



WalkBoston

April 27, 2007

Secretary Ian A. Bowles  
Executive Office of Environmental Affairs  
Attn: MEPA Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Rodney Sinclair  
Boston Redevelopment Authority  
Boston City Hall, 9<sup>th</sup> Floor  
Boston, MA 02201

RE: Comments on 120 Kingston Street Environmental Notification Form and Project Notification Form

EOEA # 13367

Dear Msrs. Bowles and Sinclair:

We have reviewed the 120 Kingston Street ENF and PNF, which proposes 180 housing units at 120 Kingston Street and 48-52 housing units on a vacant lot between Oxford and Ping On Streets in Chinatown. The Oxford Street construction is linked to the Kingston Street building as a way of providing affordable housing units for the Chinatown community.

120 Kingston Street is a proposed 29-story building of 279,230 gross square feet adjacent to, and incorporating portions of the façade of the existing Dainty Dot (Auchmuty) Building. The project abuts the Rose Kennedy Greenway and the new Chinatown Park that are built above the tunnel of the Central Artery. The principal façade of the new building will be set on a diagonal parallel with the Greenway. Retail uses are proposed for the ground floor along Essex Street, and include a possible restaurant with a terrace overlooking the Chinatown Park.

The principal pedestrian entrance to the new residences will be located on Kingston Street. Access to retail uses will be from Essex Street and at the Essex/Kingston corner. Sidewalks are retained in their current widths on the two sides of the structure facing Essex and Kingston Streets.

No direct pedestrian access to the Greenway from the site is shown in the preliminary designs described in the document. The relationship between the site and the Greenway is made quite difficult because the new structure sits behind a 6' high Greenway park wall now under construction along the site boundary. The Greenway sidewalk is being constructed by the CA/T with walkers in mind. It is extensively landscaped to promote pedestrian use.

The building is very close to downtown shopping, and excellent transit access is provided by the Red Line at the South Station transportation complex (2 blocks away), and Green and Orange Line stations (3-4 blocks away).

### **Relationship between the new building and the Greenway - re-thinking the project**

The physical and access relationship between the proposed building and the Greenway has not been resolved in a manner that WalkBoston finds comfortable or inviting for pedestrians. While there are a number of tall buildings along the Greenway, many of them have entrances that face the Greenway and generate pedestrian use of the Greenway. New buildings designed since the Greenway was planned take advantage of their frontage on the Greenway and provide direct pedestrian entrances. Similarly, renovations of existing buildings have added entrances to the Greenway where there were none before.

As far as we are aware, this is the first new building proposed for a Greenway edge that has no direct access to the Greenway. While this lack of relationship is in part due to the design of the park at the site edge - it is truly driven by vehicle access to the building. We suggest that further design efforts develop alternatives that devote much less of the ground plane to vehicles and much more to people and uses that create a lively streetscape. (We estimate that about 50 % of the ground level - and all of the Greenway edge of the site - is devoted to vehicles.)

The vehicular access ramp to the basement, the truck service locations and the elevator access are concentrated on the side of this site that faces the Greenway, effectively cutting off direct access to the Greenway. Likewise, above the lobby of the building, the first five floors that face the Greenway and surrounding streets are entirely occupied by parking that requires an access ramp and elevators within the building.

Given the small, triangular shaped parcel that this project occupies, we believe that the proponent should explore a project design that minimizes vehicular penetration of the site, and that the city work with the developer to allow such a project concept to go forward. Given the terrific transit and pedestrian access that this site enjoys, perhaps this project could be built with no parking on site. If parking is absolutely required, then an off-site location, perhaps within an existing garage, could be explored. In addition, with the limited service-loading requirements of a residential building, and the very low volumes of traffic on Kingston Street, perhaps the city could consider allowing on-street loading, much as this neighborhood has lived with for all of its history.

The removal of parking and service vehicles from inside the building would provide much more flexibility in the design of pedestrian circulation, including pedestrian access directly to the Greenway from both the residential lobby and retail areas. The removal of parking from the upper floors would allow the historic Dainty Dot building to be redeveloped as residential units (a more compatible use of the building) and allow a substantially smaller overall structure which would be less out of scale with the Greenway, the Chinatown Park, Chinatown and the Leather District.

The comments below address the design as presently proposed.

