



Are you on board?

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February 21, 2017

Via email to frank.taormina@state.ma.us

Frank Taormina
Waterways Regulation Program
Department of Environmental Protection
One Winter Street, 5th Floor
Boston, MA 02108

Re: GE Headquarters Project Waterways License Application No. W16-9800-N

Dear Mr. Taormina,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Waterways License Application submitted by General Electric (GE) and the Massachusetts Development Finance Agency (MassDevelopment). We have had the opportunity to view the project presentations on several occasions and participated in public hearings, including the hearing held on January 30, 2017.

We applaud GE's efforts to reach out to neighbors, members of the public and interested advocacy groups. Through these discussions, GE maintained open channels of communication and paid special attention to community feedback. One example of this was the reduction of the Chapter 91 license term from 99-years to forty-two, recognizing both their expected tenure and future uncertainty around coastal flood conditions.

We look forward to the completion of this project and public benefits package offered by the project proponent. Our comments follow.

Project Description

According to the license application, the new GE Headquarters project includes the rehabilitation of the 5 and 6 Necco Court historic buildings, the construction of a new 12-story office building, a

pedestrian-only walkway, and a number of public realm improvements. As described in the project narrative, the project is entirely within Commonwealth Tidelands and Chapter 91 jurisdiction and subject to its regulations intended to protect and promote public use of the waterfront. Since September of 2016, there have been a number of project changes and clarifications including:

- Expansion of the project site from 2.4 to 2.7 acres,
- Reconfiguration of existing water-dependent use zone to increase on-site open space,
- Reduction in new building height and photovoltaic system or “solar veil,”
- Increased floor area in the historic building’s glass atrium,
- New Building FPAs limited to the coffee bar, the GE Museum, and lobby (referred to as a Community Work Lounge) for a total of 75% public ground floor use,
- Shifting the GE Plaza canopy to highlight the Necco Street Campus entry, and
- Preserving of the Necco Court Bridge.

Water-Dependent Use Zone

Since the initial project filings, the campus has expanded from 2.4 acres to roughly 2.7 acres of land. This increase is the result of GE acquiring an additional 11,618 SF of open space to expand the Necco Street sidewalk and a 0.16-acre section of the Harborwalk to the south of the project site. The addition of open space on the campus is a public benefit that will add to the accessibility of the site.

A 2009 amendment to the 2000 South Boston Municipal Harbor Plan (MHP) approved a substitution to reconfigure the Water Dependent Use Zone (WDUZ) within the planning area to border the include parcel “G1” (see Figure 12 of Waterways License Application). In December 2016, GE requested written clarification from the EEA Secretary Matthew Beaton to reconfigure and expand the WDUZ as amended in 2009. GE’s proposed configuration expands the total WDUZ from 28,300 SF to 28,432 SF. This change will result in a 132 SF addition to the WDUZ and a new Chapter 91 defined on-site open space total of 53,221 SF.

We support the new configuration. It will provide better pedestrian access on the Harborwalk, improve sight lines, and promote the creation of more active and usable public space – all in agreement with the intent and purpose of Chapter 91.

Public Landing

Easy access to the water contributes directly to the success and sustainability of watersheet programming. It is our understanding that MassDEP public dock license no. 12906 originally issued to Gillette initially reserved four public parking spaces in conjunction with the public dock. As currently proposed, the obligation to provide four parking spaces will remain part of Gillette’s Chapter 91 license and are not included as a Special Condition of GE’s new Chapter 91 license. We see this as a potential public access issue. Currently, residents and visitors to the Fort Point Channel can park and launch their non-motorized watercrafts from the public dock. As stated in Special Condition #3, the purpose of the four parking spaces is to guarantee the visiting public not only four reserved spaces but also a short walking distance to the dock.

Proximity to the water is essential to the continued public use of the dock. We understand the original public parking spaces were located on Gillette property and the conditions attached to those spaces remain under Gillette's control. We propose exploring the possibility of an MOU between Gillette and GE to ensure the intent of Special Condition #3 continues to be realized. Because the public landing is fully within the new GE project site, we also consider Special Conditions 1-6 of license #12906 more fitting for GE's Chapter 91 license and not the Gillette Company.

