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January 8, 2024

via email:Jennifer.Hughes@mass.gov

MEPA Office

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

Re: Dorchester Bay City Final Environmental Impact Report

Dear Ms. Hughes,

Boston Harbor Now respectfully submits the following comments on the Dorchester Bay City (DBC) Final Environmental Impact Report (FEIR) 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 closely tracked this project for more than three years, and we previously submitted comments on the DBC Environmental Notification Form (ENF). Most recently, we submitted comments on the Supplemental Draft Environmental Impact Report (SDEIR). I also serve on the Morrissey Boulevard Community Advisory Committee, a group convened by the Boston Planning and Development Agency (BPDA) to provide additional input on this project and others in the area.

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 into a new waterfront development, we see this project as a way to advance the goals of Harborwalk 2.0. Harborwalk 2.0 is 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. This has been well considered in the proposed development. A resilient waterfront development includes a variety of climate adaptation strategies to protect and serve Boston at a district scale. The proposed elevated ridge is designed to do this. 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. We hope to see this enumerated in future phases of review.

The Raised Ridge

This project, in addition to providing several other public benefits, including building 19.7 acres of public realm and publicly accessible open



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space, will realize critical infrastructure needed to protect the broader neighborhood from the threat of coastal flooding. The Raised Ridge, the primary coastal flood infrastructure on site, will peak at 22.7 feet BCB, 1.07 feet higher than the projected 2070 100-year storm surge event. The remainder of the site inland of the ridge will be elevated to 21.5 feet BCB, ensuring it will remain above harbor floodwaters even if flood entry pathways from Savin Hill Cove and Morrissey Boulevard flank the site. We appreciate that the Raised Ridge has approximately a foot of freeboard, and the rest of the development will not be inundated during a 100-year storm with 40 inches of sea level rise. We hope the Raised Ridge is able to protect the site from flood damage even further into the future; routine maintenance of the ridge will help to minimize erosion and extend its useful life. Looking further into the future, we hope the ridge and the remainder of the site can be adapted to future flood conditions, which are expected to be more extensive as sea levels rise and extreme storms become more common.

The Raised Ridge has been iteratively improved and been further designed over the past several years, and we appreciate the amount of detail the proponent has provided in this filing. We are specifically pleased to see the thoughtful mix of plantings used to enhance the ridge. Deep-rooted, salt-tolerant plantings like the ones chosen by the proponent will help stabilize it, provide wildlife habitat, and be able to recover in the event of a storm. As the proponent further designs the ridge, we hope they will strategically place plantings so that they are able to provide ecosystem services and activate the area without discouraging visitors from moving between the proponent's site and the neighboring DCR land. The planned shrubbery and plantings should still encourage porosity between the sites, and the transition between them should be as seamless as possible. Visual connectivity between the site and the water should be maintained, and pathways linking the two sites should be welcoming, with signs encouraging exploration of both spaces.

Creating Resilience Connections

To protect the district and inland neighborhoods from coastal flooding, the proponent and other abutting property owners must ensure that their coastal adaptation infrastructure provides a continuous line of defense. Since the last filing, the City of Boston (the City) has issued a Request for Proposals (RFP) for pre-construction planning and design services for the Resilient Moakley Park Connectors Project. This project, not the proponent, will determine where and how to elevate Day Boulevard. Though the City has undertaken this process, the proponent has stated they will remain engaged to ensure that the DCR Connector, which they have committed to constructing or funding, is properly aligned with elevations in Moakley Park. We appreciate that the proponent is coordinating with both



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City and State agencies to ensure that an effective line of flood protection is created. We are especially pleased that the proponent has considered the timing of infrastructure construction. In the event that resilience measures have not been initiated for the portion of the Dorchester Shores Reservation adjacent to the Harbor Point Apartments prior to the completion of the final design of the Mt. Vernon Street Complete Streets improvements, the proponent has stated that “a portion of Mt. Vernon Street will be raised to an elevation of $20.5 \pm$ feet BCB prior to the completion of Phase 1 of the Project...” The proponent is also ready to work with the City if the Moakley Park resiliency solutions are not built by 2050 to prevent an increase in floodwater velocity at the driveway of the State Police Barracks along Day Boulevard during a future 100-year event. In the same vein, we commend the proponent for constructing the Raised Ridge, including the DCR Connector portion, as a part of Phase 1, thereby prioritizing district-scale flood protection and adaptation along the coast.

Creating Park Connections

Just as there should be continuous coastal flood protection between the proponent’s site and surrounding development, streets, and parkland, so too should the user experience traveling between sites also feel continuous and seamless. We appreciate that the proponent has worked collaboratively with neighboring property owners and has been responsive to their feedback. Notably, we applaud the proponent’s improved grading in response to the request of the Harbor Point Community Task Force to facilitate pedestrian connectivity between the two properties. We also appreciate the proponent’s commitment to stewarding other public areas to ensure that they also feel inviting. The proponent has outlined in the Draft MOU with DCR that “The execution of a license agreement to govern the day-to-day maintenance obligations which are to be assumed by the Project with respect to certain portions of the Dorchester Shores Reservation, including related funding commitments to DCR,” ensuring that the space will be maintained and welcoming. Attention to detail in the upkeep of the space often determines whether people feel comfortable using it. Though not listed in this filing, we are also pleased that the proponent will be providing funds to activate and maintain Moakley Park, helping create a network of vibrant open spaces around the site for the benefit of all.

Future Facilities of Public Accommodation

Though this will be further addressed during the Chapter 91 licensing process, we are pleased the proponent has already started planning their Facilities of Public Accommodation (FPAs). The conceptual locations of the FPAs detailed in this filing are well placed, with most oriented towards the waterfront or other public gathering spots and the large contiguous open spaces. Notably, FPA space located in Buildings A, B, and C all face



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the beaches and the Dorchester Bay waterfront, and FPA space located in Building D and E focuses on activating the public green space on Third Street. Though only conceptual, we hope the finalized FPA spaces continue to face these public areas. Locating FPAs along heavily trafficked areas not only helps activate the outdoor space but also helps the public intuitively navigate to these public amenities.

As stated in our most recent letter, we would like to see more detailed FPA plans defined through city or state processes that enable members of the public to provide input on the design and use of the spaces, ideally prior to the Chapter 91 process. Defining FPA space uses and intentions too late in the developmental process can lead to awkwardly placed or oddly sized spaces that cannot accommodate their operator's needs or remain underutilized by the public. Though we do not advocate for any specific uses or users, given the site's large size and multiple FPA opportunities, we hope to see a diversity of FPAs that can be accessible at a variety of price points and appeal to a variety of audiences, especially those who have been traditionally excluded from Boston's waterfront.

Boston Harbor Now is glad to see this project, and the myriad benefits that come with it, moving forward. The extensive on-site and off-site flood resilience measures will help protect the broader neighborhood from coastal flood impacts. Creating a continuous line of defense is challenging, and we appreciate that the proponent is working closely with other property owners to ensure that infrastructure is aligned and appropriately phased. As flooding becomes more extensive and intense, we hope the proponent will be ready for future flood conditions. The project will also activate the waterfront. We commend the proponent's commitment to supporting the Dorchester Shores Reservation and Moakley Park, and we remain excited about the new open space and public amenities, like FPAs, that this project will help realize.

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".

Katherine F. Abbott
President and CEO
Boston Harbor Now