



NORTH END / WATERFRONT RESIDENTS ASSOCIATION

**February 10, 2022 (DRAFT)**

By email: [Brian.Golden@Boston.gov](mailto:Brian.Golden@Boston.gov); [Nick.Carter@Boston.gov](mailto:Nick.Carter@Boston.gov)

Brian P. Golden, Director  
Boston Planning and Development Agency  
One City Hall Square  
Boston, MA 02201

Subject: Marketplace Center, 200 State Street  
Project Notification Form

Dear Mr. Golden:

North End/Waterfront Residents' Association (NEWRA) appreciates this opportunity to comment on the Project Notification Form dated December 14, 2021, for Marketplace Center at 200 State Street, Boston (the "PNF"). Gazit Horizons Marketplace LLC (the "Proponent") proposes to redevelop Marketplace Center located between Faneuil Hall Marketplace and the Rose Fitzgerald Kennedy Greenway (the "Greenway"). The Project Site encompasses two buildings owned by the Proponent: a 3-story retail and office building on the north side of Marketplace Center (the "North Building") and the ground and second level retail portions of the building on the south side (the "South Building").

The Proponent seeks to redevelop its properties by 1) constructing a new 7-story vertical addition on top of the 3-story North Building for office use, 2) filling in the existing open/covered pedestrian galleries along the ground and second level retail store entrances of the North and South buildings, and 3) replacing the current pedestrian portal between the North and South buildings with a new pedestrian portal including proposed retail kiosks and public programming (together, the "PNF Project").

**NEWRA opposes the PNF Project.** NEWRA requests that the Boston Planning and Development Agency (BPDA) reject the project as proposed. It violates BPDA's own development guidelines and public realm goals, and it creates a greater barrier between, and impact upon, important and sensitive public resources.

**The PNF Project does not adequately take into account the Project Site's sensitive location along the Rose Fitzgerald Kennedy Greenway and key connection to Boston Harbor and Downtown Waterfront parks, including Armenian Heritage Park, Christopher Columbus Park, and Long Wharf Park.** The Project is surrounded by large public open spaces heavily used for passive and active recreation, retail and tourism activity, and pedestrian and vehicular travel by thousands of visitors each day. The Project site is an integral part of the Market District Walk to the Sea. As such, public open space and pedestrian benefits and impacts of the Project are of critical importance.

The PNF justifies the redevelopment plan (height, massing, and programming, i.e., conversion to predominant office use) and accepts the project impacts by comparison with other urban parcels. Regarding several environmental impacts (e.g., shadow, daylight obstruction, wind and glare), the PNF explains away the greater impacts that the project would cause as “values typical of densely built urban areas.” As the BPDA’s Greenway District Planning Study Use and Development Guidelines (the “Greenway Guidelines”) states, “There is no one-size fits all solution; each subdistrict and parcel is unique.” It further states that development should “maximize the quality of the parks and extend their impact beyond (their) edges.” Overlooked in the PNF is the special attention that should be the goal of any redevelopment plan at this site to protect and enhance adjacent public open spaces, pedestrian accommodation and safety, and the inviting visual and walking connections between the Government Center/Market District and Boston Harbor waterfront resources. NEWRA concludes that the PNF Project falls far short of these goals, while the PNF documents several adverse project impacts.

**The PNF Project violates the City’s Zoning Code, development guidelines and goals.** According to the City of Boston Zoning Code, the Project Site lies in Planned Development Area IV (PDA-IV) within both the Greenway Overlay District and the “Market Protection Area” of the Government Center/Market District. While listing these applicable codes and districts in Section 1.5, the PNF provides no information regarding compliance or conformance of the PNF Project with the Zoning Code, PDA-IV, and related development guidelines and goals. The Greenway Guidelines referenced in Article 45-10 of the Zoning Code and applicable to the PDA-IV Zone calls for “reconnecting the downtown neighborhoods to the harbor” and “preserv(ing) the newly created open spaces (environmentally, aesthetically, and economically) by identifying densities, heights and other building massing criteria that are compatible with the recreational activities and horticultural life.” The PNF Project lacks attention to these criteria, aside from a welcome addition of retail store and café fronts at ground level that would replace the blank brick wall facing the Greenway.

