



July 15, 2019

The Honorable Martin J. Walsh, Mayor of Boston
The Honorable Andrea Campbell, Boston City Council President
Boston City Hall
Boston, MA 02201

Re: City Ordinance Chapter 2-15.1, *An Ordinance Amending Chapter 2 of the City of Boston Code, Ordinances, Regarding Lobbyist Registration and Regulation*

Dear Mayor Walsh and Council President Campbell:

We represent a diverse coalition of member associations, non-profits, and businesses that work within the City of Boston who have joined together to express our concerns with the recently implemented Boston Lobbying Ordinance, signed into law in October of 2018. We believe several provisions of the Ordinance go far beyond the state and federal lobbying requirements, and are likely to result in unintended consequences and significant uncertainty for residents and businesses in Boston.

We understand the importance of transparency to the City of Boston and believe that accountability is of paramount importance to the work we do with the City.

However, this Ordinance has several sections that call into question its scope and efficacy. We are concerned that if these sections are not modified, hundreds of individuals will face registration and reporting burdens for activities that are not traditionally considered lobbying as they go about their normal course of business. Furthermore, we are concerned that the Ordinance as written could chill civic engagement.

Attached for your review is a legal analysis of the Ordinance, prepared by the law firm Foley Hoag, which highlights our key concerns, provides examples of how certain sections could create barriers and burdens to participation in government, and proposes new language for amendments that we believe would provide guidance, clarity, and consistency for Boston's businesses and residents. Please accept this letter and the attached written memorandum as a petition for action by the City to amend the Ordinance in the manner outlined. We understand that pursuant to the City's established procedures and consistent with state law, these documents are required to be a matter of public record.

Our broad coalition is committed to working on this important issue, as we recognize it is in everyone's best interest to implement a clear ordinance.

We appreciate the opportunity to provide you with our comments and look forward to working together on this important issue.

Respectfully,

 <p>MNN Massachusetts Nonprofit Network</p> <p>Jim Klocke, CEO Massachusetts Nonprofit Network</p>	 <p>James E. Rooney <i>James E. Rooney</i> President & Chief Executive Officer Greater Boston Chamber of Commerce</p>
 <p>NAIOP COMMERCIAL REAL ESTATE DEVELOPMENT ASSOCIATION MASSACHUSETTS</p> <p>Tamara Small, CEO NAIOP Massachusetts, The Commercial Real Estate Development Association</p>	  <p>David C. Bryant, Director of Advocacy Massachusetts Association of Community Development Corporations</p>
  <p>Greg Vasil, President Greater Boston Real Estate Board</p>	  <p>Eric White, Executive Director Boston Society of Architects</p>
  <p>Abbie R. Goodman, ACEC/MA Executive Director American Council of Engineering Companies of Massachusetts (ACEC/MA)</p>	  <p>John R. Regan President & CEO Associated Industries of Massachusetts</p>
  <p>Ricardo Austrich President Boston Society of Landscape Architects</p>	  <p>Robert Petrucelli President and CEO Associated General Contractors of Massachusetts</p>
  <p>Greg Beeman President and CEO Associated Builders and Contractors</p>	  <p>Pam Kocher President Boston Municipal Research Bureau</p>

 <p>Rachel Heller Chief Executive Officer Citizens' Housing and Planning Association</p> 	 <p>Michael McDonagh CEO Associated Subcontractors of Massachusetts</p> 
 <p>John Nunnari Executive Director AIA MA MA Chapter of American Institute of Architects</p> 	 <p>Meg Mainzer-Cohen President and Executive Director Back Bay Association</p> 

CC:

- City Councilor Annessa Essaibi George, At-Large
- City Councilor Michael Flaherty, At-Large
- City Councilor Althea Garrison, At-Large
- City Councilor Michelle Wu, At-Large
- City Councilor Lydia Edwards, District 1
- City Councilor Ed Flynn, District 2
- City Councilor Frank Baker, District 3
- City Councilor Timothy McCarthy, District 5
- City Councilor Matt O'Malley, District 6
- City Councilor Kim Janey, District 7
- City Councilor Josh Zakim, District 8
- City Councilor Mark Ciommo, District 9
- Maureen Feeney, City Clerk for the City of Boston
- Sammy Nabulsi, Chair, Municipal Lobbying Compliance Commission
- Vivien Li, Commissioner, Municipal Lobbying Compliance Commission
- Stephanie Everett, Commissioner, Municipal Lobbying Compliance Commission