

*A Joint Comment Letter from Members of the North End/Waterfront Community
on the Development Proposals at Parcel 9*

By email: MassDot.RE@dot.state.ma

Hard copy to follow.

June 3, 2012

William Tuttle, Director
Office of Real Estate Development
Massachusetts Department of Transportation
Ten Park Plaza
Boston, MA 02116

Subject: Comments on Parcel 9 Development Proposals

Dear Mr. Tuttle:

The following are comments on the Parcel 9 development proposals jointly submitted by members of the North End/Waterfront community. Our shared perspective in reviewing the four development proposals and crafting the consensus opinions below is formed by our longstanding interest and endeavors to enhance and protect the quality of residential life, historical character, cultural integrity, and sustainability of the North End/Waterfront neighborhood. In our active, ongoing participation with government, developers and the business community, we seek to promote responsible growth and associated benefits and opportunities for our neighborhood, the City of Boston and its citizens, now and well into the future.

Our comments begin with a listing of what we believe to be overarching goals and considerations for any development at Parcel 9 and, for that matter, any development within the City of Boston's designated Market District, a once seamless part of our neighborhood with which we continue to share an historical identity, as well as future aspirations. Clearly, the development context for the Market District and, particularly, Parcel 9 will inevitably affect the North End/Waterfront neighborhood.

We then identify what we perceive are the key strengths and weaknesses of each of the four Parcel 9 proposals. We ask Massachusetts Department of Transportation (MassDOT), in continuing coordination with the Boston Redevelopment Authority (BRA) and the Parcel 7 & 9 Advisory Committee for the designation of a developer at Parcel 9, to consider these proposal-specific strengths and weaknesses not only for the purpose of evaluating and rating the proposals, but also to form a framework for guiding the chosen development through the forthcoming lease negotiations, design reviews, project approvals and continuing public participation.

Goals and Important Considerations

Appropriate development at Parcel 9 should:

1. Promote the Boston Market District Feasibility Study goals and recommendations, including the recommendation that the Market District “preserve itself from becoming overtaken by tourists and visitors who would enjoy the market experience but would not want to buy basic foods”;
2. Help relieve the demands for affordable housing in the area and bring into the district long-term residents who will provide a strong customer base for the adjacent markets;
3. Promote a Market District-wide urban character that reflects and is sensitive to the historical and residential character of its surroundings, including the North End/Waterfront neighborhood, and does not compete with, but instead complements, the existing North End/Waterfront commercial activity;
4. Integrate the existing and planned market uses in the District;
5. Preserve and enhance the impressive view corridors between the Blackstone Block and the North End, taking full advantage of the aesthetics of the Greenway parks;
6. Enhance the public’s enjoyment of the Greenway parks and cause no harm to the parks;
7. Promote pedestrian access and avoid worsening existing traffic problems;
8. Provide substantial public accommodation;
9. Provide 24-hour human presence and morning to midnight activity;
10. Be implemented by a project team with development and management experience that demonstrates commitments to quality of urban residential life, community connections, commercial activity, and urban environmental integrity;
11. Realize the development goals and benefits in a timely manner; and
12. Bring significant financial and economic benefits to the citizens of the Commonwealth and not add burden to the state’s already dire fiscal problems or shift resources away from important public programs.

The Boston Museum and Community Marketplace

Civic, cultural and historical museum with education and meeting spaces; museum store and café and community marketplace on first floor.

Strengths:

- Adds to the cultural and historical resources of the city.
- Provides highest level of public accommodation and potential for community uses.
- Provides public venues for viewing the Greenway, the North End and the waterfront (for a cost).

Weaknesses:

- Carries the highest risk for inadequate funding, compromising the ability to build and operate it in a timely manner.

- Does not complement or build upon the other market venues existing or planned within the Market District. Museum visitors would not provide an economic base for the existing and planned markets. The museum appears not to be compatible with the goals of the Boston Market District Feasibility Study, which warns that tourists can have a destructive impact to public markets.
- Does not help satisfy the need for housing and affordable housing, especially in an area adjacent to downtown residential zones.
- Does not provide 24-hour human presence or 18-hour human activity. The building likely would be closed and/or inactive as much as half of the time.
- Generates hundreds of additional tourists daily, potentially bringing more pedestrian and vehicular congestion into the North End.
- Will attract a high number of travelers from outside the area, increasing traffic and parking demand. Drop-off parking and chartered buses along the Surface Artery will have adverse impacts to traffic circulation, especially during HPA operating times, and will adversely affect the Greenway park experience and enjoyment.
- Presents a not-well-thought-out and potentially complicated first floor market use plan that while offering indoor HPA accommodation (which may be contrary to HPA's business plan) may also create competition for the existing HPA vendors or for the Boston Public Market at Parcel 7.
- Does not provide 24-hour attractive and comfortable pass-through from the Greenway to Blackstone Street, creating a barrier along the Surface Artery.
- As currently proposed, is a signature building that does not blend with the Blackstone Block as required by the design guidelines.

