ONLINE SURVEY PUBLIC COMMENTS ON DRAFT PLAN: DOWNTOWN			
What is your name?	What is your	What do you like about the draft PLAN: Downtown?	What would you like to see changed in the draft PLAN: Downtown
N/A	I would like to feel safe at Downtown Crossing	Preservation of architectural heritage! This is important-we are a city of history! So many lovely building facades that are almost unnoticeable due to filth and rundown conditions in neighborhood.	Please re-use more old buildings (or at least save old facades!!) for residential purposes w/income restricted rental opportunities. Boston isn't doing enough to save its architectural heritage. Need intense cleaning of area. Can homeless shelters be moved to a different location? Sadly, too many alcohol and drug-addicted people in need of services wandering about. I have actually bought lunch for an elderly man sitting on the sidewalk—that is unacceptable! Take care of these people! Increased police presence would be nice—elderly are being attacked randomly by teenagers! Presently a dirty, hostile environment—please do whatever it takes to concentrate on improving the appearance, safety, quality of services offered (too much low-level retail here!). More pedestrian-friendly environment is needed, more police, better sanitation!
Sylvia Courtney	I live Downtown	Focus on creating an architecturally cohesive neighborhood.	Focus on Public Safety! One cannot walk through downtown without encountering drug users and vagrants. What is the city doing to prevent downtown crossing from becoming the next Mass Cass?
Ben Allen	I frequently visit Downtown		Prioritize residential building, loosen zoning restrictions and make it easier to get around via protected bike lanes and spaces that prioritize pedestrians.
Mark	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
May Lee	I live Downtown	historic and easy access	less homeless, more store fronts
Barry Fidelman	I live Downtown	CONVERSION OF EXCESS OFFICE SPACE TO RESIDENTIAL AND OTHER USES	Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
	I live Downtown		Revive and clean up Bromfield street
Kristin Nelson	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
David Binder	I live Downtown	Seems very comprehensive with focus on livability, pedestrian mobility and enhanced asthetics	The one thing that I didn't see explicitly stated is how to "encourage" /force existing landlords of buildings that are vacant to actaully do something. A great example of these are all the empty storefronts and buildings on Bromfield street. It doesn't seem like the owners of these buildings are in much hurry to improve, develop these buildings and I suspect that they are sitting on tax deductions or other incentives to NOT improve or they are just sitting on these properties until market conditions make it more appealing to sell. I think the city of Boston needs to put financial pressure on these types of buildings in a similar fashion to what mayor menino did previously to move forward the development of Millenium tower, which until that time was a big hole that Vornado Realty was doing nothing with. Thank you
Whitney Sands	I live Downtown	I like that a project is proposed.	Preservation of historical sites.
Michael Mansour	I live Downtown	I am highly concerned that the planning and zoning of additional office buildings compromises the charm of the area. I am also confused why the city requires so much more office space. With a pandemic and cases rising again and imminent virtual work likely to be required, why is the city building more office space with low likelihood to be useful. I strongly oppose the construction of additional structures aimed at office and business space. We need more preservation and development of housing for the neighborhood.	Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Raymond Marcinowski	I live Downtown	More holistic view of development	Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
N/A	I live Downtown	fact-based decision making process	Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.

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What is your name?	What is your	What do you like about the draft PLAN: Downtown?	What would you like to see changed in the draft PLAN: Downtown
Carla P	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Brooke	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Mary Mouradian	My immediate family member lives Downtown and I visit frequently.		Preserving the integrity of the Ladder Blocks character area is important to the City's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I OPPOSE the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city. Additionally, the City administration promised a stronger voice for local communities in the planning process. Feedback regarding protecting character preservation areas has been loud and broad repeatedly from citizens and historians during the PLAN: Downtown process. However, the city has not made accommodations related to the 400 feet. The community should be heard.
Lawrence Shieh	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Carla Pantuosco	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Michael Sroczynski	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city. A major reform effort promised by Mayor Wu was to emphasize planning and let that lead and inform development efforts. The 400-foot accommodation for two development sites directly contradicts this promise and undercuts the city's credibility in providing a fair process for all constituent groups impacted by development projects. Boston has an immense surplus of office capacity, with more coming to market in the next year. Meanwhile, the city has perhaps no other greater goal than to increase housing availability and affordability across the city. Given that situation, the city should not be making zoning exceptions to add even more office capacity.
Sean T Wright, Descendant of Nathan Carruth, Dorchester	As a descendant of Carruth Hill, I take part with Dorchester H.S. to look at old structure	More focus on Mixed Use Development.	While I do not have anything specific. I'm not happy about the time it is taking. Just since 2018 using Carruth Hill as example. 30 Beaumont old Carruth Family House has been restored and in that 6 years lots of surrounding houses have been restored. A lot happens in 6 years that could change the scope of what downtown Boston needs.
Wynn Gerhard	I frequently visit Downtown	Organizing areas of downtown	need to Protect historic buildings from effects of clusters of tall buildings , wind tunnel effects
Brett Leav	I live Downtown	I agree with the objectives stated in the PLAN. As a resident of downtown, I am completely aligned with the vision of improving the quality of life for those that live, work and visit the area. I bekli the architecture, ensuring some open space, enhancing opportunities for small business and maintaining access to public transportation.	I disagree with the "spot zoning" that has been applied to Zone 2a to enable more tall buildings which contradict the objective of preserving the historic fabric and distinctive history of the Ladder Block district. I am disappointed that this change to permit a disproportional height allowance was added without transparency. The lack of transparency is validated by the apparent plan to enable two development sites along Washington Street, one of which will add unnecessary office space to an area that already has a surfeit of unoccupied commercial buildings. The construction of additional office space makes no sense in this context and is further misaligned with the Mayor's vision for a 24/7 downtown and the incentives that are being offered for office space conversion. Please reconsider this "spot zoning" in Zone 2a.
Michael Sullivan	I live Downtown	I am happy you are trying to address the challenges we see in the Downtown area, but I think the current plan has some serious flaws.	Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city. In addition, a large building at the corner of Bromfield would cause tremendous congestion on Province Street which is already very difficult to navigate and often unpassable. I am also the CEO of a nearby company and we DO NOT need more office space. This will only make the problems downtown worse. I urge you not to approve these height expansions.

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What is your name?	What is your	What do you like about the draft PLAN: Downtown?	What would you like to see changed in the draft PLAN: Downtown
Adam Buggia	I live Downtown	There is a lot I like about the plan: more residential, more affordable residential. I for solutions to address even if they increase height density. I don't care about height restrictions (FAA regs withstanding) and am against NIMBY-ism that would impede development.	I didn't see anything to address/help the unhoused. It's not that big of an issue in Boston but could be improved. On Bromfield (near where I live) there are often needles on the streets and business owners/employees can have challenges with street access in the mornings.
Anne Altmeyer	I live Downtown	The fact that there is some urban planning	Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Gina Cella	I live Downtown		I strongly oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites -- one of which is unnecessary office space -- at the expense of the broader neighborhood, its residents and visitors, and the City of Boston. It is essential to preserve the integrity of the Ladder Blocks character, to maintain the city's historic fabric, its tourism economy, and protect neighboring historic landmarks. We don't need more office space, especially as so many commercial buildings remain empty. What we do need is to respect and protect the one-of-a-kind historic treasure that is the Ladder Blocks district.
Amy Siegel	I live and own a business Downtown	I like that there is a plan for Downtown, which has so much potential as a tourist, student, living and working destination if we get the balance right	I am strongly opposed to the spot zoning exceptions for high office towers on Washington Street, particularly the one on Bromfield. It is a move in the wrong direction for the area, which has tons of empty office space, will snarl up already difficult traffic, and disrupt the charming historic character of that part of Diwntown.
Gabriella Spatolisano	I live Downtown	It is looking at the big picture	I am not opposed to tall building, but we still need to take care of the historical buildings that help tourism and nice architecture. The zooning in Washington street and the two proposed projects of 400f damage the Old State House and the Old South Meeting house. Also, we need residential and not more offices. We have empty buildings, we should restore and make them affordable houses, this will revitalize the neighbor and make it safer.
Joel Berger	I live Downtown	It potential to further vitalize the Downtown area in an more organized manner.	Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city. The Wu administration promised a stronger voice for local communities in the planning process. Feedback regarding protecting character preservation areas has been loud and broad during the PLAN: Downtown process. However, the city has not made accommodations related to the 400 feet. It is worth underscoring that the community should be heard. A major "reform" effort promised by Mayor Wu was to emphasize planning and let that lead and inform development efforts. The 400-foot accommodation for two development sites directly contradicts this promise and undercuts the city's credibility in providing a fair process for all constituent groups impacted by development projects. As most are well aware, the specific proposal being made for the 11-21 Bromfield site (corner of Washington and Bromfield) is for an office tower. Boston has an immense surplus of office capacity, with more coming to market in the next year. Meanwhile, the city has perhaps no other greater goal than to increase housing availability and affordability across the city. Given that situation, the city should not be making zoning exceptions to add even more office capacity.
Patrick Wetherille	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Pengli Li	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Jacqueline Church	I live Downtown		There seems to be almost nothing in the Chinatown section "a walkthrough" is mentioned but no other details, plans, suggestions, discussion, points made, etc. are evident here. They may have been omitted?
Steve Pearson	I live Downtown	Attempt to frame a comprehensive plan across a broad zone	Eliminate the harmful idea of creating a special narrow carve-out in the Ladder Blocks in which provides developers the ability to build MUCH higher. This seems like a special gift to developers when incentives for revitalization should be more than adequate at the 155ft. level used for the rest of the area. Allowing up to 400ft. oddly matches almost exactly the proposed development at 11-21 Bromfield, and everyone can see what is going on. A consistent approach across this entire area is absolutely required in order to maintain the sense of the city's historic proportions, especially in regard to Old South, the Old City Hall, and the Old Corner Bookstore. Please do not gift developers a special accommodation when it isn't necessary and when it will do real harm to tourism and our common efforts to preserve historic landmarks and the unique character of a critical area in downtown Boston.

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What is your name?	What is your	What do you like about the draft PLAN: Downtown?	What would you like to see changed in the draft PLAN: Downtown
Ellen Lipsey	Revolutionary Spaces Board member	Planning that seeks to keep downtown vibrant is positive	Remove the 400 foot bonus height in the Ladder Blocks and recognize this character area.
Chi Shing Ma	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Christine McMahon	I work Downtown	The encouragement of housing and the emphasis on growth. Downtown has been and should continue to be the economic epicenter of the city. I appreciate that height is allowed while respecting the historic heights in the Ladder Blocks.	Boston has to embrace growth and change. We need not be stuck in time and space as some of the strong preservation advocates would prefer. We should be able to work to preserve and encourage growth and work together.
Shanna	I am a business owner Downtown	Revamping downtown crossing because it has been the last part of Boston to be redeveloped. It's been noticeably forgotten about. I am on board with the idea of creating mixed used (rental properties) for buildings no longer used by companies for offices. I do not see the benefit for million dollar luxury condos. It's not an accurate reflection for what downtown crossing has ever had to offer.	I would like to see downtown crossing, specifically Washington street, to become a pan-handle free zone.
Adam Bakun	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Jason Bessey	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Maren Anderson	I live Downtown	I love the plans for parks and open space, mixed use cultural events and for Chinatown and the ladder blocks to be considered wholistically as historic areas of significance ! I like that climate resilience was considered in the plan This was a lot of work thank you.	We need to address transportation and crowded traffic streets a bit more as cars don't seem to be going away with the T in disrepair Also please don't spot zone to 400 feet for Midwood in the Ladder Blocks. We need consistency for the historic district. Also Midwoids plan is so wrong for our neighborhood - we need housing not commercial.... Thanks for listening. We have commented on this repeatedly snd it would be nice to see some change in the plan to respond to neighborhood input. Best to you all.
Grand Rabbi Y. A. Korff	I live Downtown and work Downtown.	Open spaces, greenery, consistency.	It is critical to limit height in the area, particularly near or in view of historical buildings such as the Old State House, Old South Meeting House, Old Corner Bookstore, etc. - current proposed heights as a matter of right will jeopardize the atmosphere, these historic buildings, and change the feel and environment of the historic district.
Mammen Chally	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
sheila willard	I live in the Wharf District	A commencement of a necessary discussion	1. More public participation in process. 2. The Wharf District needs to be treated as a neighborhood: not pieces to be split up. We aren't the Financial District .We are a separate neighborhood and have been for years. It is really bothersome that BPDA has NOT listened to the concerns of our neighborhood not our representative, the Wharf District Council .
Anthony Baez	I live Downtown	I support the plan to simplify zoning in Downtown. The current zoning is too confusing and this will only create a more predictable planning process. The height limits could be increased, but I understand those have been worked out throughout the process.	I would like to see more emphasis placed on improving the pedestrian experience Downtown. I appreciate the expansion of spaces like Phillips Square and the Tontine Crescent.
Anirudh Desikan	I am a student Downtown	I believe that larger buildings and the simplification of zoning will lead to greater ease of building housing, which will in turn lower the rents of people suffering from higher rent burdens.	
Neil Loftus	I frequently visit Downtown	Not much	Proposed Height and density of the proposed buildings

