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Gregory J. Galer, Ph.D.

May 3, 2016

Brian Golden, Director
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201
Re: One Bromfield Proposal by Midwood Properties

Dear Mr. Golden,

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, 85 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 unique, engaging, and pedestrian-scaled character of the city.

We are writing today in regard to the DPIR filed by One Bromfield LLC/Midwood Investment and Development on April 28, 2016 for new construction at the corner of Bromfield and Washington streets in the heart of downtown Boston.

The Alliance has met with the Midwood team to discuss their proposal for this new tower in the Ladder District, one of the most historic, pedestrian-active, and newly reactivated areas of the city. We appreciate the Midwood team's willingness to share their proposal with the Alliance in advance of filing. While the Alliance does not oppose development on this site, we do have several significant concerns about this particular proposal. We have also heard concern from many of our constituents and downtown property owners.

The Alliance's mission is to protect and promote Boston's distinct character by protecting places, promoting vibrancy, and preserving character in a balanced manner beneficial to each of these categories. We are unable to support the current proposal for One Bromfield due to a variety of concerns, outlined below, which suggest the project's inability to meet these goals. Our opposition to the project falls into two categories – first regarding this project and its impact on urban design, planning and the Downtown Crossing neighborhood as well as the precedent it sets for an unmanaged and unplanned influx of character-altering large development in the Ladder District and Downtown Crossing; the second pertaining to specifics of this proposal and its design.

Urban Design & Planning Implications

We are troubled that a proposal of this scale and impact is being considered in the absence of broader planning for the Ladder District and Downtown Crossing, particularly on Bromfield Street. Ed Logue once used the scale and character of Bromfield Street as his reference point when criticizing waterfront planning proposals. “Where’s Bromfield Street?” he asked, suggesting that the new development lacked the pedestrian scale and charm that exist along Bromfield. Now we are considering a proposal that dramatically alters Bromfield without the opportunity to consider its place amongst the many other towers, both proposed and pending, for this neighborhood. We feel strongly that the collective impact of several towers on the neighborhood needs to be examined before such dramatic zoning relief should be granted for One Bromfield.

Parking, open space, and other public amenities as well as the physical impact of a new scale of construction should be considered within the larger context of this current wave of development rather than each project individually. With proposals for 533 Washington Street (Felt), Pi Alley Garage and others in close proximity emerging, now is the time to assess their impact *comprehensively* and not let a myopic focus on tax revenue and housing (today’s immediate needs) cloud longer-range thinking. Considering a neighborhood context and whether several dense, tall developments would enhance the historic neighborhood as a collective whole rather than individually will have better long-term outcomes. Bold, new architecture and density can be of benefit but needs to be assessed in a broader window.

As Downtown Crossing and the adjacent Ladder District continue to be reenergized, it is important to recognize that one of this neighborhood’s greatest assets is the scale and character of much of the existing fabric. With few exceptions, the vast majority of existing high-rise development is on the eastern side of Washington Street and properties such as the one in question are part of an ensemble of buildings of more moderate height. Therefore, a sense of Boston’s commercial past has endured in this unique corridor. It is a neighborhood rife with historic character and important landmarks such as the Old South Meetinghouse, King’s Chapel, the Old Corner Bookstore, Old City Hall, several historic burial grounds, the Old State House, and the Winthrop-Carter Building. Enhancing these landmarks are many complementary historic commercial buildings like the old Boston Casualty Co. (Sam LaGrassa’s), the iconic Parker House, the newly rehabilitated Godfrey Hotel and a consistent collection of others down Washington Street to Boston’s prized Theatre District. The Washington Street corridor and the adjacent ladder blocks to Tremont are quintessential Boston, certainly in need of some investment but potentially devastated by the insertion of a host of unplanned, uncoordinated, and unsympathetic towers.

Though we appreciate the innovative design of Midwood’s tower – curved and irregular, skewed on the site to reduce shadow/wind impact, and narrow compared to the full site footprint – we question its appropriateness for this location. Despite its narrow profile, the tower still casts shadows on several historic sites including the Common, the Granary Burying Ground, King’s

Chapel Cemetery, and the Old South Meeting House, among others. Though seemingly relatively small these shadows are not insignificant. Shadows on historic buildings cause real physical impacts and should be serious considerations throughout the review process. For example, shadows on Old South Meetinghouse are more troublesome than suggested and deserve further study as do the wind impacts at Old South.