Blackstone Market

50-units of rental housing within a building of relatively small foot-print at North Street with three large restaurants on the second floor and a first floor market/eatery; 13,000 square foot green roof providing an urban agricultural center.

Strengths:

- Helps satisfy housing needs, and residential use provides 24-hour human presence.
- Maximizes sight lines, especially promoting visual connections between the Blackstone Block and the North End. Expansive lower level structure should also benefit the Greenway parks experience.
- Offers pedestrian pass-through between the Greenway and Blackstone Street.
- Proposes a project team that is well-formed, complementary, and has the Boston development experience to successfully implement the proposal.
- Shifts the housing component and building massing away from the core of the Market District, which should benefit the market operations on and off site and any synergy among the markets, the Greenway Parks, and the North End commercial activity.
- Architecturally blends with its surroundings.

Weaknesses:

- Includes a significant, destination restaurant component. The more than 20,000 square feet of destination restaurant space will attract a large volume of transient users, putting additional pressures on traffic, parking and enjoyment of the Greenway parks (especially from outdoor deck dining). The types of restaurants proposed are not compatible with the adjacent commercial activity in the North End. Valet service seems inevitable, and certainly cannot be accommodated easily or without impact to traffic circulation, pedestrian safety or the adjacent park.
- The second-story restaurant terraces may contribute noise, especially along the edges of the Greenway parks, without enhancing ground level activity and connectedness. The three proposed ground level entrances to the restaurants will not promote, and may impede, connectivity between the public realm and the publicly accessible interior spaces on the first floor (entrances to higher-floor restaurants tend to have a private feel). Together with the entrance(s) to the residential units, the three restaurant entrances reduce the extent of the ground floor perimeter that is connected to the building's public surroundings.
- Limits housing and affordable housing, with less than half the number of housing units and affordable housing units offered by a competing proposal. Housing could be expanded by replacing some or all of the second floor restaurant space with additional residential units.
- Proposed green roof with urban agricultural center seems to be out of place, may not be feasible all year long, and may not be environmentally well-located given the preponderance of air pollution sources, including adjacent major roadways and nearby tunnel ventilation stacks.
- Market concept is not clear – various alternatives are presented, some of which could present redundancy and competition with other planned markets in the District.
- Access to public restrooms seems limited – only from Blackstone Street, and not from the public areas within the building.
- Is non-committal with respect to Blackstone Street improvements.

Hotel (Normandy and Jones Lang LaSalle)

180-room hotel with 2-story public winter garden, nearly 20,000 square feet of first floor market, HPA and retail space, top floor restaurant, and rooftop gardens.

Strengths:

- Includes extensive public accommodation within the entire building.
- Includes a substantial, comfortable and aesthetic through-block public access from Greenway to Blackstone Street 24/7, joining with a 2-story Winter Garden hotel lobby.
- Commits greatest accommodation to HPA both inside (accessories) and outside the building without substantively changing longstanding HPA operations.
- Provides high opportunity for community uses, such as meeting space.
- Proposes a building height that is no higher than nearby buildings.
- Proposes lots of access points to the interior, along all streetscapes.

- Provides a high level of connectivity between the first floor spaces and uses and the adjacent streetscape, especially along the Surface Artery, facing the Greenway.
- Provides a higher level of security to the building and its surroundings with the 24/7 hotel management, which may also contribute to enhanced care and security to the adjacent Greenway park.

