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March 25, 2022

Via email: [aisling.kerr@boston.gov](mailto:aisling.kerr@boston.gov)

Boston Planning and Development Agency  
Attention: Aisling Kerr  
One City Hall Square  
Boston, MA 02201

Re: Dorchester Bay City DPIR Comments

Dear Ms. Kerr,

Thank you for the opportunity to comment on the Draft Project Impact Report (DPIR) for Dorchester Bay City submitted by Bayside Property Owner, LLC; Morrissey Property Owner, LLC; Mt. Vernon Street Property Owner, LLC; and B.T.U.H.W.F. Building Corporation care of Accordia Properties, LLC. Boston Harbor Now has been following this project closely since 2020. Our staff has met with Accordia Partners and attended public meetings, and I served on the Morrissey Community Advisory Committee, which has advised on the project.

Given its prominent role on Boston Harbor and its proximity to Moakley Park, we have paid special attention to how the design of the site integrates with the surrounding parkland and Harborwalk both to provide coastal flood protection in anticipation of sea level rise and to create an integrated public realm where people feel like they are walking through open spaces where they are welcome to recreate and linger. While we are strongly encouraged by the stated goals for this project—including “Protect the neighborhood from rising sea levels with [a] city-wide resiliency solution” and “Enhance public access to the DCR’s waterfront,” we do not believe that the plans for this entire 36-acre project have been refined to a point where it is ready for BPDA board approval. Too many details are being left to future processes without a level of detail expected from other waterfront properties. We anticipate a future supplemental filing and further review.

At Boston Harbor Now, we use the term “Harborwalk 2.0” to capture our aspirational standards for creating resilient and welcoming spaces along the Boston Harbor waterfront. Although the stated goals of the project are in



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alignment, the details for how some of these goals will be achieved is less clear. The site elevations meet flood resilient standards for 2070, but an increase in permeable surfaces and modifications to the design can adapt the site to prepare for a wider range of threats from a changing climate like heat and increased precipitation. Similarly, the open space and indoor space can be refined to intentionally welcome people from across the city to take part in all that this future coastal development has to offer. We offer some design suggestions below, but it is the principles, if not the details, that we hope to see manifested in the design alterations.

### *Coastal Resilience and Adaptation*

Throughout the site, the proposed elevations meet the target threshold defined by the BPDA's *Coastal Flood Resilience Guidelines & Zoning Overlay District*. Their target elevations align with the City's design standards for 2070 in order to protect the area from a 1% annual chance storm combined with projected sea level rise and an additional foot of freeboard. We believe that for the most part, the elevated buildings as well as the elevations along the waterfront meet the required standards.

However, as important as protecting the buildings from flooding is protecting the streets and public spaces. The site sits at the apex of a major flood pathway that could turn Columbia Point into an island during a major storm and allow coastal flooding to intrude into inland neighborhoods. Additional coordinated investments by the City, the State, and the proponent must provide interconnected flood protection in both directions to link from Moakley Park and beyond Harbor Point to the UMASS campus. The change in elevation can keep out future tidal flooding, but to further address wave energy, funding may also be required to enable the Massachusetts Department of Conservation and Recreation (DCR) to build a combination of nature-based shoreline protections.

We are strongly supportive of a feasibility study to understand the options for connecting an elevated berm across Day Boulevard and subsurface infrastructure to connect with Moakley Park, and hope to see the most suitable project funded and implemented.



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### *Permeable Surfaces*

Although much of the site will be elevated beyond typical coastal flooding, rainwater flooding remains a threat. Figure 3-33 illustrates possible stormwater management strategies, but the simplest way to collect, filter, and retain water on site is through additional permeable surfaces. According to the DPIR, more than 42% of the site will be open space, exclusive of roadways, however less than half of that will be pervious. Upon closer inspection, even this statistic relies heavily on pervious paving materials, planting buffers, and green furnishing zones. The lawns along Third Street, for example, are crisscrossed by walking paths and the cycle track. Both “The Playground” and “The Porch” also provide opportunities for incorporating additional green space rather than the plazas and other hard surfaces proposed. Where Third Street meets The Porch, the gradually widening green space could extend to the existing DCR greenspace instead of changing to harder surfaces, and the hard surfaces between Building A and the water could stop at the curving path.

Should Building A be removed, as suggested verbally by the proponent, we hope that this area is more fully integrated into the surrounding DCR parkland, invites pedestrian flow between the site and the waterfront, and welcomes a range of organic public uses.

### *Integrated Waterfront Open Space*

Ideally, future park users and waterfront visitors should not be able to identify the property line between Dorchester Bay City and the waterfront parkland owned by DCR. The entire coastal park space should feel equally accessible regardless of the direction people are traveling on the Harborwalk, and people should be encouraged to spend time there. The present design of “The Porch,” between buildings A, B, and C and the waterfront, has created such a distinctly different space from the public park beyond it that it segments the two into distinctly private and public space. A softer edge, narrower boardwalk, and a blended combination of green spaces on the site can make the area feel less like a back deck exclusively for the proposed buildings. To complement this change, a single path that extends from the sidewalk on Third Street to the shoreline could invite pedestrians all the way to the water.



