



Are you on board?

15 State Street Suite 1100
Boston, MA 02109
617 223 8667
bostonharbornow.org

September 4, 2019

Via email: Chris.Busch@boston.gov

Boston Planning and Development Agency
Attention: Chris Busch
One City Hall Square
Boston, MA 02201

Re: Proposed Zoning Amendments to Article 42A- Harbor Park District

Dear Mr. Busch,

Thank you for the opportunity to comment on the proposed zoning amendments to Article 42A in order to conform the provisions of the existing zoning to the City of Boston's Downtown Waterfront District Municipal Harbor Plan & Public Realm Activation Plan. Boston Harbor Now has reviewed the proposed changes and attended the August 12th public meeting.

We appreciate that these zoning amendments are the next step in the Downtown Municipal Harbor Plan (MHP) process that included a multi-year planning process and over 40 public meetings. We are also aware that other critical planning processes offer guidance for shaping this section of waterfront that is particularly vulnerable to flooding with increased sea level rise and extreme storms. In particular, the Imagine Boston 2030 plan, the water transportation business plans for the Inner Harbor Connector, the Flood Resilient Building Guidelines & Zoning Overlay District, and Climate Ready Boston: Downtown/North End all provide guidance on the future of the built environment in this geographic area.

The Boston Planning and Development Agency (BPDA) has carefully revised the Article 42A zoning language to comply with the Downtown MHP with a special focus on inclusionary zoning, resilient design, and adjustments to allow for two new building developments that did not comply with pre-existing zoning. The need to accommodate a range of cultural uses in the previous zoning has been removed to focus on supporting the New England Aquarium, the primary civic anchor in the district, which welcomes approximately 1.4M visitors on an annual basis.



Are you on board?

15 State Street Suite 1100
Boston, MA 02109
617 223 8667
bostonharbornow.org

In Section 42A-12, the BPDA should be commended for incorporating a specified Sea Level Rise Design Flood Elevation for the purpose of incentivizing and supporting structures that want to design proactively for higher high tides based on current climate change projections. New allowances in Section 42A-17 for an additional 30 feet, to relocate mechanical equipment to roofs, is also providing the capacity for buildings to better prepare for sea level rise. The BPDA was similarly proactive in Section 42A-8, subsection 15, where new protective infrastructure is called out in the zoning.

A significant portion of the changes in the zoning involve special accommodations for the Hook Lobster site and the Harbor Garage site. Both of these projects will undergo future development permitting processes, which we will be following closely.

On the Hook Lobster site, the parcel is too small for a planned development area so the zoning in Section 42A-12-f has been adjusted to allow for the agreed upon dimensions of the building as well as important open space area and an essential waterfront setback that will be crucial for continuing the Harborwalk. The quality of the public open space here in proposed designs will be monitored carefully.

To allow for the Downtown MHP's proposed dimensions for the Harbor Garage site, a Planned Development Area (PDA) is being allowed by the new zoning. We will remain involved in the PDA process to ensure that the Chapter 91 Requirements (Section 42A-5) and the Urban Design Guidelines (Section 42A-8) shape the historic character, public access, and resilience of the new development. The height currently proposed is not in conformity with the existing character of the Long Wharf section of the waterfront nor does it honor the history of this harbor gateway connecting back to the Custom House. Public benefits commensurate with the scale of the building remain a priority.

We anticipate that through multiple planning and design processes, a welcoming and resilient waterfront will emerge. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott".

Kathy Abbott
President and CEO