

# BOSTON PRESERVATION ALLIANCE

www.bostonpreservation.org

September 18, 2023

Chief Arthur Jemison  
Boston Planning and Development Agency  
Boston City Hall  
**Re: PLAN: Downtown**

Dear Chief Jemison,

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 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.

As a member of the Advisory Group I have been closely following the PLAN: Downtown process since 2018. In my role as an advocate for historic preservation and building-reuse in Boston, I engage regularly with development teams, Article 80 and Article 85, the Boston Civic Design Commission, the Boston Landmarks Commission, etc. I also serve in other advisory capacities such as the Design Vision Community Advisory Board and the Board of the Legacy Fund for Boston on behalf of the Alliance. In these capacities I have become familiar with how development decisions are made in Boston and both the immediate and long-term impacts that those decisions have on the vibrancy of our neighborhoods.

Past administrations have approached development in different ways, with some Mayors maintaining tight control over development and others giving the green light to all development with little consideration for unintended consequences to our communities. But the BRA/BPDA has always held the power. The Wu administration promised something different: "Abolish the BPDA." In her 2022 State of the City address, Mayor Wu said, "Under the leadership of our Chief of Planning, Arthur Jemison, we're charting a new course for growth, with people as our compass." We were promised a new process that prioritizes the people: public engagement and planning before permitting, a better balance between growth and livability, and transparent decision-making. What this administration has delivered, however, is more of the same. And PLAN: Downtown is a prime example.

Before the three-year pause in the planning process, many of us on the Advisory Group felt there was broad consensus that the Plan should adopt the approach of balancing development with preservation, and that the intent of the Character Preservation Areas was to limit height to maintain scale, character, and historic fabric. It has become clear that as the new Chief of Planning, when you engaged with this process, you identified areas that you felt were appropriate for height and altered the planning documents accordingly. That is within your role and responsibilities to do. But after months of consistent objections from residents, business owners, advocates, stewards of historic resources, and many others who voiced that this decision would be detrimental to the vibrancy and livability of downtown, it is now your responsibility to change course.

For decades the BRA, and then the BPDA, has told Boston residents that they know best and have exercised extreme power over the fate of the city. Because of this we saw highways seer through

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our neighborhoods, communities disenfranchised, and entire populations displaced. The wounds of the West End have not healed, and we are not prepared to accept decisions that will continue to erode our city because of a “difference of opinion.”

We all want the best for Boston. Through our 45 years of experience working closely with residents, the Alliance has learned that we need to listen first, hear what matters most to Bostonians, and then help make that a reality. BPDA leadership has a responsibility to do the same. The residents and stakeholders of Boston have spoken on this issue, clearly and consistently. We expect that you will remove the 400’ spot zoning in the Ladder Blocks, increase protections for historic resources, and create a better balance of growth and preservation in PLAN: Downtown. Otherwise, at this critical moment of transformation and zoning reform, the BPDA is choosing to sacrifice what remains of our trust in leadership, the Wu administration, and the entire public process. Boston deserves better.

The Alliance continues to offer our assistance to find a path forward that retains and enhances the unique, historic assets of downtown while identifying appropriate areas for growth.

Thank you,



Alison Frazee  
Executive Director

CC:

Michelle Wu, Mayor of Boston  
Chief Mariama White-Hammond, Chief of Environment, Energy, and Open Space  
Murray Miller, Director, Office of Historic Preservation  
Aimee Chambers, Director of Planning, BPDA  
Diana Fernandez Bibeau, Deputy Chief of Urban Design, BPDA  
Board, Boston Planning & Development Agency  
Representative Aaron Michlewitz, MA State Representative, 3<sup>rd</sup> Suffolk  
Representative Jay Livingstone, MA State Representative, 8<sup>th</sup> Suffolk  
Senator Lydia Edwards, MA State Senator, 3<sup>rd</sup> Suffolk  
Councilor Ed Flynn, Boston City Council President, District 2  
Councilor Gabriela Coletta, Boston City Council, District 1  
Councilor Michael Flaherty, Boston City Council, At-Large  
Councilor Ruthzee Louijeune, Boston City Council, At-Large  
Councilor Julia Mejia, Boston City Council, At-Large  
Councilor Erin Murphy, Boston City Council, At-Large