

downtown north association

July 8, 2013

John FitzGerald, Senior Project Manager
Boston Redevelopment Authority
City Hall Plaza
Boston, MA 02201

RE: June 2013 Project Notification Form for Redevelopment of the Government Center Garage and Related Recommendations Regarding the Scoping of a Draft Project Impact Report and a Draft Environmental Impact Report for this Project

Dear John,

What follows are the comments of the Downtown North Association (DNA), which is also a member of the Government Center Garage (GCG) Project Impact Advisory Group (IAG), regarding the Project Notification Form (PNF) filed by HYM Investment Group on June 5, 2013, with particular attention to the recommended scope of an expected DPIR/DEIR for this project.

The more than one hundred DNA member organizations encompass all aspects of the diverse and growing residential, recreational, commercial, institutional and professional community historically known as the West End of Boston. That community comprises the area of Boston from New Sudbury Street to the Charles River, between Beacon Hill and the North End; and it includes the site of the Government Center Garage. And among our valued DNA members is HYM Investment Group, a leader of the GCG development team.

These comments are intended to reflect a consensus view of DNA as a whole, although individual DNA member organizations, some of which also IAG members, may be offering their own comments on the GCG project. Such individual DNA member comments may have a somewhat different emphasis or focus; but hopefully they will not be either substantially inconsistent or incompatible with the views expressed herein. In any event, these comments are not meant to replace or obviate any other comments by individual DNA members.

It should be noted that this is not the first time that DNA has offered its opinions on this project. In April of 2009 we commented quite extensively and generally favorably on a previous redevelopment proposal for this site, which had been advanced by the Raymond Property Company pursuant to a prior series of community meetings on that proposal. Those 2009 written comments are attached hereto for reference, in part because many of those initial observations comments remain relevant and timely, since in some respects these two project iterations are quite comparable.

We continue to support this GCG project for the same fundamental reasons as its previous iteration: it fully and finally replaces the last remaining barrier between the West End and Downtown Proper with a mixed-use development that reflects and reinforces the surrounding neighborhoods and restores the historical connections among downtown neighborhoods in the West End, North End and Beacon Hill and with the emerging new Market District.

In other important respects, however, the current project and its previous version are quite different, most particularly in terms of their scope, strategy and sequencing:

- ❖ **Scope:** The 2009 development proposal contemplated redevelopment of not only the site of the GCG, but also as the adjacent properties on Bowker and Hawkins Street, including the BPD Area A-1 District Station; whereas the current development proposal is confined to the site of the GCG itself.
- ❖ **Strategy:** The 2009 proposal contemplated the initial and complete demolition of the GCG as it now stands; whereas the current project will continue all of the parking garage in full operation throughout most of the construction period, eventually demolishing only the portion of the garage that spans and extends east of Congress Street and permanently retaining the half of the existing garage that lies west of Congress Street, around which planned redevelopment will take place.
- ❖ **Sequencing:** The 2009 proposal contemplated continuous and generally contemporaneous redevelopment of the cleared GCG sites both east and west of Congress Street; whereas the current project contemplates a redevelopment process and product that would be phased over time, commencing west of Congress Street and concluding east of Congress Street.

It is generally agreed that the nature and scope of the current redevelopment strategy offers several economic, environmental, logistical and other advantages over the 2009 proposal, all of which make the approach described in the current PNF a more viable and reliable approach, particularly in the current real estate market. Among other things, it avoids the sudden and initial elimination of hundreds of existing off-street parking spaces that have been a major functional element of the neighborhood transportation infrastructure for many years.

But this phased redevelopment approach also comes at a notable price to the community in at least four important and related respects, each of which could/should be addressed in and through the ensuing DPIR/DEIR process:

- ❖ **Delayed Garage Demolition:** The demolition of the portion of the existing garage that spans and extends east of Congress Street is arguably the single most visible and dramatic urban design and community benefit of the entire GCG development; and that is not now planned to occur until the third of four development phases, following completion of the

major residential and office buildings on the West Parcel. While the economic rationale for this sequence from the perspective of the developer is obvious, its community and urban design appeal clearly leaves something to be desired.

