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April 23, 2024

Via email: susan.you@mass.gov

MassDEP Waterways Regulation Program

Attn: SusanYou,
100 Cambridge Street,
Suite 900
Boston, MA 02114

Re: Dorchester Bay City Consolidated Written Determination

Dear Ms. You,

Boston Harbor Now respectfully submits the following comments on the Dorchester Bay City (DBC) Consolidated Written Determination (CWD) 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) and Supplemental Draft Environmental Impact Report (SDEIR). Most recently, we submitted comments on the Final Environmental Impact Report (FEIR). 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. 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.

Phasing

Dorchester Bay City will be developed in two phases. According to the CWD, the first phase is expected to build the Raised Ridge, which includes both the on-site and off-site portions, “major new open spaces,” which consist of the Boardwalk, the Dorchester Green, Dorchester Bay Esplanade,



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the Draw, and an open space area on the northwest portion of the Bayside Site, the street network, and Buildings A, B, C, D, E, G, K, L, and M. Phase 2 will likely focus on the remainder of the site which includes Buildings I and J, as well as any remaining common elements like roads, utility infrastructure and stormwater management.

We've always appreciated the proponent's "commitment to helping to protect nearby areas and neighboring properties from rising sea levels in collaboration with DCR and the City, creating new open and green spaces for public enjoyment ... early in the Project's development timetable." The site sits at the apex of a significant flood pathway that could turn Columbia Point into an island during a major storm and allow coastal flooding to intrude into inland neighborhoods. The delivery of this flood infrastructure affects not only the proponent's assets but also the neighborhood's. BHN uses Dorchester Bay City's promise to "front-load" critical flood infrastructure and open space as well as their willingness to go beyond their project's bounds as the gold standard which we hold other developments to.

It is, therefore, vital to us that the proponent commit to building their on-site and off-site flood infrastructure in Phase 1 in writing as promised through the permitting process. More specifically, these commitments should be realized before or concurrently with the development of the buildings. Similarly, open space should be built ahead of or in conjunction with the development of buildings on site.

Facilities of Public Accommodation and Activation

Dorchester Bay City is an exceptionally important location for Facilities of Public Accommodation (FPAs) because it is a convergence point of several waterfront assets, destinations, and communities. These include not only Dorchester Bay City itself and the neighboring redevelopment projects, but the Harbor Point community; UMass, Boston College High School, and the McCormack Middle School; the DCR shoreline amenities; Carson Beach; Moakley Park; the modernization and expansion of the Mary Ellen McCormack community; the surge of multifamily development around Andrew Station; and the established neighborhoods a bus ride or bike ride away. Properly planned FPAs in this location can be quite successful with such captive and diverse audience around it.

We expect FPAs to be inclusive and activate the site and, by extension, support visitation to the waterfront. Boston Harbor Now believes that FPAs can play a vital role in creating a more equitable waterfront by introducing uses and amenities that support and encourage waterfront visitation for all. As the proponent selects tenants for their FPAs, we ask that they consider tenants who will create a more welcoming waterfront and further the idea of



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the waterfront as a destination. FPAs and other waterfront amenities should provide services at various price points, including low-cost and no-cost opportunities, to eliminate social barriers that may deter visitors from coming to the area and to make it accessible to all. Although we expect to see basic amenities that allow visitors to use the space comfortably, like water fountains and bathrooms, we also want to see amenities that actively encourage audiences to visit the waterfront. FPAs should reflect both the local community and the communities we hope to bring to the waterfront. To actively rewrite the waterfront's segregated past, FPAs should appeal to audiences who have not historically been welcomed to the waterfront.

To be successful, FPAs must be located in areas of high visibility, like along the waterfront, open space, and other places with high foot traffic. Signage, preferably icon-based or multilingual, can help direct visitors to amenities, but it is not a substitute for thoughtfully located spaces that are easily found. We appreciate that the proponent has located many of their FPAs along places of heavy foot traffic like the parks and waterfront. Boston Harbor Now approves the proponent's decision to relocate FPAs from the Commonwealth Tidelands to other portions of the ground floor so long as these spaces are areas of high visibility and the relocation supports areas where visitors will congregate.

In conclusion, Boston Harbor Now is glad to see this project and the myriad of potential benefits that come with it moving forward. In particular, we would like flood infrastructure and open space prioritized in the construction sequencing to project this site and its neighbors. This investment and its connection to the city's flood resiliency project at Moakley Park are critical to protecting significant Boston Housing developments at the Old Colony and Mary Ellen McCormack communities. Additionally, as the site develops, we hope to see thoughtful FPA spaces and amenities that invite people to the waterfront and welcome a diverse audience.

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 "Katherine F. Abbott".

Katherine F. Abbott
President and CEO
Boston Harbor Now



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