

September 5, 2022

Leah Michalak

Preservation Director

Metropolitan Planning Commission

Via email

Re: Concerns about 11 Jefferson Parking Facility

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Leah,

I am writing on behalf of my client, the owner of the contributing historic property adjacent to the site of the recently proposed parking garage at 11 Jefferson Street. The historic building is just north of the project site at the corner of Bay Lane and Jefferson Street. We intend to bring forward details of a comprehensive historic rehabilitation and preservation project for this building soon.

Our first concern is that the proposed parking facility is overly large and as designed would dominate the ward. The Historic District Zoning Ordinance strictly limits large-scale development to footprints of no more than 13,500 SF, and this project is an entire Tything Block, much larger than the allowable area. Although the Petitioner has proposed an imaginary property line to subdivide the property, currently enforced building codes do not allow property lines in the middle of buildings. The property lines have strict requirements for fire separation. More to the issue before the Historic District Board of Review, if this stealth method of avoiding the HDZO size limit is permitted, then it would render the footprint limitation meaningless.

Our second concern is that the parking facility relies entirely on Bay Lane for automobile ingress and egress. This is unprecedented in the Historic District, and the number of proposed cars that could be parked (~600) would completely overwhelm the capacity of a narrow single width fire lane to handle the traffic load. This in turn would adversely effect life safety in case of a fire, and routine use of Bay Lane the way that it was intended, as a back door side away from the street for "carriages" and waste removal. Every other parking garage in the Historic District relies on streets not lanes for automobile ingress / egress, and the HDZO specifically allows parking entrances on north-south service streets, like Jefferson Street.

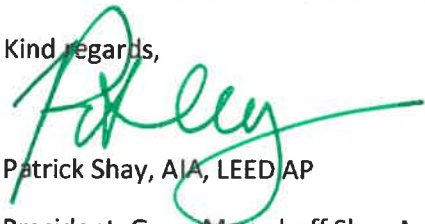
Our third concern is that the deep foundations and excavation required to construct the proposed giant parking structure is highly likely to damage the fragile foundations and masonry structure of our contributing historic building. This already occurred with the installation of the Ellis Square underground parking area which caused nearby historic buildings to crack and settle. These kinds of historic buildings have un-reinforced masonry foundations and exterior walls, which are easily damaged. In our experience, deep foundations of the kind proposed require pilings that are driven, or else tie-backs that extend out and under nearby lanes, streets and structures. If the building is permitted, it

should be with some form of covenant against any geotechnical disturbance, and proven with a qualified geotechnical report and a qualified structural engineer's warranty against damages.

Our final concern is that the proposed design is deliberately deceptive. It uses a ruse to avoid the size limit, and also employs an exterior façade that completely masks the fact that it is a parking garage, not an office building or apartment building. Although this may meet the HDZO standards, it will be perfectly obvious at night as the cars are lifted up and down behind those fake widows. Also, these windows would never be cleaned from the inside and the car fumes would soon make them awful looking. There are a variety of better solutions that have been employed on other parking structures to screen the openings in a way that is honest. In the end, the overall design proposed is a lie.

I hope that you and the Historic District Board of Review will take these matters into consideration before determination of visual compatibility.

Kind regards,



Patrick Shay, AIA, LEED AP

President, Gunn Meyerhoff Shay Architects, PC