- ❖ **Delayed Congress Street and East Parcel Redevelopment:** Directly related to the garage demolition schedule is redevelopment of the East Parcel and the Congress Street perimeter of the West Parcel, which are now planned to occur in the last of four development phases. These much later elements of the proposal contain the overwhelming share of the retail and restaurant activities planned for the site, as well as the most significant of the planned streetscape, pedestrian, transit facility and public realm improvements, all of which are exceptionally beneficial and most important to the surrounding downtown communities.

- ❖ **An Extended Development Schedule:** Although community discussions of both the current and the previous GCG development proposals have suggested an overall development schedule that is likely to extend over a decade, the current PNF (p. 1-12) indicates that the development period could require as much as twenty years. While a more conservative written estimate is understandable and even prudent, the effect of any such more prolonged development schedule is further delay of the most beneficial community aspects of the proposal as described immediately above.

- ❖ **West Parcel Permeability:** Since the existing garage structure west of Congress Street is being retained in the current GCG redevelopment proposal, to obvious economic and environmental advantage, that precludes the kind of potential permeability that was an inherent option in the 2009 proposal, which had then been quite favorably described as the conversion of a barrier to a crossroads. That places an additional burden on the streetscape and public realm improvements around the West Parcel, as well as those on, around and through the East Parcel, to achieve this desirable crossroads effect; and the PNF addresses those issues and opportunities quite directly and explicitly in the final two phases of the overall project. Left largely unaddressed in the PNF, however, was whether and how the permeability of the West Parcel development in the first two development phases might be expanded and enhanced through increased public accessibility and utility of the podium created by the retained garage around which the new buildings are arrayed -- and perhaps through increased public accessibility and utility of those buildings themselves.

As previously noted, all of these matters could/should be addressed and potentially resolved in the DPIR/DEIR process. That should include particular attention to whether and how the development sequence could/should be revised and the development schedule could/should be accelerated to accomplish more of the community benefits of the project sooner rather than later. And to that end, some of the observations that follow suggest in part how and why that might be done.

In that context, the following are among other issues and opportunities raised by the current PNF that could and should be addressed in the DPIR/DEIR:

- ❖ **The Proposed Height and Massing of the Six Planned Buildings:** As is pointed out in the PNF itself, the height and massing of the various buildings encompassed within the overall GCG site redevelopment plan are in all respects less than what was outlined in the 2009 GCG Project PNF, which featured a tallest building height of approximately 700 feet and a density of 4.0Msf, albeit on a somewhat larger development footprint. The tallest building height proposed in the current PNF is 15% smaller at 600 feet, with a development density of 2.4Msf. And those development parameters explicitly intended to be consistent with the use and development guidelines included in the recent BRA Greenway District Planning Study. Within what is permitted by those BRA guidelines, however, a number of urban design/development questions arise that could/should be further addressed through the DPIR/DEIR process as part of the continuing discussion of project height and massing:
 - **With Respect to the GCG Site Itself:** What other height and massing options were considered and why was the proposed option selected? Would it be possible, for example, to reduce the height of the taller buildings by reallocating some required density to some of the smaller buildings? Since the realignment of the streets has effectively precluded the possibility of actually restoring the East Parcel as the apex of the Bulfinch Triangle, should thought be given the somewhat more density on that parcel to associate it more with the West Parcel than with the Bulfinch Triangle itself – without sacrificing the critical view and pedestrian corridors that now make crucial north/south connections through this space?
 - **With Respect to the Planned Redevelopment of the Surrounding Area:** How does the height and massing of the proposed buildings relate to the height and massing of the buildings in the surrounding area? How does this project relate to that larger architectural, topographical and community context? How does it compare to what else is already planned, permitted or in process for this area? How does this project advance the larger urban design and development vision of which it would be so critical and visible a part?
 - **With Respect to the Potential Redevelopment of the Surrounding Area:** What is the possible precedential effect of the height and massing proposed for this project on the possible future redevelopment of the area beyond what is already in plan or progress? Within the West End community, for example, this would clearly include the adjacent EDIC and other properties that were a part of the 2009 GCG redevelopment proposal, but are not a part of the current one. These properties are relatively underdeveloped by comparison with the area as a whole; and they likely be perceived as even more so with the realization of this GCG redevelopment plan.