The Project Site lies within the Market District, for which the BPDA’s Greenway Guidelines states that development should “set the stage for an expanded Market District that builds on the existing historic fabric while providing 21<sup>st</sup> Century accessibility and amenities needed in this part of the city,” and provide “greater levels of transparency and permeability at the Greenway edges of Quincy Market, most notably Marketplace Center” with “connections between the life of the Market District and its surroundings ... made more seamless.” NEWRA concludes from the PNF presentations that the proposed architectural design, project height and massing, and proposed office space expansion are counter to these goals. The PNF also lacks adequate details and explanation of how the proposed new pedestrian passage encumbered with large structural columns, retail kiosks, and office floors atop it would improve visual and pedestrian connections over the current similarly wide, glass-topped and ceremonial passage.

The dimensional requirements for a Proposed Project within PDA-IV shall be as set forth in the approved Development Plan, which shall be guided by the Greenway District Planning Study Use and Development Guidelines, as determined by the Boston Redevelopment Authority. The Greenway Guidelines states, “Height should be limited to 75’ to minimize shadow impacts and view obstruction from City Hall Plaza, Faneuil Hall, and Quincy Market,” and “Buildings should be stepped back at a height that aligns with the existing base of the buildings.” The PNF Project would add seven stories to the existing 3-story North Building, raising the height from 35 feet existing to 125 feet, with no stepping back of the new floors.

With respect to potential Zoning violations, Table 1-2 in Section 1-6 of the PNF notes, “variances and zoning relief, as applicable,” while Section 1.5 states, “the Project Site is located within the PDA-IV zone, and the Proponent expects to request approval of a PDA Development Plan or amendment to an existing PDA Development Plan to provide the zoning relief necessary for the Project.” The PNF lacks information necessary to understand the specific zoning violations and the Proponent’s proposed approach to obtaining zoning relief, whether by the Zoning Board of Appeal by variances and/or by the Zoning Commission through a PDA amendment. Any proposed zoning relief or PDA amendment for this important site should be thoughtfully vetted in public process at the outset of this Article 80 review.

**The PNF Project would create a greater barrier between, and impacts upon, important and sensitive public realm resources, historical resources, and connection of the Government Center/Market District and Boston Harbor.**

The PNF states that the proposed project will cause the site to evolve “from a barrier to a gateway.” NEWRA disagrees. The project as proposed will create a greater barrier between the Market District/Government Center and the public spaces of the Greenway, Armenian Heritage Park, Christopher Columbus Park, and the Downtown Waterfront, both structurally from its greatly expanded height and massing and programmatically from its conversion to predominant office use.

The PNF in part justifies the proposed higher height with the following: *In researching the historic fabric around Quincy Market, it was observed that the 1980s Marketplace Center replaced a block of taller six to seven story mercantile buildings from the 19<sup>th</sup> century. Throughout the life of these buildings, vertical additions were a common feature, some of which can still be seen at Granary and Central wharfs. The Project is a modern approach to this same densification that was a direct result of the importance of the commerce in the previous centuries.*

The context of the area surrounding the Project Site is vastly different than it was in the 19<sup>th</sup> Century. The Project can either enhance an important public connection from the Downtown Waterfront and large green public spaces of the Greenway and Christopher Columbus Park to the historic Faneuil Hall Marketplace and City Hall Plaza, as happened when the Central Artery viaduct was removed, or it can become a greater barrier. We see only the latter.

The Proponent proposes to add seven stories on top of the current 3-story North Building, increasing the height of the building from approximately 35 feet to 125 feet. No setbacks are proposed on the side of the building facing the Greenway or the side of the building facing Faneuil Hall Marketplace. According to the two-season shadow study in the PNF, the Project will increase shadow on the Greenway, Armenian Heritage Park, and portions of the open public area of Faneuil Hall Marketplace. Bright, warm spaces open to the sky are hard to come by in the neighborhoods adjacent to these spaces. Any additional shadow on these open areas would further compromise both horticultural integrity and the experience of park users and market strollers.

The Project will also decrease the amount of daylight reaching public areas around the Project Site and increase wind and glare. Results of analyses presented in the PNF show that the Project will result in increased daylight obstruction and increased glare on parks, green spaces and travel ways “similar to the daylight obstruction (and glare) values typical of densely built urban areas.” But the Project environs is not densely built urban area. It is public open space and public market space

that should be protected by avoiding or minimizing impacts, which cannot be achieved without consideration of project or significant design alternatives.

