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February 28, 2023

Boston Planning and Development Agency Attention: Caitlin Coppinger One City Hall Square Boston, MA 02201

Re: Dorchester Bay City Supplemental Filing Comments

Dear Ms. Coppinger,

Thank you for the opportunity to comment on the Supplemental Filing for Dorchester Bay City (DBC) 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 (BHN) has been following this project closely since 2020. Our staff has met with Accordia Partners and attended the most recent Morrissey Boulevard Community Advisory Committee (CAC), Public Realm and Resilience, and Transportation public meetings. I also serve on the CAC.

Via email: caitlin.coppinger@boston.gov

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. In addition to transforming a parcel of land that is currently dominated by surface parking, we see this project as a way to advance the goals of Harborwalk 2.0, a vision for a waterfront that is accessible and welcoming, prepared for the coastal impacts of climate change, and centers equity and inclusion in its design, construction, and programming. An accessible waterfront development should have linear and lateral connections between the city and the water and numerous activation strategies to serve all Bostonians, all of which has been proposed in this development. A resilient waterfront development includes a variety of climate adaptation strategies to protect and serve Boston at a district scale as the proposed elevated ridge is designed to do. To center equity in waterfront development is to focus on strategies that make the waterfront feel safe and inclusive through lighting, multilingual signage, full ADA accommodations, affordability, community relevancy, and the elimination of features that make users feel unwelcome or excluded, which we hope to see enumerated in future phases of review.

We appreciate the proponent's updates to the DBC proposal. They have made several improvements suggested by BHN and other community members, resulting in more welcoming open space, district-wide flood protection, and thoughtful transportation mitigation, all of which serve to reinforce principles of Harborwalk 2.0. As conceptual visions evolve into more fine grained plans, we expect to evaluate design details and policy decisions that will shape the



ultimate effectiveness of this project. In particular, BHN anticipates continued conversations about flood protection infrastructure, ground floor uses, civic and cultural space, and the design and operation of parks and the public realm on and off site. For a redevelopment site of this scale, we know that these future decisions will be financially and physically rather small, but at the human scale, they will have a significant impact on how people experience the site and waterfront.

Improvements since the DPIR

Since the proponent's last public presentation with the Boston Planning and Development Agency (BPDA), this project has made significant strides in addressing resilience, access, and public space concerns previously raised by our organization and other stakeholders. The proponent has created a more inviting waterfront that encourages visitors to move more freely between the Harborwalk, Department of Conservation and Recreation (DCR) park land, and the DBC site. Previous iterations of this project showed buildings that crowded along the edge of DCR's property, potentially delineating the privately owned space from the public land rather than creating a continuous park. Removing Building A, pulling back Buildings B and C, and moving the elevated ridge of flood protection onto the site makes the area feel more open, welcoming, and cohesive. The removal of Building A and a concerted effort to decrease impervious space around the site, especially around the 2 Morrissey section, has created an additional 2.2 acres of green space, which is better equipped to handle storm water and mitigate heat island impacts. Improved project phasing, and moving all of the resiliency work to Phase 1, is a huge improvement that will help better protect the site from coastal flooding in the near term and allow for integrated protection with adjacent projects across DCR and the Massachusetts Water Resources Authority (MWRA) properties and at Moakley Park. By building flood protection and open space early in the phasing, the proponents have prioritized resilience and public activation in the project.

Just as substantive as the on-site improvements are the proponent's commitments to off-site investments. The proponent has committed to creating a flood protection connection between their site and Moakley Park across DCR's Dorchester Shores Reservation and Day Boulevard. The dollar amount for this project and for supporting operations at Moakley Park have not been specified. The proponent has also agreed to pay an additional \$10 million in off-site transportation mitigation, increasing the total to \$36.8 million. Off-site transportation mitigation will be vital to DBC's transportation strategy, as will their emphasis on providing meaningful alternatives to driving to the site by making it better to travel on foot, by bike, and via public transit.



