



March 6, 2023

To: City of Boston City Council

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Boston City Hall
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Subject: **ADCO urges a more open, equitable reform path for the BRA, with clearly identified community benefits and goals, more community representation, and predictable/committed sunset of urban renewal powers**

Dear Members of the Boston City Council:

ADCO encourages meaningful BRA/BPDA reform, including movement away from the closed, semi-private structure of the current BRA. However, we are quite concerned about the present course of action the administration is taking on BRA/BPDA reform. In ADCO's view, the Wu/Jemison reform plan has not yet been adequately fleshed-out, and it misses neighborhood/resident expectations in three areas especially:

- 1- The steering committee should more adequately represent neighborhoods and residents
- 2- The BRA/BPDA urban renewal powers need to be eliminated, not repurposed
- 3- Organizational changes should follow, not precede reforms in process and purpose

ADCO is an all-volunteer organization representing downtown Boston residents (20% of Boston's population) and advocating on behalf of the nine largest resident associations of downtown Boston: the Bay Village Neighborhood Association, the Beacon Hill Civic Association, the Boston Chinatown Residents' Association, the Downtown Boston Residents' Association, the Fenway Civic Association, the Neighborhood Association of the Back Bay, the North End/Waterfront Residents' Association, the South End Forum and the West End Civic Association.



The administration and the BRA/BPDA have been surprisingly closed and private about their reform plans. The recently-announced “Steering Committee to Advise on Reforms,” anticipated with much hope by most community organizations, has deeply disappointed with its closed meetings and developer-dominated make-up. **This is far from the transparency that ADCO expected and that our residents deserve.**

Most BRA/BPDA-driven development has historically been centered in Boston’s downtown neighborhoods. It is hard to imagine, therefore, why a reform-focused steering committee would contain **no downtown neighborhood representation** and only one neighborhood association representative overall (out of nine). Such a glaring omission seems misguided on several levels. First, this once again signals that Boston’s neighborhoods are subordinate to the desires of the development community in the City’s eyes. Second, it **places no value on the deep expertise which exists in many Boston neighborhoods** on BRA/BPDA performance, and what has gone wrong historically.

Just as worrisome to neighborhoods is the apparent “re-animation” of the very land-taking powers which sullied the BRA’s reputation years ago. Per BRA/BPDA testimony at the March 3 City Council working session, the “new” BPDA expects to morph the current Urban Renewal powers into a **new set of equally draconian UR-like powers which could now be triggered by subjective criteria** like resiliency, affordability, and equity (per Devin Quirk’s testimony), rather than a more clearcut legal observation of blight. In ADCO’s view, this makes **total elimination of these UR powers more important than ever**. ADCO believes that the City will continue to have sufficient legal power to protect affordable housing without holding on to these outdated, extreme powers.

ADCO is also troubled by the announced sequencing of the proposed BRA/BPDA reforms. To kick off BRA/BPDA reforms by administratively merging EDIC into the core BRA seems like an unneeded walk into a human resources hornets’ nest. We struggle to understand both the rationale and the timing of this proposed change. **Shouldn’t complex organizational change steps be left until later, after more process and role clarity emerges?** Shouldn’t the first focus be on benefits, like how Boston will achieve predictable zoning, or enable earlier neighborhood info sharing on large development projects, or create linkage improvements that can help fund a working subway for a city of 800,000?

Finally, the administration has indicated that it would prefer to have hand-picked consultants privately determine policy on Article 80 and community interaction reform, in consultation with their closed committee. **ADCO does not favor such a consultant-driven approach.** We’re convinced we’ll just get a repeat of the expensive McKinsey and KPMG reports from the early part of the Walsh administration. You may recall that both, while nicely written, ended up being expensive – and forgotten.

For all these reasons, ADCO urges the City Council to **reject the Home Rule Petition until more clarity and substance is provided on the plan by the Administration.** We ask that the City Council demand more explanation about reform goals and community benefits from the administration. ADCO also asks that the City Council, as the legislative and oversight body of City Government, take positive steps



to open up and energize a more public BRA/BPDA change process. **A series of City Council-sponsored public hearings on BRA/BPDA reform would be a much fairer and more resident-friendly route forward**, in our opinion. Hearings could focus on the different needed elements of reform, from Article 80/development process retooling, to enhancement and focus on early community input, to increased transparency and standards, to elimination of "cheats" like PDA spot-zoning. They could also examine more critically which (if any) old-style urban renewal powers like land-taking are really needed moving forward.

Last summer, ADCO started a working group to study options on development process and BRA reform. Our working group involved community leaders from across the City, all very knowledgeable in Article 80, PDAs, IAGs and the other half-working mechanisms the City and BRA/BPDA currently use. We have drafted a preliminary set of priority issues for the City's attention. **We would be privileged to share with the City Council what we have learned**, at your convenience. We look forward to an invitation to meet with you and to be heard/included on these matters.

Thank you.

Sincerely,

Ford Cavallari
Chair, Alliance of Downtown Civic Organizations

cc: Mayor Michelle Wu
Planning Chief Arthur Jemison
Deputy Chief Devin Quirk
Rep. Aaron Michlewitz
Rep. Jay Livingstone
Rep. Chynah Tyler
Rep. Jon Santiago
Senator Lydia Edwards
Senator Liz Miranda
Senator Will Brownsberger
Senator Nick Collins