April 16, 2020

Abigail Vladeck
Senior Project Manager
Division of Capital Asset Management & Maintenance
Office of Real Estate
One Ashburton Place, 15th Floor
Boston, MA 02108

Re: Charles F. Hurley Building Redevelopment

Dear Ms. Vladeck:

Since 1922, the Beacon Hill Civic Association (“BHCA”) has strived to preserve and enhance the quality of residential life on Beacon Hill and the downtown neighborhoods. In this regard, we very much appreciate the opportunity to provide initial comments to the Division of Capital Asset Management & Maintenance on the Commonwealth’s proposal to ground lease the site of the Hurley Building to a redevelopment partner, who is expected to construct one or more large buildings along Cambridge Street, Staniford Street and New Chardon Street in the West End, immediately across Cambridge Street from Beacon Hill (the “Project”), as you prepare to issue a solicitation for proposals for the Project from a redevelopment partner (the “Solicitation”).

Solicitation Process and Outcome: We raise a number of specific issues below; these should become part of the Solicitation process, from start to finish. It is critical that these issues be an explicit part of the initial Solicitation that is issued, as well as being used to guide decisions about a redevelopment partner and the Project. Proposals should be evaluated and selected in significant part on how well they meet the objectives below, as well as other issues raised by nearby communities during this process.

We are apprehensive that, unless the full range of issues are a specific part of the initial Solicitation, this process will strongly tend toward creating the largest conceivable office building on the site. That is very much the wrong outcome for this site.
Traffic: Residents have acute concerns about vehicular traffic, as well as pedestrian and cyclist safety, along Cambridge Street and the connecting streets. There is every reason to expect these issues will return once the current crisis eases. The Solicitation should state that there should be no increase in the size of the Project’s parking garage, as additional parking only serves as a magnet to further draw vehicles to Beacon Hill, the West End, and nearby areas. Planning for the project should include greater reliance on public transportation or other alternative options to avoid exacerbating an already overloaded traffic system in this area.

Traffic congestion along Cambridge Street has also been a substantial factor in diverting truck and automobile traffic, including numerous rideshares, through the narrow streets of Beacon Hill, which cannot safely accommodate such traffic. The Project must take into consideration a neighborhood plan to lessen the impact of increased traffic.

One of the primary goals of the redevelopment, as we understand it, is to allow the Commonwealth to consolidate existing leases for office space in the downtown area into the Project. However, as discussed above, any expansion of office space must avoid increasing vehicle traffic in the area.

Mixed Uses: The Solicitation should consider the role that other uses of the site, such as residential, might play in allowing a successful redevelopment of the site and an improved public realm, while reducing the traffic and other adverse impacts of the Project.

Tenanting ground floor areas of the Project with restaurants, retail and other uses that will generate activity into the evening hours would enhance the neighborhood. The additional evening activity would also improve the safety of the area for residents and visitors.

The solicitation process should seek to include a public school in the Project. As has been widely reported, the City of Boston and in particular the downtown neighborhoods present a number of challenges for families seeking to remain in the city. The lack of public schools has forced many families to move out of the city. This creates essential issues for the health of our neighborhoods, as families are a critical element in the success of any neighborhood. It has proved extremely difficult to find suitable sites for public schools in Boston’s downtown neighborhoods. The Hurley site presents a rare opportunity to address a critical need.

Project Design and Public Realm: The Project massing, design and streetscape along Cambridge and Staniford Streets will affect visitors and residents for decades to come, as the existing building has since its construction. The Project presents an opportunity to substantially improve the quality of the public realm in this area.
We advocate for upper story setbacks on all sides of the Project to avoid urban canyons and the loss of light and increased wind disturbance that accompany such designs. The Project should avoid using the all-too-common superblock design, as it is inconsistent with the character of the area. The use of multiple buildings, with smaller and larger buildings, would fit better within the existing streetscape.

In addition, the design of the Project should respect its unique context, adjacent to the historic Old West Church and the Otis House buildings. These exceptional buildings are among the last vestiges of the early development and life in this area of Boston.

**Mitigation of Light and Noise:** The Solicitation should require that the Project minimize the post-construction effects of the Project’s lighting and mechanical systems for nearby residents. Residents of the North Slope of Beacon Hill have reported issues with both in recent years, from nearby institutional and commercial buildings. In particular, it is important to visually screen and to minimize the noise from HVAC equipment. Residents currently find that when wind conditions carry the noise toward their homes, there is significant loss of quality of life in outdoor spaces and residences. Without careful planning and mitigation for the Project, it seems likely residents near Cambridge Street and Staniford Street will see these conditions worsen.

**Construction Impact:** With a large project and a two-year construction period, management of the construction impacts of the Project (such as noise, traffic disruption, pollution, access to local businesses and shopping, and so on) will also be crucial to residents’ quality of life. Taken in conjunction with several additional proposed projects, including the nearby MGH Clinical Building and redevelopment of the West End Library, as well as others involving Massachusetts Eye and Ear and Storrow Drive tunnel construction, the Project’s construction will place a burden on surrounding neighborhoods.

**Cambridge Street Redesign:** The City of Boston’s efforts to redesign Cambridge Street are underway. Given that the Project’s construction will extend through 2025, it seems imperative to coordinate planning for the Project with planning for Cambridge Street, including installation of bike lanes and planning for a Red/Blue connector of the MBTA subway lines, to ensure better traffic flow and a high quality pedestrian and cyclist streetscape.

**Energy Use and Climate Impact:** The Solicitation process should include an evaluation of sustainability and energy use, and commit to alternative approaches, such as how the Project might meet the goal of carbon neutrality and the use of carbon-free electricity for energy for the Project.
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**Federal Site Restrictions:** It has been half a century since this site was last redeveloped, in connection with urban renewal. The federal restrictions that were placed on the use of the site at that time have fully served their purpose. Should those restrictions conflict with the development of an appropriate Project, the Commonwealth should seek to have those restrictions modified, waived or removed.

We look forward to further constructive discussions regarding the Project.

Very truly yours,

Eve Waterfall
Chair

cc: Senator Sal DiDomenico  
Senator Joseph Boncore  
Representative Aaron Michlewitz  
Representative Jay Livingstone  
Councilor Edward Flynn  
Councilor Kenzie Bok  
Jonathan Greeley, Boston Planning and Development Agency  
Jane Wilson, West End Civic Association