



NORTH END / WATERFRONT RESIDENTS ASSOCIATION

By email: Brian.Golden@Boston.gov; Lance.Campbell@Boston.gov
April 9, 2021

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

Subject: Cross Street Hotel, North End – Expanded Project Notification Form

Dear Mr. Golden:

The North End/Waterfront Residents' Association (NEWRA) has reviewed the subject Project Notification Form (PNF) and submits the following comments on the proposed Cross Street Hotel at 42 Cross Street, North End. NEWRA submits these comments for consideration by the Boston Planning and Development Agency (BPDA) in its administration of the Article 80 review of the project's appropriateness and potential impacts, and especially for consideration by North End/Waterfront residents and their elected officials in the ensuing, important public process.

Our comments reflect concerns that have recently been raised in the North End/Waterfront neighborhood regarding the hotel project's lack of residential community purpose and benefit, community and resident impacts, parkland impacts, and private use of public space, as well as an inadequate public process to date. We also raise question and concern about past planning that may not have been adequate to measure the fitness of the proposed hotel project – or any other development proposal at the site - in an appropriate planning context that complements neighborhood character and supports neighborhood interest with minimal impact.

Lack of Residential Community Purpose and Benefit

The Hotel project site is located between the entrances to Salem Street and Endicott Street and is the gateway to our North End neighborhood from the rest of Boston. The project site is surrounded primarily by residential buildings on Salem, Endicott and Stillman streets, where hundreds of North End residents live, and by parkland and public open space, including the Rose Fitzgerald Kennedy Greenway, the Cross Street pedestrian plaza, and Vincent Cutillo Park, a neighborhood park immediately behind and bounded by the project site.

The project site has a very long history of North End community service. Before 1917, it was composed mainly of residential buildings and neighborhood supporting businesses. In 1917, the site was taken by the City for a neighborhood park that would be named after Vincent Cutillo, a son of the North End killed in World War I. In the 1950's, the portion of Vincent Cutillo Park that is now the proposed hotel site was allowed to be developed with one-story

commercial buildings. For decades, until affected by the impacts of Central Artery construction in the 1990's, these commercial buildings housed popular neighborhood businesses, including an Italian deli, a bakery, and a fruit and vegetable market, that supported the needs of North End residents and visitors alike. The project site has a hundreds-year history of being part of and serving the North End residential community.

Now comes a development plan from Cross Street Ventures LLC, which proposes to construct a 134-room hotel with two ground-floor restaurants and seasonal rooftop bar and dining terraces having total seating capacity of approximately 300. The hotel is proposed to be a monolithic five-story building rising to 55 feet over the entire project site (approximately 45 feet higher than the current structures) and with a Floor Area Ratio (FAR) twice the FAR allowed in the Zoning Code. The development plans also include redesigning and repurposing the Cross Street pedestrian plaza fronting the site primarily for hotel and restaurant purposes, including guest arrivals and departures, valet parking for hotel guests and restaurant patrons, and possibly deliveries and waste removal.

The proposed hotel is incongruous with our historic, residential neighborhood. It provides only the benefit of a new building and new activity on the site, and with a specific proposal that may have greatest impact compared to other development possibilities. It effectively removes the site from the North End for the purpose of accommodating more city visitors. The proposed hotel may help meet the city's demand for hotel rooms, but it does not help satisfy the city's need for residential housing or the North End's need for neighborhood support services.

We question the need and wisdom of removing the site from neighborhood purpose to hotel purpose, when hotels recently have been completed, are under construction, or are planned nearby, at North Station, Government Center Garage, 88 North Washington Street, and Parcel 9 adjacent to the Haymarket Pushcart vendors, to name a few.

Community, Resident and Open Space Impacts

The hotel project will create a barrier, a high wall, between the Rose Fitzgerald Kennedy Greenway and the North End. The hotel structure is proposed to completely fill the legal limits of the site, stretching to the property lines and as high as the 55-foot height limit in the North End, not including rooftop structures, mechanicals, and the rooftop terraces that will accommodate seasonal bar and dining patrons. Rooftop structures could increase the total height another 15 feet. Even greater massing is proposed with the design to extend the building's floors 2 through 5 beyond the property line and over a portion of Cross Street plaza.

The project includes no open space, and it proposes to commandeer most of the public open space that is Cross Street plaza. A proposed ground-floor opening through the project from the Greenway to Vincent Cutillo Park would be a welcome amenity as part of any project at this site, but it does little to offset the impacts to the park from the proposed building's height, massing and hotel/restaurant activity.