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Kimberly Trask	I live Downtown	The creation of character areas for protection	I am strongly opposed the the creation of a spot zone on Washington Street in the ladder blocks at 400'. The PDT process should be guided by planning and not project-specific concerns. The ladder block height should be protected at 155'. Successful development has happened on Washington Street within the current zoning limits including at Millenium Place and the Godfrey Hotel. These are very successful projects which activated the South End of Washington Street. There is no compelling reason to add height to the ladder blocks, but there are many compelling reasons not to. This district is home to many important historic structures which must be protected from the damaging effects of additional height. This has been confirmed by the historical experts and professionals charged with maintaining these structures. This concern is heightened by the damaging effects of climate change. In addition, the character and height of Washington Street as the 'main street' of Downtown should be protected in the same way that the shopping corridors of other historic neighborhoods have been protected such as Newbury Street, Charles Street, Hanover Street and Tremont Street. The Community feedback has been consistent and fervent in favor of protecting the Ladder Blocks as a character area and maintaining current zoned height of 155'. The Mayor pledged community-driven planning processes in lieu of developer driven planning. It is important to the public trust that this pledge be respected. I have requested via a separate letter that the Ladder Blocks be provided a separate process similar to the important Chinatown Cultural Area. I do not support the PDT zoning as currently proposed.
Ashley Garrrett	I am a native Bostonian	I like that the city is trying to save downtown	More affordable housing for students and young professionals especially those in nonprofit spaces. We have a labor shortage and traffic because people cannot afford to live in Boston proper.
Derek Hepworth	I frequently visit Downtown	Less zoning	Even less zoning
Nour Sultan	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Rajesh Tekchandani	I live Downtown	Not much.	The plan messes up what Historic downtown stands for. Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Peter Coughlin	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Jonae Barnes	I live Downtown	We need a PLAN: Downtown but NOT this one for the Historic Ladder Blocks / Downtown Crossing area.	Spot zoning at 400 feet in the Washington Street corridor in the Ladder Blocks character preservation area should NOT happen. This will negatively impact Boston's historic landmark buildings along the Freedom Trail and it will also negatively impact the people who live and work in this area. Tourism is critical to the Historic Ladder Blocks in this specific location and PLAN: Downtown in its current form will negatively impact tourism due to the acceleration of climate change destruction of these important historic landmark buildings. This entire neighborhood should be zoned in line with what's been proposed elsewhere within the Ladder Blocks character area (maximum heights around 155-180 feet), and new buildings should include restaurants and shops to add growth and vibrancy to the area. Spot zoning goes directly against what Mayor Wu's platform promised. I urge you to listen to the numerous and diverse community stakeholders that have spoken at the public meetings and have written and submitted comment letters opposing the 400 foot spot zoning in the Historic Ladder Blocks / Washington Street area.
Aldo D'Amico	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Chantal Marquis-D'Amico	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Anthony D'Amico	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.

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What is your name?	What is your	What do you like about the draft PLAN: Downtown?	What would you like to see changed in the draft PLAN: Downtown
Patrick	I frequently visit Downtown	I like that it simplifies the zoning for downtown and generally encourages more development. I also really like the suggested new or re-imagined public spaces. The downtown office conversion program is also very positive and I think encouraging more housing throughout the area is great.	I think the overall density/height limits should be more generous. There are very few places in the Boston region that have the kind of transportation infrastructure to support very high density residential and commercial developments. We should be doing everything in our power to encourage maximum density here. I think a greater emphasis should also be placed on incorporating old building facades into new construction which would allow the best of both preservation and upzoning/increased density. I would also be great to see some of the ugliest/underutilized buildings specifically targeted for redevelopment. The huge above ground parking garages (particularly on Washington St) are an eyesore and embarrassment and we should use incentives or zoning to encourage redevelopment of those.
	I live Downtown	I like that you are working to enhance downtown where I live and work. Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks	I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Sumit Mehra	I live Downtown	I am glad that that there is actually a PLAN for downtown, and the Mayor and government is talking about hearing the voice of the local community	I am surprised that despite such strong opposition from local residents, the city is trying to change the Ladder Blocks by allowing a 400ft building in a site that would completely change the character of the area. Traffic is already horrendous in our area due to all the bike lanes and one way streets, and city is trying to fill it up more by making tall office buildings - buildings that we don't even need. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city. Preserving the integrity of the Ladder Blocks character area is important.
Lawrence Shieh	I live Downtown	NA	Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Adam Dufner	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
	I frequently visit Downtown	Building heights and upzoning	People keep complaining about the false narrative of "spot zoning." I have a solution: Get rid of the ladder blocks and "enhance areas". Just upzone everything downtown to FAA height and shadow regulations on the Common. I don't like how Chinatown was carved out of this process and the size of the Chinatown "enhance area" is way too great. It should all be growth areas.
Chikako Cheng	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
David Wantuck	I live Downtown	Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks.	I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Peter B. Coughlin	I live Downtown	Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks.	I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Prianka Bhatia	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Barry Fidelman	I live Downtown	Conversion of office space to residential and retail as we have a significant oversupply of office space.	Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.

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What is your name?	What is your	What do you like about the draft PLAN: Downtown?	What would you like to see changed in the draft PLAN: Downtown
Jack Gorman	I live Downtown	Safeguarding the cherished heritage of the Ladder Blocks character zone stands as a cornerstone in preserving our city's rich history, nurturing its thriving tourism sector, and defending the sanctity of adjacent historic landmarks. I staunchly object to the targeted, ill-conceived rezoning of 400 feet along Washington Street, intended solely to cater to two development projects, one of which amounts to superfluous office space. This shortsighted move not only undermines our broader community but also tarnishes the essence of our city.	Common sense zoning that serves the residents of Boston, not big business and real estate developers.
Wesley Stimpson	I live Downtown	It proposes ways to bring people back to the area and create a vibrant area to live, work, visit and recreate in.	The definitions of the various neighborhood zone boundaries have been substantially redefined and the work done to heal the scar from the elevated central artery seems to be for not and future opportunities for continued improvements appear is be unavailable. The redefinition of the boundaries of the Wharf Distinct and the apparent disregard of the Wharf District Councils past and ongoing work seems to have been disregarded as little opportunity of interaction have been made available.
Anne Fitzgibbon	I live Downtown	Honestly, not much.	More attention to maintaining existing neighborhoods.
Rush Lincoln	I live Downtown	First of all I live in downtown overlooking the Greenway and I also work in the Financial District, two distinctly different neighborhoods. The part of the plan I like is the fact that there is now a plan to improve the livability of downtown Boston.	I'm concerned that the Wharf District across from the Greenway is being rezoned to Downtown and removed from the Wharf District neighborhood and is being considered a growth district. The removal of the Expressway served to reunite the residential areas abutting the Greenway up through Broad Street and now using the Greenway as a line of demarcation and placing this area in the Downtown Financial District is a step backward. There are numerous residential condominiums in this area that should remain in the Wharf District. This is a vibrant residential neighborhood with neighbors meeting in the Greenway and enjoying the open space. It is significantly different than the Financial District and doesn't deserve to be relabeled and rezoned as a growth area. This is no place for large scale new development and should more reasonably be considered an enhancement area and left in the Wharf District. Thanks you
Jerry Berman	I live Downtown	Please do not alter the current Wharf District boundaries.	Please do not alter the current Wharf District boundaries.
Brennan White	I live Downtown	I like seeing the city move forward.	Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Robert Stricker	I live Downtown	Not much.	Please do not reduce the size of the wharf District or change its designation from Enhanced to Growth.
Doug Gribbel	I live Downtown	Revitalization efforts for businesses!	Please DO NOT change the boundaries of the Wharf District! We've been working hard to create a unified neighborhood in Boston and now you want to divide us by changing the boundaries. Please don't set us back to where we were during the big dig.
Kelli Gribbel	I live Downtown	Revitalization for the businesses downtown.	Please DO NOT CHANGE THE BOUNDRIES OF THE WHARF DISTRICT.
	I live Downtown	I like that the plan encourages residential buildings and comercial to residential conversion	I would like to see a balanced approach to the building heights. I am concerned that tall buildings could be placed too close together. This could create wind tunnels. I am alos concerned of the adverse effects on the historical buildings especially the Old South Meetign House.
Marc Ehrlich	I live Downtown		I've lived in The Wharf District at 199 State Street for 12 years, and I love the neighborhood . The New development plan that is proposed will change the nature of our neighborhood. My values and vision of the future is more aligned with the rest of what is now the Wharf District, not the Financial District. Don't recreate the division from the Wharf District as the Southeast expressway did.
Judith Ehrlich	I live Downtown	That the city will establish a vision for my neighborhood	So much of the plan that addresses the Wharf District runs counter to what the WDC and the neighborhood (both residents and businesses) have accomplished over the years. The plan would put at risk the harmony that exists between the historic nature of this area and the changes that would protect us from sea level rise and overdevelopment. The wharf district is certainly an area that can be "enhanced" but to reinstate an arbitrary barrier along the Greenway, to cut off the district from the historic streets that link us to the city to the west and to redefine our neighborhood as a "growth" area feels like undoing much of what the district has become. I am strongly opposed to this proposal and urge the BPDA to leave the wharf district whole so it may serve the tourists, residents and businesses as well as it has been. Thank you.

ONLINE SURVEY PUBLIC COMMENTS ON DRAFT PLAN: DOWNTOWN			
What is your name?	What is your	What do you like about the draft PLAN: Downtown?	What would you like to see changed in the draft PLAN: Downtown
International Masonry Institute	IMI is a labor-management partnership between the International Union of Bricklayers and Allied Craftworkers and its signatory contractors that works to promote responsible building with masonry and tile. IMI works closely with BAC Local 3 MA/ME/NH/RI, which represents craftworkers who build and live in Boston.		Dear Chair Rojas and Mr. Jemison: Please accept the following comments filed on behalf of the International Masonry Institute (IMI) in response to the Boston Planning & Development Agency PLAN: Downtown. IMI is a labor-management partnership between the International Union of Bricklayers and Allied Craftworkers and its signatory contractors that works to promote responsible building with masonry and tile. IMI's team of architects, engineers, and construction managers researches and develops programs and technical advice related to masonry and tile installation, including around the resilience, sustainability and durability of these materials and their building systems. We applaud the City of Boston for planning for the future of downtown. Many of the goals of the Plan are appropriate and will serve Bostonians well into the future. We do have reservations for a recommendation made in Design Guidelines section under Sustainability & Climate Resilience. In Section 4.2 (on page 77) there is a recommendation to implement Cool Walls for Facades when possible. However, that recommendation is misguided as it relates to Boston and should not be included in the final document. While cool roofs and pavements can help reduce the heat island effect, cool wall strategies may not help as intended and actually work against other recommendations in this guide. Boston is a Heating Dominated Climate As referenced in the Plan, the "Heat Resilience Solutions for Boston" document states: "If emission trends continue as they are, it's predicted that there will be up to 25 to 42 days above 90°F, including up to 1 to 6 days above 100°F by the 2050s. For communities who are already overburdened, increasing extreme heat risks can cause disproportionate impacts." The Northeast, including Boston, however, has 6,013 Heating Degree Days (HDD) according to the U.S. Energy Information Administration which means that more heating is required for buildings in Boston than cooling days. Therefore, walls which reflect heat actually require buildings to use more energy to provide comfort for occupants. This increases the operational carbon of a project which Plan: Downtown is meant to mitigate. Highly efficient buildings use walls with thermal mass (brick and concrete) to slow the transmission of heat through the wall thereby reducing the energy consumption of a building. The heat capacity of these walls are actually beneficial during warm or hot periods since they absorb heat during the hottest part of the day. You can look at the thousands of masonry buildings in hot climates to see that this type of construction can mitigate hotter temperatures. Cool Wall Research Was Based on the Climate of Los Angeles, Not Boston. The Plan references the LEED Pilot Credit for Heat Island Mitigation as a basis for the recommendation; however, the basis for that credit is based on research on cool surfaces in the Los Angeles area. The research paper "Measured Cooling Energy Savings from Reflective Wall Finishes: Evaluation as an Efficiency Measure across Climates" by Danny S. Parker, FSEC Energy Research Center, University of Central Florida, does not support that climates such as Boston will benefit from cool walls. "With simulations we corroborated the finding of Petrie et al. (2007) that reflective walls are unhelpful in heating dominated climates such as Baltimore, Minneapolis and New York City. Essentially, if the ratio of cooling degree days to heating degree days is less than 0.9, there seems little advantage for more reflective wall surfaces." Based on information from the U.S Energy Information Administration the ratio of cooling degree days to heating degree days for Boston is 0.10 (647 CDD / 6013 HDD) which is much less than that recommended by researchers. Cool walls will diminish Boston's architectural history. Boston has a unique sense of place that is tied to its rich architectural history. That built heritage has also played a very important role in the economic growth opportunities both through tourism and skilled jobs. One of Boston's character-defining features is its red brick buildings and cool walls will require all walls to be white or near white which will not contribute to the sense of place. As the Plan states in the Policy Action section (p. 57), "Preserve cultural heritage, historic building fabric, and embrace distinctive histories to create a unique and cohesive Downtown." The requirement to use light colored walls will destroy that aesthetic and connection. Thank you for the opportunity to comment on the PLAN, and for your consideration of IMI's submission. We look forward to continuing to engage with BPDA on these and other critical issues. Sincerely, Caryn A. Halifax President