But it would also include the nearby Lindemann/Hurley State Services Block, which has long been suggested for potential reuse and/or redevelopment; and of most critical interest to our Beacon Hill neighbors, it would could well include significant portions of Cambridge Street, for which institutional and other development plans have yet to be determined for some very visible properties.

In most respects, these considerations are well beyond the purview of the GCG project proponents; and it is not their obligation to address in their DPIR/DEIR the potential consequences of their plans for properties beyond their custody and control. But is the role and responsibility of the BRA; and the BRA scoping of the DPIR/DEIR is a timely and appropriate opportunity for to do so. Not to do so would risk complicating and confusing the individual review process for this and other major projects.

This is not a new problem, but it is an increasingly urgent one. The precedential effect of any single development project on the development of other proposed or potential projects and on the community as a whole has long been an understandable source of serious and continuing community concern. In the absence of normative and reliable public policy guidance, the community is left to speculate on the nature and scope of any such implications in a manner that can well often be ill informed, inaccurate and counterproductive.

For that reason, the Downtown North Association, among others, have long requested the BRA to formulate an overall West End Plan that would consider and coordinate the many individual and worthy project plans already in place with expectations for major properties yet to be developed. The result would be a comprehensive and integrated community design and development strategy, which could/should still be flexible and pragmatic, but would fit each project into its larger and longer context. That obviously has not yet been done; but in its absence, we would again recommend and request that the BRA address the issue of whether or not the height and massing approved for the GCG project is expected or intended to have any implications for the planning and development of the surrounding area, and most particularly, for the West End, North End and Beacon Hill neighborhoods.

- ❖ **Expanded Public Accessibility and Use of Project Amenities:** The PNF outlines a number of design/use initiatives involving green roofs and other amenities on both the East and West Parcels, all of which are thoroughly commendable. But as currently proposed, such amenities are primarily, if not exclusively, available for the benefit of project residents and office tenants. And in our view, more serious consideration could/should be given in the DPIR/DEIR process to whether and how these above-grade amenities might be made more available for public enjoyment and use.

Of particular relevance in this regard is the design and use of the podium created by the retention of the existing garage on the West Parcel. If this rather substantial and potentially very attractive space could be devoted in whole or in large part to some combination of commercial and recreational uses, such facilities of public accommodation could quite substantially address three perceived deficiencies of the current development proposal:

- **Enhanced West Parcel Permeability:** If public access to the West Parcel podium were designed to be visible, attractive, convenient and welcoming, the ability of the public to use this space would greatly enhance the actual and the perceived permeability of this important element of the project; and if access points were located to link with critical streetscape elements, it could serve the desirable community crossroads function that would not be possible as current proposed.

- **A Better Balance of Retail/Restaurant Uses Between the East and West Parcels:** As now proposed in the PNF, the West Parcel accommodates less than one-third of the retail/restaurant space that is projected for the much smaller East Parcel – i.e., 19.8Ksf v. 62.7Ksf. If some significant portion of the West Parcel podium were devoted to such purposes, that would not only expand such desirable community uses for the project as a whole, but also create a better balance of retail/restaurant uses between the East and West Parcels.

- **Acceleration of Community Benefits:** As described in the phasing schedule outlined in the PNF, the development of the East Parcel, as well as the activation of most of the planned retail/restaurant uses on the West Parcel, are all planned for the latter stages of the development sequence. If the enhanced public use of the West Parcel podium were a focus of the project development plan from the outset, the availability of such retail/restaurant and other facilities of public accommodation could be expanded and accelerated to significant community benefit.

Obviously, expanded public access and use of the West Parcel podium space would involve additional issues of building security, maintenance and management that would have to be addressed and resolved. But the DPIR/DEIR process provides the opportunity to do so; and the potential benefits of this approach would appear to warrant an effort to mitigate its potential burdens. The result would be a project more fully integrated into the fabric of the surrounding community and in which that community would have a more vested, substantial and self-sustaining interest.

- ❖ **Height as a Public Amenity:** In a similar vein, as DNA has also suggested in other such high-rise developments, the DPIR/DEIR for this project could/should explore ways in which the proposed building height might be devoted to some public purposes, at least in part.

