



Are you on board?

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*Via email to: [Alexander.Stryisky@state.ma.us](mailto:Alexander.Stryisky@state.ma.us)  
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Secretary Matthew A. Beaton  
Executive Office of Energy and Environmental Affairs  
Attention: Alex Stryisky, MEPA  
100 Cambridge Street, Ste 900 (9<sup>th</sup> Floor)  
Boston, MA 02114

Brian Golden  
Boston Planning and Development Agency  
Attention: Gary Uter, BPDA  
One City Hall Square  
Boston, MA 02201

Re: Seaport Square Notice of Project Change

Dear Secretary Beaton and Director Golden,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Notice of Project Change (NPC) for the Seaport Square project. Boston Harbor Now has commented extensively on the original project, the Planned Development Area Plan, the Draft Environmental Impact Report, and the Final Environmental Impact Report. Our comments relate to three main topics:

- Impact on Boston's working port
- Open Space and Harborwalk Connections

- Climate preparedness

As we have done previously for Block A, B, H, and M, Boston Harbor Now plans to participate during the Chapter 91 licensing process for parcels within its jurisdictional limits. We support and agree with others' concerns about potential loss of destination open space and cultural space in the Harbor Square development (Buildings L3-L6). Since these buildings lie outside Chapter 91 jurisdiction, however, we defer to others in their detailed descriptions of potential improvements. Block G is the last remaining undeveloped block and sits on landlocked tidelands as defined by Chapter 91. We look forward to contributing more detailed comments for the Block G proposal.

### **Project Description**

Seaport Square is the largest project proposed near the Boston Harbor waterfront. As presented in the NPC, the project covers twenty-three acres and spans twenty city blocks. The NPC covers thirteen of the total acres and includes nine individual buildings.

### **Open Space and Harborwalk Connection**

Nearly seven acres or 30% of the project site is proposed for pedestrian-only access. Harbor Way and Harbor Square replaced the 2010 proposed vehicular bridge connection to Seaport Hill Green. We think the idea of providing pedestrian connectivity from Summer Street down to the waterfront, eventually combining with the Harborwalk to complete a recreational loop is terrific. Please note that completing the Harbor Loop requires collaboration between the proponent and the Fallon Company. We understand that such conversations are ongoing and we hope to see this agreement soon.

Seaport Common is one of seven public spaces proposed for the Project area. It is situated next to District Hall and across the street from Fan Pier Green. As presented in the NPC, throughout the summer and fall popular programming activities and events at the Common include fitness classes, a speaker series, performances by the Boston Symphony Orchestra and the Seaport Holiday Tree lighting. The location of the Common offers a view of the Harbor that has become increasingly rare in the Seaport District.

We have a dilemma. District Hall as a public innovation center has been a resounding success. We hope that collaborative spaces like it will continue to pop up throughout Boston. This parcel was intended to be permanent open space, which is a resource that the Seaport sorely lacks. The parcel is an ideal opportunity to expand the Seaport Common green. We encourage the final plan to preserve both District Hall and the open space acreage originally promised for this site. This would increase views of the Harbor and Fan Pier Marina as well as create the opportunity for a more active recreational park.

## **Transportation**

We strongly support Mayor Walsh's commitment to a carbon-neutral Boston by 2050. This is an ambitious goal that requires significant collaborations between the public sector and private development. Seaport Square will add significant new residents and workers to an already overburdened transportation situation in the neighborhood. We appreciate the thoughtfulness of the project proponents' transportation plan, as laid out in Section 3 and Appendix A:

- Enhancements to the pedestrian environment adjacent to its buildings
- Provision of long-term secure bicycle parking for residents
- Providing 2,235 secure bicycle parking/storage spaces within the project site
- Increasing the number of Hubway stations within the project site (Note there is a discrepancy in the number of stations. Figure 3-7 shows six existing stations while Figure 3-21 shows eight existing stations)
- Construction of buffered bike lanes
- Construction of a new Silver Line entrance to the Courthouse Station
- Additional electric vehicle charging stations to accommodate 5% of all parking
- Encourage ridesharing programs within the Project Site
- Eliminating 1,000 of the parking spaces proposed under the 2010 Project

In addition to these welcome initiatives, the project should promote connections between land transit and water transportation through signage and placement of Hubway Stations and bicycle parking. With its proximity to the Fan Pier Marina and Seaport World Trade Center, Seaport Square residents and workers will be able to take existing water taxis and a coming-soon ferry to North Station.

