

August 15, 2022

**BY E-MAIL (APCC@boston.gov) AND  
HAND DELIVERY**

Ms. Kat Eshel  
Deputy Director of Climate and Environmental Planning  
Boston Air Pollution Control Commission  
City Hall, Room 805  
Boston, MA 02201

Re: **Application for modification of APCC Exemption #APCC453717 in connection with the Clinical Building Project located at Parkman Street, Blossom Street, Cambridge Street, and North Grove Street in Boston, Massachusetts**

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Dear Kat:

We represent The General Hospital Corporation (“MGH”), a Massachusetts charitable corporation created pursuant to Chapter 190 of the Massachusetts General Laws. MGH has embarked on a redevelopment project of an approximately 124,645 square foot area of land located in the MGH’s main campus in the West End neighborhood of Boston for the construction of a new state-of-the-art clinical building (the “Project”). In connection with the redevelopment Project, MGH will replace existing commercial and exempt parking spaces serving the main campus with exempt-only parking spaces, which will service the main campus and the new clinical and patient care space in the Project. Through this Project, MGH will return 557 commercial parking spaces to the Parking Freeze Bank. To accommodate the addition of the new clinical building to its campus, MGH proposes to add a limited number of net new exempt spaces to its campus for use by its patients, guests and visitors, and in limited circumstances, employees. Accordingly, MGH seeks a modification of APCC Exemption #APCC453717 (the “Application”) related to the Project.

Enclosed please find one (1) original of the following:

1. Parking Freeze Application Form of The General Hospital Corporation, including parcel list;
2. Statement of Need;

3. Preliminary Adequacy Determination Waiving Further Review, dated October 26, 2021;
4. Transportation Access Plan Agreement, dated June 9, 2022;
5. Plans entitled, “Mass. General Hospital, 275 Cambridge Street, Boston Massachusetts, Existing Conditions Plan of Land”, prepared by VHB, dated August 16, 2019 (Sheet 5 of 8 and Sheet 8 or 8);
6. Plans entitled, “Cambridge Street Project, 4B / Parkman”, prepared by NBBJ, dated March 11, 2022;
7. Plans entitled, “Cambridge Street Project, 4B Building Phase 1”, prepared by NBBJ, dated March 11, 2022;
8. Plans entitled, “Cambridge Street Project, Parkman Building Phase 2”, prepared by NBBJ, dated March 11, 2022;
9. Deeds evidencing that MGH is the owner of record to file this Application; and
10. Application Fee, which is being delivered under a separate cover by MGH.

Under APCC Exemption # APCC453717, MGH used 85 exempt parking spaces located at 15 North Anderson Street (commonly known as the Wang Ambulatory Care Center Lot) (the “WACC License”). More recently, however, through the use of stackers, this lot accommodated 132 exempt parking spaces. Under Permit # APCC453718, MGH currently uses 557 commercial parking spaces located at 10 Parkman Street (the “Parkman License”). Through the Project, all of these spaces will be replaced and consolidated into a single parking facility.

At full build, the Project will include an approximately six-floor below-grade parking garage (the “Clinical Building Garage”) to accommodate approximately 864 parking spaces, which will add approximately 222 net new spaces (or 175 net new spaces, based on the use of stackers at the 15 North Anderson Street lot) to the overall MGH campus. Although the Project will be constructed in phases, the resulting Clinical Building Garage will operate as one integrated facility upon completion. For that reason, MGH proposes to modify the WACC License to coincide with the phased construction as more particularly described in the attached Statement of Need.

MGH respectfully requests the WACC License be modified to approve the full build number of exempt spaces (864), but that these spaces be “taken down” for use in stages as the Project is constructed, as follows: (i) upon commencement of the first phase of construction, MGH will discontinue use of the existing 85 exempt parking spaces under the WACC License; (ii) upon completion of the first phase of construction for the Project, MGH will provide notice to the APCC of the pending issuance of a temporary certificate of occupancy for such portion of

the Clinical Building Garage and the commencement of use of 500 exempt parking spaces; (iii) upon commencement of use of the first phase portion of the garage, the second phase of construction will commence and MGH will provide notice to the APCC that it is closing and demolishing the 557 commercial space Parkman Street garage and it will terminate Permit # APCC453718, through which MGH will return the existing 557 commercial parking spaces under the Parkman License to the Parking Freeze Bank; and (iv) upon completion of construction of the Project, MGH will provide notice to the APCC of the issuance of the certificate of occupancy for the full garage and the commencement of use of the remaining spaces for entire 864 exempt parking spaces.

