



**National Trust for  
Historic Preservation**  
*Save the past. Enrich the future.*

March 6, 2025

VIA: PLANdowntown@boston.gov

Kairos Shen, Chief of Planning  
Boston Planning Department  
1 City Hall Square #9  
Boston, MA 02201

Dear Mr. Shen:

The National Trust for Historic Preservation has reviewed the Boston Planning Department's January 2025 draft zoning amendments for PLAN Downtown. In our view, the proposed zoning amendments could result in irreparable harm to Boston's historic and cultural resources. We respectfully recommend full public review and consideration of the potential adverse impacts of these proposed zoning changes and consideration of alternative approaches before the City's approval process is allowed to proceed.

Boston-based stakeholders including the Boston Preservation Alliance have expressed grave concerns about the potential adverse impacts of the draft zoning amendments upon the character of several important historic downtown blocks. The National Trust shares the Boston Preservation Alliance's concerns. We encourage revisions to the proposed zoning amendments to enable and incentivize the preservation-based rehabilitation and adaptive reuse of the historic buildings that distinguish Boston's downtown. The reuse and retrofit of Boston's existing older and historic buildings is a sustainable way to help address the local community's need for housing. State and federal tax credits are available to support adaptive reuse of historic buildings for housing. By contrast "facadism," the retention of only the skin of a historic building, is not considered a best practice in historic preservation. It is a last resort.

In addition to the potential loss of valuable historic buildings, Boston-based stakeholders including Revolutionary Spaces have expressed serious concerns about the adverse impacts of the proposed zoning changes upon the Old South Meeting House, the Old State House, and other individual cultural landmarks that are open and interpreted for the public. These historic places are essential to a full understanding of American heritage. The National Trust shares the concerns expressed by Revolutionary Spaces. The City of Boston should make every effort to preserve and protect these unique and irreplaceable landmarks. Visitors to Boston's internationally renowned treasures deserve the opportunity now and into the future to visit and experience the power of these historic places.

Given the very serious concerns raised by esteemed local historic preservation institutions, which have actively participated in Boston's master planning process, the National Trust strongly recommends that the City of Boston pause the re-zoning approval process in order to provide a meaningful opportunity to fully assess the potential adverse impacts that the proposed downtown zoning changes will have on Boston's historic buildings, streetscapes, and cultural treasures.

Thank you for considering the views of the National Trust for Historic Preservation.

Sincerely,

A handwritten signature in black ink that reads "Rob Nieweg". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Rob Nieweg  
Senior Vice President, Preservation Services & Outreach  
National Trust for Historic Preservation