Over the current 3-story height of the buildings, there is today a visual connection from Christopher Columbus Park and the Greenway to buildings of various styles and heights in Government Center and adjacent Financial District. There is also a visual connection of City Hall Plaza to the waterfront. These visual connections and vistas from these important public spaces will be lost with the proposed increase in height. The PNF lacks evaluation of the effects of varying the height (reduced additional floors and heights less than the 125 feet proposed) on shadows, daylight, visual connections between the Greenway/Waterfront and the skyline west of the project, and the comfort and enjoyment of public spaces east and west of the Project Site in part by minimizing the loss of daylight and the impact of glare. It also lacks evaluation of the effects of alternative setbacks of new floors on shadows, daylight and the comfort and enjoyment of public spaces east and west of the Project Site. The PNF includes no before and after photo renderings of sight lines from fixed pedestrian points in Christopher Columbus Park, the Greenway, and City Hall Plaza.

The Greenway Guidelines states that “redevelopment of Marketplace Center 2 (the North Building) would need to appropriately respect and relate to the architecture of Faneuil Hall and Quincy Market.” NEWRA sees no relationship of the proposed architectural design to these historic buildings, and the PNF provides no explanation.

**The PNF Project would significantly increase a use (office space) that is inappropriate and unnecessary for the site and the city, and would not promote retail market success and the public market experience.**

The Proponent seeks to maximize rentable floor area of the North Building by adding seven stories over the existing 3-story structure and filling in the existing first and second floor retail entrance galleries. In the South Building, the plan calls for filling in the first and second floor galleries. All second-floor retail space would be converted to office space, and retail (including potential restaurants and cafes) would remain only on the first floor of each building. In addition, two floors of office space would be created over the new pedestrian portal.

Once complete, the Project will increase total floor area from 61,825 sf to 199,450 sf (222% increase). The plan increases office space from 53,950 sf to 135,550 sf (151% increase). The plan increases retail space from 51,875 sf to 61,875 sf (19% increase), which is net a 6,325-sf reduction due to conversion of second-floor retail and approximately 16,325 sf of additional retail space by filling in the retail entrance galleries.

With no explanation, the PNF states that the vertical addition will add commercial activation “to realize the potential of the site and support retail and cultural activities of Quincy Market, State Street and Government Center, will “foster greater opportunity for new and diverse retail than is currently attracted to the Quincy Market area,” will add “balance to the largely retail and tourism uses of the site,” and will provide an “elevated retail experience.” The PNF does not identify the types of “elevated retail” and retail enhancements or explain how conversion to predominant office use will bring about renewed market success in Faneuil Hall Marketplace.

NEWRA opposes what amounts to wholesale conversion of the North and South buildings that have for three decades been predominantly retail market oriented to predominate office use.

Massive new office space is under construction or proposed in other areas of downtown Boston, including areas within a half mile of the Project Site. The Project Site is within the Market District, and retail should be the priority. NEWRA does not understand, and there is no explanation in the PNF, as to how increased office space will enhance market success and public market experience.

### **The PNF Project Lacks Pedestrian Accommodation and Compromises Safety**

The PNF states that the Project seeks to “strengthen the connection between the historic Markets District and the new public space of the Greenway,” “bring views of Christopher Columbus Park and the Harbor to visitors of Faneuil Hall Marketplace and vice-versa,” “integrate neighborhoods on all sides,” and “open sight lines and pedestrian passageways to connect the waterfront and Greenway to the historic buildings of the Markets District.” To accomplish this, it proposes “a clarified, enlarged, emphasized grand pedestrian portal (as) the primary link between the Greenway and Quincy Market.”

While the Project includes a higher and enhanced pedestrian portal between the North and South buildings, the PNF also mentions the installation of retail kiosks, retail related seating, and public programming within the new portal. The current glass canopy would be replaced with a solid roof and two floors of office space over the portal. Lacking in the PNF is an in-depth evaluation comparing the current pedestrian portal with the proposed new portal, addressing horizontal and vertical dimensions, current obstructions that will be removed, new columns and proposed retail kiosks and seating, a measure of net new pedestrian passage space, and photo renderings comparing sight lines through the existing portal and the proposed portal (with proposed retail kiosks) from fixed points in the Greenway and Christopher Columbus Park and on City Hall Plaza. Also lacking in the PNF is the extent to which public programming, such as temporary art installations that are proposed as public benefit, can be accommodated while maintaining adequate pedestrian passage, as well as an evaluation of a project alternative(s) that eliminates the proposed office floors over the portal and includes a glass canopy or other view to and light from the sky.