ONLINE SURVEY PUBLIC COMMENTS ON DRAFT PLAN: DOWNTOWN			
What is your name?	What is your	What do you like about the draft PLAN: Downtown?	What would you like to see changed in the draft PLAN: Downtown
Moritz Schlenzig	I live AND work downtown	I very much agree with the need and objective for a development framework "for the preservation, enhancement, and growth of the Downtown area of the City of Boston, while balancing the importance of livability, daylight, walkability, climate change, access to open space, affordability, and a dynamic mix of uses."	The opaqueness of the process that lead to specific zoning and height decisions, lack of a true dialog with key constituents, and absence of responses to concerns raised during the many public meetings has been shockingly disappointing. This approach does not "fix Boston's broken development process." The spot zoning and bonus height carve outs, in particular, are in direct conflict with virtually all of the BDPA's cornerstone objectives, including the protection and preservation of historic landmarks and the economic vibrancy of Boston downtown. The optics lead the observer to believe that existing proposals from developers are driving PLAN Downtowns planning, at the expense of rigorous analysis, active listening to constituents and sound evaluation. This casts a long shadow on the entire effort, risks invalidating the work that has gone into it, and contributes to the distrust in our public policy officials and processes. The BPDA would help itself by providing transparency around: - The analysis that was conducted in the context of the spot zoning recommendation - The height and use options that this analysis generated and the criteria that were used to evaluate those options - The alternative areas for height and use that were considered and dismissed, and why (the BPDA maintains that there are NO other areas that could reasonably accommodate height) - To what extent the current developer proposal impacted the considerations (there is ample documentation of the developer's efforts to do exactly that) - The rationale for rejecting the many, serious concerns raised time and again regarding traffic congestion, historic building preservation etc etc etc. The local constituents have diligently attended public meetings and voiced their concerns. Senior public officials did not even show up to the meetings, and the concerns were not even acknowledged until AFTER the draft plan was released. The constituents deserve to be heard and receive real answers and adjustments to the plan where warranted. I would like to preserve the integrity of the Ladder Blocks character area and neighboring historic landmarks. I strongly oppose the spot zoning of 400 feet along Washington Street to accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood character. Everybody's agrees that downtown needs 24/7 activation to ensure economic vibrancy, more diverse active ground-floor uses, and new development in areas where developers have owned and allowed groups of buildings to deteriorate in order to increase pressure to do "something". The "something" now proposed is a 400ft office tower that serves the developer's perceived economic interest, but (i) flies in the face of stated objectives of the BPDA, (ii) undermines the Mayor's plan to encourage office-to-residential conversion with 75% tax breaks over decades, and (iii) blatantly and unjustly ignores the concerns of local constituents.
Kathrin Schlenzig	I live and work downtown	I agree with the need and objective for a development framework "for the preservation, enhancement, and growth of the Downtown area of the City of Boston, while balancing the importance of livability, daylight, walkability, climate change, access to open space, affordability, and a dynamic mix of uses." I also acknowledge that the compiled data provides the basis offers for various considerations. However, the opaqueness of the process that lead to specific zoning and height decisions, lack of a true dialogue with key constituents, and absence of responses to concerns raised during the many public meetings has been shockingly disappointing and does not "fix Boston's broken development process." The observer is lead to believe that existing proposals from developers are driving PLAN Downtowns spot zoning and bonus height carve outs that are in direct conflict with the plan's goals, specifically the protection and preservation of historic landmarks and the economic vibrancy of Boston downtown.	The preservation and integrity of the Ladder Blocks character area and neighboring historic landmarks deserves the highest priority. I strongly oppose the spot zoning of 400 feet along Washington Street to accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood character. Downtown needs 24/7 activation to ensure economic vibrancy, more diverse active ground-floor uses, and new development in areas where developers have owned and allowed groups of buildings to dilapidate over a decade. Given the housing crisis, residential development not office development—there is plenty of empty office space downtown—should be the priority. Mayor Michelle Wu has proposed property tax breaks of up to 75 percent over 29 years for downtown office conversions. How does that align with spot zoning for additional office space? Accommodating special interests is what the initiative of this plan is trying to prevent in the future, yet it appears that it is based again on just that. Downtown residents and business owners have been engaged and participated in the process while state officials have been absent and/or have been obscure about which considerations have lead to specific proposals within the plan. This has clearly undermined the trust in the process and in the administration. How are the many openly and repeatedly voiced concerns being included in further considerations regarding the plan? As a third point, I want to address traffic concerns not having been appropriately addressed in the plan. The downtown area is barley walkable or drivable as it is along School, Province, and Washington Street where tourists, residents, employees share narrow side walks and roads that are in terrible conditions. Additional office space would require added truck traffic in an area that is already suffocating in congestion. A more detailed and future looking traffic study is desperately needed.
Michael Burkin	I both live and work Downtown	Long overdue. I support the City in reviewing all aspects of the District and trying to improve .	The historic Wharf District boundaries should not be changed.
Mary Lou Seidner	I live Downtown	I like the character zones.	I do not think the entire character zone heights within the Ladder Blocks were respected. Exceptions were arbitrarily made and as a resident that feels quite disrespectful to the community.
Elaine Yen	I live Downtown		Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.

ONLINE SURVEY PUBLIC COMMENTS ON DRAFT PLAN: DOWNTOWN			
What is your name?	What is your	What do you like about the draft PLAN: Downtown?	What would you like to see changed in the draft PLAN: Downtown
M Holland	I live Downtown	The plan is an affront to the city of Boston. Changing the district allows development that will destroy the waterfront and open it to development that will threaten the integrity of the existing history and culture of the area.	The PLAN should be dropped. Designating the area to "GROWTH" rather than "ENHANCED" threatens the value and importance of Boston's history. All of the citizens of Massachusetts will see irreparable harm to the streets and buildings that have been part of Boston's identity since the 17th century. Our city is unique. It is a treasure to American history and should be safeguarded at all costs.
Helen O'Connor	I live Downtown		.Keep the Wharf District in the "Enhance Area" of the plan.Our community has history, cultural attractions, beauty, and a notable increase in tourism. We overcame the negative barriers inflicted upon the Wharf, ie Central Artery and now with the Greenway, we have grown into a vibrant neighborhood. Do not cut us in half, inflicting another barrier to our successful district.
Colleen	I work Downtown	I like many things, like the increased number of spaces dedicated to pedestrians and seating, better signage and connections between downtown areas, multiple strategies to mitigate flooding and urban heat island effects, increased housing, prioritizing new and legacy small businesses, etc.	Sorry if these are already listed in the Plan, but I'd love to see: - streets given back to pedestrians (ideally by superblocks that have lots of trees) - improved public transit options (particularly a system that doesn't require going downtown to take the subway between adjacent neighborhoods, and one where the red and blue lines connect) - more bike lanes, and ones that are separated from cars by grade changes or greenery - replacing all ornamental plants with native plants (which will also help with flooding) - maybe this is out of scope, but denser forested area in Boston Common than what the plan for the Common currently lists - better signage for identifying T stations - regulations to add bird-safe appliques to all windows - festivals on the Common
Jude	I live Downtown		The plan labels a large portion of the Wharf District as the Downtown or Financial District and designates this area as a “Growth Area” rather than the “Enhance Area,” designation. As the WDC has not had a conversation about zoning, I don't endorse such proposed changes.I have questions and concerns regarding the zoning implications associated with a Growth Area and not an Enhanced Area. Given the distinct historic and cultural identity of this neighborhood, zoning must be looked at. The Wharf District area I live in fits in the Wharf District neighborhood. The functionality and businesses compatible with the character of our community; the historic and cultural significance in the streets and historic buildings. Places right by my apartment like Grain Exchange, Custom House, Quincy Market, have pasts and history as far back as colonial times. The Greenway brought the neighborhood together and reinforced the district’s ability to support an active waterfront and water related industries; and to enable the development and growth of today’s large and small tourism industries.
Eric Timlin	I work Downtown	Good focus on walkability and green space, focus on lowering emissions from buildings, and focus on incorporating locals into planning (eg. Chinatown), and connecting high pedestrian traffic areas and green spaces.	Disincentivize driving down town - think congestion pricing with extra cost going into public transit improvements. More protected bike lanes (like actually protected, not just paint). Focus on native planting (and where possible, micro forests like in Cambridge). Prevent cars from reaching downtown all together (except emergency vehicles and certain deliveries) in the most pedestrian heavy areas. Think the 16th Street Mall in Denver, or Malaga, Spain. Ghent, Belgium also had a decent plan to eliminate cars from downtown while also being accessible. Lots of options, better air quality, lower emissions, all that good stuff. Thanks!
Bill Zielinski	I also work downtown		The overlay of the WDC neighborhood. It does not make sense.
Harvey Leong	I live Downtown	Nothing, as the Plan doesn’t address the needs Maybe in the next phase your address needs th	Please start with what people want in a community. For example, here is a list of desires in no particular order. Clean streets: The BID should be operating in the entire Downtown, especially Chinatown. Walking: The sidewalks should be expanded to accommodate person pushing strollers, elderly people that need walker, etc. Not a pleasant experience walking in overcrowded sidewalks in Downtown. Children should be able to walk to nursery and elementary school. Residents should be able to walk to grocery shop. Took years before Roch Bros came to Downtown...how about Target or Walmart. Note, Target has stores in many areas of Boston. Senior housing should be located in the heart of neighborhood to facilitate family interactions and daycare. Personal safety at all hours of the day...especially for pedestrians. Encourage small local eateries or large communal food halls that serve breakfast, lunch and dinner. Ban large trucks, e.g., 18 wheeler. Enforce pedestrian only areas against bikes, cars and trucks. The list goes on and on...to include houses of worship, libraries, transportation hub for buses, medical urgent care centers. So the initial plan is institutional and now you need to make it a community that people actually want to live in and feel safe and fulfilled. Happy to assist.
Nikolas Varga	I frequently visit Downtown	Public realm recommendations, transportation	100' max height limit in Bay Village and 125'/155' elsewhere should be taller. It's crazy that in 2023, in a HOUSING CRISIS where you have the goals of letting people live downtown and having lots of affordable housing there are still nitpicky limits like this. Let developers build tall buildings in downtown Boston!!! If there's one place there should be really tall buildings, it's downtown. I don't like the stupid limitations on additions, either. Why must the cornices of old buildings be preserved? I love downtown's old buildings, but these are subjective architectural guidelines that discourage development and make it harder to build new uses. Who cares if a new building is taller than all the other ones in the Wharf District? If it had a lot of housing and community uses, I don't think anyone would, but you're limiting buildings to like 12 stories by right. The majority of your recommendations regarding form and height are both overly prescriptive and architecturally subjective. Just let developers propose projects!

PUBLIC COMMENTS ON DRAFT PLAN: DOWNTOWN	
NAME	**COMMENT**
Barry Fidelman	I live in Downtown Crossing at 45 Province St and am shocked at the destructive proposal you have made on zoning height. I have been in the Boston area for over 50 years and love the old ambience. Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city.
Tom and Sylvia Courtney	We have reviewed the plan and see no mention whatsoever of how public safety concerns will be addressed in the downtown area. Downtown Crossing has had repeated incidents of violence and drug users congregate and intimidate passersby. No plan will be successful unless people feel safe, are there actions that will be taken as part of the plan to address public safety issues? It is essential to clearly articulate Public Safety as an essential element for success of the revitalization plan. The area is filled with drug users and vagrants. No matter how beautiful and vibrant the architecture and economy, people will not come unless they feel safe. We must prevent Downtown Crossing from becoming the next Mass Cass. Your final recommendation must unequivocally state its dependence on a a public safety Manhattan project in the area.
Brett Leav	My wife Amy Siegel and I are residents of 45 Province Street. We have lived in the neighborhood for just over two years but have worked in the area for many years. I am very appreciative of the work of the Boston Planning and Development Agency to commission a plan to guide the development of this unique part of our beautiful city. I agree with much of the plan, including the stated objectives. However, I disagree with the "spot zoning" that has been applied to Zone 2a in the PLAN Downtown to enable more tall buildings which contradict the objective of preserving the historic fabric and distinctive history of the Ladder Block district. I am disappointed that this change to permit a disproportional height allowance was added without transparency. The lack of transparency is validated by the apparent plan to enable two development sites along Washington Street, one of which will add unnecessary office space to an area that already has a surfeit of unoccupied commercial buildings. The construction of additional office space makes no sense in this context and is further misaligned with the Mayor's vision for a 24/7 downtown and the incentives that are being offered for office space conversion. Please reconsider this "spot zoning" in Zone 2a.
Amy Siegel	I am a resident and business owner in Downtown Boston, I have always loved this part of the city, choosing to locate my office in Downtown for the past several years, and more recently choosing to move my life to this part of the city during COVID, just as my employees were returning to our office on Milk St. I appreciate the unique historic character of the area, the centrality to everything, and the mix of residents, students, tourists, shoppers and workers. My business, S2N Health, employs ~10 people Downtown. I do my best to spend money at local stores, restaurants and theaters, enjoying the Downtown day and night. I am a big advocate of the Mayor's “24 hour Boston” goal and believe in the potential for a vibrant Ladder Blocks district. I am also keen observers of the area’s struggles - the homelessness, blighted, unoccupied storefronts and offices, and business confronting the changing work week. For my business, we downsized from a 2000 Sq ft leased space on Congress St. to a 200 square ft space on Milk St. because of remote and hybrid workers, and I don’t see that changing anytime soon. From what I see, many other businesses have made similar decisions. In this context, I have gotten involved in the Plan Boston community events and the Downtown Boston Area Residents meetings to familiarize myself with the vision for development of our beloved downtown. I believe that the development needs for Downtown are fundamentally changing. The promise for a vibrant Downtown will be realized with investment in housing and tourism, which has already spurred the appearance of grocery stores, pharmacies, restaurants, dance clubs, and other businesses that support 24 hour life in Downtown. The Plan Boston exemptions allowing for the construction of large office towers between Bromfield and Pi Alley are not consistent with the Mayor's vision for a 24 hour city, and will deal a severe blow to already empty offices, the burgeoning tourist flow, and the Downtown residents already struggling with 17th century traffic patterns. The developers who have left us for years with blighted buildings should be directed to a vision more consistent with a vibrant Downtown as they invest in construction - housing, hotels, and smaller, more flexible work spaces. As a resident and business owner, I would be happy to engage with your administration to create a more sustainable, successful vision for Downtown.