The Project addresses growing demands for delivering the highest level of care and services to the residents of Boston, the Commonwealth, the region and the world. The new clinical building will include operating rooms, patient rooms, clinical spaces and other hospital uses, including MGH's Center for Cancer Excellence and Center for Cardiac Excellence. The Project will allow MGH to alleviate ongoing capacity challenges in its Emergency Department, accommodate new and rapidly evolving technologies, and enable the consolidation and organization of related services. Further, the new clinical building will create a comfortable, efficient, and positive healing environment for patients and families through the addition of single occupancy patient rooms, which is important for infection control and patient treatment where today, many rooms at MGH are double occupancy. Similar to the other buildings in the MGH main campus, the new clinical building will accommodate patients that are severely sick, immunocompromised, and vulnerable – these patients are often those that do not have access to nearby public transit, are unable to use public transit for health reasons, or are otherwise the most vulnerable members of the community so that even if public transit is available, such option is not a viable method of travel. These patients, and their visitors and guests, need to be able to have access to the hospital's resources in a safe manner. The Project also includes pedestrian bridges and underground tunnels to ensure patients, guests and visitors have access to all of MGH's facilities campus-wide.

By approving a modification to the WACC License in the foregoing manner, MGH and the APCC will be able to allow the Clinical Building Garage to operate under one license as one facility while being able to track the allocation and use of the spaces affected by the Project. This also allows MGH to utilize the spaces in the first phase of the Project, and then at full build of the Project, to service the existing main campus uses and the uses in the building, which is critical to serving MGH's patient care mission.

We respectfully request to appear before the Air Pollution Control Commission at its next hearing scheduled on September 14, 2022. Please let us know if any additional materials would be helpful. We appreciate the Commission's attention to this filing, which will allow MGH to advance this important project. Thank you for your assistance.

Very truly yours,



Christian G. Regnier, Esq.

Enclosures

cc: (by e-mail, with attachments)  
Mr. Nicholas Haney  
Ms. Tammy Simeonidis  
Ms. Bonnie Michelman  
Mr. Teague Dyer  
Mr. Vinod Kalikiri  
Mitali Biswas, Esq.



**A. GENERAL APPLICATION INFORMATION**

1. *Project Location*

Generally bounded by Parkman Street, Blossom Street, Cambridge Street and North Grove Street a. Street Address	Boston b. City/Town	02114 c. Zip Code
Please see attached parcel list. f. Assessors Map/Plat Number	Please see attached parcel list. g. Parcel/Lot Number	

2. *Applicant*

Tammy a. First Name	Simeonidis b. Last Name	The General Hospital Corporation c. Company	
55 Fruit Street d. Mailing Address			
Boston e. City/Town		Massachusetts f. State	02114 g. Zip Code
617-726-7512 h. Phone Number	N/A i. Fax Number	tsimeonidis@partners.org j. Email address	

3. *Property Owner*

N/A a. First Name	N/A b. Last Name	The General Hospital Corporation c. Company	
55 Fruit Street d. Mailing Address			
Boston e. City/Town		Massachusetts f. State	02114 g. Zip Code
N/A h. Phone Number	N/A i. Fax Number	N/A j. Email address	

Check if more than one owner:

(If there is more than one property owner, please attach a list of these property owners to this form.)