### **Pedestrian access between the Greenway and the proposed project**

Direct physical access to the site from the Greenway is not possible under the current plan and pedestrians and vehicles must approach the building from either Essex or Kingston Street. Preliminary designs show a mezzanine terrace that sits about 6' above the Greenway and Chinatown Park – at the height of the park wall that is being constructed. External stairway access to the terrace is hidden behind the 6-foot wall of the Chinatown Park. If the purpose is to make the terrace accessible to the public, this plan is not successful, because the terrace is a hidden place and may attract undesirable activities. We are very concerned that this exterior access will be puzzling to walkers, and that the terrace will be a lonely, hidden and underutilized place. Likewise, the internal connections to the terrace are limited because of a floor plan that is very constrained by vehicular access to the building.

Creating a direct physical connection to the space from the Greenway would be critical for its success. Perhaps some accommodation can be made between the Chinatown Park and the new building so that pedestrians can enter more directly. This might take the form of a direct stairway from the Greenway to the terrace level of the building. If no direct access can be created between the Greenway and the building's terrace, it may be more appropriate to use the terrace area for landscaping that complements the park, but is not open to public access.

### **Orientation for walkers on local streets**

The proposed structure will be a dramatic and very visible landmark for pedestrians (and drivers) on the Greenway, as it sits at a curve in the road that is at a focal point for both directions of the Greenway and surface road.

The existing Dainty Dot Building is highly visible to pedestrians on Washington Street and Avenue de Lafayette, who can see the building from 3-4 blocks away because it terminates the view at Kingston Street. The building is an important landmark of the Textile Historic District—one of the few left. As proposed, the building's facades will be narrowed from their present dimensions – the Essex façade by removal of 2 of the 4 bays, and the Kingston façade by removal of 2 of the 5 bays. The removal of the building's bays will seriously diminish the building's importance as a historic and pedestrian landmark for the district. In order to maximize its validity as a step toward historic preservation the project should retain the entire facades of the building – particularly along Essex Street.

### **Wind, Shadow and Solar Glare Impacts**

Pedestrian level wind, shadow and solar glare effects have not yet been explored. These are critical elements of the project's impact on pedestrians and park users. We assume that the next project filing will include this information, and that the building height and exterior materials will be modified to mitigate negative impacts on pedestrians using the city's newest most anticipated public open space of the last fifty years.

### **Vehicular access**

Vehicle access to the site will impact pedestrians on Essex and Kingston Streets. The garage entrance is on Essex Street, and the exit is on Kingston Street. Service vehicle access and

egress are combined with the Kingston Street garage exit. The project includes 160 parking spaces, 18 located below grade and 142 spaces above grade, reached by an elevator.

The Essex Street auto entrance is at a location where traffic is moving toward the Artery and South Station. A relatively small number of vehicles are estimated to enter this driveway in the AM peak hour, with a higher volume in the PM peak. Storage space for vehicles queued to enter the garage is provided on the ramp leading down to the basement area.

Although no existing or projected traffic volumes are provided in the document, based on our observation of the site it is clear that in contrast with Essex Street, Kingston Street carries a low volume of traffic. Kingston is one-half of a U-shaped street (paired with Edinboro Street) that connects on both ends with Essex Street. The proposed vehicle circulation for the building will add to the volumes on Kingston Street, a street that is regarded by many community members as almost a pedestrian zone and extension of the Chinatown Park. We suggest that the proponent evaluate switching the entrance and exit for the garage to reduce the addition of vehicles on Kingston Street. During the evaluation, one safety issue to be reviewed is the visibility of pedestrians at a possible Essex Street exit, due to the adjacent Chinatown park wall.

#### **Parking and vehicle trips**

Shuttle service for residents is planned. However, major transit services are nearby and the Chinatown and downtown shopping districts are minutes away. It is difficult to understand what the shuttle services are intended to do. Walking in this district is a distinctly preferable mode of transportation.

Likewise, in such a transit and pedestrian accessible location, with a truly urban project design, we believe (as noted above) that the proponent should explore eliminating or significantly reducing the number of parking spaces that are included.

#### **Sidewalk width and materials**

Adjacent to the Dainty Dot Building, the sidewalks on both Essex and Kingston Streets are constructed of heavy black stone slabs which occupy about one half of the width of the sidewalk (the curb edge of the sidewalks). Stone slab sidewalks were virtually the only kind built in downtown Boston at the time this building was constructed. They are very distinctive, and help set the tone of the historic district of which this building is a part. They should be retained, perhaps coupled with a more modern (smooth) sidewalk finish between the existing stone slabs and the building façade.

Thank you for the opportunity to comment on this ENF/PNF. Please feel free to contact us for clarification or additional comments.

Sincerely,

Wendy Landman  
Executive Director