



Are you on board?

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February 12, 2021

Via email: ebony.darosa@boston.gov

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

Re: Project Notification Form – Hook Wharf Redevelopment

Dear Ms. DaRosa,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Project Notification Form (PNF) filed by 400 Atlantic Avenue, LLC for the Hook Wharf Redevelopment project. Boston Harbor Now considers this to be one of the most important sites in the downtown given its location at the confluence of two historic waterways, Boston Harbor and the Fort Point Channel, and its role as a gateway to the South Boston Waterfront, more commonly referred to as the Seaport. It is identified in the Downtown Waterfront Municipal Harbor Plan as a priority redevelopment site and has been the subject of extensive planning work and public processes to lay the groundwork for the redevelopment of this site.

Members of the Boston Harbor Now team have attended several of the public meetings on this project as well as the Impact Advisory Group meetings. We now respectfully submit these comments on the PNF.

Project Site

The Project Site is less than ½ acre in area, and is comprised of solid-filled land and a pile-supported pier. The majority of the parcel is pile-supported structure over flowed tidelands, including a pile-supported seawater pump house. It is situated between the Evelyn Moakley and Northern Avenue bridges, and functions as a gateway to the Fort Point Channel and Seaport District from the Downtown Wharf District. Since 1925, the site has been the home to family-owned James Hook & Co., a wholesale and retail distributor of fresh seafood as well as a restaurant.

The proposed project involves the construction of a single building totaling approximately 275,000 sf and comprised of a 266,000 sf hotel (305 feet tall, 357 rooms) and 9,000 sf of publicly accessible retail and restaurant space dedicated to the Hook Company's operations.

There will be no parking on-site. A loading dock servicing the building will be accessed from the Northern Avenue side of the site.

Public Access/Open Space

As noted in the PNF, this is a very small site (1/2 acre) and, as such, presents significant development challenges in order to meet all of the needs of a 357-room hotel as well as three restaurants and a ballroom on the parcel. Figure 1-6 (PNF, p. 1-11) shows a building with a footprint that covers 70% of the site (14,039 sf out of 20,056 sf). The remaining area (30% of the site) is dedicated to open space, including the creation of a new Harborwalk connection. This is consistent with the requirements of the Downtown Waterfront Municipal Harbor Plan (MHP); however, a typical development project on Commonwealth Tidelands would normally be required to limit its lot coverage to 50% of the site.

The creation of almost 300 linear feet of new Harborwalk on this site has the potential to provide new public access to the waterfront along the Fort Point Channel and parallel to the Evelyn Moakley Bridge. In order to fulfill the promise of safe, accessible and resilient open space, this site must be able to both support the needs of the proposed uses (including all of the loading needs of the hotel and restaurants), as well as create a well-used, and safe, waterfront connection that feels welcoming and inclusive to all. Indeed, the MHP requires that the City “work with [the] developer and interested stakeholders on developing and implementing a plan to improve the Harborwalk connection between Hook Wharf and 470 Atlantic Avenue across Seaport Boulevard with significant enhancements for pedestrian safety and wayfinding.” (MHP, p. 53). Connecting the Harborwalk along this stretch of the Fort Point Channel is a long-anticipated and welcome change. However, it must be done in a way that allows pedestrians to safely access and utilize the Harborwalk at each of the critical connection points, as well as along the water’s edge. Based on the information provided in the PNF, we have concerns that this vision has not yet been fully realized.

First, pedestrians using the Harborwalk on the north side of the site will have to contend with a seven-foot grade change from the Northern Avenue bridge abutment to Atlantic Avenue. This seems likely to cause problems for people wanting to cross over the bridge and continue along the Harborwalk to the west of the site. We would ask that the proponent provide a more detailed explanation of how pedestrians will navigate this grade change as well as safely cross to the GSA building with buses, cyclists, and trucks utilizing this space at the same time. Further, the intersection of Seaport Boulevard, Atlantic Avenue, and I-93 is also challenging for pedestrians. Without a sidewalk on the west side of Atlantic Avenue, there is a high volume of people walking who need to be protected and prioritized here. We ask that the proponent find ways to accommodate more of the site’s loading needs on the project parcel without creating this bottleneck at the edge of Atlantic Avenue. Ensuring a safe and continuous Harborwalk at this site is critical. Options to do that, such as scaling down the project further, or eliminating or reducing the size of the ballroom or restaurants to reduce potential conflicts with vehicular traffic accessing the site should be explored.

On the water-side of the project site, the PNF describes a 12-foot wide Harborwalk with an additional 13 feet dedicated to outdoor dining reserved for Hook Lobster patrons. With this much room by the water, we believe that the Harborwalk should have a greater width than the minimum required by Chapter 91. Committing more than half of this area to private dining will discourage the public from using this space. Additionally, we have seen during the pandemic that private seating areas have a tendency to interfere with public access along the shoreline, contributing to a feel of privatization in public tidelands. This should not be allowed to happen here and space for fully public seating, distinct from what is provided for the restaurant, should be included.