One of the problems with significant height in a community context is that the burdens of height – e.g., any adverse wind, shadow, and view corridor effects, all of which will continue to be addressed – are borne by the community, whereas the benefits of height are essentially restricted to project residents and tenants. That imbalance of benefits and burdens could be remedied to some extent by providing more community more access to and use of the upper floors in the taller buildings.

This might include restaurant, fitness and/or viewing pavilions at or near the top of these taller buildings, as is already being done in office and residential buildings elsewhere in Boston; and it could also include shared meeting spaces for community organizations and activities, as is also becoming increasingly common here and elsewhere. Such common amenities would be equally beneficial to project residents and tenants and to the public alike; and they could become an integral element of the type of shared office/conference facilities that are becoming typical and attractive in centers of innovation of the type that the GCG could/should well become. Such community-oriented building uses would also involve the kinds of building security, maintenance and management issues alluded to above; but those issues are likely to be ameliorated if the goal of expanded and enhanced public access is embraced as both a public value and a project priority from the outset.

- ❖ **Long-Term Traffic and Transportation Issues & Opportunities:** Based on the initial presentation in the PNF, as well as the discussions to date in the public agency scoping session and in the IAG process to date, we are confident that traffic and transportation issues and opportunities relevant to this project will be fully and finally addressed in the DPIR/DEIR process. That is not meant to minimize the quite central importance of these multimodal challenges, but only to suggest that the procedural precedent is quite well established as to how these critical matters – particularly including adequate parking, transit and transit capacity, relocation of parking/loading access points, and bus facilities improvements -- will be addressed and resolved through the balance of the planning and permitting process.

In anticipation of that process, however, we would commend the thoughtfulness and sophistication of the parking supply and demand evaluation that was presented in the PNF. That includes the analysis of the shared-parking options that would result in the most efficient use of the reduced number of parking spaces that will be available on-site. It is worthy of note that, in the public process related to the 2009 GCG/PNF, parking was among the most controversial and contentious neighborhood concerns – particularly as to whether the reduced number of on-site parking spaces would be adequate to address both the existing public parking demand and the additional private parking demand created by the project itself. In our view, the initial PNF presentation on this matter makes a persuasive initial case that the reduced number of on-site parking spaces can and will be adequate for these purposes, as this matter is further evaluated in the DPIR/DEIR process.

That balanced parking supply/demand outcome, however, is much more likely to be achieved and sustained if the costs of project parking to residents, tenants and the public alike are determined in a manner that provides economic incentives to the types of parking that should be encouraged at various times and economic disincentives to the types of parking that should be discouraged at various times. To that end, we recommend and request that the parking pricing policy and practice of the developer for various categories of potential parkers be identified and evaluated as timely and relevant variables in the discussion of the parking supply and demand projections for this project, with specific regard to the critical functions that this facility now serves for large and small businesses and other organizations in the surrounding neighborhoods.

We would finally acknowledge and applaud the continued and expanded use of an affordable off-peak parking program – overnight, weekends, holidays --- that is described and reaffirmed in the PNF. This approach makes economic use of commercial parking spaces that would otherwise be unused during those periods; and the example of this project should be seriously considered for other projects similarly situated. Such off-peak parking programs are especially attractive to neighborhood residents who work outside of the immediate area; and they should be encouraged wherever and whenever possible.

- ❖ **Construction Period Traffic Management & Mitigation:** As has been made clear in our oral comments to date, both in the initial public agency scoping session and in the IAG process thus far, we are much less confident about the ability of the project to address and resolve the more complicated and acute problems of traffic management and mitigation during a lengthy period of project construction of at least ten years and possibly more. This has nothing to do with our confidence in the technical and professional expertise or experience of the development team – quite the contrary. Rather it reflects the nature and scale, the urgency and complexity, of the traffic management and mitigation challenges that this and every other construction project in this crucial area will have to face.

Consider the larger and longer context in and around the West End alone. During all or some significant part of the projected period of GCG Project construction, the following ten other major development projects will likely also be under construction as well -- not counting the possibility of redevelopment activity in the Nashua Street Quadrant or the State Services Block:

- *Parcel 9* redevelopment immediately to the south in the Market District.
- *The One Canal, Merano and Forecaster projects* in the adjacent Bulfinch Triangle.
- *The Lovejoy Wharf, Nashua Street Residences, Boston Garden, Garden Garage and the new public elementary school projects* immediately north of Causeway Street.
- *The Massachusetts Eye and Ear Infirmary development* on and around Cambridge and Charles Streets.

