

# BOSTON PRESERVATION ALLIANCE

February 22, 2021

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## Executive Director

Gregory J. Galer, Ph.D.

Lance Campbell  
Boston Planning and Development Agency  
Boston City Hall  
One City Hall Square  
Boston, MA 02201  
**Re: 11-21 Bromfield Street**

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. With 40 Organizational Members, 103 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 actively engaged with the previous version of this project and had been anxious to see its reappearance and evolution of its design and program. Though we were disappointed the proponent did not proactively reach out to us prior to the latest filing, as they had promised, we have subsequently met with the proponent and had an introduction to the new proposal. Some of the changes, like the removal of on-site parking, we feel are positive. The building's design has moved in a direction more appropriate for the site than what we previously proposed. However, we continue to have concerns both on a large scale and more detailed level. Most troubling is the height of the building; while significantly reduced from the previous scheme, it remains a flaw in the proposal that prohibits the possibility of our support, regardless of needed tweaks to the design, materials, landscape improvements, etc. that we will note.

The height of the proposed tower is not appropriate for two reasons. First, the proposal significantly exceeds the current zoning: 325' proposed vs 155' existing. We are not aware of any hardship to justify additional height, which would be required for a zoning variance. This tower is not in keeping with the scale and character of the neighborhood, a concern we have consistently expressed since the previous plan for this site. The Ladder Blocks district is an iconic area in Boston's historic downtown. Bromfield Street in particular exhibits the core authenticity of the district; it is a pedestrian-scale commercial street of a character that supports local businesses so essential to the desirable qualities of downtown Boston. Its historic buildings and intimate feel are the essence of the historic downtown shopping district, and the scale

of this proposal runs against the grain of this character-defining area. Rather than enhancing and reenergizing we believe the proposal is an intrusion that diminishes the neighborhood.

These unique qualities and the mounting development pressure to demolish and obscure them led us in 2016 to nominate the Ladder Blocks as one of Massachusetts' Most Endangered Historic Resources, a designation which was subsequently awarded that year by Preservation Massachusetts. Though tall buildings exist in the area of the Ladder Blocks they should not be used as precedent for building to that height or taller. New construction in these historic blocks should be consistent with overall human-scale massing.

The second reason why the proposed height is not appropriate is due to the anticipated guidelines and/or zoning changes to come from the PLAN: Downtown effort. The fact that the City opted to delay the process due to the Covid-19 pandemic should not justify projects moving forward (and the neighborhood suffering) due to that stalled planning effort. The process was moving in the direction of a recommendation to cap height for this district at 125'. While that conclusion is certainly not yet definitive, moving ahead with a proposal that is 325' before the results of the study are codified would undermine a significant element of the planning work completed to date as well as the intention of such planning. It certainly makes it hard to understand why serious consideration is being given to a proposal more than double the height limit that is actively being considered.

The Alliance agrees with the proponent that downtown is a prime location for density given the proximity to several public transit options, but the intent of the PLAN: Downtown effort is to determine which parcels in the downtown neighborhood are appropriate for height and which are not. The planning effort, before it was paused, determined that the Ladder Blocks and two other districts are not acceptable locations for excessive height. Not every parcel that *could* be a tower, *should* be a tower. This particular parcel is not an appropriate location for excessive height and should not be permitted to move forward unless altered to be within the height limit of the planning process.

After the project is revised to a height of 125' or lower, the Alliance looks forward to engaging on other aspects of the proposal such as landscape improvements and changes to Bromfield Street. Though some hardscape upgrades are necessary to improve accessibility conditions, we feel it a bit ironic that while the proponent touts the desirability of the historic neighborhood the proposed streetscape changes are heavy handed, introducing a very modern tone and feel to the historic street. We believe a more restrained intervention is appropriate in order to preserve the historic character and pedestrian experience of the corridor. The streetscape includes several historic buildings as well as legacy businesses that are meaningful to Bostonians and visitors. The character of the streetscape contributes to the charm and atmosphere that supports these businesses and promotes tourism to the neighborhood. Every

effort should be taken to preserve other aspects that give Bromfield Street such a strong and endearing sense of place.

We feel compelled to mention another unfortunate reality of this proposal. The developer purchased multiple properties several years ago in one of the most prominent retail locations in downtown Boston, and then effectively abandoned them for years. The storefronts have been largely empty and dark and the buildings have not been maintained, creating blight on the block. Now, the developer cites that blight as a reason to demolish the buildings, advertising that demolition is a community benefit. This is a tactic used across the city: a property owner allows a property to fall into such disrepair that the neighborhood can then be convinced that any new project would be better than the current condition. Demolition by neglect, intentional blight, must be addressed by the BPDA immediately. Boston continues to lose meaningful existing buildings and businesses because of deliberate neglect, and we lose a part of our community each time it happens.

The Alliance strongly urges the BPDA to reject the proposed height of this project and to work with the proponent and the community to find ways to preserve the character of Bromfield and Washington streets through this process of change.

Sincerely,



Greg Galer  
Executive Director

CC

Rosanne Foley, Boston Landmarks Commission  
Jim Igoe, Preservation Massachusetts  
Jonathan Greeley, Boston Planning and Development Agency  
Kennan Rhyne, Boston Planning and Development Agency  
Lauren Shurtleff, Boston Planning and Development Agency  
Ed Flynn, Boston City Council  
Kim Janey, Boston City Council  
Annissa Essaibi George, Boston City Council  
Michael Flaherty, Boston City Council  
Julia Mejia, Boston City Council  
Michelle Wu, Boston City Council  
Kenzie Bok, Boston City Council  
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Nat Sheidley, Revolutionary Spaces  
Kathy Kottaridis, Historic Boston, Inc.  
Rosemarie Sansone, Downtown Boston BID  
Amy Korte, Arrowstreet  
Rebecca Lee, Mintz

Mark Rollins, Midwood  
Christine McMahon, Wharf Partners