



June 10, 2026

via email to Eva.Vaughan@mass.gov

Eva Vaughan
Massachusetts Environmental Policy Act Office
100 Cambridge St, Suite 900
Boston, MA 02114

Re: Environmental Notification Form - New England Revolution Stadium

Dear Ms. Vaughan,

Boston Harbor Now respectfully submits the following comments on the New England Revolution Stadium, Everett Environmental Notification Form (ENF).

Boston Harbor Now's mission is to ensure that Boston Harbor, its waterfront and islands are accessible and inclusive, and that these special places are properly adapted to the risks of climate change. We advocate for climate resiliency measures that contribute to district-scale flood protection and improve ecosystem services, as well as waterfront activation that welcomes everyone, especially those who have been historically excluded. We do this through a variety of initiatives, including the Stone Living Lab, with the goal of realizing our Harborwalk 2.0 vision of a vibrant, welcoming, and resilient coastline along Boston's 47-mile waterfront.

After reviewing the ENF filing by 173 Alford Street, LLC (the "proponent"), we are pleased to see a number of meaningful commitments that can transform this historically inaccessible industrial waterfront property into a vibrant public destination for the people of Everett and the region. In particular, we appreciate:

- The \$20 million investment towards the creation and community-led design for a world-class, publicly accessible waterfront park with year-round programming intended to reconnect surrounding neighborhoods to the Mystic River and Boston Harbor. This investment is particularly important following generations of industrial use and environmental harm caused by the former fossil fuel uses on the project site. Boston Harbor Now looks forward to engaging in the park design and activation processes.
- The commitment to hosting "a number of" non-ticketed community events such as farmers' markets, art shows, and youth programming to activate the site in all seasons (New England Revolution Stadium ENF Filing, 2026). We request that the proponent commit to a specific number of non-ticketed events each year, and suggest at least one community event per month, and more during warmer months, once the stadium and park are completed.

[Boston Harbor Now](#) | PO Box 961712 | Boston, MA 02196

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- The new harborwalk along the water's edge of the site with seating, lighting, and public safety improvements. All pathways throughout the project site should be designed to the best practices described in [Visualizing Harborwalk 2.0](#).
- A \$2 million investment in the Alford Street Phase II Harborwalk Extension Project towards creating a continuous access between existing Harborwalk around the Encore Casino and the project site.
- A \$500,000 estimated yearly commitment over 15 years to operate, maintain, and program the park. Ensuring that funding is dedicated to support these functions at least for the first 15 years will be vital to ensure that residents and visitors feel welcomed and represented in this new waterfront open space. We also call for the proponent to actively engage and collaborate with local governments, community leaders, public schools, and nonprofit partners to ensure all visitors and neighbors experience equitable access to the park and waterfront and a sense of belonging at the site, and to leverage additional public and private dollars in activating the park.
- Commitments to Assembly Square MBTA Headhouse, pedestrian and bicycle safety improvements along Route 99, and Sullivan Square infrastructure upgrades.
- Commitment to continue deep public engagement through accessible public meetings, a City of Everett-appointed advisory group and broader community engagement process related to the waterfront park design and revitalization plan, and continued meetings with community groups and leaders.
- Commitment to provide annual charitable fundraising efforts to programs and partners to support education and children initiatives, women and diversity in sports and management, and local community programs. We hope the proponent will commit to a significant and specific amount of philanthropy that will be donated each year to neighboring community groups, as this amount is not listed in the filing.

Transportation Connections

Through its transportation management plans and other means, the proponent should make every effort to ensure the success of multimodal transportation solutions on the Route 99 corridor in Everett and Boston. Boston Harbor Now looks forward to a more detailed transportation impact assessment in the project DEIR, including anticipated mode shares for stadium attendees, workers, visitors, and park users under regular operations and major event conditions.

