



Are you on board?

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July 13, 2018

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#15874
100 Cambridge Street, Ste 900
Boston, MA 02114

Re: Residences at Coleridge Coast, EEA#15874

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Environmental Notification Form for the Residences at Coleridge Coast development project submitted by Rock Development on June 14, 2018. Boston Harbor Now supports the multi-family residential building proposal and looks forward to the completion of this project.

Project Description

As presented in the ENF, the proponent will construct a 19,000 SF multi-family residential development in a neighborhood well-served by transit. The project will provide 19 residential units, 22 below-grade parking spaces, 12 bicycle racks, a 1,400 SF facility of public accommodation, and 10,111 SF of open space on site (or 8,834 SF according to Figure 2-3).

The project sits on approximately 8,066 SF of filled private tidelands. Because the proposed development is for a non-water dependent use, the project will require a Chapter 91 license.

Public Access

The northeast boundary of the site borders Rice Street and sits across from tennis courts, the Porrazzo skating rink, and Constitution Beach--all controlled by the Department of Conservation and Recreation (DCR).

Part of the project proposal includes the creation of a new onsite, 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

encourage the proponent to work with DCR to continue the proposed Harborwalk across their site. Establishing a 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 and the East Boston Greenway. Initial improvements should include a marked crosswalk and signage.

Climate Preparedness

According to the ENF, the project site is within FEMA flood zone AE. Although the site was not identified in the Climate Ready East Boston Neighborhood flood study as a high-risk area, it already floods during high-tide storm events and is near potential flood pathways. Residential buildings constructed 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.

Figure 2-3 indicates that a small section of the proposed Harborwalk is within the coastal bank area. 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. To that end, the proponent should be cautious that enhancements like the creation of a new Harborwalk and rain garden do not disturb existing resource areas that are critical to improving resiliency at this site.

It is our understanding that the proponent plans to request an extended term license during the Chapter 91 application process. 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. An extended license term should correlate with building designs that are prepared to withstand future climate change and sea level rise projections.

We look forward to reviewing the next phase of this project and its associated public benefits.

Sincerely,



Jill Valdes Horwood
Director of Policy