



Are you on board?

15 State Street Suite 1100  
Boston, MA 02109  
617 223 8667  
[bostonharbornow.org](http://bostonharbornow.org)

**Board of Trustees**

- Bud Ris, *Chair*
- Joseph Aiello
- Grace Macomber Bird
- Jamie M. Fay
- Robert Gollodge
- Elizabeth Grob
- Meaghan Hooper-Berdik
- Ann Lagasse
- Malia Lazu
- Mary Kay Leonard
- Shelagh Mahoney
- Martin O'Neill
- Elaine Richardson
- Demetriouse Russell
- Cathy Douglas Stone
- Kishore Varanasi
- Richard Walker

**Ex-Officio Members**

- Katherine F. Abbott
- Rev. Mariama White-Hammond
- Michael Creasey
- Fred Laskey
- Rebecca Tepper
- Andrew Hargens

**Lifetime Trustees**

- Governor Michael Dukakis
- Governor William Weld

**President & CEO**

- Katherine F. Abbott

April 7, 2023

Via email: [DEP.Waterways@state.ma.us](mailto:DEP.Waterways@state.ma.us)

MassDEP Waterways Regulation Program

Attn: Daniel Padien  
100 Cambridge Street, 9th Floor  
Boston, MA 02114

Re: Atlantic Wharf Facilities of Public Accommodation and Special Public Destination Facilities

Dear Mr. Padien,

Boston Harbor Now respectfully submits the following comments on the *Proposed Minor Project Modifications to Public Spaces at Atlantic Wharf* prepared by BP Russia Wharf LLC (an affiliate of Boston Properties). Boston Harbor Now, in conjunction with the Conservation Law Foundation (CLF), has been involved in past discussions with Boston Properties and the Massachusetts Department of Environmental Protection (MassDEP) regarding this site and the proposal to relocate a public meeting space from the second floor to a ground floor location facing Congress Street. We continue to remain invested in the activation of this site, which had been a long time model for public space design, signage, and programming. Boston Harbor Now staff has met with the property owner directly and attended the March 13th, 2023, public meeting about these changes.

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 waterfront 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 waterfront includes a variety of climate adaptation strategies to protect and serve Boston at a district scale. To center equity in waterfront 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.

Relocating the existing Fort Point Room to the ground floor simultaneously addresses two separate issues cited by the proponent, the vacancy of the former boloco space, which has left the ground floor dark and less engaging,



Are you on board?

15 State Street Suite 1100  
Boston, MA 02109  
617 223 8667  
[bostonharbornow.org](http://bostonharbornow.org)

and the current Fort Point Room's lack of visibility at the rear of the second floor. Although the move seems to solve two problems, it also creates a new one: an overall square footage reduction in total FPA space on site from the existing layout. We support the relocation of the Fort Point Room but would like to ensure that the new space is adequately supported to ensure its regular use and effective activation of Congress Street. Proper signage and staff training will be necessary to ensure the public are informed of their rights to the new space. We also suggest that a portion of the revenue generated from the rental of the existing Fort Point Space should be given to the Fort Point Operations Board as mitigation for the reduction in FPA space.

### *Moving the Fort Point Room*

Boloco was a valuable Harborwalk asset, providing a relatively affordable local food option and activating Congress Street adjacent to the Harborwalk. Like many other restaurants, it has struggled financially during the pandemic and closed this location. Boston Harbor Now appreciates the challenges facing the restaurant industry and the desire to activate empty or underutilized ground floor spaces that have emerged throughout downtown Boston in response to the pandemic and other real estate pressure. We believe the relocation of the Fort Point Room is an acceptable replacement use for the space that has the potential to reactivate this corridor.

For the reasons listed above, moving the Fort Point Room to a larger ground floor space is an intuitive decision. At present, the room's location on the second floor makes it relatively hidden from the public and difficult to find. Elsewhere in Chapter 91 jurisdiction, properties have been criticized for putting facilities of public accommodation on the second floor or in other tucked away locations. Moving it to the ground floor will help activate the streetscape and make it more visible to the general public. With proper signage, the room's relocation will hopefully encourage more potential users to find and take advantage of the conference room space and showcase the range of programming happening already. The new Fort Point Room would also be larger and have improved audio/visual capabilities, making it more functional for nonprofit organizations and other members of the public looking for meeting space.

The original Chapter 91 license called for 31,000 square feet of FPA space while the minor modification currently in effect includes 39,642 square feet. With these changes, the FPA total will be 33,742 square feet, an increase of 2,742 square feet from the original license but a loss of 5,900 square feet from the most recent minor modification. Given that the relocation of the Fort Point Room to the ground floor will allow the space it currently occupies to be rented



Are you on board?

15 State Street Suite 1100  
Boston, MA 02109  
617 223 8667  
[bostonharbornow.org](http://bostonharbornow.org)

at market rate, the reduction in square footage should be considered relative to the value of the loss. A portion of the added value generated from enabling a change in use for this space should be contributed to the Fort Point Channel Operations Board. While the obligation to pay into the fund was intentionally set at the outset of the license through *Special Condition # 8: Monetary Contributions*, we believe this should be an additional contribution made by the proponent to mitigate the lost FPA space that would otherwise help activate the channel and address the reduction in total square footage of publicly accessible space in the building.

### ***Activating the Fort Point Room and Addressing the Loss of a Concierge***

Moving the Fort Point Room to the ground floor will significantly improve its visibility, but intentional efforts will be required to ensure that it is well programmed and invites diverse usage. To help activate the room to its full potential, the proponent must support it through proper signage, staffing, and programming. The proponent intends to use digital signage to help advertise the new Fort Point Room's availability and other ongoing events held at Atlantic Wharf and around the Fort Point Channel. We see the advantage of digital signage, specifically its multilingual capability, but we anticipate that this will be supplemented by support from Atlantic Wharf's existing staff. With the loss of previously promised concierge staff, Atlantic Wharf security staff should be trained to understand the site's Chapter 91 amenities, including the public's rights to the new Fort Point room and other spaces on site, and they should be able to direct members of the public to someone who can help them reserve the space. We recommend that staff have a list of Q&A content about Chapter 91 and the site's amenities available for the public.

Boston Harbor Now also hopes to see the return of events that the space was previously known for, including panels, workshops, and community conversations. Since the start of the COVID-19 pandemic, fewer groups have hosted these kinds of events, especially in person, which has led to a reduction in events. The room's new location and significant amenity updates provide an opportunity to re-invite previous conveners to resume the civic gatherings that will be imperative to keeping the ground floor active.

The Fort Point Room will only sometimes be occupied by organizations renting the space, leaving the room largely vacant. Continuing to provide the space at no cost to non-profit groups for a variety of uses during the day and evenings can help fill some of the room's downtime while also visually advertising the room's availability. Events in the space should remain primarily free or low-cost for attendees in order to encourage equitable activation of the space.



Are you on board?

15 State Street Suite 1100  
Boston, MA 02109  
617 223 8667  
[bostonharbornow.org](http://bostonharbornow.org)

We were previously concerned about the lack of a public dialogue about these proposed changes, and we appreciate that there has been an effort, though with very limited advanced notice, to engage a wider range of stakeholders in this process. We appreciate the opportunity to comment formally on Atlantic Wharf's FPA space. 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", with a stylized flourish at the end.

Katherine F. Abbott  
President and CEO  
Boston Harbor Now