PUBLIC COMMENTS ON DRAFT PLAN: DOWNTOWN	
NAME	**COMMENT**
Joel Berger	I am writing to you as a Downtown resident to provide my thoughts on what I believe should be altered in the proposed Downtown Plan befor it is approved. Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city. The Wu administration promised a stronger voice for local communities in the planning process. Feedback regarding protecting character preservation areas has been loud and broad during the PLAN: Downtown process. However, the city has not made accommodations related to the 400 feet. It is worth underscoring that the community should be heard. A major "reform" effort promised by Mayor Wu was to emphasize planning and let that lead and inform development efforts. The 400-foot accommodation for two development sites directly contradicts this promise and undercuts the city's credibility in providing a fair process for all constituent groups impacted by development projects. As most are well aware, the specific proposal being made for the 11-21 Bromfield site (corner of Washington and Bromfield) is for an office tower. Boston has an immense surplus of office capacity, with more coming to market in the next year. Meanwhile, the city has perhaps no other greater goal than to increase housing availability and affordability across the city. Given that situation, the city should not be making zoning exceptions to add even more office capacity. It is critical that these issues be taken up and appropriately resolved before the proposed Downtown Plan is approved.
Robert L. Thurer	I have lived in Boston for over 50 years and was a homeowner on Beacon Hill for 42 years. About two years ago, my wife and I moved to a condominium in the downtown area (45 Province Street). We were very happy on Beacon Hill and proud to maintain our historic property in accordance with that neighborhood's requirements. We are well settled in our new location and pleased that we continue to live in a historic part of the city. We are very interested in improving the quality of life downtown for residents, workers and visitors to the city. I was pleased to learn of the downtown planning process and the city's attention to the unique issues in the downtown area. We applaud the BPDA and Mayor Wu for this effort. As you may recall, I wrote to you several months ago about the specific issues I thought needed to be addressed, particularly the plan to build a high rise building at the corner of Washington and Bromfield Streets. I have joined your Zoom meetings on the downtown plan. Unfortunately, I am very disappointed that, despite the overwhelming opinion of the residents in the area as well as Revolutionary Spaces that maintains the Old South Meeting House and the Old State House, the current plan includes a provision for spot zoning of 400 feet along Washington Street. Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. While I support new construction along Washington Street, I oppose this deliberate spot zoning of 400 feet to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city. I hope that Mayor Wu and the BPDA will respect the opinions of the residents in the area and reconsider this portion of Plan Downtown.

PUBLIC COMMENTS ON DRAFT PLAN: DOWNTOWN	
NAME	**COMMENT**
Steve Berk	My name is Dr. Steven Berk. I grew up in Boston, completed my undergraduate and Doctoral education here. I've lived in the Wharf District, at Greenway Place for 16 years. Throughout my childhood, my grandfather and Uncle worked 2 blocks from my residence and my great Uncle operated a television and radio repair shop several blocks away. The side of my building, until recently, displayed a hand painted sign with the name of his shop and an index finger pointing the way to its location. During the era of the expressway, the elevated highway created a physical division between the vibrant "Financial District," to the West and the sadly neglected area to the East which consisted of broken docks, broken glass, and broken people. The development of the big dig and the Greenway spawned the creation of the "Wharf District," an area that is rich and storied in our nation's history. This development promised to augment the Rowe's Wharf, Aquarium, Marriott Hotel and Columbus Park landmarks with continuing] ocean-edge visionary development and an identity as a true community of residents and businesses. I am deeply concerned that the proposed plan, in its current form, inadvertently marginalizes, contracts, and ignores the Wharf District Community. Indeed, the plan repeatedly and incorrectly identifies the Wharf District area as the "Financial District." This reinforces the perception that people work here but do not actually live here, even though more than 60% of the occupancy in his district is residential. By way of example, the Wharf District remains the ONLY district in Boston which does not provide ANY residential parking designated areas, while smaller areas such as the Leather District are provided with this benefit. I note that the Introduction section of the plan (p.7) references its reliance on "community feedback" however, there appears to have been little to none prior to tonight. The Priorities for the Wharf District articulated on page 13, "to provide a greater mix of services careering to residential uses in the neighborhood to meet residents' daily needs." Is sorely needed. I have two general questions regarding the proposed plan: What was the rationale for reclassification of a large portion of the "Wharf District" to "Financial District?" I fear the exclusion of the area east of the Greenway within the Wharf District creates a current day barrier not unlike the elevated highway which did this prior to the big dig. What was the rationale for this? Thank you for the opportunity to share my concerns and questions.
Peter Kutz	I am opposed to the 400-foot zoning height exceptions being granted in the ladder blocks and believe that successful developments can happen at more modest heights. I would like to point out a handful of examples of successful projects that are completed and approved in the area that are all within the current zoning heights. The Godfrey Hotel: A renovation of buildings built in the early 1900's without increasing height. This project transformed a dingy neglected building into a jewel on Washington St. It has been a bustling area since completed. 7 Hamilton Place: This approved project will restore the existing 3 story facade and incorporate new construction for a 12 story hotel into the restored front within the 125' zoning height. It should be a great improvement to Hamilton alley 17 West St: This proposed 15 story hotel to built on a lot currently used for parking. If approved, it will be built at 152', within the current zoning height. 580 Washington St(Millennium Place): Built as proposed, the residential building is 155' with the design and materials seamlessly blending in with the surrounding area. 125 Lincoln: Originally proposed as a 24 story, 340' tower. After public feedback and developer revisions, it has now been approved for an 11 story, 176' building. This will blend in with the surrounding buildings in the Leather District. The 125 Lincoln St Project mirrors the initial proposal for 21 Bromfield. It seems a similar outcome can be achieved for the Bromfield proposal. These examples show that projects can be completed that make economic sense for the developer, provide economic benefit for the city, and receive support from the community while enhancing the neighborhood by assimilating into the surroundings at the current zoning heights. This can work for the Ladder blocks without special exception to building height for select sites.

PUBLIC COMMENTS ON DRAFT PLAN: DOWNTOWN	
NAME	**COMMENT**
Kimberly Trask	I am following up from last night's PDT meeting. I am requesting that the BPDA provide a separate review process for the important historic area of the Ladder Blocks ---- similar to the process that is being provided for the important Chinatown Cultural Area. The need for a separate review process is critically important. The number of people attending last night's meeting and the volume of the concerns raised from several key constituencies (from historical organizations, tourism businesses, historic building stewards, local business owners and community members) demonstrates that the Ladder Blocks have special and unique concerns which need to be vetted more thoroughly, most especially with regard to the protection of the historic buildings in this area, but also with regard to the protection of the 'main street' of downtown. There were many people in attendance who shared the same views as those expressed in the meeting who did not have a chance to speak (given Chief Jemison's availability window). However, many did have an opportunity to add comments in the meeting chat box. The stewards of the historical properties in this area have been very clear that wind tunnel and wash-boarding effects caused by additional tall buildings (especially given added environment threats caused by climate change destruction) in this area will be devastating to these historic structures and will put these buildings under continuous scaffolding which will substantially negatively impact their ability to attract tourists. The Boston Globe recently wrote a story about this zoning and quoted Martha McNamara, board chair of Revolutionary Spaces — the steward of both the Old South Meeting House and the Old State House — and an architectural historian at Wellesley College specializing in 18th and 19th century New England. This article can be found here. https://www.bostonglobe.com/2023/08/30/business/boston-charts-future-downtown-development-new-plan/ Tourism has become a critically important contributor to the economic vibrancy of the Downtown area and the proposed spot zone on Washington Street threatens that significant activity. Tourism is providing the greatest amount of foot traffic to the Downtown Crossing / Washington Street area and providing essential business to the local restaurants and shops. Turning this history-rich area and primary shopping corridor into a high-rise district will discourage pedestrian flow and tourism to this area. In addition, I would like to request that Chief Jemison participate in a walk-through of the Ladder Blocks with the stakeholders, including the historical experts. Based on comments last night, it seems there are misunderstandings about the location and site-lines of the current buildings in this area. Several made this request. Lastly, given the Report prepared by Sara Bronin, the PDT time-line should be extended to better align PDT to the key recommendations in the Report. One critical recommendation is prioritizing planning above project-specific pressures. The creation of a spot-zone on Washington Street catering to developers does the exact opposite. All of the elected officials holding office at this critical juncture have a responsibility to ensure historic Boston is protected for Bostonians and our Nation and to ensure that the Downtown Area is best positioned for economic success which includes protecting our tourism industry and creating a 'main street' as a pedestrian friendly character area which promotes a desirable and historic dining and shopping experience, in the same way that Newbury Street, Charles Street, and Hanover Street do in their respective communities. We did not put up high-rise buildings in the middle of those 'main streets' and we should not do so here.
Dorothy Willey	Just heard about the plan which would change the boundaries of the wharf District. Please please do not change the boundaries of our historic wharf District
Jim Alexander	As a long time Boston proper resident, and architect with over 50 years experience in the city, I am opposed to the Proposed Downtown Plan/Zoning proposal in its current form. Increased density is NOT the correct way to address other city issues in housing, open space and quality of life. Particularly onerous are the proposals for changes in Areas 2a,2b, 2c and other areas with concentrations of historic and quality existing buildings and streetscapes. I urge BPDA to seriously reconsider this proposal and protect the core of Boston. We don't need another seaport in the core of Boston!
Rita Advani	As you consider the creation of Boston's new zoning districts, please do not break up the current Wharf District into 2 or more districts. I have owned my condo and lived here on the Waterfront for over 20 years and have seen this area truly blossom into a neighborhood. I have an old lithograph from the early 1800's that shows this area as it was. Yes, there were wharves, but there was also a neighborhood where people lived and did business. We have worked hard to create connections with others who live in this area and bring their children up in the area. Please don't split it and break up this neighborhood in which we live.

PUBLIC COMMENTS ON DRAFT PLAN: DOWNTOWN	
NAME	**COMMENT**
Steve Pearson	I am a long-time resident in the Ladder Block neighborhood, and I appreciate the chance to comment in writing on the updated zoning proposal for downtown Boston. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites at the expense of the broader neighborhood and the city. Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. Yet it is clear from the section of the PLAN along upper Washington Street that is labeled "125/400" that the BPDA has made extraordinary accommodations for the site of 11-21 Bromfield (the lower portion of that 125/400 section) as well as any potential development that may take place at the site of the current Pi Alley garage. Many in the community (but not all) feel this unique accommodation shows inappropriate zoning favoritism to a specific developer in what should be a neutral, if not community-led planning process. Moreover, many of us would agree that the stature of most buildings within the Ladder Blocks is of more modest height, including all buildings adjacent to the 11-21 Bromfield project proposal, and that this contributes greatly to the historic character of this neighborhood. That perspective has been communicated consistently to all levels of the BPDA for months, but it has not resulted in a change to the proposed height. Mayor Wu promised a stronger voice for local communities in the planning process. Feedback regarding protecting character preservation areas has been loud and broad during the PLAN: Downtown process. However, the city has not seemed to listen at all to our concerns related to the 400 feet. The persistence of the BPDA in proposing this 400-foot accommodation for two development sites directly contradicts the promise that our voice would count and undercuts the city's credibility in providing a fair process for all constituent groups impacted by development projects. It is worth underscoring that the community should be heard. As the ongoing development along Newbury Street demonstrates, “growth and revitalization” do not require that developers be granted new accommodations to build higher than the surrounding area. Please listen to the residents who know this neighborhood best and seek instead to achieve your goals without this bald-faced giveaway to developers.
Laurie Radwin	The PLAN threatens historic sites. For one, wind tunnels from skyscrapers damage historic buildings. Moreover, the character of our unique historic downtown is threatened by the close proximity of new skyscrapers and other overly dense, tall buildings. Last, I must register that this is no way to change the zoning code. Pop-ups, zoom meetings, and the like are no substitute for a truly democratic process. Rezoning affects our quality of life in a deep and sustaining way. The Roslindale Neighborhood Strategic Plan provides an exemplar of true community involvement. https://www.bostonplans.org/getattachment/2f9bc52c-7229-4611-9a18-be4d629280a8 I hope the BPDA and the Mayor will consider such a process in the revamping of the Zoning Code. I speak as an individual and not for the Coalition.

