

Ebony DaRosa Boston Planning and Development Agency One City Hall Square Boston, MA 02201

Via Email: Ebony.DaRosa@Boston.gov

Re: Comments on Hook Wharf PNF

February 12, 2021

Dear Ms. DaRosa,

We are pleased to provide preliminary comments on the PNF filed by 400 Atlantic Wharf, LLC for Hook Wharf along the Fort Point Channel. The site is situated between two bridges, the Moakley Bridge and the Northern Avenue Bridge with Atlantic Ave on one side and the Fort Point Channel on the other side. It is a gateway site and important future connection between the Downtown waterfront and the South Boston Waterfront neighborhoods.

In addition, the project site is situated on both flowed and filled tidelands and as such is subject to certain restrictions and to providing ample public benefits and access in exchange for use of the people's tidelands. Therefore, we request further review and clarification on building placement and water dependent use. Given the placement of proposed 55' podium and the angle of the 235' tower resting above it at the closest edge toward the Channel, it is difficult to decipher whether it is sitting on filled or flowed tidelands.

Hook Lobster Company is a favorite of the neighborhood and a long-standing tradition. The future commercial/wholesale operations are unknown and therefore may not necessitate a water dependent use, especially with the removal of the pump house. All that is referenced or acknowledged publicly is a restaurant and retail shop utilizing two spaces on the ground level totaling approximately 9,000 sf. We request further clarification from Hook Lobster Co. ownership on their future plans at the site. And keeping in mind the Secretary's decision of the Downtown Municipal Harbor Plan, an alternative water dependent use or special public destination facility should be developed. It is unusual that no community space is provided. Overall the lack of onsite public benefits is rather astounding.

If James Hook & Co. ceases or substantially reduces its water-dependent operations at the site during the term of my Decision, I am requiring that the ground floor continue to be occupied by a similar combination of water-dependent uses and Facilities of Public Accommodations, or by Special Public Destination Facilities. (Secretary's Decision DMHP 2018)

## **Ground Floor**

Public bathrooms, separate from the restaurant, need to be made available from the exterior of the building on the ground floor.

We appreciate the dock space included in the proposal. We would like you to consider a buildout that maximizes accessibility through the use of ramping and launch points to allow for full ADA compliant use during all tidal cycles. The Piers Park Sailing Center in East Boston has Massport constructed ADA compliant docks and can be used as an example of expanding the use of the water for all.

Additional visitors will increase the risk of people falling into the channel and possible drowning. A number of best practices should be considered for inclusion on the dock. The City of London has recently announced a comprehensive approach to riverside safety and there are some similarities with the banks of Boston Harbor and the Fort Point Channel. We would like you to consider;

- U.S.C.G approved life rings / buoys with attached line installed on the dock
- Exit ladders installed on the dock
- Grab chains installed on the pilings
- Signage, in multiple languages, outlining the use of the safety devices.

With the current proposal of a restaurant and retail shop, dedicated dock space for patronage should not be supported. The limited number of slips planned should be available for all to use with no preference to restaurant, retail or hotel clients.

## **Public Access**

We have serious concerns with the amount of space being dedicated for building access on Atlantic Avenue. With the planned use as a +350 room hotel with 3 restaurants and a retail seafood shop (with no onsite parking) and only spots for 3 cars in front of the building, we believe the congestion of the additional vehicle and pedestrian trips will create an unsafe condition. The current vehicle volumes along both Atlantic Ave, Seaport Boulevard and the onramp to I-93 are already at capacity. Additional vehicle trips generated by the planned use utilizing this small area for pickup and drop-off will be unsustainable.

Sidewalk widths on Atlantic Avenue on either side of the parcel are 25 feet wide. The plan to build out the sidewalks in the proposal on Atlantic Avenue to only 8 feet width would create excessive pedestrian crowding and possibly force pedestrians into the road.

We appreciate the proposal to provide continuous Harborwalk access through the site. In regards to the Harborwalk connection to Independence Wharf, we refer to the Secretary's decision and look toward greater improvements.

