



Charlestown Preservation Society
P.O. Box 290218
Charlestown, MA 02129

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February 2, 2022

Sarah Black, Project Manager

Boston Planning and Development Agency

One City Hall, Ninth Floor

Boston, MA 02129

Re: One Mystic, Charlestown, MA 02129

Draft Project Impact Report (DPIR) Comments

The Charlestown Preservation Society Design Review Committee (DRC) has reviewed the Project Notification Form (PNF) submitted to BPDA on November 12, 2021 and the Scoping Determination of the BPDA posted on November 2, 2021. Our members have participated in the virtual presentations by Fulcrum Global Investors (FGI) and architects from Stantec to the public on January 25, 2022, and to the Impact Advisory Group (IAG) on January 19, 2022.

We have also reviewed the draft master plan for the MBTA's abutting parcel, and we were actively involved in the four planning studies that provide context for the site including Imagine Boston 2030, the Sullivan Square Disposition Study, the Rutherford Avenue / Sullivan Square Design Project and Coastal Resilience Solutions for Charlestown Phase One. Our members actively participate in the ongoing PLAN: Charlestown planning initiative.

While we support the redevelopment of the site given the property's current underutilization, the proposed new build is over-built, and not appropriate to the density and scale of this historic Charlestown neighborhood. The proposed project requires substantial zoning relief and its location in a future development area will set a precedent for the area that is unacceptable and unattainable.



We have many specific planning / process concerns and a number of design concerns.

1. **The proposed change of use for the site from industrial to residential cannot be supported by the neighborhood context, today.** The project site is isolated from the historic and residential portions of the neighborhood on both sides of Sullivan Square. This isolated siting has been celebrated and emphasized by the proponent. However, the boundaries created by Main Street, Alford Street and the rail lines that bind the project site with the light industrial use of the MBTA's parcels should be more heavily weighted when considering a change in use for the site. Heavy traffic, railroad and heavy bus traffic create an island for this area that is treacherous for pedestrian and bicycle access.
 - i. In the future – should a residential or mixed-use zoning designation be established for nearby parcels in the Sullivan Square vicinity, a change of use to mixed-use could be considered.
2. **With 1,600 new residential units approved for Charlestown at the BHHD, can Charlestown absorb another 530 market-rate rental units?** While we appreciate the percentage increase in affordable units from the mandated 13% in the PNF, we are concerned about whether this large number of *market-rate* rental units can be absorbed into our existing infrastructure and rental market. In addition to what has been approved to date, there are many other residential rental unit projects proposed in Charlestown that are on more appropriate sites.

This does not conflict with the neighborhood's need for affordable workforce housing. We hope to see developments in Charlestown provide affordable homeownership as there are none currently proposed or approved at this scale for Charlestown. We believe that this increases the demand on existing units available for purchase and increase the already high cost of housing in the neighborhood.

- i. We recommend that further study be conducted in regard to land use and housing demands for the neighborhood.
3. **Significant changes and variances to Charlestown's zoning should be deferred until Plan: Charlestown is complete.** An expected outcome of PLAN: Charlestown are changes to zoning, and changes should be considered comprehensively for all of Charlestown – not on a case-by-case basis by each development. This proposal asks to change the zoning use, exceeds the maximum building height allowed, and adds a significant number of housing units to Charlestown in an area not planned for such.
 - i. We recommend that these requests be denied at this time – OR reviewed AFTER the current planning process for Charlestown has concluded.
4. **The proposed density and height are far too great for this location** – the project seeks to construct 639 units on a site with an FAR that has been reduced after the PNF – but is still over double the allowable limit of 2.0. While we appreciate the reduction in FAR, overall building height and improvements to the design, the proposed density far exceeds any development built within the borders of Charlestown. The project would use a great deal of the total development capacity



envisioned for this developing area of Charlestown and does not fit within the overall planning context for the neighborhood.

- a. The turning of the building and separate massing is an improvement.
 - b. The siting of the building nor its landscaping ameliorates the sense of the surroundings. The landscaped plaza opens to heavy traffic against 93 as well as light industrial abutters.
 - c. The pedestrian path to Sullivan station, Assembly Square and other parts of Charlestown is treacherous. Additional pedestrian and bike traffic in this area could be dangerous and debilitating for vehicular traffic.
 - d. Vehicular access for Ride-Shares and deliveries has not been planned for sufficiently.
 - e. The “Gateway” of FGI’s proposal on Main Street is over-scaled and restricts entry views of the neighborhood and the Bunker Hill Monument. Sullivan Square is Charlestown’s northerly gateway and should reference the historic neighborhood beyond. Although the “proposed project aims to create a residential, transit-oriented “gateway” into Charlestown”, this design falls far short of that.
 - i. We recommend that a new building on this site be no more than what zoning currently allows and reflect the massing of the proposed buildings on the abutting MBTA parcel.
 - ii. We recommend that no signage be allowed on the building.
 - f. Buildings in Charlestown such as Hood Park at 265 feet, Assembly Square at 250 feet and the Encore Casino are set well back from the street and are surrounded by open, landscaped space. One Mystic has insufficient landscape and open space, it is too tight of a site for the height and massing proposed, and too close to heavy traffic for pedestrians to circumnavigate safely.
5. While we are pleased that the project is proposed to be transit oriented and has a low parking to housing unit ratio, **the proposal does not include improvements to the public realm that would make it a successful TOD site** where residents are encouraged to walk to Sullivan Station and the Charlestown neighborhood. The highly trafficked location at Sullivan Square, adjacency with diesel powered rail lines, and light industrial parcels are concerning.
- a. We recommend that sidewalk connections and crossings between this building and Sullivan Station be coordinated and designed within the larger Rutherford Avenue / Sullivan Square redesign with Mass DOT and BTM. The projected opening date of 2024-2025 is well in advance of the BTM project design schedule.
6. **The mitigation benefits are insufficient for the impacts projected for Charlestown. Mitigation benefits should provide a rational, definable benefit to the public at large that mitigates the impacts of the development on the community.** The impacts detailed through public meetings (blue bike station, pedestrian cross walk, and shuttle services) benefit residents of the building due to the isolated siting of the proposed development. The additional open space is appreciated, but the siting of what is essentially a traffic median does little to contribute to usable space for residents of the building and is not easily accessible to the rest of the neighborhood.
- a. We recommend that mitigation / community benefits directly mitigate the impacts to the neighborhood that the development creates. This could include improvements to the Sullivan



Square station that would make it more inviting and friendlier to use, contributions to Boston Public Schools to expand school seats and access for Charlestown residents and / or contributions towards an in-town shared shuttle that serves the residents of all of Charlestown.

We oppose the project as it is proposed today and request that the developer rework the plans for this site. We hope that a new project does not seek to drastically stretch the limits of Charlestown's zoning for this isolated area of the neighborhood, and that the development team continue to engage in the PLAN Charlestown and Rutherford Avenue / Sullivan Square planning effort in order to create a project that benefits all of the residents of Charlestown. Changes to zoning in the area should happen within the Plan: Charlestown process and not through this project.

We thank you for your attention to these matters.

The Charlestown Preservation Society is dedicated to protecting the architectural character of our community.

Sincerely,

A handwritten signature in cursive script, reading "Amanda C. Zettel", is written over a horizontal line.

Amanda Zettel, President
Charlestown Preservation Society
and Acting Chair, Design Review Committee
Charlestown Preservation Society
P.O. Box 290201
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cc.:

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