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