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February 6, 2023

Via email: BOST_Rangers@nps.gov

CNY Master Development Plan Project
Boston National Historical Park
Attn: Superintendent Michael Creasey
21 Second Ave
Charlestown, MA 02129

Re: Environmental Assessment for the Charlestown Navy Yard

Dear Superintendent Creasey,

Boston Harbor Now (BHN) respectfully submits the following comments on the Environmental Assessment (EA) for the proposed actions under the Master Development Strategy for the Charlestown Navy Yard. Our organization has followed this project since its inception and submitted written comments on the EA in July 2022. Most recently, members from BHN attended the January 18th, 2023 meeting held by the National Park Service.

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 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.

Boston Harbor Now is supportive of the proposed demolition and redesign of both the Hoosac Building and Building 109 as well as the preferred alternative presented by the NPS. The two buildings proposed for demolition, though part of the historic character of the Navy Yard, were purpose-built for uses that are at odds with the current visitor experience. Neither the 1895 warehouse construction of the Hoosac Building nor the 1937 power station meets the needs of present guests, and both inhibit high-quality Harborwalk experiences. A new beginning for both structures allows for structures that are better prepared for sea level rise and other flood risks, better serves public needs in the historic waterfront park, and provides greater creativity and potential



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harborside activation. Redevelopment of the Hoosac Building enables the creation of a shared gateway facility for the Navy Yard, the USS Constitution, and the USS Constitution Museum for the benefit of the surrounding community and park visitors. A new open frame structure at the site of Building 109 can offer shade and protection along the waterfront, a much needed improvement in this area.

An Engaging New Hoosac Building

Of the three proposed alternatives, a brand new Hoosac Building will provide the best experience for both Navy Yard and Harborwalk visitors. No action would perpetuate the current disuse of this site and preserve the existing discontinuity in the Harborwalk. Adaptive reuse would stifle the integration of the USS Constitution Museum, US Navy security, and NPS Visitor Center, given the limitations of the odd layout of a building not intended to accommodate them. Conversely, a new building could be tailored to accommodate the new uses of the building, creating a more ideal visitor experience.

We hope that the new Hoosac Building would also allow for creative integration of the Harborwalk in its design to connect the current dead ends on Constitution Wharf and on Constitution Road. Just as the new building should be tailored to meet the needs of the museum and visitor center, it should also be designed to accommodate and activate the Harborwalk.

The redesign of this building provides an opportunity to reimagine what the Harborwalk can be—perhaps a way to preview the indoor space, perhaps a new viewing deck. Regardless, we hope that the Hoosac Harborwalk will be designed to remain open to the public at all times, be well signed, and be creatively integrated with the new building so that they are synergistic with each other.

Building 109

We believe that replacing Building 109 with a new open-frame shade pavilion will provide an excellent amenity for Navy Yard and Harborwalk users. The historic industrial character and expansive paved areas of the Charlestown Navy Yard suffers from the heat island effect. Although the Navy Yard is not devoid of shaded areas, there is limited shade in the active shipyard and along the waterfront. Adding a new protected rest spot in this area will allow people to spend more time engaging with the waterfront and fill a currently unmet need.



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We hope the new pavilion can also house interpretive programming that attracts more people to this part of the waterfront. The structure may be an ideal spot for programs and special events, and its singularity will make it an easy-to-spot landmark. When the space is not actively used for programming, public seating and added greenery would help activate and cool the area.

Building for Longevity

Like other parts of the Boston waterfront, the Charlestown Navy Yard is vulnerable to coastal storm flooding and sea level rise. At present, the Hoosac Building and Building 109 are not sufficiently elevated for the projected 40 inches of sea level rise expected by 2070. New construction allows NPS to build in flood protection and ensure that these structures serve the public well into the future. As NPS progresses with designs, we anticipate that both new structures will be sufficiently elevated to protect them from the 1% chance storm event in 2070 with 40 inches of sea level rise (SLR), and the new Harborwalk should be protected from nuisance flooding with 40 inches of SLR. NPS should continue coordinating with local stakeholders and the City of Boston on integrated coastal flood protection measures.

Just as we appreciate our partnership with NPS to make the Boston Harbor Islands exceptional, we appreciate the opportunity to comment on this important waterfront project and will continue to remain engaged in the future development of this area. We would be happy to speak with you further if there are additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott", with a stylized flourish at the end.

Katherine F. Abbott
President and CEO
Boston Harbor Now