



Are you on board?

15 State Street, Suite 1100  
Boston, MA 02109  
617.223.8671  
[bostonharbornow.org](http://bostonharbornow.org)

January 7, 2018

The Honorable Matthew A. Beaton  
Executive Office of Energy and Environmental Affairs (EEA)  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Re: Downtown Waterfront District Municipal Harbor Plan

As the only non-governmental organization solely dedicated to realizing the economic, social and environmental potential of Boston Harbor, Boston Harbor Now offers the following additional comments regarding State approval of the final Downtown Waterfront District Municipal Harbor Plan (MHP).

Parcel-by-parcel permitting has failed to create a well-connected, climate resilient, and engaging waterfront around Boston Harbor. The Downtown Waterfront is the most significant stretch of waterfront and serves as the City's primary and historic gateway to Boston Harbor. The Downtown Waterfront District MHP offers the last best opportunity to set new standards for our waterfront while optimizing area-wide benefits in this critically important district. Months after the close of the State's public comment period, there continues to be virtually universal support for a Downtown Waterfront District MHP that is more comprehensive, cohesive and transformative.

Since negotiations between major property owners in the Downtown Waterfront District appear to be at an impasse, we respectfully request that you approve the Downtown Waterfront District MHP with specific and immutable minimum standards. Rather than continuing to wait for agreements among individual property owners, these standards would apply to any development projects proposed in the Downtown Waterfront District. To be truly transformative, the MHP should be independent of and bigger than any individual project proposed within the jurisdictional boundary of the MHP.

The final Downtown MHP must create a vibrant, dynamic, detailed blueprint that makes the most of Boston's Downtown Gateway. The final MHP should include the following:

- A comprehensive approach to inner harbor water transportation that includes a Long Wharf all-weather, passenger-friendly central transportation hub that would be built on the BPDA's parking lot next to the Chart House, together with a drop off area for the marina and a substantially improved pedestrian corridor to provide a better East-West connection to Faneuil Hall and the Boston Harbor Islands Pavilion and North-South connection on the Harborwalk.
- Enhanced, district-wide pedestrian connectivity from Christopher Columbus Park to Hook Lobster, with a special focus on completing the Harborwalk connections from the US General Service Administration Captain John F. Williams Coast Guard Building (Coast Guard Building), through the Hook Wharf site and across to Independence Wharf as well as an improved and signage throughout the district and connecting with the Rose Kennedy Greenway,
- Improved development of the water's edge, including the Harborwalk and parks as public access and climate resilient infrastructure, and
- Implementation of the Aquarium's "Blueway" concept to create a new visual and pedestrian corridor between the Greenway and the waterfront, thereby significantly opening up opportunities for expanded public access, greater interaction with the water sheet, and demonstration of successful climate resilience measures.

The work on the BPDA parking lot should be completed with public benefit funds generated by projects in the Downtown Waterfront District. Those funds should also be supplemented with the BPDA's own resources—since the agency owns the property—and/or contributions from private sector ferry operators. The District-wide pedestrian connectivity should be a condition of any approval of the redevelopment of Hook Wharf. Such approval should require significantly more public benefit funds than proposed in the MHP submitted by the City. Additionally, improved development of the water's edge should be facilitated by limiting lot coverage for the Harbor Garage site to 50% and requiring substantially greater public benefit contributions than have been proposed thus far. There should also be some consistency across projects in terms of percentage of public benefit funds and the scope and scale of deviation from Ch. 91 regulations.

The City's *Imagine Boston 2030* plan envisions creating a waterfront city that better connects Bostonians to the harbor. The Downtown Waterfront District MHP could—and should—be the key that unlocks that vision.

Moreover, as noted on page 27 of the MHP's Public Realm Plan, "a permanent Harbor Islands gateway on the Chart House Parking Lot on Long Wharf would enhance the visitor experience to the Harbor Islands and facilitate growth of ferry service on the Harbor." The Downtown Waterfront District MHP can contribute to this vision by connecting the "grand staircase" leading from City Hall, through the Faneuil Hall Visitor Center, the Boston Harbor Islands Pavilion on the Greenway, and down along Long Wharf to the Harbor and Harbor Islands. Given the likely increase in ferry transportation, the final Downtown Waterfront District MHP needs to prioritize water transportation in this section of the

waterfront. It is an ideal location for a significant harbor ferry terminus and gateway into, as well as out of, Boston.

Recent flooding from the January 4 winter storm "Grayson" confirms the findings of the City's Climate Ready Boston initiative: due to low site elevations and exposure to coastal storms, structures, parking lots, and pedestrian corridors in the Downtown Waterfront District are especially vulnerable to projected sea-level rise and coastal flooding. This area requires responsible planning and preparedness measures, as proposed in the Downtown Waterfront District MHP. This especially includes the Chart House parking lot, which clearly will need to be elevated at some point (see attached images of flooding in the Long Wharf and Central Wharf area). We urge you to encourage the City of Boston to designate the Downtown MHP as a Flood Resiliency District, consistent with City's Climate Ready Boston's recommendation that such overlay districts be created in vulnerable areas. Institutionalizing climate change preparedness and planning as an integral part of development along this stretch of the waterfront will be a key measure of success for the Downtown Waterfront District.

Finally, we request that you include conditions that will ensure that the New England Aquarium will not be harmed in any way by development of the Harbor Garage site. Through the millions of visitors it draws to its exhibits, Harborwalk, waterfront plaza, and whale watch program, NEAq is the largest activator of Boston's waterfront. For this reason, and because of its status as a water dependent use, the institution warrants special protection.

Boston Harbor Now respectfully insists that the MHP create an accessible waterfront, enhance water transportation within the Harbor, and realize a transformative climate resilient public and private realm for the most visited and visible section of the waterfront. For these reasons, we ask that you approve a version of the Downtown Waterfront District Municipal Harbor Plan that includes specific and immutable minimum standards, including those identified above.

Sincerely,

Kathy Abbott  
CEO & President



Central Wharf Flooding, January 4, 2018 winter storm Grayson.



Charthouse Parking Lot Flooding, January 4, 2018 winter storm Grayson.