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July 1, 2016

Mr. Christopher Tracy
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201

**RE: Archer/Donahue Residential Development - 33-61 Temple Street
Expanded Project Notification Form ("EPNF")**

Dear Mr. Tracy:

The Beacon Hill Civic Association ("BHCA") has, since 1922, strived to enhance and protect the quality of life of residents in Beacon Hill. We appreciate this opportunity to comment on the Expanded Project Notification Form dated March 31, 2016 (the "EPNF") for the Archer/Donahue Residential Development located at 33-61 Temple Street, Beacon Hill, Boston (the "Project") submitted by JDMD Owner, LLC (the "Proponent") and the proposed modifications presented by the Proponent in public meetings. We also thank the Proponent and the City for the public process and continued communications and conversations during the process.

We welcome residential use at the proposed site and believe the Project has the potential, if planned thoughtfully, to improve the quality of life for those living on Temple Street, the surrounding streets and the entire neighborhood. As this is a large development project sited between the two small streets of Temple Street and Ridgeway Lane that would increase the residential density of Temple Street by nearly 50%, careful planning and consideration of the impacts on the location and on the neighborhood are essential for this Project to be successful.

Preserving the Pedestrian Nature of Temple Street

Beacon Hill visionaries of the 1960s and 1970s led the effort to transform Temple Street into a "shared street" that has become a national model for pedestrian-friendly, accessible streetscape design. Federal, State and City support, along with community development block grant funds, helped make it reality. At its dedication in 1977 as cited in the *Boston Globe*, Governor Dukakis and Mayor White dubbed the street "Temple Walk". Parking was eliminated, sidewalks were widened, trees were planted and the curb on one side of the street was made flush with the street to create an accessible street shared by pedestrians, wheelchairs and strollers. Car traffic was further minimized by the daily blocking of the street from Derne Street by Suffolk University

officials during afternoon rush hours. In 2002, a neighborhood coalition comprised of residents, Suffolk University, the Beacon Hill Garden Club and the BHCA raised money to purchase the lots that became the Temple Street Park and turned them over to Boston Parks and Recreation Department. Today, with its wide sidewalks and a modest incline from Cambridge Street to the State House, Temple Street attracts residents, tourists, playing children and workers traveling from North Station into downtown. The Greater Boston Convention and Visitors Bureau has installed wall-sized photographs of Temple Street in several terminals in Logan Airport, showing people walking among the budding trees and flowers, bricks and gas lanterns, as an enviable example of what makes Boston an attractive and walkable city. Great care must be taken so that the Project preserves this legacy. In this context, we submit the following comments.

Height of the Building

The 65 foot height limit in Beacon Hill is fundamental to the preservation of both our historic resources and the modest scale of the built environment that makes the neighborhood so livable. It is a character defining feature of our community. The BHCA has therefore long advocated for the maintenance and application of this height restriction, both for new construction and in redevelopment of existing buildings.

The Archer/Donahue building, currently at 81.75 feet high, is already 16.75 feet higher than the height limit. Rooftop mechanical structures make the effective height with respect to visual and shadow impacts even greater. In the EPNF, the Proponent proposed a 33-foot increase in height. The latest revision (presented in a BRA-hosted meeting on June 21st) reduced the proposed height to 95 feet, still 46% above the as-of-right-zoning height for the district. Even in its reduced form, the proposed penthouse floor would be visible from the State House, Ashburton Place, and the surrounding public areas.

The construction of new additional living space above the already excessive height of the building could set a precedent with long term negative implications for the historic and residential character of the neighborhood. We therefore feel strongly, consistent with our longstanding position on this issue, that the height of the building as it pertains to livable space should be maintained at its current level.

We applaud the intention of reducing the visual impact of unsightly rooftop mechanicals, and these structures should be set back from the roof edge and shielded to the maximum extent possible. While the latest revised design would enclose the mechanicals within the envelope of the proposed additional floor of living space, it would also broaden the footprint of this floor beyond that of the existing rooftop structures, increasing its visibility and associated shadow impacts in an already light-challenged part of the neighborhood.