With so much of the city already shadowed by existing buildings it is important to consider a different metric, the building's impact on sky view, or the visibility of the sky from the street (which exists even when one is in shadow). As more towers are built across Boston's historic neighborhoods, the pedestrian view of the sky is increasingly lost and a feeling of "canyonization" detracts from the sense of place. For example, visitors to the Freedom Trail once viewed the Old South Meeting House framed by a background of blue sky, as Bostonians have since 1729. With the One Arch Street and the Millennium Tower constructed, the historic meeting house is now visually overshadowed by glass curtainwall from every vantage point.

The DPIR's daylight analysis reveals little because it fails to assess the building's impact on views further from the building such as from the corner of School Street, from Old City Hall, or further up Bromfield Street as the building is approached from Tremont, just to name a few. The three "area context viewpoints" provide little useful information, merely noting that looking directly at large existing buildings blocks much of the the sky. The justification that a new project generating high obstruction values is appropriate given that existing neighborhood buildings already generate similar high values is nonsensical. With existing neighborhood buildings obscuring the sky there is even more reason to preserve this precious resource. A neighborhood in which the view of the sky continues to deteriorate is not a healthy, vibrant, or desirable one.

If towers continue to be permitted in the downtown area without a broader assessment, the powerful historic context of the neighborhood will be lost. We discussed with the Midwood team the need for additional images of the proposed building from the street to allow us to better understand the impact of the proposal. However, isolated from analysis including the multiple forthcoming tower proposals for this neighborhood these images will only provide a limited perspective. While extreme height is often difficult to perceive in close proximity to the building, from a moderate distance towers can obstruct a significant amount of view shed, especially when several towers dominate the skyline in the same neighborhood. The full impact of this tower and the others it will trigger can only be examined with comprehensive planning for the neighborhood, planning that in particular examines the pedestrian experience and how it is impacted as skyview is lost from new construction.

With zoning in this area at 155' we see no justification for the drastic relief the proponent seeks for a project at nearly 700'. There is no PDA here, no "hardship" that zoning relief requires, and no direct community benefit. The proponent points to affordable housing, but they are proposing no more than the required affordable housing quota. They also point to the benefits of urban density and additional residents in Downtown Crossing. While true, these do

not rise to the level of community benefit justifying such relief – no public space, no neighborhood enhancements, no historic restoration, nothing they propose exceeds what they would desire for the benefit of the development itself. Quality design (as was cited at BCDC) is not sufficient community benefit but something we should insist upon for every project in our city. Consider the significant and diverse community aspects of the recent submissions for Winthrop Square by comparison (an observation deck, large indoor cultural spaces, 40 percent affordability, etc.)

Though the Millennium Tower across Washington Street received our support, that project was very different and should not be considered precedent setting for a tower of similar height across the street. First of all, Millennium was built under a PDA without the zoning variances requested here (dramatic relief proposed – 500' plus in height alone). Second, Millennium was responding to a crisis – a particularly vexing hole in the ground, a then-challenged neighborhood, and a different time in the economic cycle. Third, Millennium included the restoration of the historic Filene's Building, a city landmark and strictly adhered to not just Boston Landmarks Commission review but National Park Service review as well. Finally, that project rebuilds Shopper's Park and the T station at the corner of Franklin Street and rebuilt much of the Summer Street plaza adjacent to the project.

This project, by comparison, offers no clearly defined public benefit and no contribution to the historic integrity of this extremely significant corridor. The Alliance feels that granting the requested variances for this project is unjustified and sets a dangerous precedent that is likely to open the door to a multitude of towers southward in the Ladder District, altering the valuable, pedestrian-friendly character and qualities of this neighborhood. In the absence of larger contextual planning for this neighborhood we cannot in good conscience support this project and the zoning relief it requires.

The Proposal's Specifics

The particular buildings Midwood proposes for demolition certainly do not qualify for Landmark status and are in need of rehabilitation to better contribute to the streetscape and vitality of the block in meaningful ways. It's unfortunate that a variety of legal, leasing, and financial circumstances have left the owner feeling challenged to occupy these buildings or maintain their curb appeal; the community typically interprets this disinvestment as a strategy by owners to justify demolitions. We are pleased that at a recent meeting the Midwood team clarified their challenges and offered to enhance these vacant storefronts to better enliven the streetscape as their larger, long-term proposal is being evaluated.