The PNF states, “drivers travelling in the vicinity of the proposed development are expected to experience an increased level of visual glare,” and the Project will cause “greater wind speeds through the grand portal,” both of which could compromise pedestrian safety. Furthermore, the Project proposes the creation of a new drop-off zone for three vehicles immediately north of the signalized crosswalk between the pedestrian portal and the Greenway. The proposed drop off zone will require a modification to the existing curb line (a cut-out of the sidewalk) along Surface Road and would place parked vehicles within the sight lines of pedestrians at the crosswalk and drivers of vehicles heading to the crosswalk. Today, there is no allowed parking and no obstruction of sight lines along this portion of Surface Road. The proposed drop-off zone carries significant pedestrian safety risk.

The PNF lacks an analysis of current roadway and traffic conditions approaching the crosswalk, including roadway/lane widths, traffic convergences (such as the exit ramp from I-93), and roadway alignment, as well as a detailed description of the crosswalk and signalization. The PNF Project lacks evaluation and recommendation of crosswalk/signalization improvements to improve accommodation and safety. For instance, can and should the crosswalk be widened to the width of the proposed portal as a public benefit? More information also is needed regarding architectural design approaches that can minimize glare, and an explanation of the need for a drop-off zone,

including descriptions of the types of vehicles and uses and the frequency of vehicle pull-ins and pull-outs. The PNF and its proposed project does not include evaluation of the potential impacts of the drop-off zone on pedestrian and driver sight lines, pedestrian safety at the crosswalk, and the potential impacts on traffic heading south on Surface Road or an evaluation of alternative drop-off locations, including Clinton, Chatham and State streets.

### **Landscaping/Trees**

The Proponent proposes “to include new landscaping to the extent feasible to reduce the heat island effect.” The PNF mentions proposed vegetation on new building rooftops, the preservation of existing plantings on Commercial Street (within Faneuil Hall Marketplace) and recently planted street trees on the Greenway side, and proposed new plantings within the pedestrian portal potentially with planters and climbing vines. On the Greenway side, any new landscaping will be coordinated with retail frontage to create a new sidewalk experience along Surface Road.

The PNF notes that the Project’s landscaping “is designed to protect most existing street trees and plantings, while encouraging pedestrian and bicyclist trips to and through the Site.” This statement suggests that some existing trees may be removed. A site plan of the Project shown in Figure 1-5 identifies the location of several trees along the Surface Road sidewalk, but the planters at some of these locations may currently be empty. The PNF provides no detailed inventory and condition assessment of Project area landscaping and trees along Surface Road, Commercial Street and State Street adjacent to the North and South buildings, and in adjacent areas of Faneuil Hall Marketplace in part to support recommending additional public realm improvements. Any redevelopment of Marketplace Center should include a landscaping enhancement plan based on the above assessment, as well as consideration of other, more remote, landscaping improvements that may help offset project impacts in coordination with the Boston Parks and Recreation Department, Friends of Christopher Columbus Park, Armenian Heritage Foundation, and the Greenway Conservancy.

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As stated above, NEWRA urges the BPDA to require an alternative redevelopment plan from the Proponent that meets the goals of prior planning and zoning and a renewed vision for this important connection of Government Center and the Market District to the resources of Boston Harbor and its waterfront.

Sincerely,

Cheryl Delgreco  
President, NEWRA

cc: Mayor Michelle Wu  
Representative Aaron Michlewitz  
District 1 Councilor Lydia Edwards  
At-Large Councilors Michael Flaherty, Ruthzee Louijeune, Julia Mejia, and Erin Murphy  
Rev. Mariama White-Hammond, Chief of Environment, Energy and Open Space  
Ryan Woods, Commissioner, Boston Parks and Recreation

Brona Simon, Executive Director, Massachusetts Historical Commission  
Members of the Impact Advisory Group for Marketplace Center  
Ciara D'Amico, Mayor's Office of Neighborhood Services  
Joel Faller, President, North End/Waterfront Neighborhood Council  
Susanne Lavoie, President, Wharf District Council  
Christopher Cook, Executive Director, Rose Fitzgerald Kennedy Greenway Conservancy  
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Joanne Hayes-Rines, President, Friends of Christopher Columbus Park  
James M. Kalustian, President, Armenian Heritage Foundation