

BOSTON PRESERVATION ALLIANCE

www.bostonpreservation.org

January 27, 2023

Michael Sinatra
Boston Planning and Development Agency
Boston City Hall
Boston, MA 02210
Re: 11-21 Bromfield Street, Downtown

Dear Mr. Sinatra,

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. With 40 Organizational Members, 107 Corporate Members, and a reach of over 100,000 friends and supporters we represent a diverse constituency advocating for the thoughtful evolution of the city and celebration of its unique character. We appreciate the opportunity to offer comments on projects that impact the historic character of the city.

The Alliance has been engaged with this project since 2015 through dialogue with the developer, participation at countless public meetings, and the submission of several comment letters. While we feel thoughtful progress has been made regarding the design, we remain strongly opposed to the project.

Despite vocal, consistent opposition from direct abutters and nearby property owners like Revolutionary Spaces, members of the Impact Advisory Group, members of the Advisory Group for PLAN: Downtown, advocates for historic resources such as the Alliance, and the general public, this project continues to move forward. The BPDA has heard at every public meeting, and in the vast majority of public comments, that the proposed height for the new structure is not appropriate for this location and would have irreversible consequences to the historic neighborhood. The proponent has not altered the project to sufficiently reduce these impacts, which would require a substantial reduction in height. A critical, multi-year planning process for downtown is expected to conclude in the coming months and this project should not continue to advance until we can be certain it complies with the outcomes of the new plan.

Just this week, in her State of the City address, Mayor Wu reiterated the City's commitment to planning. We have heard repeatedly from leadership in both her administration and at the BPDA that planning will be prioritized, the development process will be more transparent, and that the voices of Bostonians will be heard. And yet, at this early opportunity to follow through on those promises, the BPDA has undermined an entire ongoing planning process for downtown by introducing spot zoning to the Ladder Blocks character area in order to advance a noncompliant project. The decision to overturn the zoning that was supported by the Advisory Group was made behind closed doors by the BPDA and presented to the public before consultation with the Advisory Group. This communicates that the BPDA is not listening to the voices of Bostonians, does not intend to plan before permitting, and will base development decisions on what is best for developers, not Boston.

This is a crucial moment for Boston. The BPDA and the City have the opportunity to prove their commitment to planning by reverting back to the height limits supported by the Advisory Group for

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PLAN: Downtown, rejecting any proposal, like this one, that does not adhere to the plan, and host transparent public dialogue about all decisions that impact the preservation and growth of our city. Though we are told meaningful changes are coming to the BPDA, we need to have a reason to believe that real change is possible. Approval of the current proposal for 11-21 Bromfield Street would erode the public's faith in Boston's leadership.

The Boston Preservation Alliance strongly opposes this proposal and urges the BPDA to not advance the project until it is in compliance with the completed downtown plan.

Thank you,



Alison Frazee
Executive Director

CC:

Mayor Michelle Wu, City of Boston
Chief James Arthur Jemison, Boston Planning and Development Agency
Chief Mariama White-Hammond, Environment, Energy, and Open Space
Councilor Flynn, Boston City Council
Representative Aaron Michlewitz, MA State Representative, 3rd Suffolk
Senator Lydia Edwards, MA State Senator, 3rd Suffolk
Elizabeth Stifel, Boston Civic Design Commission
Andrew Nahmias, Boston Planning and Development Agency
Kennan Rhyne, Boston Planning and Development Agency
Michael Christopher, Boston Planning and Development Agency
Nathaniel Sheidley, Revolutionary Spaces
Liz Vizza, Friends of the Public Garden
Mark Rollins, Midwood Investment and Development