Open Space Maintenance

Public programming and activation of the Fort Point Channel are an important part of promoting public use and enjoyment of this area. The Draft Management Plan included in Appendix E of the license application indicates that the Headquarters Site Activity Leader, an individual assigned by GE to manage and coordinate activation of on-site public spaces and oversee third party vendor activity, will manage all maintenance responsibilities.

We commend the project proponent for including a kayak rental operation, access to the public dock, and public restrooms as part of the on-site public amenities. Consistent with comments made at the public hearing and throughout the permitting process, the proponent and Site Activity Leader are strongly encouraged to work in close cooperation with the neighboring community to identify additional opportunities to expand and execute the vision of the Fort Point Channel Watersheet Activation Plan.

For example, the Open Lawn is an excellent opportunity for the Headquarter Site Activity Leader to engage community representatives, neighborhood stakeholders, local artists and third-party vendors to develop an annual calendar of public activities (e.g., exhibitions, musical performances, theatrical plays, book readings, yoga). Similar to those proposed for Atlantic Wharf and Pier 4, a successful work plan ensures public outdoor spaces are activated and open for public events throughout the calendar year.

According to the Draft Management Plan, the Site Activity Leader is also responsible for all matters related to Harborwalk maintenance and management. Throughout the permitting process, the GE team confirmed that the Harborwalk would be expanded from 12 to 18 feet, include interpretive signage, seating areas, native plantings for stormwater retention, and integration with the GE Plaza through the use of steps and landscaped paths.

We applaud GE's efforts to provide a well-integrated Harborwalk that is inviting to all and provides the continued waterfront access expected of all Chapter 91-related projects. Boston Harbor Now is the non-profit designated to receive and address all Boston 311 calls related to the Harborwalk. We would be glad to engage with the Site Activity Leader early on to ensure the Harborwalk section of the proposed project consistently meets and exceeds the requirements of Chapter 91.

Climate Preparedness

As we understand it, the site elevation of the GE Campus ranges from 14-19.5 feet Boston City Base (BCB), and the expected lifespan of the project is 50 years. Currently, Boston's high tide (mean

higher high water) is approximately 11.2 feet BCB and the 100-year storm surge is about 5 feet. GE has indicated they will be using the new Climate Ready Boston projections in their design of the headquarters and not rely solely on current FEMA FIRM maps. We strongly commend them for doing so and encourage the final building design to include opportunities for a future owner to retrofit the structure to increase its flood resilience even past its 50-year projected lifespan.

As presented in the Waterways License application and at public hearings, the proponent plans to raise the first floor of both the existing brick buildings and the new facility to 19.5 BCB. This is a good idea and appears to be consistent with the projections from the BRAG report. We support raising the Harborwalk 1-1.5 feet as the first line of coastal flood defense.

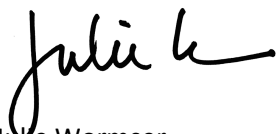
Proponents predict that this minor elevation increase coupled with the north and south overland flooding pathways will prevent flooding of adjacent parcels. We hope this is the case, though would ask that GE monitor this strategy during early years of occupancy and, if needed, revisit the proposed Harborwalk design. We see this as an excellent opportunity to work with abutters to ensure this section of the Harborwalk remains usable during extra high tides.

Throughout the permitting process, the GE team has made clear their commitment to building an energy efficient campus. Early on in the presentation phase, the Boston Civic Design Commission members supported the solar veil design, both for its energy production and aesthetic appeal. During several community meetings, neighbors expressed concern over the proposed height of the veil, which extended the height of the building from 180 feet to 245 feet.

As presented in the license application, the new building will be 173 feet at the highest occupied floor plus the 62-foot tall solar veil, an overall height reduction of 10 feet. We commend GE for incorporating design feedback from both the BCDC and interested stakeholders. The new configuration will result in an approximate new height of 235 feet and additional public benefits to mitigate the shadow created by the building and solar veil.

We strongly support GE's incorporation of its guiding principles as a community convener, performance enabler, and resiliency pioneer into the headquarters project. We look forward to the completion of this project and public benefits package offered by the project proponent. Thank you for your consideration of our comments.

Sincerely,



Julie Wormser
VP of Policy



Jill Valdes Horwood
Director of Waterfront Policy