

BOSTON PRESERVATION ALLIANCE

www.bostonpreservation.org

August 2, 2024

City of Boston Planning Department
Via email: plandowntown@boston.gov

Re: Draft Amendment to PLAN: Downtown Design Guidelines – Historic Context Chapter

Dear Planning Team,

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 engaged in the PLAN: Downtown process since its inception and is pleased to collaborate towards its conclusion and implementation. While we feel the Plan has made much progress, we must acknowledge that there remain considerable concerns amongst the preservation community, as well as downtown residents and business owners, that the Plan, including the Historic Context addendum to the Design Guidelines, does not sufficiently protect historic resources. These outstanding concerns warrant additional consideration and review from the Planning Department.

The following suggestions relate specifically to the Draft Historic Context Chapter of the Design Guidelines in PLAN: Downtown:

- On page 4, and elsewhere, "staff of the Boston Landmarks Commission" might more appropriately be referred to as "staff of the Office of Historic Preservation."
- On page 5, it may be helpful to clarify if all non-Landmarked buildings are required to be considered for Article 85 review, or if there are other conditions.
- On page 6, there is language stating that downtown is not a museum; the intention of which could be inferred to mean that downtown is not stagnant and should continue to evolve, as it always has. However, museums are places where the public can engage with, and be immersed in, local history and storytelling, which is exactly what downtown Boston is and should be. In that sense, downtown itself very much thrives as a living history museum and, as such, serves as a critical component of Boston's economy. Also, it should be noted that there are traditional museums and educational spaces within the study boundary that should be celebrated and protected.
- On page 7, it is stated that 92% of the building stock in the study area is considered historic, and this percentage will increase over time as existing buildings age and gain significance. While this document does encourage adaptive reuse, we feel that it does not strongly enough direct development toward adaptive reuse/continued use. In fact, much of the guidelines refer to new construction, suggesting that the City acknowledges that many of the historic buildings will be demolished, despite these guidelines. It is most likely that these losses will be concentrated in the lower-scale areas with smaller, human-scaled buildings, which would

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vastly change the character of downtown. This document should state in concrete terms that adaptive reuse is the appropriate approach to development throughout the study area, unless extreme circumstances render that approach impossible. Adaptive reuse of existing buildings is not only necessary to preserve the historic fabric and character of downtown Boston, one of the country's most historic urban centers, but also a critical tool for climate action. The City should demonstrate its commitment to climate action with clear, consistent messaging that mechanical demolition of viable buildings is not acceptable.

- Several sections include a list of historic resources in various areas of downtown, which is a helpful resource. However, it might be appropriate to note that these lists are not stagnant and will continue to grow, so property owners and developers should connect with the Office of Historic Preservation for accurate information in the future.
- On page 33 there is a photo of the Art Deco Verizon Building accompanying language about eliminating large buildings that consume whole blocks, which could possibly be interpreted as condoning the demolition of this important historic structure. There may be a more appropriate image to illustrate this point.
- On page 41, Winthrop Center is noted as a case study for good development. Many in the historic preservation community would strongly argue that massive glass towers have more negative impacts to historic resources than positive. There is likely a more appropriate example of sensitive development within a historic context study to illustrate these points.

Thank you for your ongoing efforts to safeguard Boston's historic resources as the city continues to grow and change. We look forward to further engagement on this and future planning initiatives.

Sincerely,



Alison Frazee
Executive Director