



West End Civic Association



NORTH END / WATERFRONT RESIDENTS ASSOCIATION

June 23, 2022

James Arthur Jemison II, Chief of Planning/Director
Boston Planning and Development Agency
One City Hall, Ninth Floor
Boston, MA 02201

Subject: 251 Causeway Street Redevelopment Proposal

Dear Mr. Jemison:

First, the West End Civic Association (WECA) and the North End/Waterfront Residents' Association (NEWRA) congratulate you on being appointed to the positions of Chief of Planning and Director of the Boston Planning and Development Agency (BPDA). We look forward to your affirming Mayor Wu's commitment for structural changes that will elevate city planning, reform the City's development process, and bring more public transparency and involvement to the City's growth and future. It is in this spirit that we write to you at this time.

WECA and NEWRA recently became aware of an owner/developer's proposal to redevelop 251 Causeway Street and adjacent properties along North Washington Street within the Bulfinch Triangle section of the West End. We are writing to you to request early public notice of and transparency in any City or BPDA conversations or other interactions with the developer, and we seek information you may now have about the redevelopment proposal. We understand from certain stakeholders who were recently approached by commercial real estate management company RMR Group that there is a redevelopment proposal involving the construction of a multi-use tower that could replace existing renovated 100-year-old buildings at 251 Causeway Street, 126-132 North Washington Street, and 100 North Washington Street with a building rising to as high as 700 feet. We are unaware of any planning by the City that has evaluated, let alone recommended, such height and density. Based on past planning, the Zoning Code for the Bulfinch Triangle District limits height to 100 feet and floor area ratio (FAR) to 7.0, even then only when a project complies with Large Project Review and receives Compliance Certification.

251 Causeway Street, 126-132 North Washington Street, and 100 North Washington Street currently fit into an architectural and historical framework related to the manufacturing history of the immediate district. The sites are located at the edges of two historic residential neighborhoods in a sensitive area that includes many residential properties, a public school, public waterfront parks and other waterfront resources, a proposed bridge/park now under construction, and the Freedom Trail. The sites abut one of the most heavily travelled and most problematic street intersections in Downtown Boston.

NEWRA and WECA request information you and your Planning and BPDA staff can provide about this redevelopment proposal, and we welcome communication with you regarding Mayor Wu's approach to the evaluation of development proposals that exceed the restrictions in the Zoning Code. Prior to commencing any Article 80 review of a project that would greatly increase density within the already overburdened Bulfinch Triangle District, the City should conduct a detailed analysis, with public participation, to determine that existing zoning should stand or that updated district planning is warranted. If the latter, no Article 80 project review should commence until planning is complete.

Sincerely,



Susann Benoit, Chair
Zoning and Planning Committee
WECA



Victor Brogna, Chair
Zoning, Licensing and Construction Committee
NEWRA

cc: Senator Lydia Edwards
Senator Sal N. DiDomenico
Representative Aaron M. Michelwitz
Representative Jay D. Livingstone
City Councilor Gabriella Coletta
City Councilor Kenzie Bok
City Councilor Ed Flynn
Ciara D'Amico, Mayor's Office of Neighborhood Services
Cheryl Delgreco, President, NEWRA
Joseph A. McDonald, President, WECA
Joel Faller, President, North End/Waterfront Neighborhood Council



August 17, 2022

Re: 251 Causeway Street Redevelopment Proposal

Dear West End Civic Association and North End Waterfront Residents Association,

Thank you for your letter concerning the potential for development at 251 Causeway Street.

BPDA staff have had an initial introductory meeting with representatives from the RMR Group, who control the site, but the full scope of the proposal is yet to be understood. As of writing this letter, the development team has not filed a proposal with the BPDA.

As stated in your letter, the current zoning allows a max of 100 vertical feet and a floor-area ratio of 7. Article 80 of the Boston Zoning Code legally allows proponents of projects that exceed zoning compliance to file projects with the BPDA, and they are required to be reviewed via the Article 80 process.

