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15 State Street, Suite 1100  
Boston, MA 02109  
617.223.8671  
[bostonharbornow.org](http://bostonharbornow.org)

March 29, 2018

Secretary Matthew A. Beaton  
Executive Office of Energy and Environmental Affairs (EEA)  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Re: Downtown Waterfront District Municipal Harbor Plan Supplemental Information

Dear Secretary Beaton,

On January 15 of this year, before the City of Boston filed supplemental information in March of 2018, Boston Harbor Now offered comments to the Secretary for the Downtown Waterfront District Municipal Harbor Plan (MHP). In our letter, Boston Harbor Now called for a version of the Downtown Waterfront District MHP that includes specific and immutable minimum standards.

We want to commend the State for doing more to ensure that the New England Aquarium will not be financially or irrevocably harmed by the development of the Harbor Garage site and for embracing the Blueway vision.

Over the past five years, our organization (and its predecessor organizations) actively participated in the Downtown Waterfront MHP's Advisory Committee. We believe strongly in the benefits a Municipal Harbor Plan can create for a community beyond the parcel-by-parcel Chapter 91 requirements. This notion also resonates with members of the public, who continue to display nearly universal support for a Downtown Waterfront District MHP that is comprehensive, cohesive, and transformative.

We are at a crossroads. For Boston Harbor Now to wholeheartedly support a final State-approved MHP, the following four conditions must be met:

1. A firm commitment from the BPDA to the design and construction of an all-weather, passenger-friendly water transportation hub, and improved public open space on Long Wharf and the BPDA-owned Chart House parking lot.
2. A clear analysis of a Chapter 91-compliant project versus the current Hook Wharf proposal that justifies the need to build Facilities of Private Tenancy over flowed tidelands—a proposal unprecedented in Boston Harbor. A public land trade-off of this magnitude is worthy of a comprehensive discussion to ensure the public is fully aware of its implication and receives sufficient mitigation in return.
3. A commitment to the development of a) the Downtown Climate Ready Boston Plan that identifies resiliency strategies for the district and b) Design and Use guidelines that

incorporates the resiliency strategies and provides clear guidelines for the public realm. This requires absolute clarity about the scope of the proposed Design and Use Standards, the extent to which these standards will incorporate the (future) Climate Ready Boston Downtown Plan, and a clearly-defined funding mechanism to both design and implement strategies that address both the public realm and the resiliency needs for the Downtown Waterfront.

4. An adequately funded and fully accessible connection between the existing Harborwalk and around the Hook site to create a more connected pedestrian experience that integrates with the future design of the Northern Avenue Bridge.

The MHP process should be more focused on developing a comprehensive plan and less on finalizing agreements among individual property owners. To be truly transformative, the plan should be independent of and bigger than any individual project proposed within the jurisdictional boundary of the MHP. A five-year long planning process suggests it may be time consider improvements that make better use of the Citizen Advisory Committee and delivers a comprehensive plan within a reasonable timeframe.

Finally, this MHP process confirms the long overdue need to develop a more comprehensive Chapter 91 public benefits formula to address whether benefits resulting from a Municipal Harbor Plan are commensurate with the scale of the projects being considered and the substitute provisions being offered. We do not believe this MHP adequately balances public benefits with private gains, which is a central principle that underlines the Chapter 91/MHP process.

The Downtown Waterfront District is widely recognized as Boston's gateway to the harbor. Rich in history and natural beauty, it is a central focal point for visitors and residents. This MHP must do more to emphasize the significance of this stretch of waterfront and the public's physical and visual access from the harbor into the city. Boston Harbor Now can be a resource for both the City and the State in finalizing an MHP that creates an accessible waterfront, enhances water transportation within the Harbor, and realizes a transformative climate resilient public and private realm for the most visited and visible section of the waterfront.

As the only non-governmental organization solely dedicated to realizing the economic, social, and environmental potential of Boston Harbor, Boston Harbor Now remains committed to a final Downtown Waterfront MHP that necessarily creates a vibrant, dynamic, detailed blueprint that makes the most of Boston's downtown gateway. Again, we respectfully ask that the State approve a final MHP only if it includes the conditions delineated above.

Sincerely,

Katherine F. Abbott  
President and CEO