At the same time, the following five major and multi-year transportation infrastructure projects will also be under way in this same area:

- *Longfellow Bridge reconstruction*, including the related Red Line transit right-of-way and Storrow Drive improvements, reconstruction of other upstream Charles River bridges and installation of a new pedestrian bridge at Leverett Circle.
- *The Causeway Street Crossroads Initiative*, including the design and reconstruction of Causeway Street and Lomasney Way, Lowell and Keany Squares, and adjacent parts of Staniford and North Washington Streets and related reconstruction of the Bulfinch Triangle streets and sidewalks west of Canal Street.
- *North Washington Bridge reconstruction*, including related Rutherford Avenue and Sullivan Square roadway reconfiguration and reconstruction in Charlestown.
- *The Green Line Extension*, including related station relocation and improvements at Lechmere Square in Cambridge and beyond.
- *Government Center T Station* closure and reconstruction.

Together, these public and private projects represent an exceptional confluence and variety of construction activity over the next decade. Effective projection and monitoring of their interactive and changing traffic and transportation implications is clearly well beyond the purview, let alone control, of any single project proponent. Even if it were not, requiring each proponent to address these matters individually would involve an enormous and unnecessary duplication of effort. And any failure of coordination or communication is likely to have immediate and far-reaching economic and environmental consequences, not to mention adverse public health and safety effects, in a district such as our, which is densely populated with major medical institutions.

For that reason, a case can well be made that not only does construction-period traffic management and mitigation policy and practice need to be coordinated, it may have to be consolidated, under the ultimate purview of the Boston Transportation Department (BTD). Beyond the relevant lessons of the CAT Project, the ongoing redevelopment of the major MassDOT parcels in the Bulfinch Triangle provides an even more recent and local example of such an approach.

In that case, given the complexity and the schedule for multiple parcel development, it was agreed by all concerned that it was appropriate and advisable for the traffic planning for these various projects to be closely coordinated with each other and with the planned reconstruction of Causeway Street. For that reason, a single traffic engineering firm was retained to handle construction traffic management and mitigation functions for each project, as well as for Causeway Street and for the Bulfinch Triangle district as a whole.

The cost of that collaborative effort was shared by the project developers; and those efforts was guided and monitored by BTM. The result has been an integrated and comprehensive construction strategy to address traffic issues and opportunities, which has proved to be notably successful to date.

Given that success, and in light of the far greater urgency and complexity of the issues that are likely to confront our community and our developers in the next decade, we would urge BRA, in consultation with BTM and others, to proactively address the interactive problems of construction-period traffic management and mitigation for this and other relevant projects in the scoping of this DPIP/DEIR. That would specifically include the continuing need for public leadership as well as communication, coordination and possibly consolidation of the efforts of various public and private developers to achieve that goal. That might also include, but need not be limited to, the kind of consolidated/collaborative approach taken in the case of the Bulfinch Triangle parcels.

- ❖ **The Proposed Mix of Housing:** The PNF describes the first phase of the overall GCG Project as the development of a 45-story 403-unit residential apartment building in the southwest corner of the West Parcel. It further indicates that most or all of the upper floors will each contain one three-bedroom unit, repeating the strategy that was so well received for the recently approved Nashua Street Residences project. That will create a substantial additional number of the types of larger residential units that are lacking in surrounding communities and for which the downtown neighborhoods have long advocated. Such units are especially desirable for the increasing number of families with children, who would be within walking distance of the new public elementary school on Commercial Street, as well as for those in a live/work situation. And the project proponent should be commended for this development strategy.