While we are not opposed to a sensitive redevelopment of this site, we have serious concerns about the impact of the current proposal and question the appropriateness of the current design, and ultimately its success in bringing the 24-hour vibrancy needed to enhance Downtown Crossing. Our concerns are on two levels: the tower, which we have outlined, and the pedestal.

Some aspects of the pedestal we feel are beneficial to the site; the height of the pedestal is appropriate and consistent with the abutting buildings. The most recent renderings of the Washington Street façade reflect a more subtle approach to materials and fenestration that we hope will continue to evolve into a more cohesive relationship with the neighborhood's character.

We have expressed to the Midwood team that we feel the façade design at the street level suggests a single occupancy, rather than multiple retail opportunities and storefronts, which would alter the sense of Downtown Crossing. This neighborhood has historically engaged pedestrians with its smaller scale and varied shopping opportunities with diversified storefronts. Such an arrangement produces an engaged, pedestrian-friendly downtown commercial district. We suggest several, smaller retailers in this space, particularly dining options, that would better energize the neighborhood with a vibrant pedestrian experience. A building with a design that reflects this division of space would be most successful in the streetscape, and the Midwood team seemed willing to investigate this suggestion.

However, an area where we continue to disagree is the proposal to put parking and mechanicals on the upper levels of the pedestal. While the plan calls for the view of the cars to be blocked from the street, these floors present a wasted opportunity for continued street level engagement. The upper floors will be static and dead with no visible activity. As the proponents highlight, this block is a central location to Boston's public transit and we feel parking should not supersede other demands upon the building such as a vibrant and active face to the street. We encourage the BRA to require some below grade parking to reduce the demands on the upper pedestal floors, thus allowing them to be visually active and occupied spaces which engage the street below. Even if parking remains on these upper levels, it should be pushed back from Washington and Bromfield Streets to allow other active options for the perimeters of the building, such as micro units.

Similarly, the proposed building presence on Bromfield Street is of great concern. Vehicle access dominates the design and clashes with the historic nature of the granite commercial block across the street. Though the project widens the sidewalk, it disengages pedestrians since this overly-prominent entrance is not intended for the general public but, instead, only for residents and is further segregated by those who own and those who rent. And since the car and lobby access dominates the streetscape, lack of visible retail storefronts discourages pedestrians heading north on Washington Street from turning the corner and entering Bromfield Street in the way that retail storefronts have historically. We fear this will reduce pedestrian traffic on Bromfield overall and cause other businesses on the street to suffer.

In conclusion, in order for the Alliance to consider supporting this proposal, (1) the podium of the building must be redesigned to address the concerns described above and (2) the BRA must have determined, after an opportunity for real public engagement and discussion of the various proposed development projects in Downtown Crossing that the benefits to the neighborhood and the city of such a large tower on such a key corner will

outweigh the comprehensive negative changes in scale and character that it will assuredly cause. .

Thank you for the opportunity to express our concerns with this proposal. We look forward to engaging further as the dialogue continues.

Sincerely,



Greg Galer
Executive Director

CC:

At-Large City Councilor Michelle Wu
At-Large City Councilor Michael Flaherty
At-Large City Councilor Annissa Essaibi George
At-Large City Councilor Ayanna Pressley
City Councilor Bill Linehan
David Carlson, Boston Redevelopment Authority
Sara Myerson, Boston Redevelopment Authority
Jonathan Greeley, Boston Redevelopment Authority
Christopher Tracy, Boston Redevelopment Authority
Brona Simon, Massachusetts Historical Commission
Rosanne Foley, Boston Landmarks Commission
Pamela McDermott, McDermott Ventures
John Usdan, Midwood Properties
Rebecca Lee, Mintz Levin
Emily Curran, Old South Meeting House
Kathy Kottaridis, Historic Boston Incorporated
Liz Vizza, Friends of the Public Garden
Suzanne Taylor, Freedom Trail Foundation
Sean McDonnel, Architectural Heritage Foundation
Tony Ursillo, 45 Province Street Trustees
Randi Lothrop, RG Lathrop Consulting