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June 7, 2024

Via email: nick.carter@boston.gov

Boston Planning and Development Agency
Attn: Nick Carter
1 City Hall Square, Floor 9
Boston MA. 02203

Re: Reserved Channel Project (Phase 1) Project Notification Form

Dear Mr. Carter,

Boston Harbor Now respectfully submits the following comments on the Reserved Channel Project Notification Form submitted by the Oxford Properties Group. Our organization has been following this project since its inception, and most recently, staff attended the Reserved Channel Meetings on May 8th, 15th, and 21st. A member of our staff, Kelly Sherman, Manager of Waterfront Design, is also on the CAC, a group convened by the Boston Planning and Development Agency (BPDA) and Massachusetts Environmental Policy Act Office (MEPA) to provide additional input on this project.

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 and Flood Resilience

With sea levels persistently rising and the threat of coastal flooding becoming more extensive, it is vital that we build new coastal flood infrastructure when the opportunity arises. New waterfront development like this provides an opportunity to reimagine sections of the waterfront as more resilient and welcoming. We hope this development can help expeditiously realize flood infrastructure that protects communities from the threat of coastal inundation while also allowing them to access the water, one of Boston's great natural resources. Coastal flood infrastructure should help contribute to flood protection on a district scale and help create the continuous line of defense needed to protect more inland communities and assets vulnerable to flooding. Flood infrastructure should also be adaptable,



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allowing for additional protection as needed in the future. Finally, flood infrastructure should still allow for connection to the water and enhance the waterfront's use.

We appreciate that the proponents planned coastal infrastructure maintains a visual connection to the water. The proponent has opted to elevate their Phase 1 site in tiers, with open space and some streets raised to 19.1 feet BCB and the remainder of the site being elevated to 22.3 feet BCB, allowing clear sightlines to the water. The finished flood elevation of residential buildings will be raised an additional foot. However, we worry that physical connection to the water will be challenging even with these visual connections to the water, especially in Phase 1. As a part of Phase 1, the proponent has redesigned the existing park to tier down to the water. The new park will have three terraces at different elevations and an elevated boardwalk. The lowest terrace, closest to the water will be at 15.5 feet BCB, below the projected 2070 future mean higher high water of 16.1 feet BCB. The highest terrace will meet the expected elevation of Pappas Way, 22.3 feet BCB. Although the elevated boardwalks shown are an interesting concept that allows visitors to walk along the water safely above the future mean higher high water, it begs the question of how people are expected to access the actual terraces themselves, as depicted in various meetings. While the elevated boardwalks allow people to walk along the waterfront, it is less clear how people will get down to the water and how else visitors will be able to use the park with the elevated boardwalk running through the space. The lowest elevated board walk will allow people to get close to the water during the 2070 highest high tides, but we hope to see other opportunities to get down to the water as well.

Phase 1 only provides the flood plans for a small portion of this site's waterfront, the waterfront park where there is the most room to create a gradual elevation up to meet the 22.3 elevation that much of the site rests at. While it's clear how this project will connect the waterfront elevation to the building elevation within this park, it's unclear how the flood infrastructure in Phase 1 will connect to flood infrastructure in future phases. How will the elevated paths and roads in Phase 1 connect to future phases of the site, which, at present, are at the existing grade? Boston Harbor Now suggests that the proponent accelerate the flood infrastructure timelines for the other phases of the development to minimize the need to redesign and reconstruct areas where Phase 1 ties into other phases' flood infrastructure and expedite the closing of flood pathways. Coastal Resilience Solutions for South Boston (CRB South Boston) identified four flood pathways along Pappas Way from Summer Street to the terminus of the channel. According to CRB South Boston, "with 9 inches of sea level rise (the projection for 2030), during a 1 percent chance annual event, the flood pathways in the Reserved Channel could result in \$40,000 in direct physical and displacement damage...". We recognize that fully closing these flood pathways requires tie-ins off-site beyond the jurisdictional boundaries of this project. The proponent should work to ensure that abutting property owners are aware of the proponent's



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coastal flood resilience measures, and the City and MEPA should help facilitate these conversations.

Facilities of Public Accommodation

Although much of the buildings subject to Chapter 91 will be further elucidated in future filings, we expect all 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 uses and, eventually, tenants for their FPAs, we ask that they consider ones that will create a more welcoming waterfront and further the idea of 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 and further appeal to audiences who have not historically been welcomed.

The BPDA PNF proposes that the FPAs in Building C1, which is the only building to have FPAs as part of Phase 1, become a wellness hub that might include “physical therapy and occupational therapy facilities, a pharmacy, gyms, a spa, and a pool.” Although the filing states, “these amenities will be accessible not only to the new tenants but also to the local South Boston community, creating a shared space that promotes well-being and fosters community interaction,” we want to emphasize the importance of actively making these amenities available to the public. The wellness hub should be accessibly priced and should not feel like facilities of limited accommodation, with access granted only to those with appointments or memberships.

Traffic Impacts to the Working Port

With roughly 1.7 million square feet of mixed use development anticipated in Phase 1 and an additional 3.5 million square feet planned for subsequent phases, we expect a significant increase in daily trips to and from the site even with the proponent’s goal of prioritizing non-auto travel for residents, employees, and visitors. We appreciate the multi-faceted approach to transportation planning and mitigation outlined in the ENF but hope to see the proponent specifically explain how they will minimize impacts to the nearby DPA and working port facilities. The working port is a vital part of Boston’s economy, and their operations should not be disrupted. Ensuring quick, safe and efficient truck access for cargo shipments as well as workforce access to the various Massport and Raymond L. Flynn Marine Park employment destinations will be vital to working ports continued success.



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In conclusion, although the scope of work is centered on Phase 1, it's important to understand how Phase 1 work ties into the rest of the site, especially as it pertains to coastal flood resilience. Coastal flood resilience, to be effective, needs to provide a continuous line of defense, which is made more challenging by a phased approach. The whole development has the opportunity to close four major flood pathways. We hope the proponent can expedite their flood infrastructure to prevent the near-term flooding expected by 2030 while allowing for connection to the water. Although the proponent's tiered approach and elevated boardwalks in the park allow visitors to walk along the water, it may be more challenging to get down to the water. The current design of the park seems to encourage walking, but it is less clear what other activities we can expect visitors to be able to do here. We want the waterfront park and FPA spaces in Building C1 to feel welcoming and activated and hope to see a diverse group of visitors attracted to the waterfront and the amenities supporting its activation. Even with the increased visitation we still hope that the nearby working waterfront is still able to flourish.

We are grateful for the opportunity to comment on this project and will continue to follow its progress toward implementation. If you have additional questions, we would be happy to speak with you or the proponent.

Sincerely,
Kathy Abbott

A handwritten signature in black ink that reads "Kathy Abbott".

President and CEO
Boston Harbor Now