



Navigating our future.

15 State Street, Suite 1100
Boston, MA 02109
617 223 8104
bostonharbornow.org

November 22, 2017

Via email to: frank.taormina@state.ma.us
ben.lynch@state.ma.us

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

Re: Waterways License Amendment Application for 253 Summer Street

Dear Mr. Lynch,

Thank you for the opportunity to comment on the 253 Summer Street Chapter 91 Waterways License Amendment Application. Boston Harbor Now staff is familiar with the project site and has reviewed the accompanying project plans. Our comments focus on public access and resiliency measures.

Project Description

The proposed waterways license amendment application is for the construction of an outdoor seasonal dining area at 253 Summer Street along the Fort Point Channel. The project includes:

- An outdoor host and service station, bar service area, and seating for 95 guests,
- An overhead trellis to support lighting, space heaters, and misting system,
- An ADA accessible entrance,
- A slightly elevated Harborwalk to match the proposed grade change and material at the GE site, and
- Improvements to the stormwater management system

Harborwalk and Public Access

The Fort Point District 100 Acres Master Plan envisioned the Fort Point Channel as a well-used and activated public space between the Downtown and South Boston Waterfront. As proposed, the public seating areas, seasonal plantings, and improved wayfinding will improve site conditions and encourage public use. We are supportive of the proposed project and efforts to include "park-like" amenities on site and along this stretch of the Boston Harborwalk.

The existing Chapter 91 license (No. 9342b), Special Condition #4 requires six public parking spaces to be provided at Necco Court or Necco Street as close to the nearby GE dock entry as possible. To launch small crafts and kayaks

for recreational activities, visitors park their vehicles in the reserved spaces and walk a short distance to the dock; to that end, proximity to the water is essential to the continued public use of the dock.

Page 8 of the current amendment application proposes to relocate loading and delivery operations from the existing location on the project site to an undefined area along Necco Court. It is unclear from the information provided if the six public parking spaces will be affected by this relocation. Additional information should be provided that defines the location of the parking spaces relative to the new configuration of the loading and delivery operations. We urge the proponent to consider maintaining the parking spaces as close to the water-based facilities as possible.

We note that Page 9 and Sheet 2 of Attachment C reference a raised landscape planter at the Channel end of Necco Court. We are supportive of the proponent's effort to improve pedestrian safety. This improvement, however, must not adversely impact the public's access to and from the six reserved parking spaces to the public dock, or obstruct existing sightlines from Necco Street down to the water's edge. We ask that the response to comments provide the planter dimensions and the height of all proposed plantings.

Due to the proposed improvements, and in accordance with Section 9.53(2)(d), we ask that a draft management plan for the proposed outdoor seating area and Harborwalk improvements be circulated for public comment.

Climate Change Preparedness

The City's Climate Ready Boston report identified the South Boston waterfront and Fort Point Channel as the community most exposed to future inundation from coastal storms and sea level rise. The recently launched Climate Ready South Boston project is focused on developing neighborhood-specific resilient solutions for these waterfront communities.

The project site is on a particularly low-lying area along Fort Point Channel. Boston Harbor Now has repeatedly documented flooding on this site when the nearby Coast Guard tide gauge at Rowes Wharf measured less than 14 feet BCB. This means parts of the seawall are likely lower than 14 feet BCB or floods due to wave action.

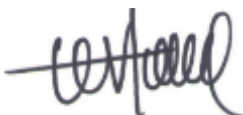
Based on Sheet 1 in Attachment C of the amendment application, the site elevation ranges from 13.46 to 15.20 BCB. To address current flooding conditions and prepare for rising seas, the proponent plans to:

- Elevate the Harborwalk to 16.2 BCB,
- Increase the capacity of stormwater management system to retain and infiltrate stormwater,
- Construct watertight barrier around utilities for protection during inundation events, and
- Install a flood protection barrier system at the building entrance adjacent to the patio

It is our understanding that the project proponent plans to coordinate with GE to match their Harborwalk site grade and materials. We commend the proponent for taking steps to ensure that the Harborwalk elevations and connections are flood resilient and create a more uniform pedestrian experience along this section of the Fort Point Channel. We ask that details of the Harborwalk site elevation coordination with abutting properties be provided to interested stakeholders.

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

Sincerely,



Jill Valdes Horwood
Policy Director