PUBLIC COMMENTS ON DRAFT PLAN: DOWNTOWN	
NAME	**COMMENT**
Jeffrey T. Angley	This email is intended to provide feedback to the Draft Plan for Downtown Boston released by the Boston Planning and Development Agency (BPDA) on August 21, 2023. My name is Jeffrey Angley. My wife, Ellen Angley and I, both reside at 45 Province Street in downtown Boston. I also work in the downtown area. I am a semi-retired zoning and land use attorney. My wife is a retired utility executive. The effort to analyze and re-think zoning and development for the downtown area is laudable. Boston zoning is byzantine and difficult to permit, which certainly makes development efforts more expensive, time-consuming, and unpredictable, both for applicants and residents. We also appreciate the aggregation of data regarding the age of buildings in the area, building heights and land uses. What is apparent from the collected data is that the Downtown Crossing and Ladder Block areas, where we reside, have some of the oldest building stock, with a general pattern of low building heights and that are the most compliant with existing zoning. This area, generally framed along the spine of Washington Street, is also largely commercial. It is marked by narrow streets and alley ways except for the broad pedestrian area built by the Millennium Tower developer. A large section of Washington Street is closed to through traffic. The effect is a highly walkable commercial shopping and business area, filled with people moving through the city and, all in all, a vibrant space. At first blush, the new zoning heights for Downtown Crossing and the Ladder Blocks seemingly seek to retain these characteristics. Thus, as-of-right heights are capped at 125 feet along Washington Street, except in the Financial District where the as-of-right heigh is 155 feet. Where you start to lose our support is with the density bonus program. We have no conceptual objection to developers securing some additional height in return for additional public benefits. The problem is the asymmetry of the proposed subdistricts and in particular subdistrict 2A. What is odd about subdistrict 2A is that it only includes, and therefore only affects, buildings on the west side of Washington Street. In subdistrict 2A there is a proposed density bonus of up to 400 feet in height. Subdistrict 2A is the only subdistrict in the Downtown Plan with such significant density. The buildings on the opposite side of Washington Street do not have a maximum density bonus for height, except as might be limited by shadow and FAA regulations. According to the BPDA Report, the strip of buildings along Washington Street are some of the lowest and oldest buildings in the area and they are all commercial. With old building stock and with the opportunity to rise up to 400 feet in height (or higher in the financial district side of Washington Street), it is not unreasonable to predict that over time, all of the building owners from Pi Ally to Bromfield Street, are going to take advantage of the density bonus program, or sell out to someone who will. Washington Street narrows considerably in this area, especially north of School Street. The effect to tall buildings rimming the street from Bromfield to Court/State Street will be aesthetically and physically unappealing, with tall buildings, increased shadows, less sunlight, increased winds and a more confining and penned in feel to pedestrians and building occupants. It seems beyond dispute that the character of this area is going to change dramatically over time and the question is why this is good for the City and for the Downtown Crossing and Ladder Blocks in which the area is located. We have neither seen nor heard of any justification from the BPDA for the disparate treatment of buildings in the 2A subdistrict. The character of the street and the buildings on the west and easterly side of upper Washington are indistinguishable. Because both sides of the street should be treated the same, we believe that a better approach is to protect both sides of Washington Street and limit the density bonus to a maximum height of 155 feet on both sides of Washington, as has been done in subdistrict 2C and 3. Moreover, it is hard to gleam what uniform policy undergirds subdistrict 2A. It is oddly shaped, cuts through the middle of existing buildings and existing blocks and seems to have no cohesive reason d'etra. The existence of One Boston Place as an entrant into the subdistrict is a clear outlier to the entire area and is not a reason for increased height. Subdistricts 2A is not an appropriate subdistrict and it should either be abandoned as a planning concept or the maximum bonus height should be adjusted downward to a height of 155 feet, as it is for the rest of the Downtown Crossing and the Ladder Block area. In short, the disparate treatment of Downtown Crossing and the Ladder Block by the creation of subdistrict 2A artificially divides Washington Street into multiple subdistricts, smacks of arbitrariness. and reflects a lack of uniformity required of the enabling statute for Boston zoning. Therefore, we object to the creation of subdistrict 2A. But, if the subdistrict is to be retained, the maximum bonus density height should be 155 feet, consistent with the other zoning subdistricts. It goes without saying that the proposed increased building heights in subdistrict 2A will ultimately create all the negative impacts brought on by higher density development. There will be, throughout the area, more shadows, less natural light, less air flow, more people and more traffic. The existing infrastructure of roads and alleys in the 2A subdistrict are not adequate, and cannot be made adequate to handle the cars, trucks, deliveries, and construction that this proposed plan will foment. We urge a reconsideration of the 2A subdistrict and the maximum height of 400 feet.

PUBLIC COMMENTS ON DRAFT PLAN: DOWNTOWN	
NAME	**COMMENT**
Cathy Dahill	I am a resident of the Wharf district and I am very concerned that this Plan is moving forward with little/no input from residents who live here. I am vehemently opposed to the re-drawing of any boundaries your plan seems to propose. We are in integral neighborhood and segmenting a tiny area off to call it the wharf district does the city, it's history, it's tourist industry and it's residents a major disservice! The PLAN labels a large portion of the Wharf District as the "Downtown" or Financial District". The PLAN also designates this area as a "Growth Area" rather than the "Enhance Area," designation. · As the WDC has not had a conversation about zoning, we cannot endorse such proposed changes at this time. · As it pertains specifically to the Wharf District, we have questions and concerns regarding the zoning implications associated with a Growth Area and not an Enhanced Area. · Given the distinct historic and cultural identity of this neighborhood, zoning must be looked at. Please open this up to public feedback and allow everyone to have a voice before decisions are made and boundaries are re-drawn.
Ellen Lipsey	As the Vice Chair of the Board of Revolutionary Spaces, I have submitted comments with Nathaniel Sheidley, President and CEO, and Martha McNamara, Chair of the Board. Those comments, as stewards of the Old State House and Old South Meeting House, express very specific concerns. Here I am speaking personally as the retired Executive Director of the Boston Landmarks Commission, professional preservation planner, and long-time Boston resident and voter. I wish to very briefly emphasize why Revolutionary Spaces and others who value Boston's historic legacy, feel so strongly about eliminating the 400-foot bonus height in the northernmost portion of the district. People come to visit, work in, and live in Boston because of the history embodied in our urban fabric. Without the buildings and places that exemplify a legacy dating to before the American Revolution, and richly representing every era from that time to the present, Boston would be just another American city. As Boston's history is at the heart of the city, the northernmost portion of the PLAN Downtown district, contains some of the city's most iconic 18th and 19th century sites. We can build on our venerable legacy and become even more relevant and vibrant in the future by sustaining the old with complimentary new growth. However, as Revolutionary Spaces has stated, historic fabric is fragile, and in time of increasing climate change, it requires present and future protection. Please reconsider the bonus height that will physically erode some of Boston's most venerable buildings and the stories they contain, so intrinsically and uniquely important to the collective American story, past and future. Consider a character district that supports this important area. Thank you and your team for all the work that has gone into the plan.
Jason Kimball	Please leave the Wharf District intact as is. I live on Broad Street and do not want to be included in Downtown for a variety of reasons. I imagine there will be many decisions for Boston going forward in regards to commercial real estate, and being designated as Downtown/Financial District will have a major impact for the neighborhood. In addition the Downtown neighborhood classification being more on the border of the WD could potentially have a negative impact on my property value going forward. We benefit from having the link of the Wharf District by incorporating the Greenway, as well as buildings of cultural significance. Please leave WD as is.
Ellis L. Reinherz	Preserving the integrity of the Ladder Blocks character area is important to the city's historic fabric, its tourism economy, and protection of neighboring historic landmarks. I oppose the deliberate spot zoning of 400 feet along Washington Street to specifically accommodate two development sites, one of which is unnecessary office space, at the expense of the broader neighborhood and the city. I state this as a resident of 45 Province St.
Katharine Cipolla	The "Manhattan-ization" of Boston is turning it into a city like all others. Many area of the old center city hold both the history of the area and the character of the place. Besides that romantic sense, there is the geological and climactic issue. Wind, sea-level rise, groundwater issues, not to mention vibration, noise, heat, shadow and economic pressure all impact both truly historic structures and those that should eventually be added to the "historic" list. The beautiful 19th century buildings in the city center, although taller than the Old Corner Bookstore, should also be considered part of the city's architectural and cultural heritage. Taller should not be the only answer to the future of Boston.

FRIENDS OF THE PUBLIC GARDEN

September 18, 2023

Mr. Arthur Jemison
Director, Boston Planning & Development Agency
One City Hall Plaza
Boston, MA 02201

RE: Draft PLAN: Downtown

Dear Mr. Jemison:

The Friends of the Public Garden has long been committed to caring, renewing, and advocating for the Boston Common, Public Garden, and Commonwealth Avenue Mall. We are excited by Boston's growth and vibrancy but consistent with our mission, we work to ensure that the parks are protected from any adverse impact from development projects. The Boston Common and Public Garden are vital to the growth of Downtown and abutting neighborhoods, and residential growth in the Downtown has had a positive impact on our greenspaces. Because of the close interrelationship of the two, the Friends has served on PLAN: Downtown's Advisory Group since its inception.

We were in support of the initial goals of the Plan, especially its incorporation of the State's shadow laws as baseline criteria. Since the waiver from the shadow laws granted to Millennium for its Winthrop Square Tower in 2017, the Friends has developed a modeling system that could serve as a consistent tool for the design of new developments that centers the vital importance of sunshine for our irreplaceable greenspaces as a value early in the development process. We have shared these with your staff and have received positive feedback from them.

PLAN: Downtown was undertaken by the BPDA to comply with c657 Articles of 2017 which stipulated that the City initiate a comprehensive Downtown plan that would provide predictability for developers and community alike, and eliminate the practice of development projects being approved in isolation. In reviewing the draft PLAN: Downtown, we question whether the Plan's proposed zoning for Sub-Area 2a is scaled with its density bonus to accommodate a specific project, 21-22 Bromfield St, already submitted to the BPDA.

In addition, we are concerned that the density bonus height proposed for Sub-Area 2b changes the Midtown Cultural District Boston Common Protection Area from Bromfield to West Streets from 125' to 180.' We would appreciate a demonstration that such a change will not violate the State shadow laws.

The Friends was pleased to be a member of the Advisory Group working with BPDA staff to develop a plan that met the objectives of c657 Acts of 2017. We were concerned that the BPDA stopped the planning process for two years, allegedly because of Covid, and we wrote to you urging a reactivation. Once the planning process was resumed, we were very disappointed that a significant change had been proposed to the historic Ladder District zoning without any discussion with the Advisory Group and that the BPDA has been unresponsive to date to the many critical comments submitted concerning the proposed upward zoning that is not compatible with the Ladder District Character Area.

Thank you for your consideration of our comments.

Respectfully,

Elizabeth Vizza
President

Leslie Singleton Adam
Char, Board of Directors

Cc: Mayor Michelle Wu
Chief of Environment, Energy, and Open Space Mariama White-Hammond
Parks Commissioner Ryan Woods
Director of Planning Aimee Chambers
Senator Lydia Edwards
Representative Aaron Michlewitz
Representative Jay Livingstone
City Council President Ed Flynn
City Councilor Sharon Durkan
City Councilor Gabriela Coletta
City Councilor Michael Flaherty
City Councilor Ruthzee Louijeune
City Councilor Julia Mejia
City Councilor Erin Murphy
Senior Planner Andrew Nahmias

The Druker Company, Ltd., Suite 1000, 50 Federal Street, Boston, Massachusetts 02110-2536

September 18, 2023

VIA EMAIL

Mr. Andrew Nahmias, Senior Planner II
Boston Redevelopment Authority
d/b/a Boston Planning & Development Agency (BPDA)
One City Hall Square
Boston, Massachusetts 02201-1007

Re: PLAN: Downtown

Dear Mr. Nahmias:

The Druker Company, Ltd. has been an active member of the Boston community for over 124 years and three generations, as well as a founding member of The Downtown Boston Business Improvement District (BID). As concerned members of the community and property owners of the block bounded by Winter Street, Washington Street and Bromfield Street in the area, we request that these properties, which encompass The Orpheum Block, become PDA eligible.

We are, accordingly, one of the largest property owners in the area affected by the Plan: Downtown and as such, are capable of and interested in providing the achievement of the goals of preservation, creation of entertainment, retail, and housing including affordable housing, and the overall goal of the revitalization of Downtown, particularly in the Downtown Crossing/Washington Street area which has been challenged by post-pandemic trends. It is critical that retail activity, community growth, residential life and overall public safety are revitalized in the Downtown Crossing. Without a Planned Development Area (PDA), however, none of these goals are likely to be accomplished. We are writing to address a particular issue regarding the PLAN, which is that Planned Development Areas (PDAs) are not included in the Draft PLAN: Downtown.

The PLAN is silent as to Planned Development Area (PDA) eligibility and proposed zoning controls for PDA eligible areas. We strongly advise and request the drafting of zoning which allows PDAs in additional areas including our site bounded by Winter, Washington and Bromfield Streets, with PDA height limits commensurate with existing building heights (in conformance with Shadow Legislation) along Washington Street including the former Filene's Block and specific mitigation and public benefit requirements.

Telephone: (617) 357-5700 Telefax: (617) 357-6494

The PDA zoning vehicle will enable owners to design and deliver projects that create new retail and entertainment venues (and, in the case of the Orpheum Theatre, allow for renovation of this vital and historic venue), increase housing including affordable housing, address preservation priorities for existing buildings, and create public benefits. These aspirations are all goals of the PLAN, and in this case, projects like the Orpheum Block will not be possible without the flexibility provided by the PDA zoning vehicle.

Currently, PDA eligibility covers a patchwork of blocks and development sites along Washington Street and a small area between Washington and Tremont Streets. The intent of Article 3-1A(a) of the Zoning Code is to allow PDAs in any part of a subdistrict, subject to public review and approval by the BPDA and Zoning Commission. According to the BPDA's written policy, PDAs promote and accommodate large-scale, complex development; provide for a greater flexibility of zoning including additional controls for the development; and public benefits for the surrounding community and neighborhood. We think this zoning vehicle is tailor-made for the Downtown Crossing and the Orpheum Block where one-acre sites are rare; and as stated above development proposals will inevitably include complex planning, design, and mitigation considerations.

Thank you for the opportunity to comment on the PLAN and we look forward to further discussion on the direct benefits of the incorporation of PDAs into the PLAN: Downtown and the future zoning.

Sincerely,

Ronald M. Druker
President

CC: Mayor Michele Wu
James Arthur Jemison II, Director, BPDA
Aimee Chambers, Chief of Planning, BPDA
Michael Christopher, Director of Development Review, BPDA
Casey Hines, Deputy Director of Development Review, BPDA
Steven D. Fessler, TDC
Barbara J. Boylan AIA, TDC
Michael Nichols, BID

INTERNATIONAL MASONRY INSTITUTE

BAC/IMI International Training Center
17101 Science Dr., Bowie, MD 20715

September 18, 2023

Priscilla Rojas
Chair
Boston Planning & Development Agency
One City Hall, Ninth Floor
Boston, MA 02201

James Arthur Jemison
Chief of Planning
Boston Planning & Development Agency
One City Hall, Ninth Floor
Boston, MA 02201

RE: Boston Planning & Development Agency PLAN: Downtown

Dear Chair Rojas and Mr. Jemison:

Please accept the following comments filed on behalf of the International Masonry Institute (IMI) in response to the Boston Planning & Development Agency PLAN: Downtown. IMI is a labor-management partnership between the International Union of Bricklayers and Allied Craftworkers and its signatory contractors that works to promote responsible building with masonry and tile. IMI's team of architects, engineers, and construction managers researches and develops programs and technical advice related to masonry and tile installation, including around the resilience, sustainability and durability of these materials and their building systems.

