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January 22, 2024

Via email: jennifer.hughes@mass.gov

MEPA Office

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

Re: Ryan Playground Improvements FEIR

Dear Ms. Hughes,

Boston Harbor Now respectfully submits the following comments on the *Ryan Playground Improvement Project FEIR* submitted by the Boston Parks and Recreation Department. Members of our organization have been following this project since its inception and have attended past public meetings.

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.

The Berm

The renovation of Ryan Playground, a 9-acre waterfront park adjacent to a tidal section of the Mystic River, will increase local and regional climate resilience in Charlestown and beyond by constructing a vegetated berm partially supported by a 6.5-7.5-foot high seawall at the water's edge. The new berm, which is expected to contribute to district-wide coastal flood protection in the event of the 2070 1% annual flood event, will protect people, infrastructure, evacuation routes, and public transportation when completed.

We appreciate that this project will protect not only the park, a valued community asset, but also the broader neighborhood from the threat of coastal inundation. Even more, we applaud the proponent for the



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thoughtful design of the berm, which will be built to be adaptable and capable of being modified to accommodate future sea level rise. The berm will also be “constructed atop a subsurface support system comprised of ground improvements, light weight fill materials and walls atop pile supports”, mitigating settlement that may happen over time. These design features will ensure the berm’s long-term functionality, allowing the City to protect the district from coastal flooding for a longer time scale.

Reducing Impervious Surfaces

Since the Draft Environmental Impact Report, the proponent has reduced the amount of impervious surface on site from 34,677 SF to 33,177 SF. The reduction in paved impervious surfaces is a welcome improvement, as its overabundance can increase stormwater runoff and contribute to the heat island effect. Though pervious surfaces are environmentally beneficial, we understand that some impervious surfaces can be helpful for accessibility. Smoother paved surfaces are preferable to stormwater-permeable but less stable stone dust pathways for those with mobility challenges, especially when wet. We believe the proponent has minimized their use of hot mix asphalt pavement, limiting it to paths further away from the water’s edge and in areas requiring universal access. Having said this, in areas where there are impervious surfaces, we want to ensure that there is appropriate drainage to minimize stormwater accumulation that would make paths impassable. In particular we hope there is sufficient drainage along the inland pathway adjacent to the playground to prevent stormwater from accumulating.

We support the reduction of impervious surfaces to the alternative of relocating recreational amenities inland to accommodate more vegetated surfaces along the berm. Moving amenities inland would reduce the available recreation space, a commodity highly prized by the Charlestown community. There is a limited amount of open space within the neighborhood, and with anticipated population growth outlined by the latest neighborhood plan, PLAN: Charlestown, maximizing the amount of usable recreation space provided by Ryan Playground is prudent. In particular we find it important that the Harborwalk remain close to the water. Ryan Playground is uniquely located along the waterfront and the Harborwalk there provides the community with the opportunity to relax and enjoy the views of the Mystic River. We hope that keeping the Harborwalk in close proximity to the water helps connect the community to it.

Landscaping and Signage

Although most of the park will be used for recreational activities, which require large swathes of uninterrupted flat surfaces, we appreciate that the proponent will be “planting... 160 native trees and shrubs and other



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vegetation...” We are pleased that the proponent will use native, salt-tolerant, and erosion-resistant plantings per CZM’s *Coastal Landscaping Index and StormSmart Coasts resources*. Though this project hopes to minimize the risk of coastal inundation, we appreciate that the selected plantings can weather potential damage from flooding.

As the proponent continues to refine their designs, we hope they will consider creating a signage plan that includes multi-lingual wayfinding and interpretive signage. Wayfinding signage directing people to the Harborwalk and other notable amenities, like the playground and various sports fields, will help people quickly get to their destination. In particular, we hope to see signage directing people to public restrooms. It is our understanding that no year round public restrooms are planned on-site. Short of providing the public with restrooms, we recommend that the proponent direct people to the Schraft’s Center, which has public restrooms open during operating business hours. We also recommend coordinating with the Friends of the Boston Harborwalk, which has completed research and design for many of the signs found around Boston Harbor, to create engaging interpretive signage for the site.

Boston Harbor Now is glad to see that this project and the myriad of benefits that come with it is moving forward. The on-site flood resilience measures will help protect the broader neighborhood from coastal flood impacts, and we appreciate that the flood infrastructure being created will be adaptable in the event of additional sea level rise. We also are pleased to see this project optimizes the amount of recreational space available. Ryan Playground is one of the critical open spaces for organized sports in Charlestown and waterfront views, and its continued ability to provide the neighborhood with these resources is vital. As the proponent continues their site design, we recommend the proponent consider the signage needed to help navigate and further activate the park.

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 that reads "Kathy Abbott".

Kathy Abbott
President and CEO
Boston Harbor Now