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January 17, 2018

Michael Sinatra
Boston Planning & Development Agency
One City Hall, Ninth Floor
Boston, Massachusetts 02201

Via Email: michael.a.sinatra@boston.gov

Re: **One Post Office Square Office Tower and Garage Improvement Project**

Dear Mr. Sinatra:

Mass Audubon respectfully submits the following comments on the *One Post Office Square Office Tower and Garage Improvement Project* for your consideration. We encourage the Boston Planning and Development Agency to consider these comments broadly in relation to building façade and landscaping designs for minimizing bird collision hazards. We are concerned that the proposed glass façade may create significant bird collision hazards, and that the proposed new landscaped areas, while positive in other respects, are likely to further increase those hazards.

Collisions with glass windows and facades cause as many as a billion bird deaths annually. Birds are not able to distinguish reflective glass as a barrier, and are at risk of often-fatal collisions. Boston is located along a major migratory bird pathway and these migrants utilize small urban parks, including Post Office Square, as ‘stopover’ or resting habitat during migration. The City of Boston has worked with Mass Audubon and owners of tall buildings to reduce bird collision hazards during nighttime bird migration¹. Building design techniques are also available to minimize bird collision risks during the daytime². In particular, it is important to avoid large, uninterrupted or non-textured areas of reflective glass in close proximity to landscape features that will attract birds, and to adjust lighting in and on tall structures during peak migratory evenings in the spring and fall. These goals can be achieved in ways that are attractive, functional, and energy-efficient.

¹ <https://www.massaudubon.org/our-conservation-work/advocacy/protecting-land-wildlife/protecting-wildlife/lights-out-boston>

² <https://www.fws.gov/migratorybirds/pdf/management/reducingbirdcollisionswithbuildings.pdf>

The project as proposed in the Expanded Project Notification Form (EPNF) includes replacing the existing pre-cast concrete façade from the ground to level 30 with a glass curtainwall system along with other modifications to the building and adjacent parking garage. The EPNF also indicates that the project is targeted to apply the LEED v4 rating system, at the Gold level, to comply with the City of Boston’s Article 37 provisions for Green Buildings which applies to all projects subject to Large Project Review. The proposed credits for this project include establishment of new vegetated roof spaces with native or locally adapted species selected to promote diversity, provide accessible open space, capture rainwater for irrigation and to minimize stormwater runoff, and reduce heat island effects. The EPNF (Section 5.12.13) also states that there are presently no wildlife habitats on or adjacent to the project site. However Post Office Square, despite its small size, is a well-known stopover site for a wide range of migratory birds. The Cornell Lab of Ornithology’s eBird Project allows citizen scientists to record bird observations at various ‘hotspots’ around the world. eBird data for Post Office Square indicate that 91 bird species have been observed at the site.³ A glass-clad building in such close proximity to a well-known bird habitat presents a clear hazard to birds.

The proposed green roofs are attractive features with benefits including open space amenities and water and energy conservation. The placement of plantings in close proximity to large expanses of glass, however, increases the risk to birds attracted to the plantings and unable to distinguish the glass reflections from a continuation of the planted oasis in the urban environment.

LEED has developed a credit for Bird Collision Deterrence⁴. The standard for this credit calls for a project to “Develop a building façade and site design strategy to make the building and site structures visible as physical barriers to birds.” Detailed guidelines are available to achieve this while providing a visually attractive, energy-efficient project. Mass Audubon respectfully requests that the developer and BPDA apply these standards and guidelines to this and other projects.

We would be happy to provide further resources on this topic, or to discuss this project or the City’s standards in more detail. Please feel free to contact Jeff Collins, Mass Audubon’s Director of Conservation Science, at 781-259-2159 or jcollins@massaudubon.org.

Thank you for considering these comments.

Sincerely,



John J. Clarke
Director

³ <http://ebird.org/ebird/barchart?r=L388515&yr=all&m=>

⁴ <https://www.usgbc.org/node/4561982?return=/pilotcredits/Core-and-Shell/v4>