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October 30, 2018

Via email to: [Alexander.Stryisky@state.ma.us](mailto:Alexander.Stryisky@state.ma.us)

Executive Office of Energy and Environmental Affairs (EEA)

MEPA Office

Attn: Alex Stryisky

100 Cambridge Street, Ste 900

Boston, MA 02114

Re: L Street Station Draft Environmental Impact Report, EEA #15692

Dear Mr. Stryisky,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the L Street Station Redevelopment submitted by HRP 776 Summer Street LLC (HRP). Our policy and planning team has reviewed the project presentation, toured the project site on several occasions, and attended a series of public meetings held throughout the summer.

As presented in the Draft EIR and following the May 2018 Designated Port Area (DPA) Designation Decision issued by the Office of Coastal Zone Management, the landward portion of the proposed 15-acre redevelopment is no longer part of the South Boston Designated Port Area along the Reserve Channel. 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 requires a new Chapter 91 license.

### **Project Description**

As described in the Draft EIR, the current proposal is for the redevelopment of 15 acres of land along the Reserve Channel in the South Boston waterfront. Since the filing of the Environmental Notification Form, the project has been reduced from 2.1 million SF to 1.93 million SF. The

amended building program proposes to increase retail use, increase office use, more than double hotel use, increase parking options, and decrease residential use. The seven-building proposal now includes:

- 85,630 SF of retail space,
- 368,070 SF of office space,
- a 344-key hotel,
- 1,397 parking spaces to be shared between office and residential users, and
- 1,344 residential units

The height of the proposed buildings ranges from 82 feet to 210 feet with the lowest buildings facing the South Boston neighborhood and the tallest buildings located along the Reserve Channel and Summer Street.

### **Existing Maritime Industrial Uses**

The project site 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 East and West. As well-known amongst stakeholders, Massport is investing nearly \$35 million in a series of facilities and operational improvements in anticipation of increased growth and container activity at Conley Terminal.

The Dedicated Freight Corridor is Boston Harbor's major truck route serving Conley Terminal with heavy industrial traffic at all hours of the day and night. It is essential that the proponent continue to work with the Massport Maritime Department to ensure that the proposed mixed-use development minimizes all potential impacts to truck access and existing working port businesses. To ensure that port activity continues to be a key component of the regional economy and also balance non water dependent use in the area, Massport has made significant efforts to move port traffic and activity away from existing residential uses.

The Draft EIR suggests expanding the use of the DFC to include service vehicles traveling to and from the 15-acre site. While this may be an alternative that is worthy of further discussion, we feel strongly that all DFC use must prioritize and benefit the existing maritime operations before a private non-water-dependent project considers using the route even on a limited basis. Section 1.4 of the Draft EIR offers signage as a means to deter passenger vehicles and pedestrians from accessing the DFC. Signage alone is unlikely to deter passenger vehicles, pedestrians, and cyclists from accessing the DFC.

To ensure that Conley Terminal operations and other related maritime businesses are not adversely impacted, the final EIR should clearly define "service vehicles," specify any potential time of day restrictions, limit the use of the DFC to off-peak truck traffic hours, and describe gates or security checkpoints under consideration.

### **Open Space and Programming**

We continue to have concerns about the characterization of current maritime-industrial activities at DFC and nearby Conley Terminal operations. Boston Harbor, especially at Conley Container Terminal, is an active industrial area that inevitably adds a significant amount of noise, dust, and vibrations to abutting spaces.

The Draft EIR includes new details for the proposed public areas along the northern edge of the site, closest to the DFC. We understand the design challenge—given the nature of marine industrial operations nearby—and encourage the team to more carefully consider the layout and programming of the public areas along this edge. They must reconcile two very different uses—general public use and the continued industrial operations of Conley Terminal and other working port businesses. The final EIR should do more to describe and depict details of the observation deck, waterfront boardwalk, waterfront plaza, performance plaza, and overlook.

Figures 3.3, 3.4A, 3.4C, and 3.4E 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 diverse set of open space experiences for the general public. We are especially pleased with the focus on arts and culture and would welcome the opportunity to work with the proponent to further define the public realm plan and best practices for waterfront programming and activation.

### **Transportation**

As proposed, this development will add a substantial number of new residents and workers to the sidewalks, bus routes, and roadways of South Boston.

The Draft EIR states the proponent will include a total 1,397 on-site parking spaces. As a general principle, we favor public transportation solutions that benefit a broader section of the population. Increasing the number of parking spaces does little to address the much-needed transportation improvements in South Boston. We understand that the project is responding to the community's current parking demands, but this approach directly conflicts with the City of Boston's efforts to be carbon-neutral by 2050.

There are five existing MBTA bus routes within walking distance (10 minutes or less) of the project site—route 5, 7, 9, 10, and 11. 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 Reserve Channel to the Seaport and Downtown. As confirmed by the Draft EIR, during peak commuting hours this route is near capacity and does not operate at all on Sundays. While we appreciate the proponent's willingness to kick off a supplemental bus service as soon as site demolition begins in 2019, we have questions about the proposed pilot program. For example, additional information about management, staffing, schedule of operation, and incorporation of the pilot into existing bus tracking technology should be provided in future project filings.

With the nearest T station more than a 10-minute walk from the site, increased access to public transportation is a critical issue that needs to remain a priority for this project. We encourage collaboration with the MBTA to fund expanded or enhanced service in this route, especially with a city proposal to add a bus only lane to Summer Street. We look forward to additional transportation discussions as the project progresses.

Finally, this 15-acre site and development is large enough to warrant a new Blue Bikes station. We are pleased to learn that the proponent is committing to installing at least one additional Blue Bike Station dock at this location.

### **Climate Resilient Design**

As presented in section 4.4.2 of the Draft EIR, the finished floor elevation for the project will be 21.5' BCB, two feet above the base flood elevation of 19.4' BCB. The site resiliency plan found in Figure 4.3 proposes to increase the site elevation, improve stormwater collection, implement permeable paving, use light-colored materials, and increase the number of shade trees. These are commendable initial steps and we applaud the proponent for including them in the early design stages of the project.

After the project proponent submitted the Draft EIR and before the closing of the public comment period, Mayor Martin J. Walsh publicly announced the City of Boston's Resilient Boston Harbor vision plan and released the Coastal Resilience Solutions for South Boston report. Both the vision plan and the report present the City's district-scale climate adaptation solution for Boston Harbor. This site is part of the Reserve Channel mid-term and long-term solution that can provide flood protection critical to reducing flood risk across South Boston.

Design detail and strategies that embrace the City of Boston's district-scale solution should be a priority for climate resiliency at this site. We look forward to reviewing additional resiliency measures proposed in the Final EIR and continuing to refine site design measures as the project progresses.

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 prominent horizontal stroke across the middle.

Jill Valdes Horwood  
Director of Policy