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April 21, 2023

Via email: Jennifer.Hughes@mass.gov

MEPA Office

Attn: Jennifer Hughes
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Dorchester Bay City Supplemental Draft Environmental Impact Report

Dear Ms. Hughes,

Boston Harbor Now (BHN) respectfully submits the following comments on the Dorchester Bay City (DBC) Supplemental Draft Environmental Impact Report (SDEIR) prepared 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. Our staff has been closely tracking this project for more than three years, and we previously submitted comments on the DBC Environmental Notification Form (ENF). Most recently, we submitted comments to the Boston Planning and Development Agency (BPDA) regarding the proponent's supplemental filing. I also serve on the Morrissey Boulevard Community Advisory Committee.

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, which have 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 direction of the proponent's ongoing changes and clarifications to the proposal. Since the ENF, they have made several



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improvements suggested by BHN and other community members that have resulted in more welcoming open space and expanded park spaces, district-wide flood protection linking to other structures planned on adjacent properties, and thoughtful transportation mitigation, all of which serve to reinforce the principles of Harborwalk 2.0. Relative to the proponent's BPDA Supplemental Filing, many conceptual proposals have been clarified, especially details about climate adaptation infrastructure strategies and design. We have some lingering questions about the integration of the raised ridge with adjacent parkland. As a key component of climate adaptation in this project and part of a district scale protection system, we hope to see best construction, maintenance and activation practices implemented to ensure its longevity and vitality. We also believe there are issues the future FEIR or further permitting processes should address, namely additional information regarding raising of Day Boulevard and Mt. Vernon Street as well as proposals for the future Chapter 91 license including the design and uses of facilities of public accommodation (FPA).

Updates from the MEPA ENF and BPDA Supplemental Filing

Since Boston Harbor Now last reviewed DBC during the MEPA process, 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 freely between the Department of Conservation and Recreation (DCR) parkland and the Harborwalk and the DBC site. Previous iterations of this project showed buildings 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 proponent has also improved the climate resilience of the site by moving all of the project work on coastal flood protection to Phase 1. Moving this work to the forefront, will prepare the site to withstand any near term storms and allow for integrated protection with adjacent projects across DCR and the Massachusetts Water Resources Authority (MWRA) properties to connect with significant flood protection at Moakley Park. By building adaptation measures and open space early in the phasing, the proponents have prioritized resilience and public activation in the project.

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 safer to travel on foot, by bike, and via public transit.



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Raised Ridge Design

The raised ridge sloping down to the shoreline serves as a significant climate adaptation measure on the site, and we hope to maximize its dual purpose as a welcoming open space and passive flood protection feature. Particularly noteworthy is the 10:1 (horizontal to vertical) slope proposed for the grade down from the top of the berm to the existing elevation along the waterfront, which should make it ADA compliant and accessible to various park visitors. We hope that some flatter spaces can be integrated to invite a wider range of recreational uses. By contrast, the decision to meet the grade of the existing Harborwalk puts the lower parts of the park and the waterfront walkway at risk of future nuisance flooding due to sea level rise. We hope that improved coordination with DCR can elevate the existing Harborwalk, which will protect the path from high tide flooding and diversify programming opportunities along the waterfront. Ultimately, an elevated waterfront path can support a broader range of programs and protect against more different kinds of flooding, building activation and adaptation into the waterfront.

We also appreciate the proponent's efforts to understand the long term durability of the proposed raised ridge. The proponent's study of the current design found that the clean fill proposed to construct the raised ridge will prevent through-seepage and the additional fill will not impact the short or long-term performance of the Massachusetts Water Resources Authority (MWRA) North Dorchester Bay Combined Sewer Outfall Storage Tunnel (CSO Tunnel) and Columbus Park Connector (CPC). As the design of the ridge is further refined, we want to emphasize the criticality of continued coordination with the City of Boston staff leading the design of Moakley Park and the Moakley Connectors project. The inclusion of a report from Weston & Sampson Engineers' Geotechnical Engineering Data Report in the filing was a good sign. Ongoing coordination will be vital to ensuring a continuous line of flood protection but also for sharing best practices for berm construction and maintenance.

Creating a Continuous Line of Defense

DBC's raised ridge, described above, is only one piece of the necessary flood protection infrastructure to create a district wide adaptation strategy that can protect the Columbia Point peninsula. The proponent has worked to build or help fund additional off-site flood infrastructure as a part of their mitigation. Notably, since their most recent BPDA Supplemental Filing, the proponent has further outlined two off-site measures for connecting to higher points of elevation. First, the proponent has suggested grading Day Boulevard, located between Moakley Park and the raised ridge along Dorchester Shores, north of the existing Access Road. Second, the proponent plans to raise a portion of



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Mt. Vernon Street to an elevation of $20.5 \pm$ feet BCB before the completion of Phase 1 if the implementation of flood protection on DCR land adjacent to the Harbor Point Apartments remains uncertain. Although listed as a project in the Climate Ready Dorchester Plan, this project has not begun even initial design.

These measures are reasonable alternatives, but we would like to see more information provided about both measures in future filings. The proponent has already acknowledged that the Day Boulevard flood connection will be further elucidated as part of the FEIR, and we would like to see additional information provided for the Mt. Vernon contingency plan as well. As the proponent continues with both designs, we hope they provide the following information: existing and target elevation, proposed grade, map of the extent of work, and timeline. We would also like to better understand the coordination process required to make substantial infrastructure changes on land not owned by the proponent.

Chapter 91 License Expectations & Facilities of Public Accommodation

The proponent has made significant strides in both their climate resilience infrastructure and open space, but to support and activate these spaces, the proponent will need to provide thoughtful facilities of public accommodation as well. Although the proponent has explained how they will legally comply with Chapter 91 and the required FPA space, we hope to see a more detailed plan outlining potential ground floor layouts, uses, and tenants since these decisions have determined the quality of inclusive space around the waterfront. As stated in our most recent letter, we would like to see these plans defined through city or state processes that enable members of the public to weigh in, ideally before the Chapter 91 process. Defining FPA space uses and intentions too late in the developmental process can lead to awkwardly placed or sized spaces that cannot accommodate their operator's needs or that remain underutilized by the public.

We appreciate the opportunity to comment on this project and look forward to following its progress toward 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".

Kathy Abbott
President and CEO
Boston Harbor Now