

Karen Mauney-Brodek, *President*

November 21, 2022

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Sarah Black

305 Brookline Avenue Project Manager
Boston Planning & Development Agency
Boston City Hall, 9th floor
One City Hall Plaza
Boston, MA 02201

Dear Ms. Black:

The Emerald Necklace Conservancy's mission is to protect and improve the Emerald Necklace for all. As part of that work, the Conservancy's Project Review Committee has reviewed the latest version of the plans for the proposed development at 305 Brookline Avenue, also known as Longwood Place. Additionally, the Conservancy has been, and will continue to be, part of the Impact Advisory Group, which is an ongoing committee engaged to review and provide feedback on this project.

While the proposal has evolved somewhat through the process and has included improvements, the Conservancy finds this project, in its current form, due to its scale and resultant significant shadow cast to be unacceptable for the public parks' waterways, landscapes, recreational park users and commuters. These shadows, shown below, cover significant areas of the park, are large and long in duration (up to 2 hours in some cases), and are present particularly during the morning and evening commutes. This park is an active corridor for commuters, including many medical area workers, in all weather conditions. This development, as proposed, would cast new shadow on vegetation and waterways that need sunlight for health. Additionally, due to snow and ice they would make pathways less safe for walkers and bikers travelling through the park in winter months.

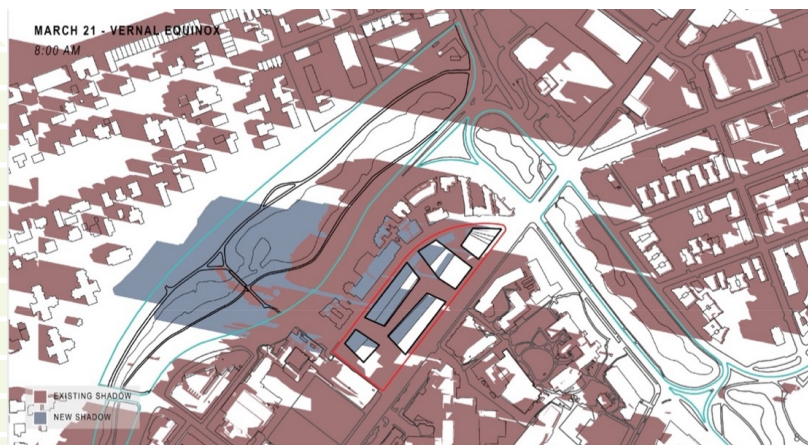


Image showing proposed new shadow on the Riverway. (March 21)

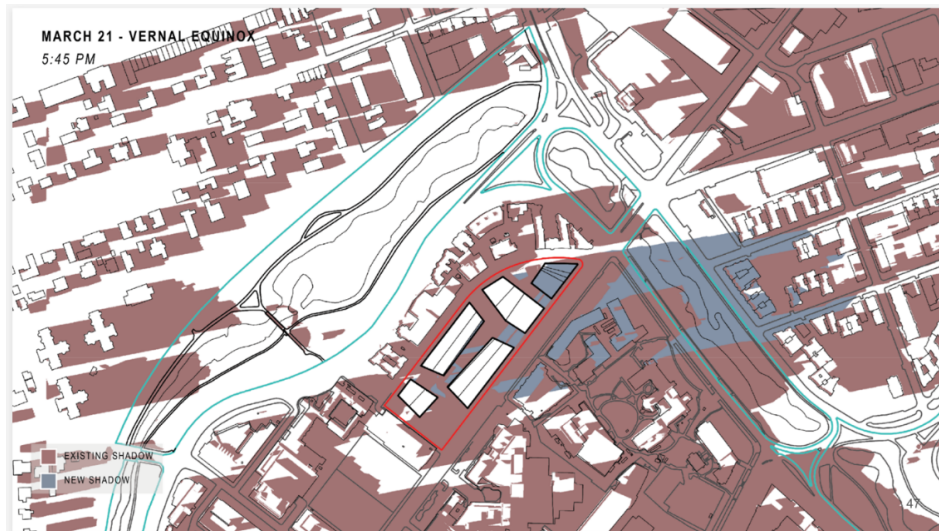


Image showing proposed new shadow on the Back Bay Fens. (March 21)

