



8 February 2008

Mr. John Palmieri  
Director  
Boston Redevelopment Authority  
One City Hall Plaza, 9<sup>th</sup> Floor  
Boston, MA 02201  
ATT: Kristin Kara

RE: 585 Commercial Street  
North End, Boston

Dear Mr. Palmieri:

The Boston Harbor Association is a non-profit, public interest organization founded in 1973 by the League of Women Voters and the Boston Shipping Association to promote a clean, alive, and accessible Boston Harbor. The Boston Harbor Association commented on the Project Notification Form for the redevelopment of 585 Commercial Street, North End, Boston in December, 2006.

In response to comments, GA 585 Commercial Street LLC, the project proponent, has modified its original plan of replacing an existing three-story commercial building with a new eight-story, 62 unit residential building. In order to make the building compliant with the Municipal Harbor Plan (MHP), the proponent has now lowered building heights from 85 feet to 55 feet, consistent with the MHP. The proponent has also indicated that a proposed marina, slated on Department of Conservation and Recreation (DCR) property, will be licensed under a separate filing if supported by DCR. We commend both of these modifications.

We have reviewed the Draft Project Impact Report (DPIR) and have had a chance to recently meet with the project proponent. Our comments follow:

Consistency with Chapter 91 requirements: We highly commend the project proponent for reducing the height of the project, consistent with the approved Municipal Harbor Plan, in an effort to reduce shadow and wind impacts on the pedestrian environment and on the watersheet.

However, the proposed building will now cover more of the project site. The 2006 Project Notification Form proposed a building with a footprint of 20,715 sq. ft. on a lot of 32,148 sq. ft., while current plans now call for a 23,297 sq. ft. building.

The 5 January 2007 Boston Redevelopment Authority's Scoping Determination for this project indicated that the proposed project is within the North End Local Business Subdistrict of the North End/ Downtown Harborpark Zoning District and that the minimum open space requirement is 50% (page 19 of BRA Scoping Determination). The BRA Determination further states (page 20): "As proposed, the project does not meet the minimum open space requirement of 50% required under the Chapter 91 regulations per 310.9.51(3)(d). The proponent should consider design alternatives that comply with Chapter 91 regulations by providing a minimum of 50% open space."

The Draft Project Impact Report for the current project states, "The project reserves 28% of the site as open space" (page 2-3). The amount of proposed open space does not appear to meet Chapter 91 or BRA requirements.

Moreover, the DPIR states (page 4-3): "Given the unusual nature of the area, which includes a large amount of public open space and a relatively small single development parcel, there exists ample public open space along the entire waterfront which would not be significantly enhanced by the provision of additional open space on the site. The

required project open space is selectively located to enhance the pedestrian environment along Commercial Street and to provide an increased buffer to the public open space along the harbor."

To the contrary, the open space required at this site is a key segment in knitting together the Department of Conservation and Recreation's open spaces and facilities and the City of Boston's recreational facilities along the North End waterfront with the newer open spaces at Lovejoy Wharf and the Lower Charles River Basin. We urge that the proponent be required to provide the amount of open space consistent with the approved Municipal Harbor Plan, and to work with abutting property owners and the community in ensuring that the required open spaces complement the existing open spaces.

View Corridors to the Harbor: TBHA's prior letter on the project's Project Notification Form asked that the proponent work to ensure that on the east side of the building between 585 Commercial Street and Steriti Rink, existing sight lines from the top of Hull Street and Copp's Hill Burying Ground to Commercial Street and the Harbor be preserved. Likewise, on the west side of the building, the sight lines along Commercial Street and Prince Street allow visitors and residents to see the waterfront and Charlestown, including the Zakim Bridge, Bunker Hill Monument, and other key historic sites.

The DPIR notes, "The MHP Compliant scheme generally has the least visual impact" (page 3-15). TBHA urges that the proponent continue to work to open up sight lines to the harbor, particularly on the west side of the building where the sight lines appear to narrow as one gets closer to the water's edge.

Facilities of Public Accommodation: We ask clarification regarding whether the proponent is required to provide additional ground floor facilities of public accommodation, and whether the proposed facilities of private tenancy

facing Commercial Street are consistent with MHP requirements for this site.

Of the 12,889 sq. ft. of facilities of public accommodation (FPAs) to be provided on the ground floor, the proponent proposes 3,970 sq. ft. for a fitness center and pool, 3,000 sq. ft. for a "river room"/lobby, and 3,080 sq. ft. for a five-room inn. In recent discussions, the project proponent has agreed to provide a public rest room for the general public in the building's lobby which will be available seven days a week. We highly commend the proponent for providing the public rest room facility, and urge that universal signage be placed on both the Commercial Street and the waterfront sides indicating its availability to the general public.

