



Are you on board?

15 State Street, Suite 1100
Boston, MA 02109
617.223.8671
bostonharbornow.org

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Via email to: Ben.Lynch@state.ma.us

Ben Lynch
Executive Office of Energy and Environmental Affairs (EEA)
MEPA Office Attn: Page Czepiga EEA#15649
100 Cambridge Street, Ste 900
Boston, MA 02114

Re: 125 Sumner Street, Waterways License Application

Dear Mr. Lynch,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Waterways License Application for the 125 Sumner Street development project submitted by WinnDevelopment. Boston Harbor Now was present during the October 5th public hearing and continues to strongly support the redevelopment of Clippership Wharf. We look forward to the completion of this project.

Project Description

In April of 2016, the Boston Housing Authority issued a Request for Proposals (RFP) for the demolition and replacement of twenty BHA housing units along Sumner Street in East Boston. This proposal is the result of that RFP.

As presented in the waterways license application, the proponent will construct two new three-story, mixed-used buildings for a total of 52 residential units. Building One will include twenty-two replacement BHA housing units, and Building Two will include thirty new mixed-income units (14 affordable units). The project will provide 56,543 SF of residential units, 4,650 SF of facilities of public accommodation (FPA), and 16,253 SF of non-vehicular open space on site. Together the two buildings make up the Clippership Wharf Apartments complex.

The buildings sit on 46,331 SF of filled Commonwealth Tidelands and are subject to the East Boston Municipal Harbor Plan (EBMHP) substitute provisions and requirements. Because the proposed development is for a non-water dependent use, the project requires a Chapter 91 license.

Public Access & Open Space

A key substitution approved by the Secretary in the 2009 EBMHP exempts this project from the Chapter 91 standard ground floor public use requirement (East Boston Waterfront District Municipal Harbor Plan, Pg. 14). For this site, the EBMHP instead requires that a minimum of 25% of the ground floor be dedicated to Facilities of Public Accommodation (FPA). As configured, the 4,650 SF of FPA exceeds the minimum 25% requirement. The waterways license application lists the following FPAs:

- A 1,072 SF Community Room open to residents, neighbors, and community groups
- An approximately 3,159 SF retail space along Sumner Street, and
- A fifty-two-space bike storage room of which twenty spaces will be reserved for the public and thirty-two available on a first-come, first-serve basis.

As indicated by the proponent, a draft management and program plan for the project will be provided to MassDEP. We request that a copy of the draft plan be circulated to commenting parties prior to its approval.

Part of the new construction involves the addition of the Havre Street extension, a private way that aligns with the existing Havre Street and opens up a nearly quarter-mile view corridor to Boston Harbor. The street will be open to the public for pedestrian, bicycle use, and short-term daytime parking. The extension will create uninterrupted access from Meridian Street through Maverick Street, Sumner Street, and Jacobbe Road down to the Harborwalk. We are firmly in support of the proponent's improvement to the accessway and increased public access to the waterfront. To make the most of the new connection, in addition to the standard blue Harborwalk signs, the proponent should include wayfinding signage with at minimum a list of on-site public amenities and hours of operations.

We appreciate the proponent's initiative to include a historic interpretive exhibit on-site. We note that Boston Harbor Now and the Friends of the Boston Harborwalk are working with Lendlease on interpretive signs along the Clippership Harborwalk and would be glad to be part of this initiative as well.

Water Transportation

This project benefits from proximity to an intermodal transportation hub, pedestrian and vehicular links to the waterfront, and the existing Lewis Mall water transportation dock. Although not specifically cited in the waterways license application, this project is adjacent to Clippership Wharf, which is promoting water transportation access at Lewis Mall. The availability and uses of water transit should be promoted with the residents and visitors of this project. Boston Harbor Now is working with MassDOT to evaluate opportunities for additional Boston Harbor ferry routes; higher awareness of and demand for water transportation will help accelerate their implementation.

The EBMHP provides that in the event the proponent seeks an extended term Chapter 91 license, additional public benefits must be directed to water transportation, port improvements, and public access or open space (East Boston Waterfront District Municipal Harbor Plan, pg. 12). As indicated in Chapter 5 of the Waterways License Application and confirmed during the public hearing, the proponent is requesting a 99-year term license.

There was little discussion of the extended term license in the Waterways license application and public hearing. Depending on the special conditions of the final license, DEP will determine the financial or physical contribution expected in exchange for an extended term. It should be noted that Lendlease is leading two initiatives that would benefit from additional funding sources, 1) the previously mentioned interpretive signage effort along the East Boston Harborwalk and 2) the promotion of water transportation at the nearby Lewis Mall dock to local East Boston residents.

Climate Preparedness

Climate change adaptation and resiliency efforts were addressed in the previously filed Final Environmental Impact Report (FEIR). The current Waterways License Application does little to incorporate details regarding site elevation, existing conditions on site, or projected flood risks. It does not address proposed or planned resiliency measure for the project site.

According to the FEIR, the project site borders FEMA's high-risk flood area. Today, the site only borders a high-risk flood area but with Boston Harbor sea levels predicted to rise between 2.4 and 7.4 feet by the end of the century and a 50/50 chance the rise will exceed 3 feet sometime after 2070, residences built on this site will need to be prepared to withstand chronic salt water flooding.

Previous filings proposed the following resiliency measures:

- Raising the finished floor elevation above the 100-year floodplain
- Placing critical infrastructure above the 100-year floodplain, and
- Raising the intersection of Clippership Lane and Havre Street Extension 1 foot higher than existing conditions.

We are concerned this information was not included in the current application and believe strongly climate preparedness and resiliency measures should be reflected in the final Chapter 91 license. As proponents of climate change preparedness in Boston, we are increasingly concerned about the potential for Boston's socioeconomic inequities to increase as residents and buildings are put under increased weather-related stress without the public funding to protect all neighborhoods equally.

The abutting Clippership Wharf development, another Lendlease project, incorporated novel design components and set a new bar for "Living with Water" multiple-benefit, flood-resilient design along Boston Harbor. The 125 Sumner Street project provides a rare opportunity for low-income renters to enjoy both waterfront amenities and flood preparedness design. We believe that updates in state and local zoning and other regulations and incentives are required to make such opportunities the norm, as well as to implement climate preparedness measures on a neighborhood, not site-by-site, scale.

We look forward to the completion of this project, the addition of low-to-middle income housing and the public benefits it will bring to the East Boston Community.

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