4. Representative (if any)

Christian a. First Name	Regnier b. Last Name	Goulston & Storrs c. Company	
400 Atlantic Avenue d. Mailing Address			
Boston e. City/Town		Massachusetts f. State	02110 g. Zip Code
(617) 574-6591 h. Phone Number	N/A i. Fax Number	cregnier@goulstonstorrs.com j. Email address	

5. What kind of application is being filed?

- Request a New Parking Freeze Permit or Exemption Certification
- Modify an existing Parking Freeze Permit or Exemption Certification

6. Which Parking Freeze is your facility located in

- Downtown Boston
- South Boston

**B. PARKING FACILITY INFORMATION**

1. Applicant

Downtown Boston		South Boston	
Commercial Spaces	0	Commercial Spaces	0
Exempt Spaces	864	Residential Included Spaces	0
Residential Excluded Spaces	0	Residential Excluded Spaces	0

2. Do you currently or will you charge for parking?

- Yes
- No
- Not sure

3. What is your current or proposed parking method and facility type? (select all that apply)

- Valet
- Surface Lot
- Self-Parking
- Garage



4. Is your project compliant with the City's Bicycle Parking Guidelines? Yes.

Number of Long-Term Bicycle Spaces: 500	Number of Showers: 43
Number of Short-Term Bicycle Spaces: 66	Bikeshare Station Size and Contribution: \$288,724, which includes \$75,000 for the installation of a new Bluebikes station
Number of Lockers: 3,088	Other Amenities (Please List): MBTA headhouse for the Red / Blue Connector project; funding to the BPDA to be allocated to the BTM and PWD, as further described in the TAPA. See also Statement of Need.

5. Is your project compliant with the City's Electric Vehicle Readiness Policy? Yes.

EVSE-Installed Points: <b>A</b> 222	Total number of spaces: <b>C</b> 864
EV-Ready Points: <b>B</b> 642	Does <b>A + B = C</b> ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Note: Please attach the Electric Vehicle Equivalency Calculator to this application, available at [www.boston.gov/recharge-boston](http://www.boston.gov/recharge-boston).

6. Please fill out the information below:

Total Number of Proposed Spaces: 864	Total Parking Facility Square Footage: 416,062
Number of New Spaces: 864	Ratio of Residential Spaces to Units: N/A
Number of Existing Spaces: 642	(Optional) Number of Spaces Returned:

7. Please list the total facility square footage by use type:

Residential Sqft: 0	Retail Sqft: 0
Office/Admin Sqft: 0	Institutional Sqft: 1,050,450
Industrial Sqft: 0	Lodging Sqft: 0

8. Are you required to execute a Transportation Access Plan Agreement (TAPA)?

Yes  No

(If yes, please attach the draft or final TAPA to this form if available.)

Please see attached fully-executed TAPA.



**C. SIGNATURES AND SUBMITTAL REQUIREMENTS**

I hereby certify under the penalties of perjury that the foregoing Notice of Intent and accompanying plans, documents, and supporting data are true and complete to the best of my knowledge. I understand that the Applicant will place notification of this Application in a local newspaper at the expense of the applicant in accordance with the Procedures and Criteria for the Issuance of Parking Freeze Permits.

*Johnny Simonidis*  
\_\_\_\_\_  
Signature of Applicant

*8/15/2022*  
\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Property Owner (if different)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Representative (if any)

\_\_\_\_\_  
Date

**D. ADDENDUM: IMPORTANT APPLICATION INFORMATION**

**PAYMENT**

Please include a check or money order made payable to the City of Boston, Air Pollution Control Commission. The fee is \$20 per parking space. Application and renewal fees apply to all locations within the Downtown, East Boston, and South Boston Parking Freeze Zones.

**WRITTEN PROOF**

Please attach written proof that the applicant is the owner of record or has written approval from the owner of record to file this application.

**STATEMENT OF NEED**

Please attach a general description of the facility and the parking needs of the project, local entities, and patrons that the proposed facility will serve. Any written support (letters, etc.) that you wish to supply in support of this statement should be attached





## **SITE PLANS**

Please attach a site plan of the parking facility showing:

- location of the facility;
- layout of the spaces;
- entry and exit locations;
- total square footage of the parking area;
- location, type and amount of electric vehicle parking;
- location and amount of bicycle parking and bicycle facilities.

## **OTHER APPLICABLE REVIEWS**

If you are working in a historic district or on a designated landmark, you should consult with the appropriate historic or architectural commission. If you are working in the floodplain or within 100 feet of a wetland, you should consult with the Conservation Commission. Visit [boston.gov/landmarks](http://boston.gov/landmarks) and [boston.gov/conservation](http://boston.gov/conservation) before starting any work.

