

# BOSTON PRESERVATION ALLIANCE

April 13, 2018

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Mr. Michael Rooney  
Boston Planning and Development Agency  
One City Hall Square  
Boston, MA 02201  
Via email: [Michael.Rooney@boston.gov](mailto:Michael.Rooney@boston.gov)  
**Re: Dock Square Garage, Downtown**

Dear Mr. Rooney,

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 36 Organizational Members, 104 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.

In reviewing the Dock Square Garage project we are disappointed to find a proposal so insensitive to one of the most historic areas of the city and surprised that it has moved forward into the Article 80 process. We would have expected the Boston Planning and Development Agency (BPDA) to have guided the proponent towards a more appropriate proposal for this historically sensitive site, though perhaps guidance was given but not incorporated. If the proponent had been in contact with the Alliance in advance we would have alerted the team to the serious concerns outlined below. We greatly appreciate the fact that the Boston Civic Design Commission (BCDC) was vocal in the many ways they found the proposal inappropriate and we are aware of strong opposition from the general public as well.

At this stage the Alliance feels that the most appropriate response is for the proponent to carefully contemplate this opposition, develop a new concept and PNF, and to reinstate the Article 80 process with a different proposal that incorporates the feedback they have received. To contribute to that feedback, we present the following challenges and opportunities:

## Challenges

- The project site is in the heart of Boston's downtown, surrounded by some of our *nation's* most historic buildings and spaces. There are few locations in the city that have a more prominent relationship with Boston's most historically significant places, as the Massachusetts Historical Commission noted during the review process for the adjacent Haymarket Hotel project. The site is

adjacent to Quincy Market, near the Blackstone Block, in the view shed of the Custom House Tower, and just across the Greenway from the historic North End. Any development on this site must be sensitive to this treasured and valuable historic environment. The current proposal is neither contextual nor appropriate. While the existing garage contributes very little to the urban realm, its presence also does not detract from it. The proposal is overwhelming, distracting, and visually incongruent and we feel would not be a benefit to the historic urban landscape.

- We are beginning to see a trend of glassy box additions atop existing buildings. The Congress Square project, for example, adds a glass addition to a historic building not far from this site, although in the far more visually constrained and congested Financial District. While we feel this approach can succeed in certain, infrequent scenarios, it is not a precedent or a regular methodology that would be advantageous for the city. We strongly advise the BPDA to discourage large, glass additions to existing buildings, especially very prominent and visible buildings like Dock Square Garage. We do not want to be a city of either planar or wildly-shaped “glass hats.”
- There are existing zoning regulations and guidelines in place to which new development should adhere. This project site falls within the Greenway Overlay District which includes Building Design Guidelines (Section 49A-7) which this proposal clearly violates. The site is also within the Markets Protection Area which restricts building height to 65' and FAR to four. Though the current garage is already slightly above those restrictions, the proposal more than doubles those limits which is unacceptable. We encourage the BPDA to reject proposals that so blatantly violate local guidelines and protection area restrictions. The heights proposed are far in excess of what is appropriate or allowable for this site.
- We wholeheartedly disagree with statements in the proponent’s PNF that the proposal “respects the scale and architecture of the existing neighborhood and adjacent landmarks” and “preserves views to the Custom House Tower.”

### **Opportunities**

- Though there is an inventory form for the garage in the Massachusetts Cultural Resource Information System, we do not feel that the current structure is or will be historically significant, nor does it currently contribute to the character, history, or sense of place of its historic surroundings. Therefore, we do feel that there is an opportunity at this site to create a new presence that would connect Quincy Market to the historic Blackstone Block, the Greenway, and the North End, consistent with the Greenway District Guidelines. With an abundance of pedestrian activity and vibrancy surrounding this site, there is opportunity to make a connection with the north façade of Quincy Market, possibly allowing for more permeability to the market

building in the future. Where the parking garage currently presents a flat, expressionless face on all fronts, perhaps a new or redesigned building could communicate with its neighbors on all sides. In those goals we agree with the proponent. However, we feel that the proposal does not accomplish these goals and is a missed opportunity to significantly improve this site in meaningful ways.

- We recognize the many physical and structural challenges of redeveloping a parking garage. However we also feel that adding extensive height to facilitate private, high end residential and the many negative elements it introduces in this historic area is not offset by anything close to equivalent public benefit.
- While we understand the current demands for parking in the Downtown area, we would like for the developer to explore and present any opportunities to replace the current garage with a new building that includes underground parking, or significantly fewer parking spaces. Ideally this location would include public spaces, restaurants, and/or retail on at least the first and second floors throughout the building to better participate in its urban environment. We urge the BPDA to require the proponent to explore other options for this site that contribute more to the city than what is currently proposed.

While there are clearly a number of failures in this proposal, we look forward to a revised concept that takes into consideration the concerns and recommendations of the community, BCDC, and the BPDA. As stated, we feel that the proponent should abandon this proposal and return at a later date with a new, revised proposal. Otherwise, we strongly urge the BPDA to extend the Article 80 process and postpone the comment deadline so that the proponent may present revisions for public feedback.

We look forward to continuing the dialogue about this important site.

Thank you,



Greg Galer  
Executive Director

CC:

Brona Simon, Massachusetts Historical Commission  
Rosanne Foley, Boston Landmarks Commission  
Victor Brogna