March 22, 2019

Katelyn Sullivan
Senior Project Manager
Boston Planning & Development Agency
One City Hall Square
Boston, Massachusetts 02201

Re: Massachusetts General Hospital Institutional Master Plan/Project Notification Form – Scoping Determination

Dear Ms. Sullivan:

Since 1922, the Beacon Hill Civic Association (“BHCA”) has strived to preserve and enhance the quality of residential life on Beacon Hill. In this regard, we very much appreciate the opportunity to provide comments to the Boston Planning & Development Agency on the Institutional Master Plan and Project Notification Form (“IMP/PNF”) for Massachusetts General Hospital (“MGH”) dated February 20, 2019, concerning MGH’s proposal to construct several new large buildings along Cambridge Street and adjacent streets in the West End, immediately across Cambridge Street from Beacon Hill (the “Project”).

The scoping determination comments of the BHCA set forth below reflect a consensus of the many comments we have received directly from residents and other members of our community concerning the proposed Project. In addition, on March 12, 2019, the BHCA sponsored a community forum attended by approximately 60 local neighborhood residents. Representatives of MGH presented a high-level summary of the proposed Project, answered questions from the audience, and responded to the many comments made by the neighbors that attended the meeting. The BHCA’s letter also contains many of the comments raised at the March 12th community meeting.

There is a high level of concern among residents about the impact on the neighborhood of this very large proposed Project. We look forward to MGH exploring new alternatives that consider inventive solutions to address many of the issues raised at the community meeting and set forth in this letter. We believe
that MGH should consider new innovative approaches to the issues raised below, particularly those around traffic, pedestrian and bicyclist safety, and access, rather than just suggest incremental changes.

**Traffic:** The traffic issues in the area are acute and of great concern, and additional traffic caused by increased parking spaces as part of the Project will have a highly disproportionate effect on already-severe congestion. The situation calls for far-reaching, transformative approaches to traffic management. In addition, the IMP/PNF should include the following:

- The scope of the traffic studies should look at all affected areas, including, without limitation: Storrow Drive and its ramps; the Longfellow Bridge; Leverett Circle; Charles Circle, North Station; Beacon Hill; and all areas adjacent to the campus.
- Evaluation of placement of left turn locations on Cambridge Street into the MGH campus.
- The location of garage entrances and their effect on traffic patterns.
- Drop-off and pick-up locations away from Cambridge Street for visitors traveling by automobile (including ride-sharing services).
- The removal or relocation of loading docks that affect traffic.
- Evaluation of further incentives to shift auto traffic to bicycle or public transit.
- Maximization of alternative routes into the MGH campus other than via Cambridge Street.
- Evaluation of shuttle routes and timing, their impact on all types of traffic, and potential alternative routes other than via Cambridge Street.
- Safety and Access for Pedestrians and Bicyclists: The area is currently often unsafe and unfriendly for pedestrians and bicyclists. The IMP/PNF should include the following:
  - The pedestrian pathways and sidewalks along the entire north side of Cambridge Street near the MGH Campus have a number of issues, and should be evaluated in depth and redesigned where possible or, where not currently possible, identified for future changes.
  - Identification of specific areas with hazards to pedestrians and bicyclists and consider targeted interventions. Two such areas are Charles Circle and its MBTA station and the North Grove Street intersection.
  - It seems likely that the traffic patterns of Cambridge Street will, in the near term, be revised to allow for bike lanes. The IMP/PNF and related studies should consider the effects of this change.

**Design and Streetscape:** The scale of the Project will have significant effects on how visitors and residents experience the surrounding areas. The IMP/PNF should evaluate several issues, including:

- Tenanting the building with uses that will generate activity into the evening hours would enhance the Cambridge Street neighborhood and the safety of the area for pedestrians and others. The IMP/PNF should present a more detailed plan for achieving this result.
- Rather than proposing a superblock for the street front along Cambridge Street, the IMP/PNF should explore ideas and alternatives that provide a street front more appropriate to this area and to Boston.
- The IMP/PNF should present detailed information on how the proposed projects relate to and integrate with the buildings, and neighborhood along the south side of Cambridge Street, and the visual impact of the buildings to neighbors and visitors.