Likewise commendable is the commitment to provide all of the affordable units on-site, which is also the preference of the community wherever possible. And we would also encourage the developer to follow the lead of Nashua Street Residences in another respect: providing a significant number of smaller units as well. Smaller units are inherently more affordable and would appeal to another aspect of the West End demographic: younger professionals who work in the many medical, academic, entrepreneurial and governmental organizations in the surrounding area and who want the convenience of a residence within working distance of their employment, recreational, cultural and creative pursuits. And in that regard, similar to the emerging Innovation District, this project could provide another appropriate opportunity to consider including some of the residential micro-units that are becoming increasingly popular in Boston and elsewhere and might also be economically, geographically and functionally suitable to this particular urban environment.

- ❖ **The Nature and Project Retail, Restaurant & Other Hospitality Uses:** The development attractiveness of the GCG site is due in no small part to the success of the surrounding communities. These not only include the adjacent West End, Beacon Hill and North End End/Waterfront neighborhoods, but also the civic and commercial sectors in and around Government Center, the emerging Market District and the well-established Faneuil Hall Marketplace. These are the districts that have given this development site its history, its context and its unique and renowned contemporary character; and in our view, these are the communities that should be first considered and explored for at least some of the retail, restaurant and other hospitality activities that will animate the commercial aspects of the GCG project and activate its streetscape and other public spaces.

A proactive developer effort to incorporate some retail and restaurant elements from these surrounding communities would not only reinforce its connectivity to those communities, but it would also minimize the possibility and perception of unwelcome competition with those existing communities. And we recommend and request that such a course of action should be pursued through the DPIR/DEIR process, whether or not it is required by it.

- ❖ **The Role of Public Art & Architecture:** Among the urban design and development advantages that taller structures afford is the opportunity to create elegant and iconic architecture, which makes a distinctive and distinguished contribution both to the city skyline and to the urban streetscape. Given the expressed community concerns about the potential adverse effects of height on this site, which will surely be further considered in the DPIR/DEIR process, that should be viewed as not just an opportunity but an obligation in this case. Without question, whatever space project structures occupy in their visible segment of the sky-plane must be beautiful to behold at all times of day and night; and whatever space those buildings occupy in their crucial sector of the ground-plane must be active and attractive, safe and secure, functional and contextual, reflecting and reinforcing the social and economic variety and vitality of the surrounding communities. And these essential values and goals could/should be effectively incorporated into the scoping and implementation of the DPIR/DEIR process and product.

That should also include a prominent role for public art, which can enhance and enliven the special character of this project as at once a new urban district and crossroads. Such an opportunity clearly exists on and around the East Parcel as currently configured in the PNF; but it could also exist on the West Parcel as well, particularly if the garage podium is designed and used as previously suggested. Both art and architecture could/should play complementary and coordinated roles in establishing this project as both a striking new focal point on the horizon and a new city destination in which to live, work, play and stay. And for that reason, they should be an important, and even indispensable, element of the DPIR/DEIR scope.

- ❖ **Other Interior/Exterior Design Opportunities:** The GCG Project, among others, provides a compelling opportunity to incorporate not only state-of-the art environmental, electronic and communications technology, for which CBT Architects has shown a notable facility in recent projects like LEED Platinum Atlantic Wharf project in Boston, but also to reflect the most advanced and contemporary principles of universal design. Among its many cost-effective benefits, universal design enhances the character of all elements as the project as attractive, accessible and useful to their full range of possible users, but it specifically allows residents to age in place, an increasingly timely, relevant and practical goal for an aging population.

In this regard, it should be noted that the West End community includes one of the foremost international advocates and practitioners of universal design in the Institute for Human Centered Design (IHCD) on Portland Street in the Bulfinch Triangle. IHCD has worked with CBT on universal design initiatives in the past; and they could provide invaluable input and feedback on the GCG and others major projects as their planning and permitting proceeds. And we would certainly encourage that.

The Relevance and Potential of the Adjacent Parcel 6: The eastern perimeter of the GCG Project is the unattractive, inhospitable and virtually impenetrable confluence of highway ramps known as Parcel 6. Along with Parcel 12, it is one of two CAT ramp parcels within sight of each other, bracketing the attractive parkland that has already been developed on CAT Parcels 8 & 10. Although the improvement of Parcel 6 is a public responsibility, and not the obligation of the GCG project developer, there is no doubt that such improvement would not only enhance the GCG Project but also the surrounding communities.

