

BOSTON PRESERVATION ALLIANCE

www.bostonpreservation.org

Lance Campbell
Boston Planning and Development Agency
Re: 11-21 Bromfield Street, Ladder Blocks

February 4, 2022

Dear Mr. Campbell,

The Boston Preservation Alliance is Boston's primary, non-profit advocacy organization that protects and promotes the use of historic buildings and landscapes in all of the city's neighborhoods. We have made several public comments on this project and appreciate the opportunity to underscore our position.

The Alliance remains opposed to this project for the following reasons:

- Significant opposition to the proposal has been expressed by several direct abutters to the project site, those who stand to suffer the consequences of the flaws in this development. The BPDA must acknowledge that this project has not meaningfully responded to the concerns expressed by so many about inappropriate height and massing, destructive shadow and wind impacts, loss of character, and harmful precedent for future proposals in the historic Ladder Blocks neighborhood.
- The stewards of the Old South Meeting House at Revolutionary Spaces have repeatedly requested more information about the impacts to their structure and have not yet received a satisfactory response, especially regarding wind at upper elevations and groundwater. If we continue to prioritize private development over our irreplaceable historic resources, we will lose the places and moments in the built environment that make Boston a destination.
- The proponent shared two studies about the new project, one outlining economic benefits and one analyzing environmental strengths of the new construction. Both of those studies failed to incorporate existing conditions such as the decade that the proponent has allowed the storefronts to remain empty and blighted, and the loss of embodied carbon and energy, as well as material waste, as the result of demolition of the existing buildings. The BPDA should require an analysis that takes these factors into consideration.
- Advancing a project that not only violates current zoning, but would grossly reject the probable guidelines of an existing planning study undermines all of the efforts made by BPDA and City staff, the Advisory Group members, and the community to develop appropriate guidelines for this neighborhood. This project should not move forward unless it is redesigned to meet existing zoning, or is revisited once the PLAN: Downtown study is complete. We strongly urge the BPDA to resume the planning process, and to consistently apply practices across neighborhoods; the Charlestown planning study, for example, continues to progress with a more comprehensive approach to neighborhood character and historic resources. Downtown deserves the same attention and thoughtful planning.

Thank you,



Alison Frazee
Acting Executive Director