



Are you on board?

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October 9, 2020

Via email: ebony.darosa@boston.gov

Boston Planning & Development Agency
Attention: Ebony DaRosa
One City Hall Square
Boston, MA 02201

Re: Project Notification Form – Harbor Garage Redevelopment

Dear Ms. DaRosa,

Boston Harbor Now thanks you for the opportunity to comment on the Project Notification Form (PNF) for the Harbor Garage Redevelopment Project (the Project).

Boston Harbor Now exists to protect equitable access to the Boston Harbor waterfront as well as to promote increased resilience in the face of climate change and sea level rise. Because this is our reason for being it should come as no surprise that we see the Harbor Garage property as one of the most critically important redevelopment sites on the Boston Harbor waterfront. We appreciate the long history of planning regarding the redevelopment of the Harbor Garage property, including the extraordinary Municipal Harbor Plan that allows the consideration of the Project in the first place.

Boston Harbor Now considers this to be one of the most important sites in the downtown given Long Wharf's centuries-old role as the gateway to Boston Harbor. As is discussed below, the Project proposed does not yet fulfill the promise of the Municipal Harbor Plan, particularly in the areas of open space, resilience, and programming. We look forward to continuing to work with the BPDA and the Project owner toward fulfilling that promise through a project that contributes meaningfully to a district-scale solution to resilience and equitable access to the Boston Harbor waterfront. Until the Project meets these reasonable expectations, it should not proceed.

Project Site

The PNF identifies the Project Site as “The Pinnacle at Central Wharf,” a 1.32-acre site currently occupied entirely by a nine-story (seven levels above grade) parking garage bounded by Milk Street to the north, Atlantic Avenue to the west, East India Row to the south, and the Harborwalk to the east. It is situated between the Harbor Towers condominiums and Frog Pond Park/255 State Street with the New England Aquarium and IMAX building on the waterside of the site and the Rose Kennedy Greenway on the landward side. The water’s edge is approximately 90 feet east of the Project Site.

Public Access/Open Space

Removing the parking garage and replacing it with a Project that includes 50% open space is a significant improvement. However, it is critical that the Project also be a welcoming, connected, and active public space commensurate with its location. Importantly, the site also presents an opportunity to provide improved visual and pedestrian connections between the Rose Kennedy Greenway and the harbor.

As noted in the PNF, the Site is within close proximity to some of the City’s most active and walkable areas, including Christopher Columbus Waterfront Park, Faneuil Hall and Quincy Market, and the North End. Ensuring seamless integration with those areas—as well as creating a significantly better connection between the Rose Kennedy Greenway, the Harborwalk, and the Harbor than exists today—will be a critical design challenge as the Project moves forward. Ensuring clear visual connections, along with safe and welcoming pedestrian connections, linking the two parallel parks is critical to the success of the public realm design for the Project. We commend the Municipal Harbor Plan’s directive to place 30% of the open space on the north side of the building in order to create a higher quality public realm between the Rings Fountain, Frog Pond Park, the plaza in front of the Aquarium, and the existing Harborwalk. This new open space would not only improve the existing conditions, it would further allow for potential roadway closures to expand and connect safe pedestrian use of this area in the future and stitch together a more meaningful integrated park or open space.

The final design of this open space will need to include three major components that connect and contribute to the district: year-round accessibility and activation; programming and character that welcomes visitors from every neighborhood; and a flood protection system that contributes significantly to a district-wide resilience solution and helps to prevent flood risks to nearby properties and public infrastructure during and after construction. The Municipal Harbor Plan envisioned that each of these components would be informed by the development—after a robust public process—of Design and Use Standards for the area but the process of developing these Design and Use Standards has just begun with the issuance of an RFP by the Boston Planning & Development Agency in early September of this year. The Project should not be approved until these Design and Use Standards have been finalized and the Project can demonstrate its compliance with them.

