



Are you on board?

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June 24, 2021

Via email:joe.christo@boston.gov

Joe Christo
Boston Planning and Development Agency
Boston City Hall
Boston, MA 02201

Re: East Boston Resilience Project

Dear Mr. Christo,

Boston Harbor Now respectfully submits the following comments on the East Boston Resilient Waterfront Project based on designs that were presented at the June 8, 2021 virtual workshop. We applaud the bold and creative designs that were put forward for protecting these vulnerable areas along the Harborwalk and want to ensure that the final projects reflect a balance of resilience and meaningful public access to our harbor.

It is particularly exciting to see these designs progressing from concepts that were outlined in the *Coastal Resilience Solutions for East Boston* report from 2017. As several of the short term recommendations have been implemented, like the deployable flood wall on the Mary Ellen Welch Greenway, and as others remain on the drawing board, we appreciate that this project is continuing to move forward through the design phase by leveraging state funding. Hopefully, this process will enable the City to secure federal funding to support its construction.

The two projects, one at Lewis Mall and one in front of Carlton Wharf, serve to block some amount of existing flooding and to protect the neighborhood, including infrastructure and buildings, from major flood events in the future caused by projected sea level rise and anticipated 100-year storms. Both projects tie into buildings and grade changes to ensure that there is a continuous line of defense at 22.5 feet (BCB).

Each project has an opportunity to exemplify the ideal standards of what Boston Harbor Now refers to as "Harborwalk 2.0" —the design of a waterfront that is accessible and welcoming, is prepared for the coastal impacts of climate change, and centers equity and inclusion in its design and programming. An accessible Harborwalk should have both linear and lateral connections between the city and the water as well as numerous activation strategies to serve all Bostonians. A resilient Harborwalk includes a variety of climate adaptation strategies to protect and serve Boston at a district scale. To center equity in Harborwalk design is to focus on strategies that make the waterfront feel safe and inclusive through lighting, signage, full ADA accommodations, and the elimination of features that make users feel unwelcome or excluded.

Carlton Wharf

The proposed design at Carlton Wharf exemplifies Harborwalk 2.0. The gradual sloping up of the site to create natural features and seating while integrating the elevated seawall into the landscape is ideal for connecting the neighborhood to the water with continued visibility. The Harborwalk path itself is elevated to a level where it remains above projected high tides even if it is overtopped briefly by extreme storms. With few needs to cross through the center of the site perpendicular to the water, the paths of travel appear to be easy for people to navigate in wheelchairs and with strollers, and the long shoreline is designed to replicate a more natural rocky intertidal habitat than a traditional sea wall.

Though plantings have not been confirmed, there seems to be a clear opportunity to use native and saltwater-tolerant grasses, trees, and other plant materials. The lighting seems like a suggestion at present, but the final selection should feel human-scaled and cozy to balance safety and warmth. Only the gabions, a creative design touch, could pose a maintenance problem—given the surrounding conditions and the regular need for clean-ups, they could become a place that gathers trash blowing around or washing up from the harbor.

Lewis Mall

The present design proposal for the Lewis Mall section includes many features that concern us and seems to have put a litany of design constraints ahead of the practical needs of residents now and in the coming decades. First and foremost, the flood protection device, as seen by anyone coming from Maverick Square, is a wall of significant height rising up in front of the water where there is currently an exceptional view of the downtown and Seaport skylines. This space, which attracts a diversity of users today—often sitting on benches looking out across the water, will literally be walled off from the neighborhood. The promise of Harborwalk 2.0 and of City’s own “Resilient Boston Harbor” vision from 2018 was to create high quality open spaces with nature based solutions in lieu of a wall such as this.

The wall also poses a major navigational challenge at a time when Boston Harbor Now, MassDOT, Massport, the Convention Center Authority, the MBTA, other city departments, and the BPDA itself are working to initiate water transportation service at this recently improved dock that can now accommodate bow-loading ferries, with the first regularly scheduled service in two decades planned for September of this year. Multimodal connections to this dock, whether on foot, by bicycle, or transferring from other MBTA services, need to be supported with direct physical and visual ease of access.

While we could comment in great detail on specific features that could be improved, like the glass wall panels that seem like a creative but impractical

solution, we strongly urge you to reconsider this design altogether. The great opportunity at this location is to either consider a combination of in-water strategies that would extend the total surface area of this section of waterfront or to reimagine the berm being installed further inland where the existing grade is at a higher elevation. Though we are mindful that you have funding deadlines to meet by completing this phase of the design, the Lewis Mall designs must go beyond proposal with a new set of parameters. Both alternatives, discussed below, would achieve improved results and will set an essential precedent for ultimately constructing other district scale solutions to flooding threats.

The opportunity to extend protection out into the harbor would require changes to existing permitting and regulations, but these changes are already being considered with the construction of Piers Park III and the research work of the Stone Living Lab. A solution that stretches over the existing harbor could fully integrate the high quality park space from Piers Park I all the way to LoPresti Park with a new alignment that realizes the vision of *Resilient Boston Harbor*, develops additional nature based solutions to address a range of climate change issues, and prioritizes public access to the waterfront with exceptional natural features where a mere sidewalk exists today.

Conversely, the option to move the protective elevation inland will require few permitting changes but will require a reconfiguration of paths of vehicle travel as well as additional building protections. An inland option could better protect the Maverick T-station on Lewis Mall, integrate with flood protections for the Mary Ellen Welch Greenway entrance, and create improved open space adjacent to existing affordable housing. An appropriate design for this location will require close collaboration with property owners, including Massport, as well as residents along Marginal and Orleans Street. That the current design fades into indeterminate status on the southeast end of the barrier suggests that there's still time and space to consider alternatives here.

We appreciate the opportunity to comment and ask that our concerns be addressed either in this phase of design, which may conclude at the end of this month, or in further design iterations. In East Boston and around the harbor, a high quality Harborwalk experience on all the days without flooding is essential to building the inclusive waterfront we all aspire to. This can be achieved at Carlton Wharf and must be reimaged for Lewis Mall. We will continue to follow this project through future phases and would be happy to speak further with the BPDA if there are additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott".

Kathy Abbott, President and CEO