Given the limited on-site parking supply and the stated goal of reducing single-occupancy vehicle trips, a clearer understanding of how visitors are expected to access the site is critical, including more details on the proposed Blue Bike valet service. The DEIR should also evaluate how flood pathways and future coastal storm

impacts could affect landside transportation corridors and emergency access routes over the project's planning horizon.

Boston Harbor Now strongly supports new, permanent, comprehensive water transportation infrastructure at this site. Infrastructure, including docks and piers, should be a core transportation component of this project rather than a recreational amenity. While we appreciate references throughout the ENF to incentivizing non-single-occupancy vehicle travel and improving transit, bicycle, and pedestrian access, the DEIR should more fully evaluate water transportation as a primary mode of access to and from the site. Given that a deep water berth was taken out of a Designated Port Area to create this project, the proponent should fully utilize this relatively unique water-dependent resource and invest in infrastructure to support a large dock capable of accommodating high-capacity passenger ferries. We also encourage the proponent to construct the charging infrastructure necessary to support electrified maritime transportation systems at the project site. This infrastructure could also support tour vessels, visiting small ships and a touch and go landing for smaller vessels. The project presents a rare opportunity to establish a high-capacity regional water transportation hub on the Mystic River that could support not only future stadium operations, but also broader future public mobility throughout Greater Boston and Boston Harbor. This project can and should lay the groundwork for future water transportation connections to benefit visitors to the site and to support transportation options for the adjacent communities.

Boston Harbor Now encourages the proponent to work closely with the MWRA, MBTA, neighboring property owners, and relevant state agencies to continue evaluating the historic Charlestown/Mystic Pumping Station and adjacent waterfront areas as a permanent multimodal water transportation center. We urge the project team to build off considerable research led by the City of Everett around this Pumping Station, which was released in 2025. This work includes Historic Preservation Guidance, Architectural Feasibility Reports, Concept Designs, and Permitting guidance. Such a facility would support electric and green ferries, water taxis, and passenger vessels while connecting to commuter rail, rapid transit, bus routes, and regional bicycle infrastructure. This site has the potential to become an important new gateway connecting the Mystic River corridor and North Shore communities to Boston Harbor destinations including the Charlestown Navy Yard, Lovejoy Wharf, Long Wharf, the Seaport, Logan Airport, East Boston, the South Shore and the Boston Harbor Islands National and State Park. Given the site's deep water access and strategic location adjacent to major transportation corridors, the project is uniquely positioned to advance regional climate and mobility goals while reducing dependence on private automobiles.

Public Realm Design, Access, and Community Engagement

We encourage the proponent to continue strengthening the public realm and waterfront access components of the project as it advances into the Draft Environmental Impact Report (DEIR) phase. We urge the proponent to refer to the [Boston Waterfront Partners' Equity Rubric](#) to ensure the project meets benchmarks towards a “more inclusive waterfront, one in which people from BIPOC, lower-income, non-English speaking, LGBTQ, disabled, and other marginalized groups feel a sense of belonging” on our waterfront (BWP Equity Rubric for Waterfront Development, 2025). We fully support the proponent’s goal to create climate resilient open space, continuous waterfront pedestrian and cycling paths along the entirety of the property that connect inland and link to the Mystic River pathways in Everett, Somerville and Cambridge, as well as transportation hubs and improved street networks to encourage neighborhood connectivity to the water.

The harborwalk along the edge of the proposed park and pathways throughout the site need to be wide enough to accommodate families with strollers, people using wheelchairs and walkers, and cyclists to utilize the trails simultaneously. The ENF filing details that “The width of said walkway[s in the WDUZ] is to be 10 feet wherever feasible and should connect to other walkways” (New England Revolution Stadium ENF Filing, 2026). Boston Harbor Now’s [Visualizing Harborwalk 2.0](#) guidelines showcase the current best practices for harborwalk design, and we advocate for harborwalk to be a minimum of 12-feet wide, which the City of Boston recently affirmed in their City Staff Comment Letter on the Gillette Redevelopment project. For this site, we suggest that designs consider going beyond the 12-foot minimum given the high traffic on event days. The harborwalk and open space network should be designed not simply as circulation infrastructure for stadium events, but as a resilient, welcoming, and fully accessible public waterfront destination that serves nearby residents and visitors year-round.