In order to create safe, well-utilized, publicly-beneficial exterior open space, it is especially critical that the project's design avoid, to the extent practicable, pedestrian/vehicle interactions. Though the new proposal is an improvement on Milk Street where there is currently a garage entrance/exit, the PNF indicates that vehicular access to the garage for all commercial and public parking users and loading will be over the Atlantic Avenue sidewalk, while egress will take place on East India Row. The data included in the PNF on vehicle trips (Table 2-7) indicates that during the morning peak hour there will be 292 vehicle trips turning off of Atlantic Avenue across the bike lane, a lane of parked cars, and a bustling sidewalk. At the same time, under existing conditions, approximately 700 pedestrians and 65 cyclists will travel along that same block at that time. This unsignalized vehicular turning may result in an unnecessarily dangerous situation for people walking or cycling on this block. We request further study of ways to access/exit the parking facilities, as discussed below, in order to reduce the likelihood of pedestrian/cyclist and vehicle conflicts and enhance connectivity to adjacent properties.

The quality of the design of the interior space, including any overlooks, and the exterior façade on the lower floors will also be critical to fully activating the space and ensuring that it feels welcoming to a variety of visitors. The current configuration in Figure 2-23 includes a narrow corridor with right angles that provide too little visibility to be inviting to potential users, especially first time visitors. The proposed ramp to the garage on the Atlantic Street side of the building creates an incline that is creatively incorporated into the interior with a set of stairs with seating and a public viewing location on the second floor of the building; however, this creates a very confined hallway along its south side and limits views across the first floor of the building that would encourage foot traffic. At the same time, the monumental scale and mass of the building's exterior on the first two floors may be unnecessarily intimidating to people who do not live or work there. Indeed, the illustrations in the PNF showing the design of the lower floors and entrances on the western and southern sides of the building appear to be distinctly out of alignment with the historic character and scale of the area, even relative to nearby modernist buildings.

For these reasons we ask that the BPDA require the re-thinking of the location of vehicular access to the building. Locating all of the access and egress to the Project's parking on East India Row could provide multiple benefits. First, it would recognize the importance of the tremendous public investment in the Rose Kennedy Greenway and reduce the possibility of vehicular/pedestrian/bicycle interactions along Atlantic Avenue, which is already a very congested thoroughfare. Second, if a ramp elevation inside the building is needed, it would potentially allow the grand overlook to be located on the harbor side of the building, affording the public easier interior access as well as views to the harbor. Third, it would allow maximum pedestrian use of the New England Aquarium's proposed BlueWay on the north side of the building. If it does appear feasible to locate all vehicular access to the south side of the building, it will be essential to do so in a way that minimizes adverse impacts on all abutters to the site, including Harbor Towers.

The idea of a Harborwalk "porch" appears to be a highly appropriate use of the harborside portion of the site, assuming the current owners (BPDA, New England Aquarium, and Harbor

Towers) of this area and/or land immediately adjacent to it are in agreement. Future filings should detail the status of discussions with these stakeholders. We also believe the creation of nature-based coastal resilience measures along the water's edge are a sound idea, if such can be done in concert with other such measures and, like the porch, has the support of the other property owners.

We encourage the BPDA to insist upon spaces that are welcoming and available to all. In other waterfront buildings there has been mixed success with Facilities of Public Accommodation (FPAs), and publicly accessible second floors have been a particular challenge. Further review of design and proposed uses will be needed to determine the interior space's compatibility with the principles of Chapter 91 and the Harborwalk. Above all, we need to avoid the creation of another segment of the waterfront that appears "walled-off" and inaccessible to people who are not occupants of residential or office space within the building. Though we strongly support interior civic spaces, it will also be important to ensure that the mix of food and retail services provided are affordable and accessible to a wide variety of visitors.

