



Are you on board?

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October 5, 2018

*Via email to: Ben.Lynch@state.ma.us
Frank.Taormina@state.ma.us*

Ben Lynch
Director, Waterways Regulation Program
Massachusetts Department of Environmental Protection
One Winter Street, 5th Floor
Boston, MA 02108

Re: Residences at Coleridge Coast

Dear Mr. Lynch,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Chapter 91 Waterways Application for the Residences at Coleridge Coast development project submitted by Rock Development. Boston Harbor Now continues to support the multi-family residential building proposal and looks forward to the completion of this project.

Project Description

As presented in the Waterways License Application, the proponent will construct a 19,000 SF transit oriented multi-family residential development. The project will provide 19 residential units, 22 below grade parking spaces, 12 bicycle racks, a 1,782 SF facility of public accommodation, and 8,834 SF of open space on site. The project sits on approximately 8,066 SF of filled private tidelands and will be a non-water dependent project.

Public Access

The site terminates at Rice Street, across from tennis courts and a skating rink that are maintained by the Department of Conservation and Recreation (DCR).

Part of the project proposal includes the creation of a new onsite, ten-foot-wide, publicly accessible Harborwalk that terminates at Rice Street. Boston Harbor Now believes strongly that the Harborwalk is a critical point of access to Boston Harbor--our city's largest public resource. We continue to encourage the proponent to work with DCR to continue the proposed Harborwalk across their site. Establishing a pedestrian connection across Rice Street through the DCR recreational area to the waterfront at Constitution Beach cannot be understated.

In addition to the proposed Harborwalk, we suggest improving walkability to and across the site that provides better connectivity for the neighborhood and links residents and visitors with the waterfront at Constitution Beach. Improvements might include a marked crosswalk and signage.

Facility of Public Accommodation

During the September 5 public hearing, a member of the Boston Harbor Now team inquired about the proposed 1,782 SF community space. At the time, the specific use of the space had not yet been identified. We commend the proponent for their continued engagement with the community about potential uses.

Due to the project's proximity to the Harbor and nearby Constitution Beach we would encourage the proponent to consider a seasonal water-friendly public use such as a community sailing center or a kayak rental and storage facility. This has the added benefit of creating public opportunities to touch the water in contrast to the nearby members-only East Boston Yacht Club.

Climate Preparedness

The project site is within FEMA flood zone AE. As identified in the Climate Ready East Boston Neighborhood flood study, the site already floods during high-tide storm events and is near potential flood pathways. Residences built on this site will need to be prepared to withstand chronic salt water flooding.

We commend the proponent for voluntarily exceeding the City of Boston project review expectations and including the following in the project's resiliency plan:

- Elevating the ground floor to 22" BCB, at least 5.5 feet above the floodplain,
- Locating the electrical room on the elevated ground floors,
- Placing all mechanicals on the rooftop,
- Indigenous plants and graded land forms to serve as temporary protective barriers, and
- Floodable waterfront park to accommodate recurring storm surge.

The proponent is requesting a 65-year extended term license. All of the proposed resiliency strategies should, at the very least, protect the property from the effects of sea level rise and coastal flooding through the term of the waterways license and beyond 2070.

We strongly support nature-based solutions to protect coastal areas from sea level rise and coastal flooding. Improving the existing natural features, like the 80 linear feet of coastal bank, will provide more natural and much-needed shoreline protection. We appreciate the proponent's decision to pull back the proposed enhancements like the creation of a new Harborwalk and rain garden to minimize the possibility of disturbing existing resource areas that are critical to improving resiliency at this site. We are especially supportive of the "area of refuge" during storm events idea as an added benefit to the abutting community.

Thank you for your time and consideration. We look forward to the completion of this project.

Sincerely,



Jill Valdes Horwood
Director of Policy