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Beyond the property line, particularly to the west and northwest, the elevated line of defense and the design of the park across DCR property and Day Boulevard should also feel like they flow together in one continuous park. Signage, furnishings, path materials, lighting, and other features can link the public spaces along the water. There should be a consistent pathway along the waterfront above projected high tides that allows people to interact with the shoreline as well as a higher path that can be traversed in a storm as a continuous alternate route.

### *Pedestrian Experience and Street Hierarchy*

The experiences of people arriving to Dorchester Bay City on foot, by walking from the surrounding area or from JFK/UMass, has been considered at a high level, and there is evident consideration of cyclists with the inclusion of a protected bicycle facility on every street (DPIR, Figures 3-3 to 3-10). However, despite the distance between buildings fluctuating from 53 feet to 148 feet, there seems to be a lack of hierarchy in how the streets are used. By including two lanes of bi-directional traffic on every street and a separated bike facility, the practical uses of the street will be virtually identical. The additional pedestrian space is welcome in general, but when all of these streets have ample paving for each type of user, it reduces the space for more park-like spaces and plantings. The trees look promising in section diagrams, but it will be a generation or more before they mature enough to provide substantial shading and to make the pedestrian spaces feel protected and distinct.

### *Robust Cultural and Civic Spaces*

The promise of the project to “be known as a unique arts and cultural destination” is both exciting and expected for a project at this scale (DPIR, 1-48). However, there are no buildings set aside to serve as museums, performing arts venues, or other formal cultural institutions. The Seaport’s Institute for Contemporary Art at Fan Pier is the perfect example of leading with investments in culture—this non-profit museum received a permanent home prior to most of the development being constructed and now serves as a cultural anchor. Meanwhile, community trust has been damaged by not building promised theater space in the same neighborhood. The proponent could demonstrate their commitment to the creation of an intentional new community and to the arts and culture of the City by incorporating significant



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indoor cultural spaces at the sites of buildings A and B. This needs to be prioritized as an early action before additional development can proceed.

As the proponent strives to set themselves apart from other large developments, it is also worth noting that this new “city” will be farther from a post office and from a public library branch than any site in the Seaport. Providing true public buildings and amenities like these on site in addition to the proposed offerings would be to the benefit of all of Columbia Point’s residents, workers, students, and other visitors.

#### *Other Facilities of Public Accommodation*

When comparing Figures 1-24 to 1-30, the proposed spaces for Facilities of Public Accommodation seem to be noticeably limited. We appreciate the inclusion of FPA spaces throughout the development; however, once they are spread across the ground floors of ten different buildings, they neither create a cohesive sense of place as a cultural destination nor are they clearly inviting public uses. In at least six of the sites, lobby areas are included in the FPA zones, and there is no indication or guarantee that these spaces will have civic uses or provide needed public amenities.

While we recognize that the details for the uses and dimensions of FPA spaces is typically defined in the Chapter 91 process, the scope and scale of this development should include a clearly defined set of uses and processes for connecting with potential nonprofit occupants of civic spaces. From conversations with nonprofits who have tried to build out and utilize FPA spaces elsewhere on the waterfront, it’s clear that early collaboration with a transparently selected tenant can lead to better designed spaces.

#### *Contributions to Moakley Park*

Finally, among the many public benefits offered by this site, we especially hope to see a guarantee for support of Moakley Park. This 60-acre open space is being redesigned by the City of Boston to serve a wider range of users and uses as well as incorporating a significant elevated flood barrier and new stormwater management systems. Despite earlier commitments to create and contribute to an operations and maintenance fund at Moakley Park in the future, the only reference to the park in the March 8th presentation about public benefits was \$75,000 for “[Elevated] Flood Protection between DCR



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& Moakley Park.” This falls short of what is needed and does not explicitly address potential changes to Day Boulevard.

The redesigned and reconstructed Moakley Park and Harborwalk 2.0 will offer a significant public amenity to attract and then support the businesses and the people who will live and work in Dorchester Bay City, and commensurate contributions to these amenities should be included in the mitigation package. It is our hope that Accordia, The City of Boston, and DCR can work together to maximize the benefits to the general public and Dorchester Bay City.

Thank you for your consideration of these comments. We believe in the potential for this project to create a vibrant, welcoming, and resilient waterfront destination, and we look forward to continued collaboration and feedback processes to help Dorchester Bay City live up to its promise.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott", with a long, sweeping flourish extending to the right.

Katherine F. Abbott  
President and CEO  
Boston Harbor Now