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February 22, 2020

Via email: [erin.flaherty@mass.gov](mailto:erin.flaherty@mass.gov)

Kathleen A. Theoharides, Secretary of Environmental Affairs

100 Cambridge Street, Suite 900

Boston, MA 02114

Attn: Erin Flaherty, MEPA Unit

Brian Golden

Boston Planning and Development Agency

Boston City Hall, 9th Floor

Boston, MA 02201

Attn: Joe Christo

Re: MEPA Project 16514, City of Boston Resilient Fort Point Channel  
Infrastructure Project

Dear Ms. Flaherty,

Thank you for the opportunity to comment on the preliminary design of the Boston's Resilient Fort Point Channel Infrastructure Project as part of the ENF review process. Members of the Boston Harbor Now team have been closely tracking this project since 2019 and participated in the virtual MEPA site visit on February 1, 2022.

The premise of this project is incredibly exciting—2,090 linear feet of elevated flood protection on the Fort Point section of the Boston waterfront coupled with 14 outfall backflow prevention flap gates and deployable barriers. Today, this project designed to protect 31 existing buildings, approximately 814 current residents, major roadways, bike routes, the #11 MBTA bus route, and public parkland from anticipated storm and flood damage. With additional development proposed in this area, this berm will serve to protect even more residents and businesses in the future. As a result, we believe this project is deserving of federal funding and a certificate to proceed.

It is exciting to, years of planning processes are now being designed and implemented here on the east side of the Fort Point Channel across multiple



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private parcels. From 2016's *Climate Ready Boston* report to 2018's *Coastal Resilience Solutions for South Boston* plan to 2019's *Resilient Boston Harbor* vision, there has been growing momentum to build district-scale climate adaptation infrastructure to make neighborhoods more resilient to the projected impacts of sea level rise, storm surge, and extreme rain events. The MEPA filing for this berm and the potential funding from FEMA brings us one significant step closer to actualizing the ideas in these plans.

As longtime stewards of the Boston Harborwalk, Boston Harbor Now is committed to ensuring that the waterfront we build today is designed for a more resilient and inclusive future. We use the term "Harborwalk 2.0" to capture the aspirations of this work to ensure that the design of the waterfront 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 (preferably multi-lingual), full ADA accommodations, and the elimination of features that make users feel unwelcome or excluded.

With a target elevation of 14.6 feet (NAVD88), this project serves as a model for district scale adaptation; however, the design falls short of our aspirations for quality urban design that fully addresses inclusive access. As the project moves through further rounds of review by other public agencies, particularly at the state level, Boston Harbor Now wants to ensure that this resiliency solution maximizes other co-benefits. To expand equitable access to the waterfront, additional amenities are needed including an 18-foot wide path, more shade and places to rest, better integration with and access to Binford Park, and additional points of entry to the new Harborwalk and berm as adjacent parcels are developed and redeveloped.

### *A long narrow wall*

Today, the Boston Harborwalk along the Fort Point Channel is 12 to 20 feet wide and serves as the northern end of the South Bay Harbor Trail, a protected bike route extending across Roxbury and to the Ruggles T-station. The present path has frequent benches, trees, and trash cans that invite people to stop and spend time along the water. As proposed, Segment 2 is 816 feet of elevated path (only 12 feet wide) atop a double retaining wall of granite blocks. The design does not include any shade or places to rest and thus does not meet the standards already established.



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The design for Segment 2 seems to prioritize the preservation of parking in a transit-rich environment. This segment should build on pre-existing standards and thus should be wider, offer more amenities, and ideally provide additional points of access to the water rather than serving as a literal wall between the channel and the site. There may be short stretches where a wall of this narrow width is necessary, but they should be very limited. The remainder of Segment 2 should be modeled more on the berm designs of Segment 1 and 3.

With additional development proposed for this district, coupled with an emphasis on supporting a transition from auto-dependency to walking and biking at the city level, wider paths should be designed throughout to safely accommodate people of varying ages, abilities, and speeds using the Harborwalk. The present and proposed boardwalk just to the north of the berm are all 18 feet wide at minimum.

#### *Public points of access*

Binford Park was built as part of the mitigation package for the construction of the tunnels under the Fort Point Channel and Neighborhood during the “Big Dig” project. The preliminary concepts shown for the segments of the berm and wall neither honor the existing park nor show how it could be modified to continue to serve as a waterfront respite. Furthermore, the design of the wall cuts the park off from the neighborhood, making it potentially more dangerous and less frequently used. Though the entire berm would benefit from a more detailed and park-like design, this point of access is particularly problematic. A visually clear and ADA-accessible route from A Street to the Binford Street waterfront is needed as well as well-marked alternatives that can be used when the deployable barriers are installed are also needed.

Though the Harborwalk has limited neighborhood access today due to existing private property boundaries, any future redevelopment landward of the berm should allow for new public points of entry along streets, alleys, paths, and sidewalks that serve the adjacent buildings and open spaces. We also hope that if private developers adjacent to the berm expand or improve it in the future that nature-based flood protection solutions and watershed activation are incorporated into the seaward side of plans as well.

#### *An interconnected park*

Historically, the minimum requirements for the Harborwalk were focused on a 12-foot wide right of way for public access, but over the past four decades the waterfront’s development and the harbor’s cleanliness have attracted people to the harbor in greater numbers. At the northern end of the berm project, the 100 Acre Open Space plan includes a significant public park while just beyond the southwest terminus of the berm is Rolling Bridge Park. It also serves as a path to



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current and future destinations further north along the channel, including Martin's Park, the Children's Museum, and a to-be-rebuilt Northern Avenue Bridge. Though the width, seawall, subsurface infrastructure, and other limitations may not allow the berm to evolve into the next Charles River Esplanade, we feel strongly that further design iterations can support a more park-like feel. Where there is a vegetated berm present, there should also be a combination of trees and shade structures, seating, and other features that welcome people to spend time along the waterfront and not merely pass through it. As shown in the proposed cross section, some of this is being accommodated. Allowances for greater width of this infrastructure on filled tideland should be granted to provide commensurate public benefits with opportunities for active and passive recreation.

In conclusion, the proposed flood protection measures for the Fort Point Channel are groundbreaking and essential, but to improve the quality of life for the neighbors and address additional challenges from heat island effect to mental health and community cohesion, design improvements are needed. This project will set a precedent for coastal resilience projects around the region, and we want to set a high bar for what's possible when climate adaptation infrastructure serves to benefit the public every day.

We appreciate the opportunity to comment and ask that our concerns be addressed either in the Secretary's scope for a Draft Environmental Impact Report for this project or in further design iterations. Along the Fort Point Channel, and elsewhere in the City, a high quality Harborwalk experience on all the days without flooding is essential to building the inclusive waterfront we all aspire to. We will continue to follow this project through future phases and would be happy to speak further with the MEPA Office if there are additional questions.

Sincerely,

A handwritten signature in black ink that reads "Kathy Abbott".

Kathy Abbott

President and CEO