our RFP will, in all likelihood, come up with alternatives we could not foresee now.

In addition to evaluating proposals on the quality, quantity, and price of space for Commonwealth occupancy, we will also evaluate them for design excellence, responsiveness to our guidance in the RFP regarding preservation and adaptive reuse, and other qualitative criteria. Formulating these evaluation criteria is a critical element of the public outreach we are conducting and will continue to conduct in the coming months, including our consultation with you and your staff.

DCAMM looks forward to in-person consultation with MHC as conditions permit. In the meantime, Senior Project Manager Abi Vladeck has offered to conduct a virtual tour the Hurley Building and other BGSC features of interest if that would be useful in moving the consultation process forward. Abi can be reached at abigail.s.vladeck@mass.gov / 857-343-0083.

Sincerely,



Carol Gladstone
Commissioner

CC by email: Rosanne Foley, Boston Landmarks Commission
Greg Galer, Boston Preservation Alliance
Gary Wolf, DOCOMOMO New England
Kelvin Dickinson, Paul Rudolph Heritage Foundation
Mark Pasnik, OverUnder

Downtown Boston Core

5-20min walk from State House

Portfolio Overview

1,072,000 USF Owned/long-term leases
 642,000 USF Primary short-term leases
 600,000 USF Transportation building
 301,000 USF Secondary short-term leases

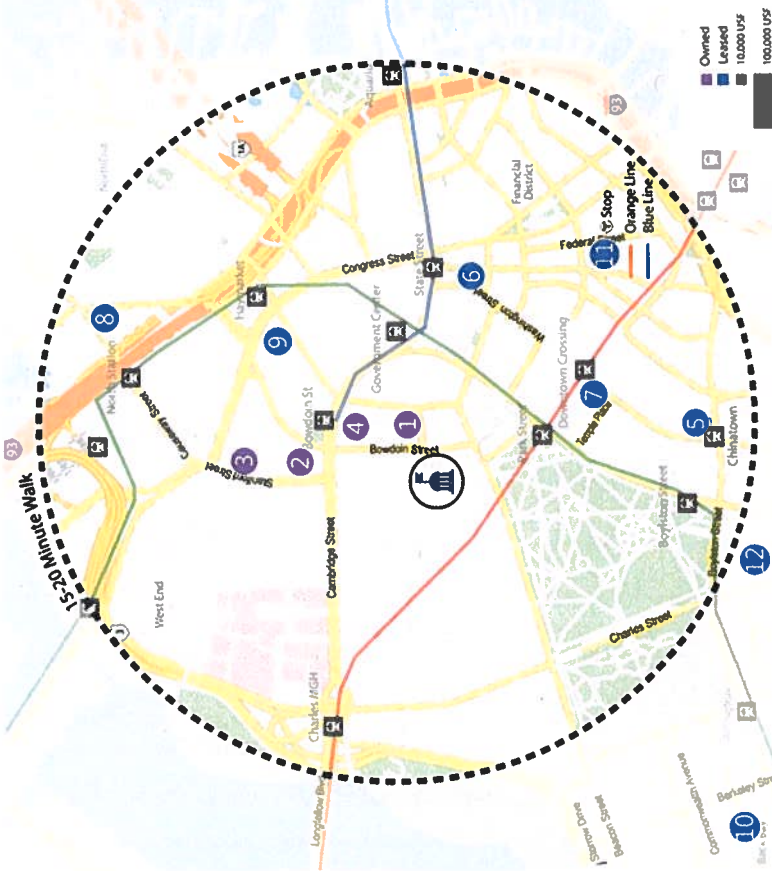
Owned/long-term leases
 Primary short-term leases

2.62 Million USF
 Boston Core
 10,930 Occupants

1.07 Million USF
 Owned/Long-term leases
 4,429 Occupants

0.95 Million USF
 Short-term Leases
 5,259 Occupants

0.60 Million USF
 Transportation Building
 1,242 Occupants



<p>1 McCormack 1 Ashburton Pl 437,000 USF 2550 Occupants</p>	<p>2 Hurley 19 Stamford St 241,000 USF 659 Occupants</p>	<p>3 Liedemann 25 Stamford St 150,000 USF 207 Occupants</p>	<p>4 Saltorell 100 Cambridge St 244,000 USF 1013 Occupants</p>	<p>5 600 Washington St 231,000 USF 1329 Occupants Exp. 2021</p>	<p>6 250 Washington St 112,000 USF 586 Occupants Exp. 2025</p>	<p>7 1 Winter St 101,000 USF 463 Occupants Exp. 2025</p>	<p>8 251 Causeway St 88,000 USF 875 Occupants Exp. 2020</p>	<p>9 1 Congress St 64,000 USF 239 Occupants Exp. 2020</p>	<p>10 501 Boylston St 32,000 USF 181 Occupants Exp. 2025</p>	<p>11 75-101 Federal St 23,000 USF 121 Occupants Exp. 2024</p>	<p>12 Transportation Building 10 Park Pl 600,000 USF 1,242 Occupants</p>
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