Finally, the wayfinding and signage along the south side of the site, where the Evelyn Moakley bridge meets Atlantic Avenue, must be well-designed to signal the location and availability of the Harborwalk and docks as public amenities. Without these indicators that the space along the water is publicly available, many pedestrians will likely choose to stay along Atlantic Avenue in front of the hotel, instead of enjoying a walk along the water-side. This would be a missed opportunity to activate an important stretch of Harborwalk for all visitors. The use of the docks on that side of the building for transient recreational boaters as well as water transportation operators for “touch-and-go” service will contribute to the activation of this area and expand the public use of the waterfront side of the site. The management plan for this site must memorialize and make permanent the commitment to public landing uses for these docks.

Though this development has been the subject of much planning through the MHP process, the Secretary’s decision on that document notes that it is not the intent of that planning “to authorize any such project at this juncture to build to these maximum standards. In fact, it is anticipated and expected that through the subsequent MEPA and the City’s Article 80 reviews, specific projects will be reviewed, assessed, and revised as necessary to conform to legal standards, comply with guidelines, and respond to concerns raised, and that such revised proposals could contemplate buildings of lower heights or configurations than otherwise allowed herein.” (Decision on the City of Boston’s Request for Approval of the Waterfront District Municipal Harbor Plan Pursuant to 301 CMR 23.00, April 30, 2018, p.25). This Article 80 process must provide the public with the opportunity to review and shape the project to meet the current needs of the area rather than treating the design parameters as foregone conclusions.

Part of the review under Article 80 requires that the BPDA determine the adequacy of the project’s proposed loading facilities in accordance with Large Project Review. We think that this will be a critical piece of the review and approval process given the large number of potential conflicts. The Project Impact Report must include an analysis of the loading requirements for the project, and the impacts of the projected loading activities, together with a description of any off-street loading facilities required to meet these needs and to mitigate projected impacts. (Boston Zoning Code Section 42A-11). In this case, based on the PNF and the information provided at the public meetings, we are concerned that the site itself does not provide enough capacity to meet the project’s loading needs. The result will be that buses, cyclists, and pedestrians – the only allowed users of the adjacent Northern Avenue Bridge when it is reconstructed - will be in conflict with the loading operations of the hotel and restaurants, creating a dangerous and confusing edge on the north side of the project. Greater coordination with the City regarding the design of the Northern Avenue Bridge, and the General Services Administration regarding their access and loading needs, must be a priority for the proponent moving forward.

Resilience

The PNF and comments at public meetings indicate the resilience strategy is focused on raising the elevation of the site to 21 feet BCB, which is consistent with the projections for protecting the property against sea level rise through 2070. The elevation at the hotel lobby door is at 19.5 feet BCB, which will require the availability of a deployable barrier to protect against future flood risk. It is likely that this project will also need to comply with the requirements of the City’s proposed Coastal Flood Resilience Overlay District, which is currently out for public comment. In the event that this Overlay District modifies the required design flood elevations for the site, we ask that the proponent provide a strategy in future filings for how these new elevations will be achieved while preserving the accessibility of the site.

It is less clear how the proponent intends to provide district-level protections and ensure that the strategy is appropriately tied-in to the neighboring properties rather than having a negative impact on those properties. The PNF indicates that the project team is working to incorporate appropriate adaptation strategies for meeting or exceeding resiliency targets established for

adjacent sites and for further reducing vulnerabilities and adverse impacts due to future climate conditions, not only on the Project Site but for the surrounding Downtown Waterfront (PNF, 1-13). These adaptation strategies should be more fully explained in future filings as they are developed.

The Downtown Waterfront Municipal Harbor Plan, which governs this site, envisioned that area property owners would work together to address resilience. It states that:

The Downtown Waterfront should also serve as the city's first Flood Resiliency District, with property owners collectively evaluating risks of future sea level rise, district wide measures that can be implemented to reduce the risk and potential future damage, as well as funding mechanisms for area-wide infrastructure enhancements. Measures to consider could include offshore storm surge barriers and wave attenuators to break up wave action; armoring and fender systems at the ends of piers and wharves; and the elevation and utilization of waterfront plazas and Harborwalk as a heightened seawall that can protect the district from inundation while continuing to provide public waterfront access. (Downtown Municipal Harbor Plan, p. 71).

This type of collaboration with adjacent property owners to explore resilience solutions and potential funding mechanisms will be critical to address sea level rise. We would like to see the City convene such a group with developers, non-profit organizations, and other stakeholders working towards finding an appropriate legal mechanism for requiring such district-level solutions as envisioned by the Climate Ready Boston project. At a minimum, project proponents should report on the status of discussions with neighbors in addressing this issue and what actions have been taken to advance district-level solutions.

Finally, the Downtown Waterfront Municipal Harbor Plan also requires the creation of Design and Use standards which will impact how this site is developed and how it fits into the broader MHP area. This robust public process is just starting now. It would be premature to finalize any design or permitting before these standards are developed and adopted by the City. We would ask, therefore, that the Article 80 process not be completed until these standards are finalized and incorporated into the design of this project. We are aware, of course, that the MHP is also the subject of litigation which may render it invalid depending on the judgment of the court. We submit these comments understanding that the basic parameters for the development of this parcel may change significantly depending on the outcome of that case.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron Toffler', written in a cursive style.

Aaron Toffler, Policy Director
Boston Harbor Now