Weaknesses:

- Does not help satisfy the demand for housing and affordable housing.
- May be “more of the same” (hotels, retail) in the Blackstone Block and Faneuil Hall Marketplace area and not be in sync with the vision for transforming the area into a market district. May extend the heavy tourist presence in the Faneuil Hall Marketplace area closer to the North End.
- May add to the volume of tourists and congestion in the North End commercial areas.
- Will not provide a customer base for the existing and proposed area markets and otherwise may not be compatible with market programming.
- Does not commit to a definitive first floor retail component that will promote the goals of the Market District initiative. In the presentation by the development team at the public meeting in the North End, the nature of the first floor establishments was made even less clear, and there is concern that the “market-related” retail component may convert from market-oriented to tourist-oriented, similar to the commercial evolution (devolution) at Faneuil Hall Marketplace.
- Limits access to the building’s interior from North Street and Hanover Street.
- Will attract additional travelers, increasing traffic and parking demands. Will exacerbate traffic problems along the Surface Artery, with adverse effects to the Greenway park experience.
- Does not validate through the team’s past experience the commitments for connections to surrounding public space and community amenities. Past projects of the development team seem not to reflect a high level of public/private interface or community accommodation. The team seems not to be experienced with the types of programming now proposed at Parcel 9.

Upton + Partners w/CBT Architects

119 residential apartments on the upper floors and 22,000 square feet of Italian-themed food markets and small eateries on all of the first floor and in the three-story “Market Square” extension at the Hanover Street end.

Strengths:

- Maximizes housing and affordable housing to help satisfy critical housing needs in the area. The high number of residents should activate the area and provide a level of residential oversight and care to the surroundings and provide a considerable customer base for the area markets.
- Focuses on area-wide public activity and integration of the Parcel 9 building and programming with its surroundings, including the rest of the Market District and the North End.

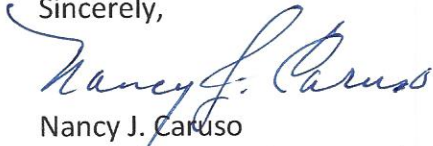
- Promotes the Market District goals, in part by seeking to integrate potential uses and parking garage management at Parcel 7. Seeks to integrate market/eatery uses with Parcel 7 public market and build strong links to food growers and providers. Proposed concept should complement, and not compete with, the existing HPA operation and the Boston Public Market in Parcel 7.
- Proposes a “North End style” urban framework, with dense residential over market/restaurant uses. Could expand the physical and resource capacity for North End-type commercial activity, without creating a much greater customer base that could add to congestion in the North End.
- Is the only proposal to place an emphasis on creating a structured, well-programmed “square” at the intersection of Hanover and Blackstone streets, to the potential benefit of all surrounding businesses and the public realm.
- May help solidify the character of the Market District in part by buffering the Faneuil Hall Marketplace tourist influences, but only if the proposed concepts are well-managed and preserved.
- Provides a \$2.1 million contribution to HPA.
- Makes a strong long-term commitment employing project team members experienced with a similar range and size of projects, including market expertise.
- Borrows from similar, successful retail programs elsewhere.
- Seems to maximize open space around the building, especially at Hanover and North Streets and provides a high level of interconnectivity between the interior commercial programming and the exterior public spaces.

Weaknesses:

- Limits sight lines between the North End and Blackstone Block and extends the residential component closer to the market square area and the HPA operations than other proposals. Building design and massing is less attractive than the other proposals and has the potential for greater impacts. Consideration should be given to shifting the massing toward North Street.
- Lacks a Greenway to Blackstone Street pass-through and limits first floor public access to retail activities.
- Has the potential to cause similar second floor “destination restaurant” and associated third-floor dining terrace impacts that are a concern with the Blackstone Market proposal, including noise and traffic and parking impacts that could impact the Greenway park experience.
- Has the potential to become a major tourist attraction if the first floor uses are marketed as a destination, are out-of-scale or character with North End establishments, and are not integrated carefully with surrounding market programming.
- Does not offer specific in-kind improvements to the HPA within the development, aside from storage.
- The development entity, as a whole, cannot demonstrate successful implementation of similar projects due to its recent formation and lack of project experience, though its individual members bring long and significant experience.

In closing, we wish to thank MassDOT for facilitating what we believe has been a rigorous and inclusive public process for setting development guidelines, reviewing development proposals, and obtaining public input toward a designation for Parcel 9. We recognize the enormous amount of work by MassDOT and BRA officials and staff, and we appreciate the efforts by the various community representatives who have tirelessly served on the Parcel 7 & 9 Advisory Committee and represented their constituencies well. We request that MassDOT continue the public process and allow the communities and their representatives to have input as development at Parcel 9 moves through award, design, approvals and construction.

Sincerely,



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North End Central Artery Advisory Committee



David A. Kubiak, Co-Chair
Zoning, Licensing and Construction Committee
North End/Waterfront Residents' Association

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*Member of Parcel 7 & 9 Advisory Committee

cc: Mayor Thomas M. Menino
Senator Anthony Petrucci
Representative Aaron Michlewitz
Councilor Salvatore LaMattina