Height/Massing

As we noted in our comments at the public meetings, we remain concerned about the height and mass of the building relative to its proximity to the Greenway, the Harborwalk, and Long Wharf. Although 600-feet is in compliance with the Downtown Waterfront Municipal Harbor Plan, we continue to believe that even relative to the nearby towers, this height is excessive for the building to be seamlessly integrated into the immediate neighborhood. The Project would be one of the tallest buildings in Boston, overshadowing every other building in this area. Furthermore, the benefits of the Project—including the \$10 million public benefits fund—are not commensurate with the promise of the Municipal Harbor Plan or the impacts of a building of this size and need to be significantly increased.

In addition to its impact on the "feel" of the neighborhood, Figure 2-21 of the PNF illustrates a "modest" increase in shadow impacts as a result of the building's height as compared to what is allowed as of right under Chapter 91. The shadow impacts analysis was conducted for October 23rd for the hours from 8:00 a.m. to 5:00 p.m. This date was identified by the Boston Planning & Development Agency as the most appropriate given the sun's position and the seasonal needs of pedestrians. Given that the project is proximate to the New England Aquarium, the Rose Kennedy Greenway and the Harborwalk, and that the hope is that the site/area will be activated throughout the year, we believe that it is appropriate to complete a more comprehensive shadow analysis for a wider range of dates. This analysis should extend throughout the year and look more carefully at impacts on these assets, as well as that of historic Long Wharf. We are encouraged that the proponent has indicated that such an analysis will be provided in the Draft Project Impact Report and request that shadows cast on both the Greenway and the Harborwalk be included in its scope.

Resilience

As noted in the PNF, this project will be subject to increased risk due to sea level rise because of its location along the Harbor. As a result, the PNF anticipates raising the project site to an elevation of 21.0 BCB in order to improve site resiliency. Further, “[t]he Proponet (sic) is also evaluating resiliency solutions along the adjacent Harborwalk to provide a catalytic contribution toward a district-wide approach to protection.” PNF Section 2.5.1.1.

Without more specificity, it is difficult to ascertain what is meant by this statement. It is not enough to simply raise the elevation of the building and create an isolated island that still allows coastal storm flooding on all sides. Further, by raising the elevation of only the Project site itself, the Project could narrow flood pathways thereby increasing the velocity of the water that would reach into the neighborhood, putting other sites and the Greenway at greater risk. It is unclear how the Project will be integrated with other properties in ways that provide a comprehensive solution to achieve coastal resilience in response to projected sea level rise and other climate change impacts. We encourage the BPDA to require the proponent to examine alternative flood protection alignments in more detail as a condition for approval, especially with the completion of the Climate Ready Downtown/North End resilience plan, which is expected imminently. We also note that the proposed 21.0 ft. BCB design elevation for the building is not quite consistent with the near-term target elevation for the area set in the forthcoming downtown resilience plan (about 21.5 feet). It is also essential that the Project proponent describe how the project could be adapted/protected to a higher target elevation over time, since the Climate Ready Boston modular elevation for the 2070 period is about 23.0 ft. BCB.

Additionally, it is imperative that the proponent detail measures to be taken to protect against storm surge during the construction process. There is important infrastructure in the immediate vicinity of the project site, including the MBTA Blue Line’s Aquarium station and access to the Central Artery tunnel that may be impacted during this time. At the time of the drafting of this comment letter, MBTA employees were deploying temporary flood barriers to protect the Aquarium station. The Proponent must complete a plan to protect this and other infrastructure assets from adverse impacts during the construction period and beyond, and this plan should be appropriately memorialized in any BPDA project approval and Cooperation Agreement.

We commend the BPDA and the Project proponent for the work that has already been done. However, as is discussed above, the Project does not yet provide benefits sufficient to justify the Municipal Harbor Plan that allow its consideration and does not at all account for the Design and Use Standards which were to precede its approval. We look forward to continuing to work with the BPDA and the Project proponent to that end.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott". The signature is fluid and cursive, with a long horizontal stroke extending to the right from the end of the name.

Kathy Abbott, President and CEO
Boston Harbor Now