As a condition of this Decision, I am requiring the City to work with developer and interested stakeholders on developing and implementing a plan to improve the Harborwalk connection between Hook Wharf and 470 Atlantic Avenue across Seaport Boulevard with significant enhancements for pedestrian safety and wayfinding. (Secretary's Decision DMHP 2018)

The width of the outdoor deck on the channel side is 25 feet, we believe only dedicating a minimum of 12 feet to the public Harborwalk should be reconsidered and the Harborwalk widened. Also public seating should be provided for everyone to enjoy the view.

The planned buildout along Northern Ave and the position of the buildings loading area directly conflicts with pedestrian and cycle traffic on the new Northern Avenue bridge. The volume of arrival and departure traffic of vehicles to the site combined with loading and unloading creates a safety conflict on Northern Avenue that requires further analysis and remediation.

The proposal includes an exterior podium and a top level terrace, each providing sweeping views of Boston harbor and the city itself. Consideration should be given to making these spaces publicly accessible, without patronage required.

## Resilience

The project constructs a Harborwalk at a 21' elevation which meets 2070 projections for sea level rise. Does it make sense to rise it higher to create an easier connection to the Northern Avenue Bridge that is at 26' and the Moakley Bridge at approximately the same height on the opposite side of the Harborwalk?

The 19' elevation along Atlantic Ave will require additional flood prevention measures and not to be omitted is constructing an ADA accessible dock that is adaptive to sea level rise and tidal changes.

Climate Flood Resilience Overlay District (CFROD) zoning and guidelines currently under review may require further climate resilient measures and adaptive designs for the property.

Also raised in meetings and requiring further development is the site's resilient and adaptive strategies and their impact on adjacent properties like the Coast Guard building and further down and upstream as well as inland such as the Greenway.

There is a great opportunity for Hook Wharf to take a leadership role in collaborating with neighboring property owners on a district wide climate strategy incorporating Climate Ready Downtown, CFROD and other best practices to combat flooding and to ensure public access.

## **Process**

At meetings we heard from other IAG members and afterwards from neighbors expressing their frustration with the lack of transparency and limited interaction permitted to the public during Zoom Webinar run community meetings for the Hook Wharf project. Webinars are typically used for lectures and therefore, do not foster transparent dialogue. The use of Zoom webinar in public meetings hides who is the "room" and is more intimidating for people to speak up or submit questions in a Q&A box, which makes questions from neighbors only visible when answered. It is a disservice to the IAG to limit public interaction and their ability to incorporate public feedback into their recommendations. The use of zoom meetings would increase transparency and the use of polls or other digital tools would encourage greater interaction.

It is confusing for the public to go through an Article 80 PNF process when there is ongoing litigation on the guiding planning document, the Downtown Municipal Harbor Plan. Depending on the legal outcome, there may be significant changes to the project.

The public is at an additional disadvantage because the Design & Use Standards are not yet formulated, which will inform Article 80 and MEPA review of the project. The Design & Use Standards are critical to the success of the development at Hook Wharf.

The Design and Use Standards will advance the City's Public Realm Plan by (1) engaging in a public process to review its recommended actions and projects and developing consensus on near, medium, and longer term priorities; and (2) developing standards, specifications, and guidelines for the following: designs, features, and amenities of new and existing open space, green space, and landscaping; and wayfinding and signage for the Harbor Walk and pedestrian connections to and from the Greenway and other links identified in the Public Realm Plan; and (3) identifying opportunities for increasing resilience to flooding and storm surges under current and future condition through the enhancement of areas of the Harborwalk, open space, or other public zones or facilities through elevation and/or shoreline enhancements. (Secretary's Decision DMHP 2018)

We look forward to participating with our downtown neighbors on the creation of the Design and Use standards and seeing how those standards could be applied around the Boston Harbor and Channel.

We formally request that the project's scoping determination with the City and the ENF submission to MEPA await the finalization of the Design & Use Standards so that they may be incorporated properly into the design and consideration of any impacts.

Respectfully Submitted,

Tom Ready - Member of Hook Wharf BPDA Impact Advisory Group

Sara McCammond

Joe Rogers

Thank you for your consideration.