



Are you on board?

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Via email to: Page.Czepiga@state.ma.us

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs (EEA)
MEPA Office Attn: Page Czepiga EEA#15649
100 Cambridge Street, Ste 900
Boston, MA 02114

Re: 125 Sumner Street, Expanded Environmental Notification Form, EEA#15649

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Expanded Environmental Notification Form for the 125 Sumner Street development project submitted by WinnDevelopment on February 28, 2017. Boston Harbor Now continues to strongly support the redevelopment of Clippership Wharf and looks forward to the completion of this project.

Project Description

In April of 2016, the Boston Housing Authority issued a Request for Proposals for the demolition and replacement of twenty BHA housing units along Sumner Street in East Boston. This proposal is the result of that RFP.

As presented in the EENF, the proponent will construct two new three-story, mixed-used buildings for a total of 50 residential units. Building One will include twenty replacement BHA housing units, and Building Two will include thirty new homeownership units. The project will provide 56,543 SF of residential units, 4,809 SF of facilities of public accommodation, and 16,253 SF of non-vehicular open space on site. Together the two buildings make up the Clippership Wharf Apartments complex.

The buildings sit on 46,319 SF of filled Commonwealth Tidelands and are subject to the East Boston Municipal Harbor Plan (EBMHP) substitute provisions and requirements. Because the proposed development is for a non-water dependent use, the project will require a Chapter 91 license.

Public Access & Open Space

A key substitution approved by the Secretary in the 2009 EBMHP exempts this project from the Chapter 91 standard ground floor public use requirement (East Boston Waterfront District Municipal Harbor Plan, Pg. 14). For this site, the EBMHP instead requires that a minimum of 25% of the ground floor be dedicated to Facilities of Public Accommodation (FPA). As configured, the 4,809 SF of FPA exceeds the minimum 25% requirement. The EENF lists the following FPAs:

- A 1,040 SF Community Room open to residents, neighbors, and community groups
- An approximately 3,400 SF retail space along Sumner Street, and
- A forty-space bike storage room open to the public with preference given to building residents.

We look forward to reviewing a more detailed draft management and program plan for the proposed FPAs during the Chapter 91 license review process.

Part of the new construction involves the addition of the Havre Street extension, a private way that aligns with the existing Havre Street and opens up a nearly quarter-mile view corridor to Boston Harbor. The street will be open to the public for pedestrian, bicycle use, and short-term daytime parking. The extension will create uninterrupted access from Meridian Street through Maverick Street, Sumner Street, and Jacobbe Road down to the Harborwalk. We are firmly in support of the proponent's improvement to the accessway and increased public access to the waterfront. To make the most of the new connection, in addition to the standard blue Harborwalk signs, the proponent should include wayfinding signage with at minimum a list of on-site public amenities, hours of operations, and special conditions.

We appreciate the proponent's initiative to include a historic interpretive exhibit on-site. We note that Boston Harbor Now and the Friends of the Boston Harborwalk are already working with the project proponents on interpretive signs along the Harborwalk and would be glad to be part of this initiative as well.

Water Transportation

This project benefits from proximity to an intermodal transportation hub, pedestrian and vehicular links to the waterfront, and the existing Lewis Mall water transportation dock. To minimize the project's transportation impacts, the proponent plans to include Transportation Demand Management (TDM) measures.

These measures include distributing resident orientation packets, an annual transportation newsletter, bicycle storage, and limiting the number of surface parking spaces on site. Although not specifically cited in the EENF, this project is adjacent to Clippership Wharf, which is promoting water transportation access at Lewis Mall. The availability and uses of water transit should be promoted with the residents and visitors of this project as well. Boston Harbor Now is working with MassDOT to evaluate opportunities for additional Boston Harbor ferry routes; higher awareness of and demand for water transportation will help accelerate their implementation.

The EBMHP provides that in the event the proponent seeks an extended term Chapter 91 license, additional public benefits must be directed to water transportation, port improvements, and public access (East Boston Waterfront District Municipal Harbor Plan, pg. 12). It is our understanding that the proponent plans to request a 40-year term license during the Chapter 91 application process. We see this as an opportunity to enhance water transportation to East Boston and plan to submit detailed comments when the formal application is filed.

Climate Preparedness

Chapter 2 of the EENF addresses sustainable design for the project. According to the EENF, the project site borders FEMA's high-risk flood area. We could not find additional information regarding site elevation, existing conditions on site, or projected flood risks. Today, the site only borders a high-risk flood area but with Boston Harbor sea levels predicted to rise between 2.4 and 7.4 feet by the end of the century and a 50/50 chance the rise will exceed 3 feet sometime after 2070, residences built on this site will need to be prepared to withstand chronic salt water flooding.

We commend the proponent for including the following initial steps in the project's resiliency plan:

- Elevating the Residential ground floors three feet above the floodplain
- Moving all electrical and mechanical equipment above the floodplain, and
- Eliminating elevator access in the building design (though does this raise ADA concerns?)

As proponents of climate change preparedness in Boston, we are increasingly concerned about the potential for Boston's socioeconomic inequities to increase as residents and buildings are put under increased weather-related stress without the public funding to protect all neighborhoods equally. The Clippership Wharf Apartments provide a rare opportunity for low-income renters to enjoy both waterfront amenities and flood preparedness design. We believe that updates in state and local zoning and other regulations and incentives are required to make such opportunities the norm, as well as to implement climate preparedness measures on a neighborhood, not site-by-site, scale.

We look forward to the completion of this project, the addition of low-to-middle income housing and the public benefits it will bring to the East Boston Community and applaud the project proponents for raising the local bar in implementing Living with Water design.

Sincerely,



Julie Wormser
VP Policy & Planning



Jill Valdes Horwood
Director of Waterfront Policy