For that reason, whether as a requirement of the DPIR/DEIR scope or as a voluntary initiative of the GCG developer, it would be quite timely and most appreciated if the development team would devote some its professional and creative expertise to whether and how Parcel 6, and perhaps even Parcel 12, might be improved for the benefit of all concerned. A practical vision for a more potentially useful, active and attractive future for this anomalous space could have physical, functional, aesthetic and perhaps even cultural benefits; and in any case, it would greatly ameliorate the pedestrian and transit conditions in the vicinity and facilitate the neighborhood connectivity that is a fundamental focus of the GCG Project.

If the talented GCG Project development team could formulate such a conceptual plan as part of the planning and design for its own adjacent property, that would provide impetus and guidance to the ongoing public process that is addressing these matters pursuant to the Greenway District Planning Study. And that in turn would expedite the possibility that something positive and meaningful can and will be done in this problematic space sooner rather than later.

- ❖ **The Option of New Neighborhood Nomenclature:** Although it is beyond the purview of the project developer, the GCG Project affords the opportunity to rectify some roadway nomenclature that dates back to an era of urban renewal and transportation planning that dates back more fifty years ago and, with a few notable exceptions, did not treat the West End very well. As we now continue the process of removing and redeveloping many of the remaining vestiges of that era, starting with the Central Artery and now moving to the Government Center Garage, it would be symbolically significant and thoroughly appropriate to consider renaming some of the surrounding roadways more accurately and historically. These might include:
 - *Merrimac Street:* As the PNF acknowledges, the roadway beneath the garage that will separate the East and West Parcels is Merrimac Street, not Congress Street; and that should be at long last acknowledged.
 - *Sudbury and Chardon Streets:* The “New” prefix for these roadways marked their effective conversion from a city street to a regional arterial. Now that that process is being reversed by the GCG Project with the downsizing and redesign of these roadways, they could/should be returned to their historical designations.
 - *The John F. FitzGerald Boulevard:* The so-called Surface Artery is actually named in honor and memory of Honey Fitz, North End native son, former Boston Mayor and now best known as JFK’s grandfather. This major roadway should be rebranded and celebrated for its distinguished lineage and a fitting two-way pair with the more suitably named Atlantic Avenue.

The combination of redeveloping the GCG site and rebranding its surrounding streets would put a fitting end to a dubious ear resonant of the 20th Century and symbolize the continuing progress of our downtown communities both back and forward to our 21st Century future.

- ❖ **The Option of a Planned Development Area:** The PNF suggests the possible use of a Planned Development Area (PDA) strategy for the redevelopment of the GCG site; and this strategy has also been suggested for other major development sites in the West End. It should be noted that a PDA strategy was also contemplated for the redevelopment of the MassDOT parcels Bulfinch Triangle. The design and use guidelines for that process were formulated and implemented by the city, state and community in concert; and they explicitly invited consideration of a PDA permitting option. That possibility was intended to reflect the scale and complexity of that development process as well as the breadth and depth of community participation in the entire enterprise. To the extent that those same variable are also present in this case, a PDA could/should also be considered and would not be without precedent.

In conclusion, we hope that these comments from the Downtown North Association, as well as those of other interested parties, will contribute to the refinement and improvement of the GCG Project. This project tremendous potential for our community as well as many issues and opportunities yet to address and resolve; and to that end, we look forward to working with all concerned through the DPIR/DEIR and IAG processes that will ensue. If past is prologue, this public processes will result in a better project for all concerned, as has clearly been the case with all of the many neighborhood development projects that have preceded it.

Sincerely,

Robert B. O'Brien, DNA Executive Director and
Member of the GCG Project Impact Advisory Group,
Co-Chair of the Bulfinch Triangle Citizens Advisory Committee,
Member of the Parcel 7 & 9 Advisory Committee

cc: District City Councilor Salvatore LaMattina and State Representative Aaron Michlewitz
Peter Meade, Heather Campisano, Jon Greeley, Lauren Shurtleff and David Carlson of the BRA
Thomas Tinlin & Vineet Gupta of the Boston Transportation Department
Nicole Leo of the Mayor's Office of Neighborhood Services Community
Other Members of the Government Center Garage Impact Advisory Group
DNA Officers, Directors and Members
Other Interested Parties