



Are you on board?

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January 30, 2019

Via email: jerome.grafe@massmail.state.ma.us

Jerome Grafe
MassDEP Waterways Regulation Program
One Winter Street, 5th Floor
Boston, MA 02108

Re: Draw Seven Pathway Extension Waterways License Application

Dear Mr. Grafe,

Thank you for the opportunity to comment on the Waterways License Application for the Draw Seven Pathway Extension. In 2016 and 2017, respectively, Boston Harbor Now submitted comments for the Environmental Notification Form and the Chapter 91 license of the broader MBTA Charlestown Bus Facility Shoreline Stabilization and Yard Improvement Project. At the time, we strongly supported the creation of a pedestrian/bike pathway and we are encouraged by the proposed Draw Seven Pathway Extension project.

We applaud the Department of Conservation and Recreation (DCR) for moving this important project forward. We strongly support their efforts and the creation Draw Seven Park pathway extension in coordination with the broader MBTA shoreline stabilization project now underway.

Project Description

As presented in the Waterways License Application, the proposal is for an approximately 1,900-foot extension of the Draw Seven Park Pathway. The path begins at Alford Street/Route 99 in Boston and extends northwest along to Mystic River to the Draw Seven Park in Somerville. The extension will create a new, paved, 10-foot wide multi-use ADA-compliant path.

The project site has been identified in the Mystic River master plan as a critical link in an integrated network of pedestrian/bike paths. As envisioned in the Mystic River Greenway Master Plan (2009), the path will offer a new pedestrian and bicycle connection to locations north and south along the Mystic River. When completed, it will also improve access to Assembly Square T Station, Assembly Row, and Draw Seven Park in Somerville.

Although the property is owned by the Massachusetts Bay Transportation Authority (MBTA), DCR has been granted a 14-foot easement for the construction and maintenance of the pathway.

Public Amenities and Management Plans

We commend DCR for incorporating amenities like the two bicycle racks, benches, and some interpretive signage. As advocates for increased public access and activation at the water's edge, Boston Harbor Now and the Friends of the Boston Harborwalk would be glad to take part in the amenities discussion to ensure the pathway provides the access and amenities the public has come to expect of waterfront walkways.

Section 9.35(5) of the Waterways Regulations states that projects that are accessible to the public must provide for long-term management of public areas to achieve effective public use and enjoyment. Boston Harbor Now, as the organization that partners with the City of Boston to respond to all BOS:311 Harborwalk-related issues, understands the need for detailed management plans.

We are pleased to learn that DCR will be responsible for the long-term management of the site to encourage public use and enjoyment of the proposed path. Part of the conditions in the final Chapter 91 license should include maintenance of items like signage, benches, plantings, trash removal, and landscape. The final path should include adequate signage at prominent locations and all entryways that advise the public of its access rights, hours of operation, rules, and regulations. We note that public accessibility means no limits on hours of use or other substantial restrictions.

A complete management plan for the pathway should be circulated for review and feedback from all commenting parties and affected stakeholders.

Pathway Design

During a project site visit, Boston Harbor Now staff noticed some sharp edges and tight corners along the existing path. The proposal mentions--but does not include renderings of--sections of the path that, due to space constraints, will require a more thoughtful design approach. Particular care should be given to the design of the pathway at these transition points for bicyclist and pedestrian safety. While we understand the spatial limitations of the path, if it is intended to be both a pedestrian and bike path it should be at least 12 feet wide and thoughtfully designed to minimize pedestrians-cyclist conflicts.

The benefits of the proposed path can be further amplified by connecting the path to the existing Boston Harborwalk network that currently culminates at Ryan Playground. We strongly recommend coordinating with any local roadway redesign to create a pedestrian-friendly connecting across Alford Street to Ryan Playground. This will serve to enhance the regional network of waterfront pedestrian/bike pathways that ensure our waterfront is more publicly accessible, more frequented, and welcoming to everyone.

Public Access & Resiliency

In 2016, the City of Boston released the Climate Ready Boston report which estimated 4-8 inches of sea level rise is likely by 2030 and up to 1.5 feet by 2050. As of 2017, the Boston Planning and Development Agency is using a reference rate of 40 inches of sea level rise by 2070.

Most recently, the City of Boston revealed its Resilient Boston Harbor vision—a vision to increase both public access and resiliency—as a critical component of the waterfront’s climate change adaptation strategy. The proposed multi-use pathway project has the potential to be an example of resilient design that combines meaningful public access and shoreline protection from coastal flooding.

Section 3.1 of the Waterways Application indicates an elevation range of 13.25 to 8.2 feet NAVD 88. The lower range of the elevation is below FEMA’s 100-year floodplain. As currently proposed, there will be times the path is flooded an inaccessible to the public.

We support DCR’s efforts to incorporate long-term resiliency measures like porous pavement, planting salt-tolerant vegetation, interpretive, and potential reclamation of wetland resource areas onsite. We know from experience that there are important sections of the Harborwalk that currently flood during coastal storms that hit at high tide. To ensure the path is prepared for current and anticipated sea level rise, we strongly encourage DCR to increase the proposed elevation of the path.

The Draw Seven Pathway Extension is a critical pathway that could become one of the major bike routes into Boston. Wynn Boston Harbor’s pedestrian and bike bridge over the Mystic River will tie into this system and eventually connect this path to bike routes running through Everett and all the way to Revere, as well as to Somerville and Medford. The design of the pathway should account for these predicted rates of sea level rise.

We look forward to the construction of this project and moving one step closer to creating a regional pedestrian/bike network. Thank you.

Sincerely,



Jill Valdes Horwood
Director of Policy