**Parking Scope:** The analysis of employee parking and the employee parking freeze should include the areas around Blossom Street, Martha Road, Lomasney Way and Staniford Street. Otherwise, additional traffic may be generated by employee parking demand that is merely displaced to nearby areas.
Public Transit: While the MBTA’s proposed Red-Blue Connector (“Connector”) may still be some years away, the large scope of the Project along the Connector route on Cambridge Street suggests additional effort should be made to consider how these projects could be coordinated with the Connector. Examples might include construction location and techniques, and utility services and connections.

Coordination with Nearby Institutions: MGH should coordinate its planning and IMP process with nearby institutions and with its Partners affiliates, particularly Massachusetts Eye & Ear. Mass Eye & Ear has itself proposed a large project, which should be discussed and coordinated with the revised MGH IMP.

Lighting: The lighting of the Project buildings along Cambridge Street, including the amount and number of windows along the facade of the buildings, have the potential to create a significant visual impact at night for the neighborhood, including significant additional light pollution on Cambridge Street. The lighting and visual impacts of the Project buildings night should be further evaluated with respect to the effect of such lighting on the neighborhood.

Co-generation: More information should be presented regarding the scope, timeline and process for the potential cogeneration plant in the Project’s proposed Campus Services Building. In particular, to what extent does approval for the IMP represent approval for the co-generation plant; and what other review processes would be expected?

Energy Use: The IMP/PNF should further explore the several issues that have been raised by neighbors during the March 12th community meeting regarding sustainability and energy use and commit to alternative approaches, such as:

- How these projects might meet or support Mayor Walsh’s goal of carbon neutrality, including achieving Platinum (4.1) LEED certification.
- The use of carbon-free electricity (rather than natural gas) for energy for the Project.
- The potential role of a cogeneration facility.

For further discussion of this issue, please refer to the letter from Ania Camargo on behalf of Mothers Out Front, dated March 22, 2019, being submitted to the BPDA as part of this scoping determination process.

Homeless Population: The construction of the proposed Project may displace or affect a significant population of homeless individuals. The effect on their well-being needs further evaluation and management and this should be a separate and articulated section of the IMP/PNF.

Garden Street Facility: Many residents have asked that MGH consider relocating the maintenance facility currently located at 12-16 Garden Street within the Beacon Hill Historic District as part of the Project. It seems likely that the Project will provide the best opportunity to effect that change, particularly since the Project’s proposed Campus Services Building will contain many of those services currently being done out of the MGH’s Garden Street Facility. The IMP/PNF should evaluate this relocation in connection with the current update of the IMP and the Project’s proposed Campus Services Building.
Historic Buildings: There is concern about the existing structures on the site of the Project. We look forward to participating in the further review of these buildings. The impact of the new buildings on the views of the historic Bulfinch Building from the south should also be evaluated.

Parks and Open Spaces: The IMP/PNF should provide additional information on parks and other open or green spaces, including North Anderson Park, both within the immediate area of the Project as part of longer term plans.

Construction Management Plan: We also look forward to reviewing the detailed construction management plan to better understand short term and medium term effects on auto traffic, pedestrians and cyclists, as well as other construction-related impacts.

Thank you for your consideration of these comments from concerning the MGH IMP/PNF - Scoping Determination.

Very truly yours,

Patricia Tully
Executive Director

cc: Senator Joseph Boncore
    Senator Sal DiDemenico
    Representative Jay Livingstone
    Representative Aaron Michlewitz
    Councilor Josh Zakim
    Councilor Edward Flynn
    Councilor Michael Flaherty
    Councilor Michelle Wu
    Councilor Annissa Essaibi-George
    Councilor Althea Garrison
    Sally Mason Boemer, Senior Vice President of Administration and Finance, MGH
    Ben Starr, MGH Task Force
    Rachel Thurlow, MGH Task Force
    Tim Pingree, MGH Task Force
    Bruce Kiernan, MGH Task Force