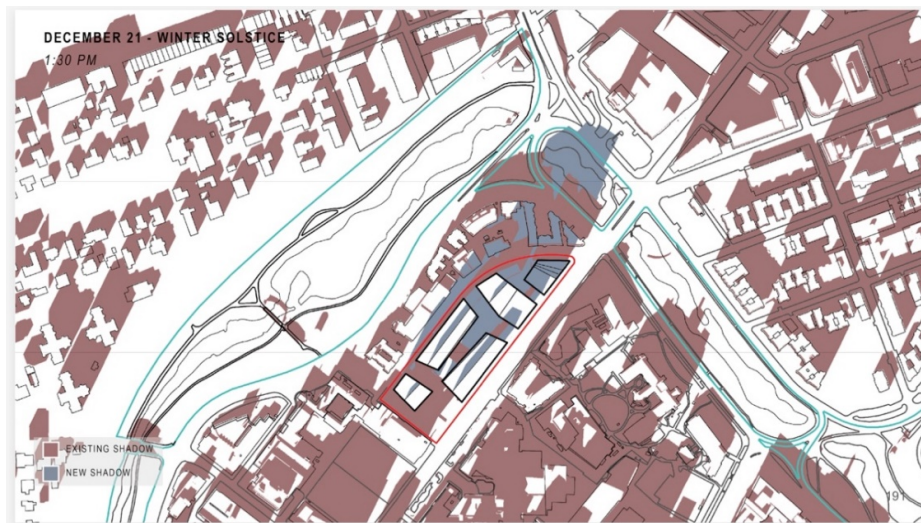
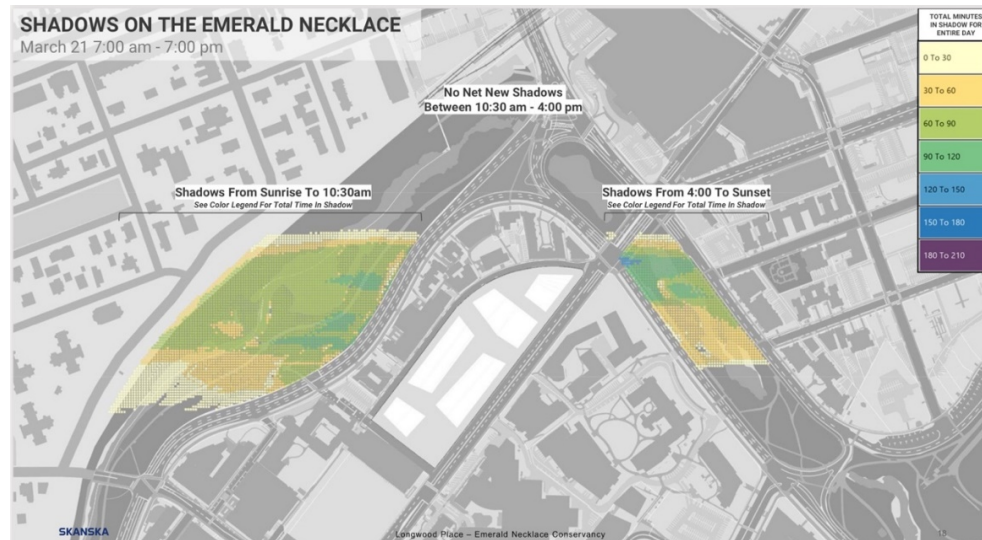


Image showing proposed new shadow on Justine Mee Liff Park and the Back Bay Fens in the Emerald Necklace. (December 21)



This composite diagram shows new shadows on March 21. Note: New shadow does fall on Justine Mee Liff Park in December visualizations (see above).

This proposal also underlines the City's lack of clear policy and guidance on development and shadow management for parks across the city. In this area, there appears to be some guidance provided on the BPDA's website in the form of the *Longwood Medical and Academic Area's Interim Guidelines*, yet those guidelines have not been followed here. The guidelines state that "no project will be approved if it casts any new shadow for more than one hour on the Emerald Necklace, Joslin Park or Evans Way Park." In addition, the guidelines call for a maximum prevailing height(s) of 75, 150 and up to 205 feet (varying by proximity to the named parklands). Longwood Place in its current form casts shadows for more than 60 minutes on large swaths of the Riverway, Justine Mee Liff and the Back Bay Fens Parks. Moreover, the proposed heights in the project are up to 320 feet, far exceeds the area's "interim guidelines."

The Conservancy urges the development team and the BPDA to significantly reconsider this project given the constraints of the surrounding area, with particular attention to the public parks. Over the last several years Boston supported a once-in-a-generation dredging of the Muddy River and restoration of the plantings and paths along its banks. We are concerned that projects like Longwood Place, as currently envisioned, threaten to undermine key areas that the City and others have been working to restore.

The Conservancy requests that the City of Boston immediately start to develop a shadow policy for all parks citywide. Working from examples employed by other cities, and from local measures in place that limit shadows on two downtown parks (see attachment for examples), such a policy could be completed by the fall of 2023. A city-wide sunlight protection policy has been needed for some time and must be developed in earnest to guide the numerous projects in consideration now and planned soon for all parts of our growing city. Additionally, like in other cities, the Parks and Recreation Commission should review all proposed development that would cast new shadow on a public park.

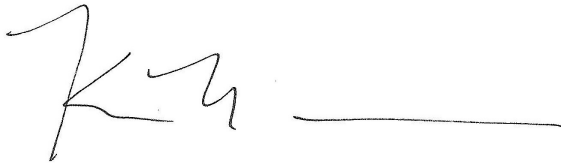
It is our understanding that the Longwood Place proposal is not requesting a specific building or project approval. Instead, the project seeks approval for development that would occur over many years and involve several buildings. The earliest we understand the first building in this proposal would start construction is four or more years from now.

If the Planned Development Area approval is considered, it must require that:

- 1) **Each new building proposed be evaluated to ensure consistency with a new city-wide shadow policy.**
- 2) **The Boston Parks and Recreation Commission's review and evaluation of any proposed new shadow.**

It is our hope that this project, in an improved form, could provide significant benefits to the immediate area, while bringing about new policies and procedures that support all parks and communities in Boston.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Mauney-Brodek', followed by a horizontal line.

Karen Mauney-Brodek
President

CC: Councilor Bok
Chief White-Hammond
Commissioner Woods
Longwood Place Development Team/Project Proponent