FAR; Number of Units

The allowed floor area ratio ("FAR") at the Project site is 2.0. The FAR of the existing building is 6.11 and the proposed FAR for the Project as described in the EPNF is 6.23. Keeping the building at its current height and reducing the number of units in the Project – by committing to more family-size units of 2, 3 and 4 bedrooms – will reduce both the FAR and the impact of additional traffic. Currently there are approximately 150 households on Temple Street. Adding approximately 70 households to the street, almost a 50% increase, will have a significant impact on the one-block street. Revising the mix toward fewer, larger units would mitigate many neighborhood concerns.

Parking and Traffic

As we have described, great efforts have been undertaken to reduce vehicle traffic on Temple Street and create a pedestrian-friendly, accessible shared street, and the Project should seek to maintain this vital aspect of its character. Likewise, significant efforts have been made over the years to mitigate traffic impacts throughout the neighborhood (the reversal of Charles Street and the reorientation of other one-way streets to reduce through traffic, etc.). Beacon Hill is also significantly space constrained in terms of Resident Parking, with three permits for every space. The Project should therefore seek to minimize, to the maximum extent possible, traffic and parking related impacts most immediately to the Temple Street and Ridgeway Lane neighbors, but also to the Beacon Hill community at large.

A significant reduction from the proposed 54 onsite parking spots would help mitigate traffic impacts on Temple Street and maintain its pedestrian-friendly character, and the Proponent should also explore ways to mitigate external traffic and parking impacts to the immediately adjacent streets and the wider community. Current data from analogous valet and garage programs in and around Beacon Hill would help make a more accurate assessment of the likely number of vehicle trips generated by the Project, peaking patterns, etc. The operations at 34½ Beacon Street, 145 Pinckney Street, and the Brimmer Street Garage would provide appropriate examples in this regard.

The incorporation of the parking transition (including passenger, luggage and valet exchanges) entirely *inside* the building, rather than on the sidewalk or in the passageway to the north of the building, would help further preserve the current character of Temple Street and significantly mitigate nearby resident concerns over associated noise impacts. It would also prevent temporarily stopped cars from blocking the flow of pedestrians or other vehicles.

We support the updated plan that all deliveries to the building be made via Derne Street through a door on upper Temple Street. The conversion of the current commercial loading zone on Derne Street to two 15-minute resident parking spots would further facilitate deliveries and provide a pick-up/drop-off area for building residents.

Installation of signage on Temple Street and Ridgeway Lane prohibiting non-resident traffic during the peak period of 4:00-6:30 pm (when cars leave the State House garage and cross-town drivers seek to avoid the congestion on Bowdoin Street) could significantly mitigate traffic impacts, and help preserve the informal defacto restriction previously implemented by Suffolk University. The addition of speed tables on both streets could further help mitigate traffic impacts.

The limiting of the parking spaces for only the use of building residents would further reduce vehicle traffic. This could be accomplished in the condominium documents and the Transportation Access Plan Agreement ("TAPA") executed with the City.

We support the Proponent's plan to provide bicycle storage, and the provision of public bicycle spots would help replace the capacity now provided by the community bike racks that will be removed.

Architecture

Under the enabling legislation that created the Historic Beacon Hill District, the subject buildings had enjoyed a statutory exemption by virtue of their ownership by Suffolk University. With the transfer of ownership the Project is now legally within the Historic District and the building's proposed design will therefore require review and approval by the Beacon Hill Architectural Commission.

On the whole the proposed design reflects a thoughtful treatment of a challenging building, in effect restoring the historic features of the older Archer Building and reimagining the newer (and widely regarded to be less successful) Donohue Building. The reorientation of the Donahue façade to read as two vertically oriented structures rather than one large horizontal one helps reduce its apparent scale, consistent with the residential nature of the rest of Temple Street. The introduction of features emblematic of Beacon Hill's past (oriel windows, two-over-two sash, etc.) further supports this intention.

While Donohue is neither old nor historically significant, residents have raised concerns over the potential visual impact of more "contemporary" building materials such as glass and steel and their prominent role in the accomplishment of this architectural program. Since the final design will need to be approved by the Beacon Hill Architectural Commission, the Proponent should explore alternatives that achieve the intended effect using more traditional vocabulary and materials, so as to more effectively harmonize with the surrounding buildings and achieve consistency with the Commission's guidelines.

With respect to the Ridgeway Lane façades, the narrowness of this street means that external lighting and other accoutrements could significantly affect nearby neighbors. Lighting should therefore be shielded from nearby windows, and the façades kept free of any utility or exhaust vents.