The project proponent indicates that a meeting room in the lobby area will be available to community groups for meetings. Similar to the Chapter 91 requirements for Building 114 in the Charlestown Navy Yard, reservation of the conference room for meetings should be on a first-come, first-serve basis so that building occupants and the general public have equal access to the space, without preference to either.

As we stated in our previous comment letter, this site is an important gateway to both the North End and Charlestown waterfronts. We urge the project proponent to continue to identify creative types of facilities of public accommodation for the ground floor, recognizing its proximity to the Freedom Trail and to the diverse recreational and open space facilities along the North End waterfront. More publicly-welcoming ground floor uses include exhibit areas to complement those at Lovejoy Wharf and Battery Wharf, consistent with the Boston Redevelopment Authority's North End Historic Piers Network Plan; bicycle rental, indoor bicycle storage space, and shower facilities to support Boston Mayor Thomas Menino's 2007 initiative encouraging additional bicycling by the general public;

and/or a fish cleaning station and area for rental of fishing gear.

The PNF indicated that a restaurant/bar would be included on the ground floor, while the current filing does not include such. A restaurant/cafe would be a more welcoming FPA use for the general public and would support the surrounding uses.

HarborWalk: Currently, there is a HarborWalk segment at this site, and earlier this year, the Central Artery/Tunnel Project completed a new segment at Lovejoy Wharf providing a key connection along the waterfront to the project site.

In addition, in response to The Boston Harbor Association's advocacy for completion of the HarborWalk network, Captain Scott Keene, Commanding Officer of the Integrated Support Command Boston, U.S. Coast Guard, has agreed to re-open the waterfront pier section of their property during daylight hours starting 1 April 2008 through 1 November, annually. As you may recall, this section has not been accessible to the general public since 11 September 2001.

The two new segments make the 585 Commercial Street HarborWalk segment an important connector. We highly commend the project proponent for agreeing to provide a HarborWalk kiosk on the west side of the site on Commercial Street, and for providing shade shelters and new public benches along the HarborWalk. We ask that an interpretive feature be placed on the HarborWalk, as well as a drinking fountain.

The project proponent proposes to widen the HarborWalk at the "elbow" nearest DCR's tennis courts. While we support a generous HarborWalk, the design of such should minimize decking over watersheet.

Watersheet Activation: The project proponent is exploring with the Department of Conservation and Recreation (owner

of the existing HarborWalk and fishing pier next to the project site) the option of replacing the existing pier with a new 1,950 sq. ft. public landing/ fishing pier and a 2,135 sq. ft. public marina as part of an off-site mitigation measure.

The project proponent is not seeking permitting for the pier or marina at this time. Because the proposed location is within DCR property, the proponent will only move forward with the pier and marina with the support of DCR. We strongly concur with the need to have DCR concurrence with the proposed plans.

If a new pier is built, it should be available for use by water taxis and for fishing. It should be free of charge and accessible to the general public at all times, similar to the existing pier. Permitting for this pier should be separate from the permitting for the proposed marina, as it is possible that the new pier may be built without the marina.

The size and location of the proposed marina may extend beyond the Harbor Line and may impact the U.S. Army Corps of Engineers' 120' Channel Setback Line (page 4-10 and Figure 4-6 of DP

IR). The proponent should reconfigure the proposed marina so that it does not extend beyond the Harbor Line nor the Corps' Channel Setback Line, and work to design a marina which minimizes conflict with other vessels.

In the event that a new public pier and/or a marina are not built off-site by the project proponent, the final PIR should identify other means of activating the water's edge, e.g., support for the water transportation facility off-site at Lovejoy Wharf.

Alternate Transportation Usage: One hundred and forty eight parking spaces are proposed for the 68 residential units. In response to comments, the proponent indicated

that the excessive numbers of parking spaces were needed because "it is anticipated that the prospective purchasers of the units will typically have two cars" (page C-91 of DPIR). In most of Boston's downtown and waterfront neighborhoods, the majority of residents do not have two automobiles nor two parking spaces. We strongly urge the proponent to significantly reduce the number of parking spaces at this site, consistent with other waterfront developments of the 21st century.

We urge the project proponent to encourage the residential tenants to utilize the existing mass transit within three blocks of the project (MBTA Green and Orange Lines and commuter rail at North Station), to utilize bicycles consistent with Mayor Menino's new initiative, and to help market and subsidize future water transportation at the nearby Lovejoy Wharf water transportation facility.

Sustainable Development: The project proponent will seek platinum LEED certification, including a green roof on over 50% of the plan area and use of landscaping materials to enhance sustainability. We highly commend the project proponent for his creative measures to incorporate environmentally sensitive design and operations into the building.

Thank you for your consideration.

Sincerely,

Vivien Li  
Executive Director  
The Boston Harbor Association