We applaud the City of Boston for planning for the future of downtown. Many of the goals of the Plan are appropriate and will serve Bostonians well into the future. We do have reservations for a recommendation made in Design Guidelines section under Sustainability & Climate Resilience. In Section 4.2 (on page 77) there is a recommendation to implement Cool Walls for Facades when possible. However, that recommendation is misguided as it relates to Boston and should not be included in the final document. While cool roofs and pavements can help reduce the heat island effect, cool wall strategies may not help as intended and actually work against other recommendations in this guide.

Boston is a Heating Dominated Climate

As referenced in the Plan, the "Heat Resilience Solutions for Boston" document states:

> *If emission trends continue as they are, it's predicted that there will be up to 25 to 42 days above 90°F, including up to 1 to 6 days above 100°F by the 2050s. For communities who are already overburdened, increasing extreme heat risks can cause disproportionate impacts.*

The Northeast, including Boston, however, has 6,013 Heating Degree Days (HDD) according to the U.S. Energy Information Administration which means that more heating

is required for buildings in Boston than cooling days. Therefore, walls which reflect heat actually require buildings to use more energy to provide comfort for occupants. This increases the operational carbon of a project which Plan: Downtown is meant to mitigate. Highly efficient buildings use walls with thermal mass (brick and concrete) to slow the transmission of heat through the wall thereby reducing the energy consumption of a building. The heat capacity of these walls are actually beneficial during warm or hot periods since they absorb heat during the hottest part of the day. You can look at the thousands of masonry buildings in hot climates to see that this type of construction can mitigate hotter temperatures.

Cool Wall Research Was Based on the Climate of Los Angeles, Not Boston.

The Plan references the LEED Pilot Credit for Heat Island Mitigation as a basis for the recommendation; however, the basis for that credit is based on research on cool surfaces in the Los Angeles area. The research paper "Measured Cooling Energy Savings from Reflective Wall Finishes: Evaluation as an Efficiency Measure across Climates" by Danny S. Parker, FSEC Energy Research Center, University of Central Florida, does not support that climates such as Boston will benefit from cool walls.

> *With simulations we corroborated the finding of Petrie et al. (2007) that reflective walls are unhelpful in heating dominated climates such as Baltimore, Minneapolis and New York City. Essentially, if the ratio of cooling degree days to heating degree days is less than 0.9, there seems little advantage for more reflective wall surfaces.*

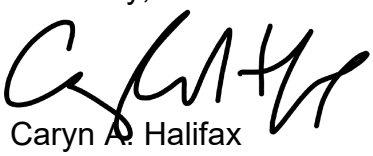
Based on information from the U.S Energy Information Administration the ratio of cooling degree days to heating degree days for Boston is 0.10 (647 CDD / 6013 HDD) which is much less than that recommended by researchers.

Cool walls will diminish Boston's architectural history.

Boston has a unique sense of place that is tied to its rich architectural history. That built heritage has also played a very important role in the economic growth opportunities both through tourism and skilled jobs. One of Boston's character-defining features is its red brick buildings and cool walls will require all walls to be white or near white which will not contribute to the sense of place. As the Plan states in the Policy Action section (p. 57), "Preserve cultural heritage, historic building fabric, and embrace distinctive histories to create a unique and cohesive Downtown." The requirement to use light colored walls will destroy that aesthetic and connection.

Thank you for the opportunity to comment on the PLAN, and for your consideration of IMI's submission. We look forward to continuing to engage with BPDA on these and other critical issues.

Sincerely,



Caryn A. Halifax
President

cc: Charles Raso, President/Secretary-Treasurer, BAC Local 3 Massachusetts/ Maine/New Hampshire/Rhode Island

September 18, 2023

Mr. James Arthur Jemison, Chief of Planning
c/o Mr. Andrew Nahmias, Senior Planner II
Boston Planning & Development Agency
One City Hall Square, Room 900
Boston, MA 02201

RE: PLAN: Downtown Draft Report

Dear Chief Jemison:

On behalf of the Downtown Boston Business Improvement District (BID), I am pleased to offer our organization's comments on the PLAN: Downtown draft report (hereafter referred to as "the report"). We congratulate the BPDA, Advisory Group members, elected officials, and consultants who have shepherded PLAN: Downtown to this critical juncture and offer our thanks to all who have participated in this process to-date. Six years ago, State Representative Aaron Michlewitz and the Massachusetts Legislature prompted the BPDA to launch a "planning initiative for the downtown area of the city of Boston." Now, in our post-pandemic environment, PLAN: Downtown's importance is even more obvious and represents an opportunity to formalize a contemporary view of how to enhance Boston's central business district.

We have heard from numerous stakeholders throughout this process, including dozens who filled out comment cards during our 3rd Space pop-up last winter and several public engagements throughout the BID district, and the voices we represent seek a downtown for Boston where:

- doing business, including real estate development, is more predictable,
- more housing options throughout the affordability spectrum are developed – or converted from existing other uses – in and near downtown,
- a functioning public transportation system delivers reliably safe and efficient mobility,
- public spaces are enhanced and enlivened – through art, programming, and design – and more such spaces are pedestrianized and leveraged to address a changing climate,
- economic opportunities are spread more equitably and reflect the phenomenal diversity of Boston,
- personal safety is maintained while appropriate government and community resources are dedicated to supporting neighbors experiencing social challenges,
- the built environment is accessible to all, and the streetscape becomes an amenity rather than liability,
- our community's cultural assets and historic places are valued and protected as the city continues to grow and evolve around them,
- economic vitality spreads throughout more hours of the day and week, and is available through a wider array of experiences,
- government officials and the business community work together effectively to shepherd the 'Future of Work' for the neighborhood's 200,000 workers and the countless family livelihoods that depend on the success of Downtown Boston.

We believe PLAN: Downtown should culminate only after each of the above goals has been incorporated and a roadmap exists toward successful implementation, and our organization is pleased by the progress reflected in this report and excited for the future of the neighborhood.

As noted above, this report arrives at an inflection point for the BID, a 34-square-block district encompassing roughly half of the PLAN: Downtown study area. On the one hand, our vibrant mixed-use district continues to transform dynamically in the wake of the pandemic, with post-March 2020 development proposals including 9 Hamilton Place; 11 Bromfield Street; 17 West Street; 55 Summer Street; and 125 Tremont Street. Included are two hotels (9 Hamilton Place; 17 West Street) and a museum (125 Tremont Street) which will further complement our district's rich assortment of tourism amenities and destinations, such as the Freedom Trail, *Embrace* memorial, and the upcoming WNDR museum (500 Washington Street). On the other hand, the pandemic has undeniably impacted our district's vitality, having contributed to office and retail vacancies, a reduction in pedestrian traffic, and other associated challenges such as those detailed on pages 16-17 of the draft report.

As the BID has evaluated these trends, our organization has pivoted over the past year to embrace initiatives recommended in the City's *Revive & Reimagine* report for Downtown released in October 2022. Recognizing that the pre-COVID model for seeing widespread economic activity downtown was too focused on office workers – a mismatch that is significantly worse in forecasting the next 5 to 10 years – we agree that cultivating other demographics will be needed to ensure a vibrant neighborhood. This report lays an important foundation to focus more on residents, students, tourists, and others to realize more sustainable economic vitality and cultural interest, while also developing strategies to right-size our office space supply for demand in the new corporate landscape. Accomplishing this pivot will require substantial new public-private investment in our streetscape, especially as it pertains to its accessibility and the management/enforcement of our pedestrian zone. New allowed uses, smart climate-resilience planning, and a transparent and predictable planning/development regime will also be critical. As to the report itself, we offer the following comments:

I. Growth & Preservation

Taking the report's Recommendations in sequence, **we strongly support the Growth & Preservation section's key recommendations** (updating zoning; conversion of underutilized offices; conducting a survey of the study area's historic assets). The Policy Actions outlined on page 55 ("promote dense, mixed-use development, and grow and diversify active ground-floor uses") highlight initiatives that our organization is already either deeply invested in, or would naturally gravitate to, given our mission. The Uses recommendations detailed on page 85 ("refine inconsistent and prohibitive use definitions . . . encourage new and diverse businesses and entertainment uses") are also greatly welcomed.

Much discussion throughout the public process was centered on building height, which is regrettable given the thoughtful and in many cases novel approach advocated by city planning officials for managing sorely needed changes to the zoning code and development review process. **Our organization fully supports the Zoning Updates laid out on pages 79-85 of the report, which recommends new district boundaries, appropriately modernized height and density limits which also transparently can involve height-bonus and public benefit system considerations that align with broadly-shared neighborhood priorities, and enhancements to how proposed uses are evaluated and prioritized**. We note that this support is, in part, relies on Zoning Updates that will follow the PLAN: Downtown report at a later time, and that we expect will align with the BPDA's stated positions to-date. When such Zoning Updates are considered,

however, we believe the BPDA should give additional consideration to the potential unintended consequence of eliminating the Planned Development Area (PDA) process from being used in much of the incredibly complex downtown development market, as larger multi-parcel development sites may yet require an additional tool to ensure successful review and completion.

Further, we reinforce here that **we support the Public Benefit process laid out on page 82** as a monumental leap forward for a process that has not historically functioned well or in the best interests of either our residential or real estate development communities. However***, the report should reflect the BPDA's position during the PLAN: Downtown process that 100% of the funds derived from 'downtown-located' projects would be retained in the fund and earmarked for 'downtown-located' spending in the public benefit categories created through this process***. It is important that this connection be maintained in its entirety and that an efficient and transparent process be created for the deployment of these funds.

II. Mobility

Similar to the Growth & Preservation section, **we wholeheartedly endorse the Mobility section's key recommendations** (updating street typologies; connect open spaces via public-realm corridors; enhance mobility infrastructure and connectivity). We are glad to see support for the Boston Transportation Department's ongoing Downtown Crossing Street Improvements Initiative cited, on page 58, as the lead Policy Action here. Our organization is already deeply engaged in this ambitious effort – the scope of which crucially includes maintaining the Downtown Crossing Pedestrian Zone's "vibrant, inclusive" character – and we remain hopeful of possibilities to accelerate its schedule for completion.

Established in 1978, the Downtown Crossing Pedestrian Zone marked the beginning of modern-day revitalization interventions and branding efforts for what would become the BID area. (Prior to that year, the concept of "Downtown Crossing" did not even exist.) While we are receptive to the recommendation, on page 59, that the City "explore expansion of the pedestrian zone," we are compelled to note that the existing pedestrian zone has been stymied, since its inception, by a critical lack of suitable infrastructure and operational plans for enforcement. *Thus, any proposed expansion must be coupled with – or preceded by – a comprehensive and achievable plan for addressing the current pedestrian zone's complex enforcement needs*. Key to such a plan will be "a management regime across the Downtown area that stipulates when deliveries and servicing can occur," as noted on page 59.

On a final note, our district—encompassing the convergence of the Blue, Green, Orange, Silver, and Red lines, with South Station just a block away—serves as the region's mass-transit hub *and* connector. Given how our service area hosts this vital infrastructure, we support the transit initiatives outlined on page 58, especially the BTD's North Station to Seaport Multimodal Corridor plan.

III. Open Space & Public Realm

Again, **we enthusiastically support the key recommendations presented in the Open Space & Public Realm section**. In the introduction (page 36), it is validating to see such emphasis on our organization's core functions: "public programming, art, improved lighting and streetscape improvements." We are always receptive to ideas for expanding our interventions in these realms, and welcome the potential for additional partnerships—especially as inventoried on page 57 ("strengthen the Theater District as a cultural hub"; "continue to promote public art . . . encourage private partnerships with local artists and community groups"). In the spirit of these

recommendations, we expect to formalize and expand our public art program in 2024, along with a new strategy for hosting more compelling, destination-worthy festivals, cultural offerings, and holiday programs.

Turning to Challenges & Opportunities, the issues raised in the Narrow Sidewalks and Areaways encapsulations (pages 40-41) are of paramount importance. To the casual observer, sidewalks and areaways may seem trivial; they certainly aren't glamorous. However, our contention is that *resolving these chronic problems is crucial to our district's transformation beyond an office worker-dominated paradigm*. We cannot foresee how the City's nightlife, residential, tourist, and other aspirations for the BID area can be attained without substantial capital investment into these realms. In this context, we are encouraged by the depth of attention and detail given on page 41 to the areaways conundrum and look forward to continuing our ongoing engagement with the City's Interdepartmental Areaways Working Group (cited on page 41).

Reviewing the Priority Improvements (pages 44-45; page 60), we are pleased to see so many of our district's plazas and squares—public ones as well as privately-owned public spaces (POPS)—addressed: 55 Summer Street Plaza; 133 Federal Street Plaza (Milton Place); 175 Federal Street Plaza; Irish Famine Memorial Plaza (aka "Reader's Park); the Kingston-Bedford Traffic Island; and Tontine Crescent Plaza. We support the recommended actions—and urge the City to partner with the BID to audit the baseline infrastructure and amenities at these venues, to establish and implement benchmark standards to facilitate programming. Is the lighting adequate? Is the venue ADA-compliant? Is it serviced by water lines? What about the condition and quality of any greenspace?