## **WHERE TO SEND**

We prefer you complete the digital application using this form. Export the form as a PDF and email your application and supporting documents to [APCC@boston.gov](mailto:APCC@boston.gov). You can also mail your application, documents, and payment to: Air Pollution Control Commission, Boston City Hall, 1 City Hall Square, Room 709, Boston, MA 02201. Please notify us that you have sent an application by mail at [APCC@boston.gov](mailto:APCC@boston.gov).

## **STATEMENT OF NEED**

This Statement of Need is provided in connection with an application before the Boston Air Pollution Control Commission (the “APCC”) for the modification of the APCC Exemption # APCC453717, which presently provides for 85 exempt parking spaces located at 15 North Anderson Street (commonly known as the Wang Ambulatory Care Center Lot) (the “Application”).

The applicant, The General Hospital Corporation (“MGH”), operates its main hospital campus in the West End neighborhood of Boston, with over 28 buildings comprising of approximately 3,851,095 square feet of gross floor area. MGH is proudly embarking on the redevelopment of a portion of the MGH main campus comprising of approximately 124,645 square feet of land, generally bounded by Parkman Street, Blossom Street, Cambridge Street and North Grove Street (the “Project Site”). The redevelopment Project will include the replacement of existing buildings on the Project Site, including an existing parking lot and parking garage, with a new, state-of-the-art clinical building of approximately 1,050,450 square feet of gross floor area (the “Project”). In connection with the construction of the new clinical building, the Project will also include an approximately six-floor below-grade parking garage (the “Clinical Building Garage”) of approximately 416,062 square feet.

The Project addresses growing demands for delivering the highest level of care and services to the residents of Boston, the Commonwealth, the region and the world. The new clinical building will include operating rooms, patient rooms, clinical spaces and other hospital uses, including MGH’s Center for Cancer Excellence and Center for Cardiac Excellence. The Project will allow MGH to alleviate ongoing capacity challenges in its Emergency Department, accommodate new and rapidly evolving technologies, and enable the consolidation and organization of related services. Further, the new clinical building will create a comfortable, efficient, and positive healing environment for patients and families through the addition of single occupancy patient rooms, which is important for infection control and patient treatment where today, many rooms at MGH are double occupancy. Similar to the other buildings in the MGH main campus, the new clinical building will accommodate patients that are severely sick, immunocompromised, and vulnerable – these patients are often those that do not have access to nearby public transit, are unable to use public transit for health reasons, or are otherwise the most vulnerable members of the community so that even if public transit is available, such option is not a viable method of travel. These patients, and their visitors and guests, need to be able to have access to the hospital’s resources in a safe manner. The Project also includes pedestrian bridges and underground tunnels to ensure patients, guests and visitors have access to all of MGH’s facilities campus-wide.

### **PHASED CONSTRUCTION OF THE CLINICAL BUILDING GARAGE**

The Project is uniquely designed so that at all times MGH will be able to continue its hospital operations. To construct the Clinical Building Garage, MGH will replace existing commercial and exempt parking spaces serving the main campus with exempt-only parking spaces, which spaces will service the main campus and the new clinical and patient care space in

the Project. To accommodate the addition of the new clinical building to its campus, MGH proposes to add a limited number of net new exempt spaces to its campus for use by its employees, patients, guests and visitors.

The Clinical Building Garage will be constructed in two phases. Phase I of the Project will consist of (i) the demolition of the existing buildings at the Project Site, (ii) discontinuance of the use of the existing 85 exempt parking spaces under the WACC License, and (iii) construction of the portion of the Clinical Building Garage called the “4B Building”, as shown on the plans entitled, “Cambridge Street Project, 4B Building Phase 1”, prepared by NBBJ, dated March 11, 2022 (the “Phase I Site Plans”) enclosed with the Application. During Phase I, MGH will continue to renew Permit #APCC453718 (the “Parkman Street License”), which presently provides for 557 commercial parking spaces located at 10 Parkman Street. Phase II of the Project will consist of (i) the demolition of the Parkman Street garage, resulting in the termination of the Parkman Street License and the return of 557 commercial parking spaces to the Parking Freeze Bank, and (ii) construction of the portion of the Clinical Building Garage called the “Parkman Building”, as shown on the plans entitled, “Cambridge Street Project, Parkman Building Phase 2”, prepared by NBBJ, dated March 11, 2022 (the “Phase II Site Plans”) enclosed with the Application.

