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October 24, 2022

Via email: frank.taormina@mass.gov

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

Attn: Frank Taormina

Re: 776 Summer Street

Dear Mr. Taormina,

Boston Harbor Now respectfully submits the following comments on the *776 Summer Street Consolidated Written Determination License Application* submitted by Hilco Redevelopment Partners and Redgate Capital Partners. Our organization has been following this project since its inception and most recently attended the October 4th Chapter 91 meeting held by MassDEP Waterways Regulation Program. We previously submitted written comments on the PDA as a part of the Boston Planning and Development Agency (BPDA) Article 80 Process.

As longtime stewards of the Boston Harborwalk, Boston Harbor Now is committed to ensuring 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 the waterfront is accessible and welcoming, is prepared for the coastal impacts of climate change, and centers equity and inclusion in the development of its design, construction, 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.

Although we understand there are some details that will be determined further along in the Chapter 91 process and the Article 80 process as licenses and permits are issued in phases, we would like to reiterate a few concerns highlighted in our previous letter. While we are appreciative that this project conforms to Chapter 91 requirements we invite the proponent to use the requirements as a jumping off point. To make the requisite open space, pathways, and ground floor building uses feel welcoming and public, all of the supporting waterfront design and amenities should be considered as well. On the whole, we hope to see more consolidated green space, welcoming signage, and high quality, publicly accessible amenities.



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Keeping the Harborwalk Public

In accordance with Chapter 91 regulations, the proponent has designed an 830-foot-long, 12-foot-wide right of way to act as the formal Harborwalk pathway and has verbally guaranteed it will remain open to the public. Ensuring that adjacent open spaces, especially on the water side of the formal path, also remain fully public should be memorialized in the license and management plan to ensure both the path and the shoreline remain fully accessible. More specifically, the management plan should include an explicit restriction on the number of private events that can be held in the open spaces within the Chapter 91 jurisdiction so the public's access to the waterfront is not infringed upon.

In addition to the formal pathway, the open space within Chapter 91 jurisdiction, and along paths leading through the site to access it, the public should be welcomed in. As previously mentioned in our letter to the BPDA, we hope to see comprehensive wayfinding and interpretive signage throughout the site invite people to the water. This signage should include the standard Harborwalk blue logo sign as well as historic signage. We recommend coordinating with the Friends of the Boston Harborwalk, an organization that most recently completed research and design for signs at Castle Island. Throughout the site, signage should direct people to the waterfront as well as enumerating the other public amenities provided by the proponent.

Improving the Public Realm and Public Amenities

Sixty-seven percent of the area subject to Chapter 91 will remain open space once the development is completed; however, as we've written previously, much of this space is impermeable and paved paths divide open spaces that could be more appealing to spend time in if they were consolidated. Where possible the proponent should simplify pathways and create green spaces that are more inviting and support a wider range of uses. Meanwhile, widening the spaces between buildings can indicate to the public that they are welcome to connect from the street to the waterfront and safely explore the space as well as supporting healthier trees and other plant growth.

We recommend additional tree planting and the installation of more structures or other protected spaces people can use for shade and shelter closer to the water, especially for days with inclement weather from precipitation to extreme heat. Increased vegetation may help to mitigate truck noise from the Butler Freight Corridor, which may be disruptive to future outdoor programming on site. In general, the proponent should carefully consider how best to design buffers between the planned open spaces and the existing maritime industrial uses adjacent to the site.

The rather limited indoor space within Chapter 91 jurisdiction includes proposals for lobby and retail with a potential community space in Turbine 1. These facilities of public accommodation (FPA) should offer tangible public and not feel merely residual or secondary. Creating a mix of programmable and inviting FPA spaces along the waterfront would further the proponent's endeavors to create an active and engaging



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ground floor that welcomes the entire community. Publicly accessible restrooms should be strategically located and well signed, retail tenants should cater to diverse audiences, and community spaces should be easy to locate and use for public meetings and other events. We encourage the inclusion of civic and cultural spaces on the ground floor within Chapter 91 jurisdiction and adjacent to the waterfront open space to enhance the overall public experience.

We appreciate the opportunity to comment on this project and look forward to seeing it move forward through the Article 80 and Chapter 91 process. We would be happy to speak with you further if there are additional questions.

Sincerely,

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

Katherine F. Abbott
President and CEO
Boston Harbor Now