



Are you on board?

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July 7, 2017

Via email to: Alexander.Stryisky@state.ma.us

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs (EEA)
MEPA Office, Attn: Alex Stryisky, EEA# 15692
100 Cambridge Street, Ste 900
Boston, MA 02114

Re: L Street Station Environmental Notification Form, EEA# 15692

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Environmental Notification Form (ENF) submitted by HRP 776 Summer Street LLC (HRP). Our policy team has reviewed the project presentation at a series of open house meetings, participated in the community design charrettes, and was present during the MEPA site visit on June 21, 2017.

We want to acknowledge the BPDA for hosting early community outreach events and walking tours of the Turbine Hall. Through its company representatives and community engagement, HRP has shown a willingness to listen and include public input in the early planning and design stages. We support increased public participation throughout the planning process and look forward to continued collaborations as the project moves forward through permitting and licensing.

As presented in the ENF, the proposed filing is for the redevelopment of the former Exelon Site located in a Designated Port Area along the Reserved Channel in South Boston. On June 20, 2017 HRP submitted a request to the Office of Coastal Zone Management (CZM) for a boundary review of this portion of the South Boston Designated Port Area.

Defined as "land and water areas with certain physical and operational features that have been reserved by the Commonwealth for maritime-industrial uses," Designated Port Area policy is intended to protect and promote water-dependent industries and prevent the loss of the areas and infrastructure required to support such industry. As longtime advocates of the working port,

Boston Harbor Now is concerned about the piecemeal de-designation of these limited land areas. We will submit a more detailed comment letter responding to the boundary review request. It our position that until the Secretary has reviewed and issued a final determination of the DPA boundary review request, it is premature to engage in a detailed discussion of the proposed redevelopment.

The following four areas will require more careful consideration should the project move forward through the permitting process:

- Compatibility with existing maritime industrial uses
- Open space and access
- Transportation, and
- Climate Preparedness

Project Description

As described in the ENF, the campus will encompass 15 acres of land along the Reserved Channel in the South Boston waterfront. Of the total land area, 4.1 acres are on filled tidelands and within Chapter 91 jurisdiction. Because the proposed development is for a non-water dependent use, the project will require a new Chapter 91 license.

There will be several buildings on site ranging in height from 80 feet to a maximum 220 feet. These buildings will include 339,639 SF of office space spread across two buildings, 68,077 SF for retail use, 1.5 million SF of 1,588 residential units across five residential blocks, and a 150-key hotel. The parking needs for these new structures will be serviced by 987 on-site parking spaces with the possibility for additional street parking.

The entire project will be phased over a 10-year period starting in 2018. Project construction will begin with the rehabilitation of the Turbine Hall and residential areas along First Street.

Existing Maritime Industrial Uses

The campus is bordered by the South Boston neighborhood to the south, the Conley Terminal Dedicated Freight Corridor (DFC) to the north, and maritime industrial uses to the immediate East and West. The Massport operated Conley Terminal runs along East First Street and is an active working port. In anticipation of projected future growth in container activity at Conley and to address neighborhood concerns over noise and dust, Massport invested nearly \$35 million on a series of facility and operational improvements:

1. Acquisition of the former Coastal Oil site
2. Construction of the 2/3-mile Thomas J. Butler Freight Corridor to move container truck traffic away from residents along East First Street and portions of Summer Street; and
3. Construction of the new 4.2-acre Thomas J. Butler Memorial Park to serve as a significant noise and visual buffer.

To our knowledge, no other mixed-used Boston Harbor waterfront development has a dedicated truck route running through a section of the parcel. Trucks are the lifeline of Boston's working port and the Dedicated Freight Corridor is the major truck route serving Conley Terminal with heavy industrial traffic at all hours of the day and night. It is essential that, before project plans are finalized and approved, the proponents work with the Massport maritime

department to ensure that the proposed mixed-use development does not impact truck access to Conley Terminal and other working port businesses. To minimize potential conflicts of use, future filings should include additional details of truck traffic to and from Conley Terminal as well as truck loading/offloading activities planned on the abutting Coastal Oil site.

Finally, due to the proximity of the proposed development to marine industrial properties, we suggest exploring a covenant or alternative agreement in property leases and sales to acknowledge baseline levels of noise and other impacts resulting from truck traffic and other marine industrial businesses. Additional opportunities for soundproofing should also be explored.