IV. Climate Resilience & Sustainable Development

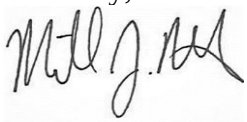
Considering PLAN: Downtown's final section, **we support the key recommendations outlined here, with one qualification noted below**. We look forward to seeing how the Downtown Crossing Street Improvements Initiative can help reduce our district's impervious surfaces and increase green surfaces and plantings (second key recommendation). As for the final key recommendation, as laudable as it is to support building performance upgrades as one element of this multipronged approach, we are apprehensive about the economic feasibility of such initiatives for our district's numerous small- and medium-sized property owners, and thus ask the City to consider subsidizing any programmatic initiatives in this realm or implementing policies that otherwise take account of the varying economic considerations at play for property owners of all sizes.

V. The Big Picture

In conclusion, we are delighted to see how many of the report's Policy Actions our organization would naturally gravitate to, given our mission. Now comes the hard part: for all our enthusiasm, we recognize that this report's successful implementation will require a unique effort, one that draws upon the resources and expertise of multitudes. That said, given how much it aligns with our mission and values—and how much of its study area is represented by our district—we relish the challenge.

In the months and years ahead, we look forward to working with the BPDA and community stakeholders—our business and property owner members, residents, nonprofits, elected officials, and all other partners—to see through on the execution of this vital undertaking.

Sincerely,



Michael J. Nichols
President
Downtown Boston Business Improvement District

cc: State Representative Aaron Michlewitz
Boston City Council President Ed Flynn
Boston City Councilor Gabriella Coletta
Rishi Shukla, Co-Founder, Downtown Boston Residents' Association

275 WS Realty, LLC
275 Washington Street
Boston, MA 02108

September 18, 2023

James Arthur Jemison II, Director
Boston Planning & Development Agency
Boston City Hall
One City Hall, Ninth Floor
Boston, Massachusetts 02201

Re: PLAN: Downtown – Effect on Development Potential of Pi Alley Parking Garage

Dear Director Jemison,

Thank you for providing an opportunity to review and comment on the Boston Planning and Development Agency's PLAN: Downtown.

I work with a family group that has owned the Pi Alley Parking Garage at 275 Washington Street in Downtown Crossing since 1986. For the past several years, we have actively considered redeveloping the property for a mixed-use tower which includes replacement public parking. Accordingly, with the assistance of our legal counsel at Goulston & Storrs, we have reviewed the Plan to identify how it might affect the property's redevelopment potential. We are concerned that the Plan's zoning recommendations would make it infeasible to redevelop the property, and accordingly ask that you consider specific changes to ensure our property's redevelopment potential.

The Pi Alley Garage is a 792-space, public-private parking garage built in 1969, located on a 32,864 square-foot lot. The garage is currently located in the B-10 zoning district, which has no maximum building height. Several years ago, we assembled a team, studied the site's redevelopment potential, and presented to the BPDA a plan for the development of a 460-foot-tall tower on the property. We were unable to conclude, however, that this project would be feasible to build due to the expense of replacing public parking, height constraints, an irregularly shaped site, and other site conditions.

Under PLAN: Downtown, our property would be located in Sub-District 2a of a new Downtown district. Unlike current zoning, Sub-District 2a would not appear to regulate Floor Area Ratio, which would provide more flexibility for redevelopment. However, Sub-District 2a is *more restrictive* than current zoning with respect to building height, providing for a base height of 125 feet and a maximum bonus height of 400 feet. We believe a redevelopment subject to this height limitation would be infeasible, even without taking into account the as-yet-undetermined payment formula to achieve the maximum bonus height.

To better accommodate the redevelopment of our property, we ask that you consider either:

- ***changing the proposed rezoning of the property from Sub-District 2a to Sub-District 1; or***

- ***lowering the threshold for Planned Development Area eligibility to ¾ of an acre (or 30,000 square feet) for development in the new Downtown District, reflecting the generally smaller parcel size in the downtown.***

Either change would expand our redevelopment options by increasing the maximum building height allowable on our property. Rezoning the property to Sub-District 1 would allow for building up to the maximum height permitted by shadow laws and FAA regulations (as you know, the BPDA estimates that this ranges from 625 to 700 feet in Sub-District 1). Similarly, lowering the threshold for PDA eligibility would enable us to pursue a PDA designation for the property, which could allow for building height that exceeds Sub-District 2a's 400-foot height limitation.

We note that there are towers located nearby at One Boston Place (601 feet tall); 28 State Street (500 feet tall); and 33 Arch Street (477 feet tall). An additional tower of comparable height on the Pi Alley Garage site would therefore be consistent with the character of the surrounding area.

Finally, we urge that zoning to implement PLAN: Downtown include a transfer of development rights provision to allow additional density on sites like ours, while protecting nearby historic buildings such as the Old Corner Bookstore.

We would welcome the opportunity to meet with you and your staff to review our property's development potential and constraints. Thank you for considering these requests.

Sincerely,

Doug Sickler

Doug Sickler
Managing Director

Cc: Matthew J. Kiefer

WHARF DISTRICT COUNCIL

September 16, 2023

Arthur Jemison
Chief of Planning BPDA

Dear Chief Jemison,

The Wharf District neighborhood appreciates the opportunity to participate in PLAN Downtown, serve on the Advisory Group and provide comments on the PLAN's final draft. We also appreciate the work of the BPDA, Advisory Group, and neighborhoods. However, there is a concern regarding the PLAN. It assigns a large portion of the Wharf District, (the area West of Broad Street) to the Downtown District.

The Wharf District Council strongly opposes a PLAN that changes the Wharf District boundaries.

It appears that the PLAN intends to enhance and enlarge the Downtown at the expense of the Wharf District neighborhood. This is done without any discussions or meetings with the Wharf District Council or the community.

We ask that the BPDA stop the proposed boundary changes from happening.

Given the existing Wharf District neighborhood's character and its historical and cultural identity, it makes no sense. The PLAN offers the justification for boundary changes that will seriously impact a neighborhood, with vague language calling the boundaries "flexible tools to bolster and promote the Downtown's character and identity". This ignores the fact that it is at the expense of another neighborhood and will impact the neighborhood, most likely with negative consequences.

If implemented this will destroy the Wharf District neighborhood as surely as the West End neighborhood was destroyed by the BRA in the late 1950's.

At the beginning of the PLAN's planning process, area maps incorrectly placed the Wharf District (WD) boundaries, allocating a large portion of the WD neighborhood to the Financial District (which is not a neighborhood). This was pointed out but never corrected. Now the PLAN has assigned it to the Downtown District.

The Wharf District with its boundaries is a recognized Boston neighborhood, represented by the Wharf District Council (WDC). The district is made up of residential and business buildings, with the RFK Greenway positioned in the middle. District boundaries are: Congress St on the West

and South; Boston Harbor on the East; and State St, portions of Quincy Market and Christopher Columbus Park to the North.

This draft for PLAN: Downtown turns the Greenway into a border and reducing the Wharf District to a strip of land between the Greenway and Boston Harbor. This is hardly a neighborhood.

Today the WD neighborhood is a thriving community with residents, businesses and nonprofits working together, to protect its historic character and buildings; support small and large local businesses and plan for a better future. This community is committed to continually improve the area and to embracing diversity, equity and inclusion. People want to live and work here; tourists and visitors love to visit.

On another topic, as the WDC has not had a conversation about zoning, we cannot endorse such proposed changes at this time. Additionally, we have questions and concerns regarding the zoning implications associated with a Growth Area and this neighborhood.

In closing I reiterate: If Wharf District loses the area to the west, it will shrink to a small strip of land on the waterfront and like the West End before it, will cease to be a neighborhood.

We asked that this plan not move forward unless the annexing of the western section of the Wharf District to the Downtown District is removed.

With Best Regards,

Susanne Lavoie

Susanne Lavoie
Executive Director

CC:
Andrew Nahmias, BPDA
Ed Flynn, President Boston City Council
Gabriela Coletta, Boston City Councilor
Brianna Miller, Chief of Community Engagement
Marc Margulies, President Wharf District Council
Matthew Murphy, Vice President Wharf District Council
Alison Frazee, Ex Director Boston Preservation Alliance
Ciara D'Amico, Community Liaison Neighborhood Services

Revolutionary Spaces
Open History. Enter Democracy.

info@revolutionaryspaces.org
TEL 617.720.1713

310 Washington Street
Boston, MA 02108

RevolutionarySpaces.org

September 18, 2023

James Arthur Jemison, Chief of Planning
Boston Planning & Development Agency
One City Hall, Ninth Floor
Boston, MA 02201

Dear Chief Jemison:

We write on behalf of Revolutionary Spaces, Inc., to express our very deep concerns regarding the draft master development plan, "PLAN: Downtown," proposed by the BPDA. We believe that the plan as currently drafted is bad for the Downtown neighborhood and bad for Boston. In particular, we urge you to reconsider those elements of the plan that would encourage significantly greater massing and height at the northernmost end of the district, where many of the city's most significant historic structures are located.

As the non-profit organization that cares for and operates the Old State House and Old South Meeting House, Revolutionary Spaces supports thoughtful development along the northern end of Washington Street. We believe that such development must be at an appropriate scale in order to protect the numerous nationally significant historic structures located in this portion of the neighborhood. Appropriately scaled development could enhance the experience at street level for those who come to the neighborhood to visit the sites and spend tourist dollars at the many businesses and restaurants that operate in Downtown.

School Street and the blocks of Washington Street between Milk and State Streets are home to four pre-Revolutionary historic structures: the Old State House, Old South Meeting House, Old Corner Bookstore, and King's Chapel. Together these represent one third of the eighteenth-century structures in the entire city, and almost one quarter of the official stops on the Freedom Trail. In addition, the same blocks contain other structures of national significance, including Old City Hall and the Ames Building. These buildings are irreplaceable assets to the city. Their presence defines the Downtown neighborhood as a distinct place, unlike any other American city's financial and commercial district. They attract millions of visitors to Boston and its Downtown neighborhood each year, are a source of pride for residents, and serve as gathering places and inspiration for the ongoing work of sustaining our democracy.

However, eighteenth-century structures are very fragile and require constant care and maintenance in order to survive. Among the most significant challenges to the preservation the Old State House and Old South Meeting House are wind and severe weather, both of which are made worse by the proximity of tall office towers. Towers have the effect of channeling the wind and concentrating its force. They also cast shadow that exacerbates the effect of moisture and ice. These impacts will certainly be further exacerbated by the effects of climate change in the coming decades.

The Old State House is already surrounded by several tall office and residential towers constructed during the past half century, and we therefore have direct experience with the destructive effects of this kind of massing on a historic structure. Of particular concern is the damage done to the historic masonry on the building's north and east facades, which are most exposed to the high winds channeled by the surrounding towers. In 2006 the northeast corner of the Old State House came close to collapse due to significant deterioration of the bricks and mortar on that part of the building; an emergency partnership between the City, the National Park Service, and the Bostonian Society delivered more than $1 million in funding needed to perform emergency repairs. However, in 2014 the east facade of the building again needed to be repointed due to damage from the wind and weather. This repair cost hundreds of thousands of dollars, and yet nine years later it is apparent that the mortar has again deteriorated and the east and north facades will need to be repointed for a third time in less than two decades.

We are concerned that the zoning proposed in the draft PLAN: Downtown will compound the mistakes already made in the 1970s and 1980s by the approval of additional massing on either side of the northernmost blocks of Washington Street. PLAN: Downtown's proposed allowance of a bonus height of 400 feet would make worse the conditions that threaten the Old State House and create similar conditions for the three other eighteenth-century buildings in the district. Tall buildings also create an unwelcoming experience for pedestrians at street level. Tourists, residents, shoppers, and office workers will not be predisposed to linger Downtown on streets and in pocket parks that are dark, windy, and inhospitable. As a result, the proposed zoning will serve to reduce rather than promote a vibrant, active streetscape in the Downtown neighborhood.

In 2019, we submitted a letter to the BPDA proposing that a character district bounded by School, Milk, Devonshire, and Tremont Streets be created to ensure that these important historic resources were adequately protected within the new Downtown plan. That proposal was not incorporated into the current draft plan, but we continue to believe strongly that it is needed. If properly protected and indeed enhanced by key public realm improvements such as those outlined in the draft plan, the precious eighteenth-century structures in this part of the Downtown neighborhood can continue to benefit our city by attracting visitors and enhancing the experience of all who live, work, tour, and shop in Boston's commercial center.

We support planning that allows evolution and history, the soul of Boston, to contribute to the future vitality of the city. Thank you for the opportunity to comment on the PLAN: Downtown draft. We look forward to working with you and the entire planning team on next steps.

Sincerely,

Nathaniel Sheidley
President & CEO

Martha McNamara
Chair of the Board of Directors

Ellen Lipsey
Vice Chair of the Board of Directors

Cc: Mayor Michelle Wu
Rep. Aaron Michlewitz
Sen. Lydia Edwards
Rep. Jay Livingstone
Councilor Ed Flynn
Councilor Gabriela Coletta
Andrew Nahmias, BPDA
Eamon Shelton, Commissioner of Property Management
John Borders IV, Director of Tourism, Sports, and Entertainment
Murray Miller, Director of Historic Preservation
Kenzie Bok, Boston Housing Authority
Kathy Kottaridis, Historic Boston Inc.
Rev. Joy Fallon, King's Chapel
Allison Frazee, Boston Preservation Alliance
Suzanne Taylor, Freedom Trail Foundation
Liz Vizza, Friends of the Public Garden

CONCERNS REGARDING PLAN DOWNTOWN

Nathaniel Sheidley, Revolutionary Spaces
September 2023

Revolutionary Spaces supports thoughtful development at the northern end of the Downtown neighborhood. Such development promises to increase foot traffic and occupancy and bring new activity and energy to a neighborhood that has been severely impacted by the pandemic.