If the RMR Group decides to submit a Letter of Intent, the BPDA will officially begin the Article 80 process by setting up an Impact Advisory Group (IAG), made up of local residents, business owners and other stakeholders. IAG members can be nominated by elected officials, other residents, or be self-nominated. We strongly encourage members of your organizations to nominate members to the IAG if the development team moves forward.

After the IAG is established, the development team is required to submit a Project Notification Form (PNF), which will outline the full scope of the project. Once the PNF is filed, the BPDA will open the proposal to a public comment period and set up a series of public meetings. During this period, the community and BPDA staff will examine the impacts of the project on the surrounding community and aspects of the project, like height, floor-area ratio, and zoning compliance will be analyzed in-depth.

Mayor Wu's administration, including the BPDA, strongly believes in planning-led development and community involvement during development review processes. If the RMR Group decides to move forward in filing their project, we are looking forward to an open and transparent community process, and undoubtedly will look to your organizations for guidance and feedback on the proposal.

Sincerely,

A handwritten signature in blue ink, appearing to read "Arthur Jemison", written over a horizontal line.

Arthur Jemison, Chief of Planning and Director of the BPDA



West End Civic Association



NORTH END / WATERFRONT RESIDENTS ASSOCIATION

September 7, 2022

By email: james.jemison@boston.gov, varisamar.cortez@boston.gov, jeffery.thomas@boston.gov

James Arthur Jemison II, Chief of Planning/Director
Boston Planning and Development Agency
One City Hall, Ninth Floor
Boston, MA 02201

Subject: 251 Causeway Street Redevelopment Proposal

Dear Chief Jemison:

We appreciate receiving your August 17, 2022 reply to our June 23 letter concerning the proposal for a 700-foot high redevelopment at 251 Causeway Street and adjacent North Washington Street parcels in the West End. However, your reply is disappointing and discouraging to us, and it does not respond to the two requests in our letter.

(1) We requested information from the BPDA regarding RMR's project proposal. This request was based on our assumption that BPDA staff had already met with the developer, an assumption confirmed by you and an August 5 Boston Globe article. Your reply that "no plans have been filed yet," continues to leave us with no information about the project or the discussions the BPDA has had with the developer. We are concerned at the apparent lack of public transparency in the BPDA's development discussions.

(2) We requested that project review under Article 80 not commence until the City conducts and completes a planning process with public involvement for the Bulfinch District. A purpose of the planning process would be to consider possible changes to the Zoning Code to establish updated, public supported guidelines for new development and for the future protection and sustainability of the district. We believe it is dangerous to continue to rezone the city with the narrow focus of Article 80 reviews, project by project and parcel by parcel. Your reply to this request indicates a BPDA "business-as-usual" attitude where you state that Article 80 may commence at the developer's discretion, without any preceding planning or other community outreach by the City.

Our requests were based on Mayor Wu's commitment to bring planning and community involvement ahead of project review. This can and should be accomplished now by the BPDA under your leadership. We understand that Mayor Wu believes that to fully realize this change for the future of Boston, the City's planning function should be separated from the redevelopment process and the redevelopment process should be reformed.

We emphasize here, as we did in our June 23 letter, that the BPDA not conduct an Article 80 process for this project until the City completes a new planning process for the subject area, involving the West End and North End/Waterfront communities and other stakeholders.

On behalf of these communities, we respectfully request receiving a responsive reply to the requests in our June 23 letter.

Sincerely,



Susann Benoit, Chair
Zoning and Planning Committee
WECA



Victor Brogna, Chair
Zoning, Licensing and Construction Committee
NEWRA

cc: Mayor Michelle Wu
Senator Lydia Edwards
Senator Sal N. DiDomenico
Representative Aaron M. Michlewitz
Representative Jay D. Livingstone
Diana Fernandez Bibeau, Deputy Chief of Urban Design
Brianna Millor, Chief of Community Engagement
City Councilor Gabriela Coletta
City Councilor Kenzie Bok
City Councilor Ed Flynn
Cheryl Delgreco, President, NEWRA
Joseph A. McDonald, President, WECA
Joel Faller, President, North End/Waterfront Neighborhood Council