Upon completion of the Project, the Clinical Building Garage will accommodate approximately 864 parking spaces, of which 642 spaces will replace the existing commercial and exempt parking spaces under the WACC and Parkman Licenses, resulting in the addition of approximately 222 net new parking spaces<sup>1</sup> to the overall MGH campus. The net new spaces represent a parking ratio of approximately 0.2, which is well under the City’s guidelines of a maximum ratio of 0.7 for institutional uses. Further, the replacement of the Parkman Street Garage with the spaces in the Clinical Building Garage will allow the return of 557 commercial parking spaces to the Parking Freeze Bank..

Because the final Clinical Building Garage will operate as one integrated facility, the Application seeks to modify the WACC License in stages that coincide with the phased construction. MGH respectfully requests the WACC License be modified to approve the full build number of exempt spaces (864), but that these spaces be “taken down” for use in stages as the Project is constructed, as follows: (i) upon commencement of the first phase of construction, MGH will discontinue use of the existing 85 exempt parking spaces under the WACC License; (ii) upon completion of the first phase of construction for the Project, MGH will provide notice to the APCC of the pending issuance of a temporary certificate of occupancy for such portion of the Clinical Building Garage and the commencement of use of 500 exempt parking spaces; (iii) upon commencement of use of the first phase portion of the garage, the second phase of construction will commence and MGH will provide notice to the APCC that it is closing and demolishing the 557 commercial space Parkman Street garage and it will terminate Permit # APCC453718, through which MGH will return the existing 557 commercial parking spaces

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<sup>1</sup> We note that more recently, through the use of stackers, the parking lot at 15 North Anderson Street accommodated 132 spaces; using such number, the Project would result in a total of 175 net new parking spaces.

under the Parkman License to the Parking Freeze Bank; and (iv) upon completion of construction of the Project, MGH will provide notice to the APCC of the issuance of the certificate of occupancy for the full garage and the commencement of use of the remaining spaces for entire 864 exempt parking spaces.

### **THE CLINICAL BUILDING GARAGE POST-CONSTRUCTION**

The Clinical Building Garage will constitute an Exempt Parking Facility (as defined in the Procedures and Criteria for the Issuance of Parking Freeze Permits, as approved by the APCC on September 16, 2020). The proposed 864 parking spaces will be used solely for the operation of the MGH hospital campus, and only MGH employees, patients, visitors and guests will be permitted to use the Clinical Building Garage. As required by the City of Boston Electric Vehicle Readiness Policy, twenty-five (25%) of the total parking spaces will be Electric Vehicle Supply Equipment-Installed, and the infrastructure will be in place so that all of the parking spaces will be compatible for conversion to Electric Vehicle Supply Equipment. Further, as part of MGH's Institutional Master Plan (the "MGH IMP"), dated October 14, 2021, MGH set forth extensive plans for bicycle accommodations throughout the MGH campus, which were designed to comply with the City of Boston Bike Parking Guidelines, dated January 2021. As part of the Project, MGH will provide a total of 500 new long-term bicycle spaces and 66 short-term bicycle spaces. Further, upon completion, the Clinical Building Garage will provide cyclists with related amenities, including 3,088 lockers and 43 showers.

In connection with other applicable review, the Project Site is not located in a historic district and is not a designated landmark. MGH has received approval from the Boston Landmarks Commission under Article 85 of the Boston Zoning Code. Further, the Project Site is neither located in a floodplain nor within 100 feet of a wetland, and therefore review by the Boston Conservation Commission is not required.