The existing transportation network does not adequately support trips to Columbia Point, and the proposed investments by the proponent as well as state and city agencies will make this site more regionally accessible. The mitigation funding has been designated to permit and re-construct Mt. Vernon Street for safe cycling and walking as well as to contribute to the redesign of JFK/UMass MBTA Station, Morrissey Boulevard, and Kosciuszko Circle (K Circle). All of these state-owned properties require significant infrastructure changes and boldly reimagined designs. The proponent's conceptual renderings for K Circle are exciting, but it will ultimately be the responsibility of the public sector to create the critical multimodal network that provides safer connections between the waterfront and inland neighborhoods.

Future Questions and Considerations

While the newest iteration of DBC's proposal is better aligned with our Harborwalk 2.0 goals, we still hope to see more details outlining the design and implementation of these conceptual visions. Our primary focus will continue to be on resilience infrastructure and ground floor uses as the development progresses.

The proponent had previously stated they would build a raised ridge at an elevation of 22.7 feet (BCB) along Dorchester Shore Reservation and provide \$5 million to help raise the Harborwalk on DCR land in front of Harbor Point Apartments. In addition to these improvements, the most recent filing added a flood protection connection to Moakley Park, which we applaud. Creating an unbroken line of flood defense is critical to protecting not only the site but the neighborhood from the effects of sea level rise and coastal storm flooding. We are supportive of these measures and their phasing, but we want to understand the proponent's implementation plan better. We hope that the proponent will consider the following questions in future phases of permitting and regulatory review.

- How will the park land and open space slope down to the water from the raised ridge in order to make it accessible and inviting for recreational uses, and what will that feel like to visitors?
- How will the new park integrate with the existing DCR park, and how
 will the sites' maintenance, funding, operations, and programming be
 managed and coordinated to ensure the waterfront is cohesive and
 engaging?
- Will the project invest in elevating the existing the official Harborwalk shoreline path above chronic nuisance flooding?



- How will the future raised ridge be constructed and managed to maintain the appropriate elevation in the event of settlement, erosion, or the need for additional height?
- What will the new flood protection connection to Moakley Park look like, and how will the team coordinate with the Boston Parks and Recreation Department to ensure the two berms are complementary and address Day Boulevard?
- Will funding be directed towards the operations, maintenance, and programming of the future Moakley Park as further community mitigation?

Though the proponent has offered a preliminary outline of the ground floor uses on-site, we would like to see a more detailed explanation that further explores the types of commercial space we can expect. This site is the largest Boston waterfront development of the past ten years. Because of the project's size, there are a number of small details that will cumulatively have a large impact on the overall ambiance. We would like to see these details sorted out through city or state public processes so that members of the public can weigh in.

- What types of retail/commercial uses will be located on the ground floor? Will any ground floor spaces labeled as such be used for other activating uses, such as cultural or institutional?
- How will the proponent select ground floor tenants, and how will they ensure that diverse tenants are supported and the selected offerings can meet the needs of a broad audience?
- What spaces will be considered facilities of public accommodation (FPA)? How will the proponent ensure that property managers and tenants using the space are informed of the public rights affiliated with Chapter 91?
- What wayfinding offerings will you provide throughout the site to advertise Chapter 91 amenities, including the FPA spaces and the Harborwalk?

The BPDA Process to Date

We appreciate the BPDA's efforts to update the public on the changes made to this site. The language access offered was impressive, and the organization of the meetings by topic allowed for a holistic view of the development in digestible segments. However, we worry about the unequal level of attention given to each issue in the discussion. The Q&A sessions focused more on discussions about housing and statements of support instead of the official



meeting topics. Of even greater concern was the lack of BPDA, City, and State staff at the Transportation meeting who could explain how this project would tie into the other planning efforts underway and better answer the questions from the public. The lack of public agency representatives to provide verification of public infrastructure project plans and to answer questions left the public doubting the ability of the transportation network to support this level of growth or to even address the existing safety and flooding issues in the area.

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,

Katherine F. Abbott President and CEO Boston Harbor Now