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Via email to: Alexander.Strycky@state.ma.us

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
Attention: Alex Strycky, MEPA
100 Cambridge Street, Ste 900 (9th Floor)
Boston, MA 02114

Re: Seaport Square Draft Supplemental Environmental Impact Report, EEA#14255

Dear Secretary Beaton,

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Report (DSEIR) for the Seaport Square project. Boston Harbor Now has commented on the original project, the Planned Development Area Plan, the Draft Environmental Impact Report, and the Final Environmental Impact Report. Most recently, we submitted detailed comments for the Notice of Project Change.

Spanning across 20 city blocks and totaling nearly 23 acres, Seaport Square is the largest project proposed near the Seaport waterfront. While the Notice of Project Change was a significant improvement from the 2010 project proposal, we continue to have concerns about

1. the potential loss of destination public open space (particularly at Harbor Square Park),
2. transportation, and
3. public access and connection to Boston Harbor.

Chapter 91 & Block G

As we have done previously, Boston Harbor Now will participate in all the Chapter 91 licensing process for parcels within its jurisdictional limits. Block G is the last remaining undeveloped block of the Seaport Square proposal that falls within Chapter 91 jurisdiction.

Table 2-3 of the DSEIR includes 8 proposed uses for Block G. It is difficult to visualize all of the proposed uses on a relatively condensed parcel. We will reserve more detailed comments regarding public realm improvements and benefits until a more focused on-site use is finalized and included as part of a future Chapter 91 application (according to the NPC, to be completed in 2022 as part of Phase 8).

For now, we note that Parcel G includes an important border street that directly abuts two existing waterfront projects—100 Pier 4 and the ICA. The future building design, proposed uses, ground-floor activation, and public benefits will all play a critical role in shaping the pedestrian experience along this last stretch of Harbor Way that leads the public down to Boston Harbor.

Finally, in light of recent revisions to the project's open space, we ask that an accounting of the open space provided as part of the mitigation requirements for Chapter 91 licenses issued to Parcel A, portions of B, H, and M1 be included in the response to public comments.

Harbor Way

Nearly seven acres or 30% of the project site is proposed for pedestrian-only access. Harbor Square replaced the 2010 proposed vehicular bridge connection to Seaport Hill Green. We continue to strongly support the proponent's idea of providing an engaging, diverse, and well-programmed pedestrian way from Summer Street down to the waterfront.

We commend the project team for their receptiveness to public input and dialogue. Since the filing of the Notice of Project Change, they have incorporated a number of changes to Harbor Way. We continue to have some concerns:

- *Relationship of adjacent programs to Harbor Way:* We feel strongly that to create the right user experience, it will require ground floors of the abutting buildings to work symbiotically with Harbor Way uses and public space. Together this would provide a continuous network of experiences that would active and engage a broad range of visitors. Lining the Harbor Way so heavily with retail is not the most appropriate or effective way to accomplish these goals.
- *Creating "place" along a "path":* We are concerned whether Harbor Way is generous enough to accommodate both paths and places of respite and recreation. It is important that Harbor Way function as more than wide sidewalks with a grassy median – it must have the width and scale to host a series of discreet, but connected, open spaces. As currently proposed, the diagrams and plans lack the dimensional specificity and design detail to describe adequately the types of places that Harbor Way might accommodate.

We would like to see additional ways to program the building fronts directly impacting the experience along the Harbor Way and further details including cross-sections and longitudinal sections across the various spaces of Harbor Way.

Children's Playground

We commend the proponent for swapping the proposed promenade materials with more greenspace along the Harbor Way. We also appreciate the inclusion of a children's playground area. A natural playground, like the one included in Figure 3-21, gives youth of all ages an

opportunity to engage with materials that urban youth do not naturally encounter. It has been our experience that multi-textured areas, like the Children's Play Room in Figure 3-29, allow children to use their imagination during play.

Finally, continued maintenance of public open spaces is an essential piece of the overall experience. This project incorporates a large area of open spaces that will require near and long-term maintenance responsibilities along with management plans. We ask for a clearly defined management plan for all of the open space areas within the project site.

Connection to the Harbor

From a more detailed review of the DSEIR, we note that Harbor Way does not directly align with the adjacent block. This will likely have an adverse effect on sightlines and connections to the waterfront at the Northern Avenue intersection. Figure 1-4 depicts the overall district open space map but, as clarified in the project documents, is not to scale. No cross section of Northern Avenue and Harbor Way is included in the current filing. Additional renderings and views of this central intersection are needed to help stakeholders better understand and suggest improvements to the recreational loop. We ask that these be included in the next filing.

The block from Northern Avenue to the waterfront is not controlled by the project proponent. Plans to collaborate with abutting property owners to complete 1) a connection to the Harbor across Northern Ave and 2) the recreational loop have not been made clear. Plans for this last connection and collaboration with abutters should be formalized before licenses and permits are finalized. Coordination among plans and property owners is critical for this important segment of Harbor Way.

Summer Street Steps

The Summer Street connection is the key point of access to Harbor Way. As presented in Figure 3-15 and on page 2-26 of the DSEIR, wheelchair and stroller accessibility will be provided through an adjacent building (currently undefined).

The proposed treatment of wheelchairs and strollers at the Summer Street stairs is disheartening. While we understand that incorporating accessible ramps can be a design challenge, we ask the proponent to consider including a practical ramp that also beautifully and seamlessly blends into the proposed Summer Street steps. Examples of ramp and stair design can be found around the globe:

- Robson Square in Vancouver
- Pioneer Courthouse Square in Portland
- Blackfriars Road in London
- Illinois Institute of Technology in Chicago
- Public park in Tjuvholmen, Oslo

Instead of creating two distinct paths, incorporating a combined ramp and stairs design promotes an equal experience for all users. We strongly urge the proponent to include a universally accessible stair-ramp design for this critical connection.

Transportation

Trucks continue to be an important and priority use for Seaport Boulevard. Seaport Square will likely be directly affected by industrial traffic, and thus we strongly recommend that buildings are designed to accommodate truck traffic and that the proposed uses on Seaport Boulevard be compatible with truck traffic.

Climate Change Preparedness

As a newer development, we understand that Seaport Square will likely be more flood resilient than its older neighbors. We commend the project applicant for adopting these measures.

The South Boston Waterfront has been identified in the City's Climate Ready Boston report as particularly low-lying and the most exposed community to future inundation from coastal storms and sea level rise. With the continuing Seaport development boom, this area of the city comprises not only the most expensive real estate but also the most vulnerable to major economic loss.

Since our last comments for the NPC, the Climate Ready South Boston project was launched to develop coastal resilience measures for the Fort Point Channel and South Boston waterfront. This is an excellent opportunity for the project proponent to include neighborhood-specific resilient solutions that protect the project site and contributes to larger neighborhood-scale climate resilient solutions.

Finally, we thank the proponent for considering our previous request to add an elevated community space that could be used as a temporary public storm shelter in case of extreme flooding. We look forward to reviewing detailed renderings of the proposed SeaPAC space on Block P.

Sincerely,



Jill Valdes Horwood
Director of Policy