## **Truck Access**

Trucks are the lifelines of Boston's working port that creates over 7,000 blue-collar jobs and contributes \$4.6 billion to the regional economy. There are more than 6,000 daily trips in and out of South Boston generated by a diverse mix of maritime and industrial businesses. It is essential that, before DEP signs off on this project, project proponents work with the Massport maritime department to ensure that the transportation design does not limit truck access to Conley Terminal, Marine Park, and other working port businesses.

There are three critical components to the Seaport's truck access network. As presented during the March 13, 2017 IAG meeting, part of the mitigation contributions from the Seaport Square project will fund the *design* of one or more components of a bypass route to connect the Marine Industrial Park to Summer Street. Massport and interested working port businesses should be included in the design of these components, with funding for its construction identified and secured.

Second, interagency efforts are underway to extend and improve Cypher Street and E Street as industrial complete-streets, which also serve as important truck routes. This link provides the most direct I-93 Southbound connection and, again, is part of the larger access network.

The final critical component of the Seaport's truck access network is the Seaport Boulevard connection that currently provides the most direct and primary truck access to and from I-93 North. Page 1-8 of the project narrative acknowledges that Seaport Boulevard is a critical corridor for vehicular travel both by passenger and commercial vehicles. The same section also speaks about transforming this corridor into a 21st-century boulevard that promotes pedestrian and bicycle traffic over motor vehicles. We see these as two potentially conflicting values.

For example, Figure 1-6 of the NPC proposes improvements that include public art installations along the Seaport Boulevard median. This rendering, in particular, suggests a narrowing of the street and expansion of the median to accommodate public art installations. Although Conley Terminal is often seen as the major contributor to truck traffic, other commercial businesses in the Marine Park, Fish Pier and elsewhere depend on efficient truck access to and from major roads and highways. Such road access is also essential to serve millions of annual visitors to Cruiseport Boston and the Massachusetts Convention Center as well as tens of thousands of Seaport commuters and residents. We sincerely hope that Seaport Boulevard can be converted to an industrial complete street without making current traffic congestion worse.

### **Climate Change Preparedness**

We note that the project proponents have a good track record of thoughtful climate resilient design, and that their discussion of climate preparedness is thoughtful and appropriately conservative. We appreciate their use of Climate Ready Boston projections even in the absence of updated regulations. We support their use of four feet of sea level rise in their flood preparedness calculations for the end of their building life cycle.

As described in the NPC, the proponents will:

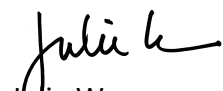
- Include graywater systems, water retention, and permeable materials,
- Move essential mechanical equipment and residential uses above predicted flood levels,
- Employ movable or permanent flood barriers to prevent water from entering parking garages, ground floors, and low lying portions of the site,
- Where possible, raise lobbies and public spaces above predicted flood levels,
- Where possible increase pervious materials,
- Design higher ceiling heights on ground floors,
- Install watertight conduits,

- Enhance building resilience through back-up outlet circuits, high performance buildings, and cool rooms,
- Locate backup generators above the potential flood elevation, and
- Incorporate salt tolerant plant materials in flood prone open spaces.

The strategies proponents anticipate using are thoughtful and at the leading edge of what projects are doing in Boston. Given the significant risk of flooding in the Seaport, we would encourage proponents to consider an initial or at least adaptive design that significantly elevates the landscaping and entryway levels above the current grade as Clippership Wharf and General Electric are planning to do, rather than relying on temporary flood barriers.

Finally, we note that existing buildings within the NPC project site that were permitted prior to the release of Climate Ready Boston are less prepared for coastal flooding than new buildings. As Seaport Square will therefore likely be more flood resilient than its older neighbors, we encourage project proponents to add to their climate preparedness design an elevated community space that could be used as a temporary public storm shelter in case of extreme flooding.

Sincerely,



Julie Wormser

VP Policy and Planning



Jill Valdes Horwood

Director of Waterfront Policy