Affordable Housing

The BHCA strongly supports the preservation of economic diversity in Beacon Hill. The Beacon Hill community has long supported affordable housing, as demonstrated in our multiple housing facilities serving low and middle income residents, elderly residents, and persons with disabilities.

We therefore support the inclusion of the affordable units required by the Inclusionary Development Policy ("IDP") *within* the Project, or the direction of funding provided in lieu thereof to the creation of other affordable housing opportunities elsewhere within the Beacon Hill neighborhood. The units are necessary and would help counter the flood of new luxury condominiums that continue to put pressure on low and moderate income families and elders to leave the neighborhood.

Accessibility

We support the accessible nature of the building, the presence of an elevator, and that all units will be easily convertible into fully-accessible units. We encourage the use of ramps on floors that have grade changes.

Sustainability

We encourage the Proponent to meet the highest standards for green building practices and energy efficiency consistent with the City's Climate Action Plan and the State's Global Warming Solutions Act, which was recently upheld by the Massachusetts Supreme Judicial Court. We hope the building, which will be one of the largest residential buildings in the neighborhood, will be a model in terms of energy efficiency and conservation. We applaud the planned use of heating and cooling controls in each unit. The sustainability of the Project could be further enhanced through features such as the following:

- Using the existing steam infrastructure for heat, hot water and cooling in line with Boston's Climate Action Plan, instead of installing new gas infrastructure;
- Insulating building walls to R50;
- Using Wi-Fi-enabled thermostats, which have shown to decrease energy use by 12% compared to buildings that don't use them;
- Managing the use of electricity in the building by using lighting that dims when not in use;
- Minimizing heat escaping from the roof with insulation (and possibly a green roof); *and*
- Providing plug-ins in the garage for electric vehicles.

Pedestrian Passageway between Temple Street and Ridgeway Lane

We are pleased that the Proponent has included in its plans for the Project the preservation of the walkway between Temple Street and Ridgeway Lane that has existed for over 50 years on the north side of the Donahue Building. We ask that safety of pedestrians be a focus and that materials such as brick be used for the walkway to make obvious and visible the pedestrian nature of the walkway.

Contributions to Neighborhood

For the past 40 years, Suffolk University and the residents of Temple Street have paid for and maintained the Temple Street Park and the tree pits and planters along Temple Street. Residents will continue to pay for the plants and do the planting and winter decorating. The Project will benefit from years of work and investments by the neighbors and so we encourage the Proponent to help maintain the beauty and safety of the neighborhood surrounding it. Specifically, significant contributions that would provide valuable benefits to the community would include the following:

- Providing for the watering of the trees and planters and pruning;
- Installing new lighting in Temple Street Park and along the sidewalk on the west side of Temple Street;
- Replacement of the tree guards (so that they are similar to those on Charles Street) after construction;
- Providing of trash barrels for the Temple Street Park; *and*
- Conducting regular trash cleanup on all sides of the site, including the walkway between Temple Street and Ridgeway Lane.

Mitigation of Impacts of Construction

In addition to the mitigations proposed pursuant to Section 4.7.4 of the EPNF, we request that all gas leaks in the surrounding area be repaired and that the opening of the streets be coordinated so that utility work, including the needed gas leak repair, can occur at the same time. For any dewatering, at no time should runoff should be routed, even temporarily, to Ridgeway Lane or Temple Street.

We further request that no contractor parking be permitted on Temple Street, Derne Street, Ridgeway Lane or elsewhere on Beacon Hill, and, consistent with the Proponent's representation that dumpsters will be located within the structure/project, that no permits be issued for dumpsters in residential parking spots.

Lastly, residents request street cleaning on a daily basis during construction and that any residents (who sign up for email notification) be notified of street closures at least 24 hours in advance.

We thank you for the opportunity to submit these comments.

Sincerely,



Mark Kiefer
Chairman of the Board

cc: Mayor Martin J. Walsh
Brian P. Golden, Director, Boston Redevelopment Authority
State Senator Joseph Boncore
State Representative Aaron M. Michlewitz
State Representative Jay Livingstone
Council President William Linehan
Councilor Josh Zakim
Councilor Annissa Essaibi George
Councilor Michael Flaherty
Councilor Ayanna Pressley
Councilor Michelle Wu