



Are you on board?

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May 30, 2017

Via email to: Anne.Canaday@state.ma.us

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs (EEA)
MEPA Office Attn: Anne Canaday EEA#13031
100 Cambridge Street, Ste 900
Boston, MA 02114

Re: 99 Sumner Street/Hodge Boiler Work Site, Notice of Project Change, EEA#13031

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Notice of Project Change (NPC) for the 99 Sumner Street (Hodge Boiler Works) development project submitted by DIV Sumner Street, LLC on May 1, 2017. Boston Harbor Now, in its previous iteration as The Boston Harbor Association, has commented extensively on the project since its original filing in 2003.

The redevelopment of this site will make a currently inaccessible waterfront area available for public use and enjoyment. We support the redevelopment proposal and look forward to the completion of this project. Site-specific comments follow.

Project Description

The proposed mixed-use project sits along the East Boston waterfront between the City of Boston's LoPresti Park and the Carlton Wharf Condominiums. It is comprised of 2.5 acres of filled and flowed tidelands and is subject to the East Boston Municipal Harbor Plan (EBMHP) substitute provisions and requirements. As presented in the NPC, the project includes:

- 119 new residential units (including 7 affordable housing units),
- A 7,200 SF facility of public accommodation,

- 147 bicycle spots (119 for residents and 28 public spaces)
- 83 vehicular parking spaces, and
- 34,539 SF of public open space and 5,045 of private open space

Open Space & Harborwalk

This project will connect the Boston Harborwalk between LoPresti Park and Carlton Wharf. As presented in Table 7-3 of the NPC, the proponent will provide 39,584 SF of open space (we note this number differs slightly from the 39,545 SF listed in Table 1-1). As proposed, the open space will total 65% of the project area, divided into:

- Landscaped areas and sidewalks, 37%
- A public plaza with overlook, 34%
- Harborwalk, 21%, and
- A private patio for building residents, 8%

In its current configuration, the longer edge of the L-shaped structure will border LoPresti Park with access to the park via the Harborwalk. With one of the more active public open spaces along East Boston’s waterfront abutting the property, we encourage proponents to consider a mid-building entrance that connects the existing LoPresti Park with the project’s public terrace.

Project proponents have committed to post one interpretive sign and one wayfinding Harborwalk sign on-site. East Boston has a rich maritime industrial history, including shipbuilding. The 2002 East Boston Municipal Harbor Plan lists the Hodge Boiler site as a key location for a marker along the Harborwalk that describes the company’s history of steam engine boiler and plate-iron production from 1860’s to the 1950’s (EBMHP 2002, p. 79).

We encourage proponents to work with the Friends of the Harborwalk to place co-branded Harborwalk wayfinding and historic interpretive signs. The Friends are in the process of researching and developing high-quality historical content and graphics for all the East Boston and Charlestown waterfronts.

Facilities of Public Accommodation

As presented in Section 7.4 of the NPC, the public work share space will be the onsite facility of public accommodation and at approximately 7,200 SF, it substantially exceeds the minimum 1,120 SF required by regulation.

As proposed, the work share space will be available to the public for daily drop-in access and through monthly memberships. Similar to the recently licensed GE Headquarters’ maker space in Fort Point Channel or popular District Hall in the Seaport, public work share space has the potential to benefit East Boston community members. We strongly encourage the proponent to work with the neighboring community, local youth organizations, and nonprofits to identify opportunities to expand programming and proposed benefits of this space. We look forward to a detailed draft management and program plan for the proposed FPA space during the Chapter 91 license review process.

Sustainable Design

Section 2 of the NPC addresses sustainable design for the project. According to the NPC, the project site is within FEMA's "velocity zone," meaning that it is subject to both flooding and high velocity wave action during storms. As sea level rises over the lifespan of this building, more of the site will be subject to flooding and wave action.

As described in section 2.4 of the NPC, the proponents will include the following initial steps in the project's climate change resiliency plan:

- Raise the first floor approximately 5 feet above base flood elevation to 23.7 BCB,
- Create a sloped Harborwalk that includes plant bundles as additional buffers for coastal flooding,
- Move essential mechanical equipment to the second floor,
- Install a rooftop backup generator,
- Reserve roof space for possible photovoltaic installation,
- Include non-mechanical strategies for extended interruption of utilities during severe storm events and
- Create a project shoreline that combines hard and soft shoreline armoring and connects with the future living shoreline at Clippership Wharf.

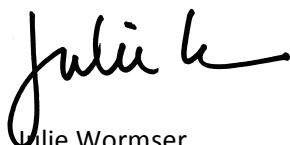
In the time since this project was originally licensed, the City has a considerably better understanding of the climate risks Boston will face by mid to late century. We were pleased to see references to the December 2016 Climate Ready Boston report and thoughtful, effective responses to flood risks.

Today's 100-year flood zone is approximately 16' BCB, with between 2.4 to 7.4 feet of sea level rise considered likely for the latter half of the century. Elevating the first floor by five feet is an excellent short-to-mid-term strategy. Along with the proposed strategies listed above, we recommend that the project consider a low wall to prevent waves from directly hitting the building, and that the foundation be designed to handle wave action, which is many times more destructive than flat water.

The project will include an underground parking garage with access proposed via Sumner Street. If the elevation of the parking garage opening is within future flood levels, it needs to be designed with an effective flood proofing strategy to prevent floodwaters from entering underground areas.

We look forward to reading the more detailed project proposal to come as part of the Chapter 91 filing. Thank you for your consideration of our comments.

Sincerely,



Julie Wormser
VP Policy & Planning



Jill Valdes Horwood
Director of Policy