Through the Large Project Review process, the Boston Planning & Development Agency (the "BPDA") approved the Project, including the number of parking spaces and bicycle spaces, as evidenced by its Preliminary Adequacy Determination Waiving Further Review, dated October 26, 2021, a copy of which is enclosed with the Application. Further, as part of reducing traffic impacts, MGH will follow an extensive Transportation Demand Management program consistent with the MGH IMP and as further detailed in the Transportation Access Plan Agreement dated June 9, 2022 (the "TAPA") by and between the City of Boston, acting through its Transportation Department, and MGH, pursuant to which MGH has agreed to mitigate Project impacts by providing, in part, funds to be allocated to the Boston Transportation Department and the Department of Public Works for the design and implementation of improvements to Cambridge Street, the Cambridge Street/Blossom Street intersection and the reconstruction of Blossom Street, constructing shell space in the Project for a MBTA headhouse for the Red/Blue Connector, providing bicycle parking spaces and accessory amenities, provisions for electrical vehicles, and a new BlueBikes station. A copy of the TAPA is enclosed with the Application.

## **THE SIGNIFICANT NEED FOR PARKING SPACES IN THE CLINICAL BUILDING GARAGE AND THROUGHOUT THE MGH CAMPUS**

As noted above, the Project addresses growing demands for delivering the highest level of patient care and services. The new clinical building will include patient and clinical care spaces that will allow MGH to alleviate ongoing capacity challenges in its Emergency Department, accommodate new and rapidly evolving technologies, and enable the consolidation and organization of related services.

The new clinical building will be the Centers for Cancer and Cardiac Excellence, serving the most vulnerable members of the community, and therefore, needs parking accommodations that provide accessibility to such population, while also continuing to satisfy the needs of the overall MGH campus. The MGH main campus includes one of Boston's Level 1 Trauma Centers and the main campus and Project serve the very sickest members of our community, region and world. While MGH is dedicated to promoting cycling, public transit, and non-vehicular means of travelling to and from the hospital, MGH's patients are often those that do not have access to nearby public transit, are immunocompromised and unable to use public transit, or are otherwise the most vulnerable members of the community. These patients, and their visitors and guests, need to be able to have access to the hospital's resources in a safe manner.

There is a significant need for the 864 exempt parking spaces at the MGH campus. These parking spaces will serve both the hospital operations of a 1,050,450-square-foot new clinical building, allowing MGH to provide exceptional cancer and consolidated cardiac care in state-of-the-art facilities, including individual inpatient hospital rooms, ambulatory care, operating rooms, clinical space, and other necessary support services, and will also replace 642 existing commercial and exempt parking spaces that served the overall MGH campus. The Project will provide integral hospital connections to the remainder of the campus through pedestrian bridges and underground tunnels to ensure users of the Clinical Building Garage have access to all of MGH's facilities campus-wide. The resulting net new 222 parking spaces represents a parking ratio of approximately 0.2. Given the size of the new clinical building, the addition of only 222 net new parking spaces is a modest increase in the number of parking spaces, while still remaining well under the City's guidelines of a maximum ratio of 0.7 for institutional uses.

