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December 1, 2023

via email: planeastboston@boston.gov

Boston Planning and Development Agency

Attn: Kristina Ricco

1 City Hall Square, Floor 9

Boston MA. 02203

Re: PLAN: East Boston and Article 53 Zoning Amendments

Dear Ms. Ricco

Boston Harbor Now respectfully submits the following comments on the *Draft PLAN: East Boston and associated Article 53 Zoning Amendments* proposed by the Boston Planning and Development Agency (BPDA). Our organization attended PLAN: East Boston in person events in the early stages of the planning process and has been tracking this project closely since discussions about the Waterfront and Evolving Industrial Areas began in July 2023. Most recently, we attended the PLAN: East Boston Draft Release Public Meeting held on September 12, 2023.

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 that waterfront developments are accessible and welcoming; are prepared for the coastal impacts of climate change; and center 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.

Traveling to, along, and across the Water

As advocates for a more accessible Boston Harbor, we appreciate the attention the BPDA has put into planning related to new multimodal connections to, along, and across Boston Harbor and Chelsea Creek. The plan contemplates new street features like bike lanes, curb extensions, and other complete street elements that expand the existing street and greenway



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network for a wide range of users, connecting people to the waterfront and its amenities. On the Chelsea Street and McArdle bridges, bike lanes and potential pedestrian improvements on the surface as well as new signage will create a safer and more comfortable experience for people crossing the water. New bike infrastructure on Border Street will help people traveling along the waterfront, while new shared-use paths extending the Mary Ellen Welch Greenway will help visitors get to Piers Park and Winthrop Greenway. We applaud these improved connections, especially in areas where the official Harborwalk does not exist along the waterfront due to designated port areas or historic uses. Though these alternate routes are not a perfect substitution for Harborwalk, the proposed improvements help realize some of the goals of “Waterfront Way,” envisioned by the 2000 East Boston Master Plan by creating connections between waterfront amenities. Finally, as the BPDA works to implement these infrastructure improvements, we hope they will be safe, comfortable, and intuitive to navigate.

We also appreciate that PLAN: East Boston builds off the ideas laid out in *Vision Chelsea Creek*. In the 2020 community-led plan, *Vision Chelsea Creek* called for an “Urban Boulevard [that] envisions a safer, more pedestrian- and cyclist-friendly corridor along Route 1A” with a potential flood barrier alignment and waterfront access points, which is echoed in the BPDA’s plan for McClellan Boulevard. We are excited that the BPDA’s design envisions a new Harborwalk along Chelsea Creek with inland connections to the neighborhood, opening a currently inaccessible part of the waterfront to community members. Though the final design of this right of way will be determined by the Massachusetts Department of Transportation (MassDOT), we appreciate the city’s advocacy for waterfront access and the community-generated planning document.

To expand the transportation network across the harbor, the BPDA has proposed a series of recommendations to make Inner Harbor crossings more accessible and equitable. We appreciate that the BPDA recognizes the importance of creating multi-modal options that accommodate cyclists, pedestrians, and public transit users and understands the inequities affiliated with the current pricing of different harbor crossing modes. With reduced fares and more consistent scheduling, ferries could be both the short and long-term solution to facilitating more Inner Harbor crossings. We recommend the BPDA, the City of Boston, and the MBTA work collaboratively to establish a permanent, affordable year-round ferry service between East Boston and Downtown. The service piloted during Blue Line shutdown and the Sumner Tunnel Closure over the past two years only scratches the surface of the potential for a more frequent, fare-integrated, bow-loading ferry system.



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A Vision for the Waterfront

New zoning for the waterfront district up-zones current waterfront industrial areas to include additional commercial uses: Community Uses, Cultural Uses, Entertainment and Recreational Uses, Office Uses, Retail Uses, and Service Uses. These zoning changes do not preclude the current water-dependent industrial uses found on the waterfront but instead allow the new uses to exist alongside them, assuming they are located outside the Designated Port Area (DPA).

The plan acknowledges that many of the existing DPAs in East Boston are not consistent with the BPDA's goals for the waterfront but stops short of outlining a vision for how the waterfront might look if the DPA designation were to be removed for any individual sites. Although there is a desire for job creation and for more welcoming uses than some of the existing waterfront industrial areas, there is no explicit mention of what uses the BPDA or community members hope to see along the waterfront in these areas.

The allowed uses in the proposed zoning suggest a less industrialized waterfront with more commercial uses, but it may be helpful for incoming development to have a more concrete list of desired amenities and uses along the waterfront, especially on the ground floor. Chapter 91 requires buildings within 100 feet of a project shoreline or on pile-supported piers that do not have a water-dependent use to include facilities of public accommodation (FPAs), providing the community with public amenities. Given the opportunity Chapter 91 presents, we recommend that further study be undertaken, perhaps in the Environment Department's Resilient Border Street Waterfront Project, to better understand how future Chapter 91 amenities and FPA spaces can be used to support the community members' waterfront vision.

The Resilient Border Street Waterfront Project, a new design study to evaluate coastal resilience strategies along the Border Street waterfront, is a key next step in the implementation of the City's Climate Ready Boston initiative. We hope the process will evaluate flood prevention strategies that will be applicable for Border Street both with and without a DPA designation, in the event that this unique area is removed from the state's protected status. If the DPA designation remains, point access between industrial sites to provide the public with views of the water or new open spaces is recommended. If the DPA designation is removed, the strategies contemplated by the plan should incorporate public access as well as opportunities for the public to interact with the water. As noted previously, a list of landside amenities needed to support waterfront usage should be compiled and used as a resource in further planning. Similarly, the Urban



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Design Guidelines created as a part of PLAN: East Boston should be expanded to include guidelines for new Harborwalk that may be created either along the water's edge or as points of access within a working waterfront. Though the proposed design guidelines contain sections on the public realm and open space, special attention should be placed on the Harborwalk and the design details needed to keep the Harborwalk cohesive and welcoming.

In-line Edits

In our reading of the plan and affiliated zoning amendments, we noticed some copy edits that may need revisiting. On page 159 in the caption of Figure 03-49, there is a typo "The parallel rights-of-way for McClellan Highway and the rail parcels converge at this location for a combined **XX**-foot right-of-way".

Additionally, the word "handicapped" appears throughout the text of Article 53 and likely in much of Boston's zoning code. Though it is not part of the code contemplated for review, we suggest the BPDA discuss proper terminology with the Disability Commission staff or use the terms "person with a disability" or "disabled."

In conclusion, Boston Harbor Now is appreciative of the BPDA's proposed plan to create a more accessible waterfront. Focus on multimodal connections will allow a wider variety of visitors to travel to, along, and across the water, and improvements like McClellan Boulevard create new opportunities for waterfront access. Upgrades to street networks will create safer and more comfortable travel paths, while new shared-use paths will connect new audiences to the water. In future planning efforts, we hope to see more focus on landside amenities to support community needs and expand waterfront usage. Though we look forward to the new Resilient Border Street Waterfront Project, which will delve deeper into coastal resilience infrastructure, we hope additional work can be done to better support the activation of the waterfront throughout the neighborhood.

Thank you for the opportunity to comment on the BPDA's plan for East Boston and associated zoning and urban design guidelines. 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