Public Benefits

The redevelopment of this site will make a currently inaccessible waterfront area available for public use and enjoyment. The project will include the following public benefits:

- Cleanup and abatement of contaminated project site
- Creation of Arts and Industry space
- Publicly accessible open space
- New retail space
- Outdoor dining areas
- Bicycle and pedestrian oriented streets, and
- Two additional vehicular access points/driveways into the Site

Figures 3.9a and 3.9b include a dozen examples of outdoor spaces and construction materials used in similar industrial areas around the country. We appreciate the proponent's efforts to present a potentially diverse set of open space experiences for the general public. We are especially encouraged by the focus on arts and culture.

The proposed project will include approximately 104,500 SF of total public open space, a little over 50,000 SF will be located along the waterfront and adjacent to the existing Dedicated Freight Corridor.

We are concerned about the ENF's characterization of current maritime-industrial activities at DFC and nearby Conley Terminal operations. These areas have active industrial uses that add a significant amount of noise, dust, and vibrations to the area. The design and programming of the public areas along the northern edge of the site must reconcile two very different uses--general public use and the continued industrial operations of Conley Terminal and other working port businesses. A successful design and activation plan will minimize negative impacts to existing water-dependent industrial uses.

Transportation

We strongly support Mayor Walsh's commitment to a carbon-neutral Boston by 2050. This is an ambitious goal that requires significant collaborations between the public sector and private development. This proposal will add a substantial number of new residents and workers to an already overburdened transportation and parking system in South Boston.

Currently, the project site has 275 existing parking spaces. The ENF states the proponent will add 712 new spaces for a total of 987 on-site parking spaces. Preliminary traffic studies expect an increase from zero trips per day to 20,370 unadjusted/8,780 adjusted vehicle trips per day. Of these new trips, 661 are expected during the morning rush hour and 768 in the evening rush hour.

Table 5-4 of the ENF points to five existing MBTA bus routes within walking distance of the project site. Only one, Route 7, has a stop immediately adjacent to the property along Summer Street and is the only bus option for inbound service across the Reserved Channel to the Seaport and Downtown. During peak commuting hours this route consistently operates over capacity and does not operate at all on Sundays. With the nearest T stations more than a 10-minute walk from the site, increased access to public transportation is a critical issue that must also be addressed in future project filings.

Section 5 of the ENF explores a number of options to alleviate transportation related concerns:

- Creation of bicycle accommodations in accordance with the Boston Transportation Department Guidelines.
- Creation of a shared-use path along East 1st Street
- Increased reliance on ride sharing services as an alternative method of transportation
- Shuttle services to and from the Project site
- Enhancements to Route 7 and reinstatement of the Silver Line 3 to City Point, and
- Implementation of a robust program of TDM strategies

After reviewing the Transportation section of the ENF, the collective traffic impacts of the proposed development remain unclear. Addressing the traffic and parking needs are high on the priority list for the South Boston neighborhood. The additional density and daily trips anticipated from the proposed project are likely to exacerbate a growing problem. Moving forward, the project must do more to address transportation concerns.

Future project filings and the DEIR should include a traffic impact analysis that acknowledges commercial, truck, public transit and commuter vehicle traffic, especially for intersections that will experience increased congestion at Summer Street and East First Street.

Climate Resilient Design

We note that the ENF discussion of climate preparedness is thoughtful and appropriately conservative. We appreciate the inclusion of climate change data from several sources including the Office of Coastal Zone Management, MassDOT, the Boston Research Advisory Group (BRAG), and the City's Climate Ready Boston Report. We support the proponent's use of BRAG's more conservative "business as usual" high emissions scenario predicted for late century (2070). As presented in the ENF, the finished floor elevation for the project is proposed at 21.5' BCB, three feet above the FEMA 100-year flood elevation.

As described in the ENF the proponent may also consider the following:

- Movable and permanent flood barriers to protect certain vulnerable sections of the project
- Emergency generators located on the roof

- Operable windows for residential spaces
- Back-up power generation capabilities
- Electrical systems located above the floodplain
- Improvements to stormwater infrastructure
- Saltwater tolerant plantings, and
- Installation of backflow preventers

Given the significant risk of flooding in South Boston, we encourage the proponent to incorporate a number of these resiliency strategies into the final project design. This particular site and building design should consider the possibility that today's 1% storm could have a frequency of 10% by mid century, and that chronic flooding associated with monthly and seasonal high tides will become more and more prevalent during the latter half of the century. According to the BRAG report, the possibility that such flooding will occur several times per week cannot be ruled out.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Valdes Horwood". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Jill Valdes Horwood
Director of Policy