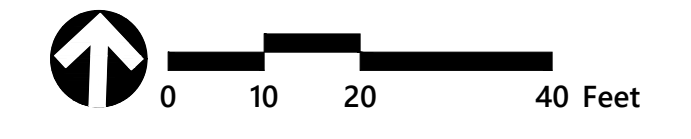
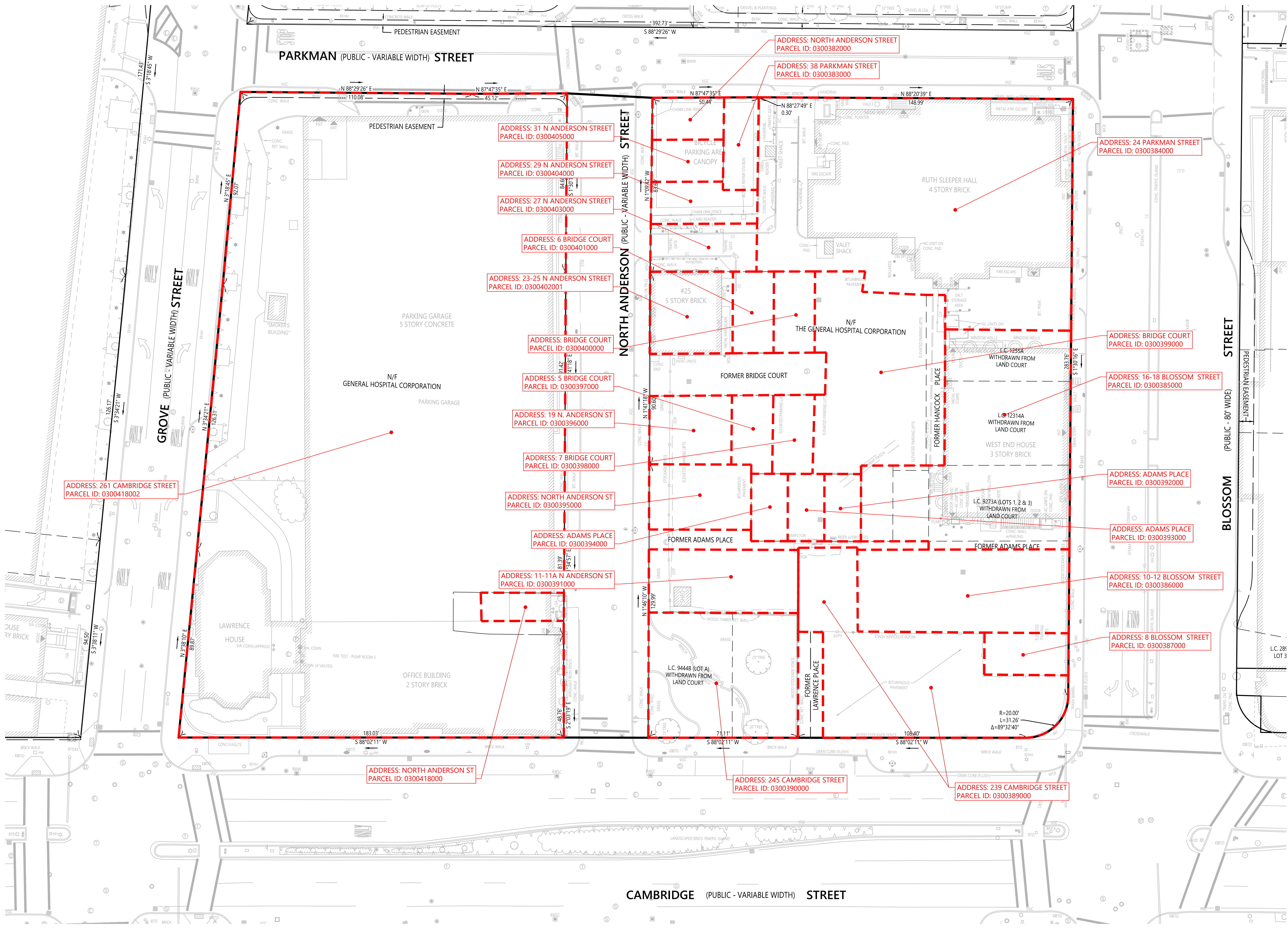
### **CONCLUSION**

Despite the net increase of 222 net new parking spaces, the MGH campus, as a whole, will still be well under the APCC's maximum parking thresholds, as will the Project on an absolute/net new basis. Further, MGH has designed the Project to support electric vehicles and has included bicycle facilities, and MGH has committed to mitigating impacts of the Project. The Clinical Building Garage, together with the discontinued use of the existing parking spaces under the WACC License and the Parkman Street License, will not adversely affect traffic to and from

the Project Site, and through the TDM measures in the MGH IMP and mitigation obligations set forth in the TAPA, MGH has carefully designed the Project to be consistent with APCC policies and regulations. By issuing this modification permit and allowing the APCC to have administrative overview at key milestones during the construction of the Project, the APCC will allow MGH to advance this important Project and provide state-of-the-art facilities and exemplary patient care, and most importantly, accessibility, while being able to track the allocation and use of the spaces affected by the Project.



99 High Street  
Boston, MA 02110  
617.728.7777



### MGH Cambridge Street Project

Boston, Massachusetts

No.	Revision	Date	Appr.

Designed by: TMD      Checked by: HFM  
 Issued for: Permitting      Date: March 17, 2021

Not Approved for Construction  
 Parcel Exhibit

# C-1

Sheet 1 of 1

Project Number: 13976.00