Future filings should detail how walkways throughout the site will be safe for multi-purpose transportation modes, with lighting, intentional layouts, and signage regarding speed and pedestrian right of way. Given the proliferation of electric bike/scooter/skateboard traffic throughout urban environments, the proponent should consider separated bike and scooter lanes as well as speed and use limits in high activity areas.

We urge the proponent to center equity in waterfront design and development focused on strategies that make this regional destination feel safe and inclusive through lighting, shade, multilingual signage, full ADA accommodations, affordability, community relevancy, and the elimination of features that could cause users to feel unwelcome or excluded. Public amenities will include Facilities of Public Accommodation (FPAs) required under the Massachusetts Public Waterfront Act (M.G.L. Ch. 91) and

regulations, which should remain open to the general public, even during games and events, and be accessible at the street level. The stadium itself, and other FPA spaces onsite, should include gender-inclusive public restrooms with baby-changing stations, drinking fountains, and free Wi-Fi and furnishings, FPAs should include amenities specifically recommended by the community as well as locally needed civic and cultural gathering spaces and meeting rooms available for public use. Gathering spaces should have a user-friendly, multilingual, online booking system so that they are truly accessible to groups that plan to use them. We hope to see these elements incorporated into this project and enumerated in future planning documents and phases of review.

We are particularly encouraged by the project's understanding of the Environmental Justice (EJ) Populations heavily concentrated around the site, including 34 EJ census tracts within one mile and 640 EJ census tracts within five miles of the site. Given this context, waterfront design and activation decisions should continue to be guided by meaningful community engagement and centered on the needs identified by surrounding neighborhoods. As highlighted during the May 6, 2026 public meeting, the proponent should reach out to nonprofit and community leaders to get the word out to neighbors on how to actively engage and provide input. Outreach should include published invitations to participate in local news outlets and social media pages. Going beyond the minimum requirements required by the Massachusetts Environmental Policy Act Office (MEPA) for outreach will help ensure that the surrounding community is adequately represented in this important public-input process.

Coastal Climate Resilience

Boston Harbor Now supports the proposed shoreline terracing strategy and elevated flood protection measures intended to protect the stadium, park, and the surrounding neighborhood. As climate risks worsen, resilience investments at this site should function as district-scale public infrastructure that protects the broader community and connects to other district level projects to create continuous lines of defense. The current plan is consistent with the Everett and Boston Community Impact Agreements, which denote a target elevation of NAVD88 +15' (the projected 2070 1% storm +1'), with shoreline terracing up to protective design flood elevations (New England Revolution Stadium ENF Filing, 2026).

Boston Harbor Now agrees that the project target planning horizon should be 2070, and recommends that resilience measures are designed and constructed in a way that would allow them to be adapted and modified to include new, additional protection features beyond 2070. We appreciate planning for a return period of a 200-year storm event (0.5%), and understand that the future DEIR filing should model impacts from both coastal storms and intense precipitation events independently and simultaneously. In addition to sea-level rise and flood protection measures, we support the planned stormwater infrastructure to retain and improve the quality of storm runoff.

We look forward to submitting more detailed feedback on coastal resilience as more specific information is released in subsequent filings.

Boston Harbor Now is grateful for the opportunity to comment on this project and looks forward to participating in the upcoming MEPA and Chapter 91 processes to discuss ways to furnish, activate, and create a more welcoming public realm. We would be happy to meet to discuss our recommendations.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott". The signature is fluid and cursive, with a large initial "K" and a long, sweeping underline.

Kathy Abbott
President & CEO