



Are you on board?

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October 24, 2022

Via email: susan.you@mass.gov

MassDEP Waterways Regulation Program
One Winter Street, 5th Floor
Boston, MA 02108

Attn: Susan You

Re: 38 Drydock Avenue

Dear Ms. You,

Boston Harbor Now respectfully submits the following comments on the *38 Drydock Avenue Waterways Administrative Request Application* submitted by Boston Planning and Development Agency. Our organization has been following this project since its inception and have most recently reviewed the materials provided for this administrative request application.

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. We have also spent the past six years working in partnership with government agencies, ferry operators, and other advocates to improve and expand regional water transportation in the region.

We comment this project for meeting a variety of objectives. First, it will expand waterfront access by improving a unique corner of the Harborwalk that has fallen into disrepair and by creating a use that will activate it on a regular basis. Second, the creation of a new dock at this location will expand the opportunities for ferry services just beyond the inner harbor. Third, ferry service to this dock will help reduce traffic congestion in the area and the need for parking in the Raymond L. Flynn Marine Park (RFMP). This is particularly important because trucks supporting maritime uses are now competing for street space with an increasing amount of general traffic in the RFMP. Although this area is served by Silver Line connections to South Station and Logan Airport, water transportation can provide a one-seat ride to North Station and the Logan Water Transportation Terminal. Finally, future ferry services at this location will be an important part of the multi-modal strategy outlined in the RFMP Master Plan Update.

Several features of this proposal are worth highlighting as best practices for other docks and piers: shelters for waiting passengers, ADA accessibility, and different



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docking options. Covered passenger waiting areas are a welcome addition in this proposal. Although ferries tend to be the most reliable mode of transit, protected waiting facilities for other ferry docks in the area are limited. Some have repurposed bus shelters, which are inadequate for the waiting crowds, while others have protected waiting areas in buildings some distance away. The proposed shelters will benefit all the users of this small park. Designing for universal accessibility at all tide levels is critical. Boston's significant tidal fluctuations make this challenging, and though other recently completed water transportation projects have complied with ADA/MAAB standards, some older facilities are in need of accessibility upgrades. Considerations for retrofitting these facilities for extreme tides and sea level rise are recommended. Finally, while bow loading ferries provide the most efficient and accessible way to load and unload, side loading vessels are prevalent in the harbor. Providing docking options with proper fender systems and freeboard heights to server a variety of vessel types accommodates a range of future services.

Without a broader public process to discuss the future-proofing of this facility, there are several concerns that we would like to raise or propose for further study. As highlighted in the [Inner Harbor Connector Business Plan](#) published in 2019, hybrid and electric vessels provide a low or zero emissions option that provide further environmental benefits including reduced greenhouse gas emissions and improved air quality. Provisions for charging a vessel or exchanging batteries at this location should be considered. Additionally, with anticipated coastal climate change impacts, the height of the mooring piles and the design of the gangways should consider extreme tides resulting from sea level rise and storm surge. The top elevation of the mooring piles was not provided on the plans, so we are not able to see whether this has been adequately considered.

We appreciate the opportunity to comment on this project, and look forward to following its progress towards implementation. We would be happy to speak with you or the proponent further if there are additional questions.

Sincerely,

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

Katherine F. Abbott
President and CEO
Boston Harbor Now