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March 19, 2018

Ms. Casey Hines
Boston Planning and Development Agency
One City Hall Square
Boston, MA 02201
Via email: casey.a.hines@boston.gov
Re: 115 Winthrop Square DPIR

Dear Ms. Hines,

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 35 Organizational Members, 103 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 was disappointed that neither the Article 80 nor MEPA processes were further along in advance of the Home Rule Petition for "An Act Protecting Sunlight and Promoting Economic Development in the City of Boston." Additionally, we feel these reviews are slated to conclude while the design of the project continues to significantly evolve, limiting the ability for the community to provide specific feedback on the most current iteration of the proposal. However, we do appreciate the information provided in the proponent's DPIR. It includes a fairly thorough analysis of shadow and the tower's effect on the Boston skyline and views from various pedestrian perspectives, for the full distance of shadow rather than some pre-determined distance from the project site. These data provide a helpful understanding of impacts such a large project will have on the city.

There are, however, some areas where we feel additional information is needed in order to allow a full assessment of the project and help us collectively assure such a meaningful project can best contribute to the future of Boston while supporting and enhancing existing and historic features that contribute to the city's unique environment. We appreciate the fact that the building continues to evolve (as it has significantly from earlier versions) in response to feedback the design team is receiving, and the proponent has been open to continued dialog with the community to enhance the proposal. We look forward to continued discussion directly with them. In particular, we believe there needs to be further examination of the proposal's engagement with its adjacencies and therefore request additional renderings and exploration of and alternatives to:

- The Devonshire Street façade as it meets Winthrop Square. We question if the current plan best engages the pedestrian experience and Winthrop Square itself. We recognize that the proponent has been clear that the redesign of the park at Winthrop Square is still in development, and we encourage a thoughtful, community-engaged process. We specifically feel that the design needs to better connect Winthrop Lane, the Square/Park and the “Great Hall” all the way through to Federal Street. The project presents tremendous opportunity for activation of currently underutilized Winthrop Square and Devonshire Street, and we feel the current design fails to deliver on the possibilities there.
- The Federal Street and Federal Court façade, more specifically how the proposal relates to the Paul Rudolph designed building on Federal Street, considered by many to be an important example of mid-century-modern design by a prominent architect.
- The relationship of the podium/bustle to the heights of adjacent buildings and the historic buildings that ring Winthrop Square, where a stronger datum line engaging these historic cornice elevations could provide a more intimate feeling of a cohesive outdoor “room” for the park.
- How the proposal appears at night, both at great distances on the Boston skyline as well as to the immediate pedestrian experience. There has been little examination of this important design element of such a large project. We look forward to reviewing that aspect of the proposal and to see what opportunities may arise through this development to enhance adjacent areas and connect Winthrop Square to Downtown Crossing, perhaps through enhancement of the nearby Tontine Crescent.
- Additionally, while we applaud the proposal’s creative approach to the “Great Hall” as a flexible, community-engaged, multipurpose space, we are concerned that there is an inherent conflict between the programming, particularly at the ground floor level (as opposed to the smaller floating meeting rooms), and the desire for connectivity through the “Hall” between Federal Street and Winthrop Square. There needs to be further examination of how, for example, a program (perhaps paid, private, invitation-only such as a business breakfast/presentation) would preclude the open, pedestrian-friendly experience that has been identified as a major goal of the project.

While we support the many positive contributions this development provides to the city, turning a defunct parking garage into both a revenue generator for the city and a driver of vibrancy to this part of downtown, we also feel it is important to recognize that development of this scale does not come without permanent negative impacts to

national and state register and Landmark properties. In our dialog with Millennium Partners we have mutually acknowledged that the success of the City of Boston results from an aggregation of many layers of change, and it is important that the new layers our generation creates respect those of preceding generations by minimizing negative impacts to the existing, historic built environment and ameliorating acknowledged impacts through mitigation.

This building will have long-lasting impacts on historic resources, both within the vicinity of the site and to the farthest reaches of the shadows created by the tower. Unlike some other development proposals in the city, the analysis of the DPIR shows that no single, particular site is overwhelmingly impacted, rather we see a smaller scale diminution over a wider area – reduced skyplane visibility, intrusion to the background and context of existing historic buildings, and the long-term impact of shadows and wind to microclimates that negatively impact the health of historic resources (e.g. deterioration of materials, microbial growth, ice dams) that we have learned are often not revealed for some time after construction.

Impacts such as these are not unique to this project, but are increasingly impactful to our historic city and poorly compensated for, leaving historic resources that have existed for generations increasingly threatened and burdened. If the purpose of the MEPA and Article 80 processes is to truly examine the impacts of projects such as this we cannot ignore the deteriorating effects of changes to microclimates, context of historic buildings, and viewsheds and must set out a process to empower a long-term, positive offset that will protect historic resources.

After initial conversations with both Millennium Partners and BPDA staff where we found receptivity, we recommend that this project should provide mitigation funds that serve to initiate a city-wide preservation fund, supported by contributions from development projects in Boston. We offer assistance in creating and managing this fund which would serve to fill a dire need in the city and bridge a large gap in financial support for Boston's historic resources. The unique character of our neighborhoods draws residents, investors, and visitors who make possible the same development that is diminishing that very character. It is a delicate balance, and it is crucial for the success of our city that our historic fabric is maintained. We feel that a preservation fund is an effective means to do so and the time has come to set this needed tool in place. We hope to work with the proponent, state and city agencies to evolve this fund through mitigation of this project from concept to reality.

We look forward to continued engagement with this project team and the BPDA.

Sincerely,



Greg Galer
Executive Director

CC:

Mayor Martin J. Walsh, City of Boston
Senator Joseph Boncore
Senator William Brownsberger
Senator Sonia Chang-Diaz
Representative Evandro C. Carvalho
Representative Jay Livingstone
Representative Aaron Michlewitz
Representative Byron Rushing
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Kathleen MacNeill, Millennium Partners
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Cindy Schlessinger, Epsilon Associates
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Rosanne Foley, Boston Landmarks Commission
Jonathan Greeley, Boston Planning and Development Agency
Elizabeth Vizza, Friends of the Public Garden
Todd Lee, Light Boston
Wendy Landman, Walk Boston