Vincent Cutillo Park is surrounded on three sides by 45-foot to 55-foot high residential buildings, most of which have been in place for more than a hundred years. Only one side of the park provides substantial sunlight and sky – the project site at the current one-story height. Careful analysis and assessment must be conducted and vetted with the public and the Boston

Parks and Recreation Department understand the proposed hotel's potential to compromise light, sun, and view of sky in Vincent Cutillo Park and impact both the green elements of the park and public enjoyment.

Equally concerning are the impacts to enjoyment of this neighborhood park by the operations of a 134-room hotel and two large restaurants. How will the park be affected by open hotel windows, by the large glass doors of the proposed restaurant that will open up to the park, by outdoor restaurant seating that may be added to the proposed park passageway, and by mechanical and ventilation equipment?

The hotel massing and the hotel and restaurant activity will impose burdens on the adjacent residential community. The barrier wall created by the hotel height and massing will impact dozens of abutting residences, blocking light and views, impacting their privacy, and harming the owners' property values.

Impacts to the broader community are also a concern. The North End is already saturated with restaurants and alcohol licenses. There are approximately 100 cafes and restaurants and as many alcohol licenses in the North End, a neighborhood of nearly 11,000 residents living in an area of only one-third square mile. The proposed hotel and restaurants will increase crowds, noise, traffic, parking demand, and delivery and trash removal trucks.

We request that the future of the public open space that is Cross Street plaza be given just as much public review and planning as the development of the project site. The current configuration and public programming were the outcome of a City-administered public process a decade ago. There should be no less public participation in City decisions that may turn over much of the use and control of the plaza to the accommodations of the proposed hotel and restaurants and potentially compromise pedestrian access and safety. The redesign of the plaza in the PNF document seems to constrain pedestrian access, and it requires those who would cross from the Kennedy Greenway to Vincent Cutillo Park to have to walk through the hotel drop-off and valet zone.

The Public Process

The BPDA has held one public meeting to date, on April 7, 2021. We request that the BPDA commit to a proactive, rigorous and transparent public process - not limited to meetings -that strives to ensure that all members of the North End community are informed about the project and are aware of available public information, public review and comment opportunities, and the scheduling of IAG and public meetings. We ask that the BPDA hold targeted North End community meetings that, while open to all, provide for the community to come together and for members of the community to share information, comments and opinions. In all public and community meetings, priority should be given to recognizing abutters, followed by other North End residents, and offering them ample opportunity for comment.

These meetings, if they must be held virtually, should be set up by the BPDA to allow all participants to be known to the others – to see and be seen. That's what "community" means. We believe it's a poor, possibly false, excuse that the technology being used by the BPDA and necessarily providing language translation does not allow participants to be viewed and named on the screen, at the participant's discretion. Please update or change the platform being used

to be able to hold virtual meetings in a form as similar as possible to the on-site meetings held before the pandemic.

Planning Context

We ask the BPDA to inform our community as to the past planning efforts regarding development in the North End, in the Central Artery and Greenway districts, and specifically at the project site, and how the proposed hotel project meets the goals and requirements of those past planning efforts. Did those past planning efforts address the questions and concerns raised in this comment letter, especially, in this case, the impacts to the community, abutting residences, and Vincent Cutillo Park? If not, then a more responsive planning process should be conducted by the BPDA now, before any further decisions about the hotel proposal are made.

In closing, we ask that the BPDA include the above concerns in its scoping of the developer's next filing and in the public and community process ahead. Given these concerns and potential serious impacts of development on the Cross Street site, of utmost importance is the evaluation of development alternatives that include variations of height, massing and use, and comparison of the impacts and benefits of the alternatives with the proposed hotel development.

Yours truly,



Cheryl Delgreco
President, NEWRA

cc: Mayor Kim Janey
Senator Joseph Boncore
Representative Aaron Michlewitz
District 1 Councilor Lydia Edwards
At-Large Councilors Annissa Essaibi George, Michael Flaherty, Julia Mejia, Michele Wu
Christopher Cook, Chief of Environment, Energy and Open Space
Ryan Woods, Commissioner, Boston Parks and Recreation
Members of the Boston Parks and Recreation Commission
Members of the Board of Rose Fitzgerald Kennedy Greenway Conservancy
Members of the Cross Street Hotel Impact Advisory Group
John Romano, Mayor's Office of Neighborhood Services
Brett Roman, President, North End/Waterfront Neighborhood Council