Revolutionary Spaces is eager to partner with the City of Boston on public realm improvements in the neighborhood, as part of our plan to improve placemaking and create a lively cultural campus connecting our sites, the Old State House and Old South Meeting House.

However, Revolutionary Spaces believes that new development must be at an appropriate scale in order to protect the numerous nationally significant historic structures located in the neighborhood and enhance the experience at street level for those who come to the neighborhood to visit those sites.

School Street and the blocks of Washington Street between Milk and State Streets are home to four pre-Revolutionary historic structures: the Old State House, Old South Meeting House, the Old Corner Bookstore, and King's Chapel. This represents one-third of the eighteenth-century structures in the entire city. In addition, these blocks contain other structures of national significance, including Old City Hall and the Ames Building.

These buildings are irreplaceable assets to the city. Their presence defines the Downtown neighborhood as a distinct place, unlike any other city's financial and commercial district. They attract millions of visitors to Boston and its Downtown neighborhood each year, are a source of pride for residents, and serve as gathering places and inspiration for the ongoing work of sustaining our democracy.

However, eighteenth-century structures are very fragile and require constant care and maintenance in order to survive.

Among the most significant challenges to the preservation the Old State House and Old South Meeting House are wind and severe weather, both of which are made worse by the proximity of tall office towers. Towers have the effect of channeling the wind and concentrating its force. They also cast shadow that exacerbates the effect of moisture and ice.

The Old State House is already surrounded by several office towers constructed during the past half century, and so we been able to document the effect of this kind of massing on the structure. Of particular concern is the damage done to the historic masonry on the north and east facades of the building, which are most exposed to the high winds channeled by the surrounding towers. In 2006 the northeast corner of the Old State House came close to collapse due to the deterioration of the bricks and mortar; an emergency partnership between

the City, the National Park Service, and the Bostonian Society delivered more that $1 million in funding needed to perform the needed repairs. However, in 2014 (less than 10 years later) the east facade of the building again needed to be repointed due to damage from the wind and weather. This repair cost hundreds of thousands of dollars, and yet nine years later it is apparent that the mortar has deteriorated and the east and north facades will again need to be repointed. In the meantime, moisture is again being driven through the brickwork on the east-facing side of the building and impacting the interior galleries.

We are concerned that additional massing on either side of the northernmost blocks of Washington Street will further exacerbate the conditions that threaten the Old State House and will create similar conditions for the three other eighteenth-century buildings in the district.

In 2019, we submitted a letter to the BPDA proposing that a character district bounded by School, Milk, Devonshire, and Tremont Streets be created in order to ensure that these important resources were adequately protected within the new Downtown plan. This proposal was not incorporated into the plan, but we continue to believe it is needed.

If properly cared for and complemented by key public realm improvements, these precious historic resources can continue to serve as an engine for economic growth in the Downtown neighborhood and features that enhance the experience of all visitors to and residents in this define part of Boston.

Beatrice Nessen
112 Pinckney St. Unit 31
Boston, MA 02114
bnessen@2nessen.com

September 17, 2023

James Arthur Jemison, Chief of Planning
Boston Planning & Development Agency
One City Hall, Ninth Floor
Boston, MA 02201

RE: Draft PLAN: Downtown

Dear Chief Jemison:

Though I have been a member of the Plan: Downtown's Advisory Group since its inception, I am now writing to you as an individual who has lived in downtown Boston for decades and watched with great pleasure the city come to life with its dynamic growth over that time. I have been involved with many developments project advisory groups, and all my civic engagements have pertained to the quality of life and the character of Boston. I love Boston and its unique character and dynamism.

When the PLAN: Downtown process began, it was such a pleasure to work with the BPDA planning team's fresh outlook and, most importantly, the open dialogue discussing the Plan. We were presented with facts and data and offered the opportunity to weigh in on various concepts and options. The process was so refreshing after so many years of the BRA's hidden-hand development procedures.

Since the BPDA's post-Covid reactivation of the planning process, such dialogue and opportunities for discussion have ceased. The BPDA has presented its revisions, especially the growth areas along Washington Street, as a *fait accomplis*. There has been no presentation of why the area of the Ladder District along Washington Street is the most suitable downtown areas for growth. What other options were considered and why has the section of Washington Street from Bromfield to Court Street been selected for growth? Why no consideration of the southern end of Washington Street? Why has the Wharf District been divided? What are the planning considerations that went into these decisions?

Once again, it appears that public input has little or no role in the BPDA's current practice. I urge you to listen to residents and citizens who experience Boston's urban qualities daily and to our objections to the current draft PLAN: Downtown.

Thank you for your consideration.

Respectfully,

Beatrice Nessen

CC: Mayor Michele Wu
Sharon Durkin, City Council
Aimee Chambers, Director of Planning, BPDA
Andrew Nahmias, Senior Planner, BPDA

September 18, 2023

Dear Chief Jemison and Mr. Nahmias,

I'm a resident of 45 Province and a member of the PLAN: Downtown Advisory Group. I appreciate being able to share my thoughts and concerns regarding PLAN: Downtown.

For me, a primary objective of my interest in serving on the Advisory Group to be a part of this effort and of my being so engaged over the past five years was to help inject some rationality and predictability into the development and zoning elements of what happens in my neighborhood.

The BPDA and formerly the BRA, has had a poor reputation within the city of Boston dating back decades. This particularly pertains to process and transparency. Mayor Wu promised that would change.

She promised to rebuild trust with communities through planning-led development. She promised that communities would have a voice - a real voice - in what happens to the neighborhoods they live in. She even promised to abolish the BPDA, which even if a figurative term, suggested she would do away with an opaque process that often resulted in back-room deals for developers at the expense of other stakeholders.

I thought PLAN: Downtown would be a major proof point for all of this. I also thought we were making great progress along those lines with the creation of character preservation areas that struck a sensible balance between growth and preservation within the Downtown area. Instead, the community's experience with PLAN: Downtown has only served to open old wounds and reinforce the agency's negative reputation.

What am I talking about? Prior to the pandemic-induced suspension of the planning process, an agreeable balance between character preservation and development that offered a win-win for Downtown, its residents, developers and the city was reached. It had the broad support of the BPDA planning staff, its consultant NBBJ, Advisory Group members, and the Downtown community, Its signature feature was the identification of three character preservation areas where development height would be more limited.

This concept was upended three years later when the BPDA and its new leadership chose to single out two particular development sites within the Ladder Blocks character area for special spot-zoned treatment by creating a "Sub-District" (2A in the Draft Report) with an egregious density bonus height limit of 400 feet - twice as high as any other maximum height across all three character areas. Notably, the community is well-aware that there is already a proposal being evaluated by the BPDA at the corner of Washington and Bromfield streets at a height of 345 feet, which would significantly exceed not only the existing zoning limit of 155 feet, but the proposed height limits everywhere else in the Ladder Blocks character preservation area. We are asked to believe that the pivot in zoning is entirely coincidental relative to the height of the

project proposal. Yet Chief Jemison is quoted in a Banker & Tradesman article dated 10/27/22 (before the resumption of PLAN: Downtown) saying that this proposal has "been in a bit of a gray area" and can now "get a second look." Despite eight subsequent months of broad and passionate pushback from the community on this unwanted change, there has been no adjustment in the BPDA's position.

One of the six Goals of PLAN: Downtown as stated in the Draft Report released in August is to "Preserve cultural heritage, historic building fabric, and embrace distinct histories to create a unique and cohesive Downtown." The creation of character areas within PLAN: Downtown was an attempt to facilitate this goal. Indeed, the Draft Report states that via character areas "contextually sensitive development will be encouraged" and "historic architecture will be prioritized." Moreover, the Ladder Blocks area is described in the report as "a series of small historic blocks" known for "its range of small storefronts and rich mix of historic buildings and architectural styles." Finally, the Draft Report notes a need to balance "sensible, sustainable development with historic preservation."

Despite the considerable focus in the Draft Report on the historic character of the Ladder Blocks, the proposal for Sub-District 2A to allow for a maximum height of 400 feet shows very little sensitivity to that character. Future development at that height would in fact be greatly out of character for the neighborhood, one that is rich with national historic landmarks within or adjacent to it, including King's Chapel, Old City Hall, The Old State House, and The Old South Meeting House as well as other historically relevant structures such as the Old Corner Bookstore, the Province House steps, and the Omni Parker House hotel. Moreover, continuing to erect buildings at a scale out of proportion with the prevailing architecture in the neighborhood would pose an increasing threat to these landmarks. The rising intensity of climate change impacts such as wind, rain, snow, ice, and shadow has already accelerated the deterioration of these structures and would be exacerbated by the presence of more large buildings in the immediate vicinity. Boston serves as a caretaker of many of the country's most treasured historic resources and the people and stories behind them. It is the city's duty not only to preserve, but to protect them, and any administration that puts these at risk will have permanently tarnished its legacy.

I think it also needs to be stated that despite the heavy-handed proposed zoning change that was made by Chief Jemison back in January, he failed to give the community the courtesy of attending a single Advisory Group or public meeting to hear feedback and answer for what's being proposed until his lack of presence for eight months was criticized, after which one additional meeting was finally scheduled. That is hardly a transparent process, and it's not what the community deserves from the public officials who purport to serve us.

So, we were promised:

- A planning process that informs development: clearly this carve-out is the exact opposite.
- A process that gives the community a substantial voice and influence over what happens in its neighborhood: in this case, that persistent voice was overridden.
- The creation of character areas to aid in preserving historic character, which were then compromised by specific exceptions to allow for developments that are wholly inconsistent with the identifiable character of the neighborhood.
- A desire to create more housing in a city in desperate need of it, but instead are asked to compromise Boston's historic landmarks for even more office capacity. Even the city's own office conversion study noted that there is an 18:1 skew of office vs. residential in the part of the city in question in the PLAN: Downtown area (excluding Chinatown), and that is a huge impediment to the continued revitalization of Downtown. And developers and real estate experts across the country are confirming that few office to residential conversions make economic sense (e.g., "Inventory Shrinks in U.S. Office Market as Conversions Take Hold," Boston Business Journal, 08/30/23).

Then to top it all off, we find out just this month that the Mayor and the BPDA have been sitting on a report for eight months that they commissioned which makes pointed recommendations about a citywide zoning overhaul. Among the conclusions are:

- Neighborhood planning isn't effective, but citywide planning can be, and the city should "stop the current process of bespoke neighborhood zoning in its tracks and pivot to a new approach." Mind you, this was recommended back in January.
- Planned Development Areas, Institutional Master Plans, and spot zoning variance grants have had an immaterial benefit to Boston, especially given the benefits that accrue to those developers. "There's no data showing that the current system actually gives the community any special benefits."
- Historic character is very important - for a city and its residents:
    - "Bostonians truly value their historic fabric."
    - "Unfortunately, the current zoning code does not protect historic properties well."

Despite all of this, the BPDA pushed forward this year with no less than six neighborhood plans that were at various stages, is continuing to grant the equivalent of spot zoning exceptions, and is dismissing the voice of historic preservation experts and community enthusiasts who passionately value Boston's historic character.

None of this makes any sense.

This plan has a number of positive elements in it to be clear. And I am aware of how many hours of effort and thought within the BPDA went into what we're looking at now. I also understand that the city feels a lot of pressure to build back Downtown. However, if you look around, Downtown Boston seems to be adapting and recovering quite well. There are traffic jams, long lines at Sweetgreen, and even the BID tweeted recently that the level of pedestrian activity in Downtown reached the highest levels since the pandemic began over three years ago. All of this has happened without any development on either of the sites accommodated by the spot zoning carveout. An additional couple hundred feet of extra office space is not going to materially change the dynamic of Downtown Boston or the broader city's economics. But it will be disruptive to the quaint and historic character of the Ladder Blocks in a death by a thousand cuts manner that we won't be able to correct once that mistake is made.

I think it's safe to say that when it comes to process and transparency at the BPDA, it still seems to be business as usual. In a Boston Globe article dated 9/13/23 regarding a new effort by the administration to rezone all of Boston, Chief Jemison indicated that the administration would seriously consider the report's design recommendations, including those that "protect the ability for neighborhoods to maintain their unique character." Yet given the immediate opportunity with PLAN: Downtown, the BPDA under his leadership doesn't seem to be giving any consideration to neighborhood character or the other recommendations noted above.

I feel strongly, as do others, that the idea of economically rewarding development and character preservation can co-exist and provide an optimal net benefit for the city. That's what many of us were trying to achieve with PLAN: Downtown. This can be successfully accomplished by changing the proposed maximum zoning within the entire Ladder Blocks to be more consistent with the preponderance of structures that exist in the neighborhood. I would identify that as being no greater than 155 feet in height. Over the past decade, projects have been completed or are in the proposal stage at around that 155-foot height level within or just adjacent to the Ladder Blocks (Millennium Place, the Godfrey Hotel, 7-9 Hamilton Place, 17-23 West Street). All have been economically rewarding for their developers while comfortably assimilating themselves into the neighborhood. We can still achieve that. The BPDA, under Chief Jemison's leadership, has the opportunity to right the ship and gain back some credibility that this agency and this administration has squandered. My hope is that Chief Jemison and the Wu administration give thoughtful consideration to making the changes to PLAN: Downtown requested here so that it works for all stakeholders in an equitable manner. The neighborhood, the community, and the city will be better for it.

Respectfully,

Tony Ursillo
45 Province Street, #2402