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August 1, 2017

Via email to: [Purvi.Patel@state.ma.us](mailto:Purvi.Patel@state.ma.us)

Secretary Matthew A. Beaton  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Ste 900 (9th Floor)  
Boston, MA 02114

Attention: Purvi Patel, MEPA Office

Re: 605 Chelsea Street Environmental Notification Form, EEA#15729

Dear Ms. Patel,

Thank you for the opportunity to comment on the 605 Chelsea Street/Cargo Ventures Environmental Notification Form. Boston Harbor Now staff has reviewed the accompanying project plans and was present at the July 20th site visit. Our comments follow.

**Project Description**

The current proposal is for the rehabilitation of the existing 28,499 SF East Boston Steam Sewerage Pump Station located at 605 Chelsea Street for use as an intermodal freight building. The site sits along the Chelsea River, is adjacent to the Chelsea Street Bridge and is within the boundary of the Chelsea Creek Designated Port Area (DPA). The entire site is comprised of 61,928 SF and includes the existing building, parking, roadway access, watersheet, and some open space.

**Designated Port Areas**

The Massachusetts Office of Coastal Zone Management (CZM) has established four Designated Port Areas within Boston Harbor: South Boston, Chelsea Creek, Mystic River, and East Boston. As stated most recently by CZM staff during a public information meeting on the South Boston Designated Port Area Boundary Review, the two central principles of the State's DPA policy are to promote water-dependent industries as an important sector of the State's economy and to prevent the loss of areas that have key characteristics:

- Access to a commercially-navigable waterway and associated developed waterfront;

- Backland space for industrial facilities and operations; and
- Land-based transportation and utilities intended for general industrial purposes (CZM Policy Guide p. 68).

Uses allowed within a DPA boundary include: 1) water-dependent uses 2) supporting uses 3) accessory uses and 4) temporary uses. The proponent is requesting a review of the proposed adaptive reuse project within the Chelsea Creek DPA as a supporting DPA use. As defined in 310 CMR 9.02, a supporting use is “an industrial or commercial use that provides water-dependent industrial use in the DPA with direct economic or operational support.”

As longtime advocates of the working port, Boston Harbor Now recognizes the importance of continued investment in working port areas. Our recent findings confirm that maritime industrial businesses often lack the capital to invest in and improve existing infrastructure and often rely on additional income to maintain operations. During the MEPA site visit, the proponents indicated that of the four possible development alternatives, the preferred option would rehabilitate a portion of the building for intermodal freight use and create a new mezzanine office space and dry storage as supporting DPA uses.

During the MEPA site visit, the proponent stated they had not identified a tenant for the new mezzanine area. Although the proposed supporting office space and dry storage have the potential to provide economic benefits in support of DPAs, future filings should include additional details about potential non water-dependent tenants and marine industrial uses on the site. The proponent should continue to work with MassDEP, CZM, and other stakeholders throughout the State permitting process to ensure that the proposed design and rehabilitation project does not impede future water-dependent industrial uses.

Future project filings should describe in more detail how the proponent intends to provide economic support to the DPA through the proposed office space and dry storage use.

### **Transportation**

Section 3 of the ENF highlights the site's direct access to Conley Terminal via Chelsea Street, Coughling Haul Road, and I-90. The ENF does little to address the anticipated daily trips resulting from the proposed change. Page 1-5 of the filing projects 204 vehicle trips per day but is unclear if these additional trips include the proposed intermodal freight operations, the proposed non-water dependent supporting office use, and members of the general public.

Traffic impacts on existing marine industrial businesses in the area should be analyzed and mitigated accordingly. A more detailed traffic report should be included in future project filings and made available to interested stakeholders.

### **Public Access**

Water-dependent industrial uses have the potential to create real public safety hazards for pedestrians on the Harborwalk. As presented in the ENF, there are two potential opportunities for public access and interaction with the site 1) the pile-supported walkway and 2) 3,450 SF of gravel/grassy area.

Section 3.3 of the ENF refers to license no. 2331 issued on May 16, 1990, to the MWRA for the construction and maintenance of a pile-supported walkway that was never constructed. During

the on-site meeting, the proponent was unable to clarify if the walkway was intended for general public access. Future project filings should include additional detail about the existing license and any plans the proponent may have to complete the pile-supported walkway in the future.

Although the current regulations do not legally require public access through a DPA site, there are some DPA sites along Boston Harbor that incorporate public points of access or viewing area (Boston East and the East Boston Shipyard). These areas give the public an opportunity to engage with the waterfront and also minimize on site hazards and conflicts between the general public and existing industrial operations.

Until we have a basic set of guidelines for creating public access through a DPA, we ask that the proponent provide additional details about the approximately 3,450 SF of gravel/grassy areas for minor public amenities mentioned on page 3-5 of the ENF. There needs to be a careful balance between creating public access through a marine industrial site and maintaining an appropriate level of public safety. We strongly encourage the proponent to work with the neighboring community, local organizations, and nonprofits to identify potential points of public access and accompanying public amenities.

#### **Climate Change**

Page 2-4 and Figure 2.2 of the ENF briefly address sustainable design for the project. According to the ENF, the majority of the project site is within the AE Zone floodplain. We could not find additional information regarding site elevation, existing conditions on site, or projected flood risks. As described in the ENF, to address future flooding on the site the proponent will:

- Raise the existing ground floor slab by approximately four feet
- Elevate utilities above the flood zone, and
- Employ renewable energy sources whenever possible.

We strongly encourage the proponent to incorporate additional resiliency strategies into the final project design. This particular site should consider the possibility that today's 1% storm could have a frequency of 10% by mid century, and that chronic flooding associated with monthly and seasonal high tides will become more and more prevalent during the latter half of the century.

We look forward to reviewing the proponent's response to comments received during the MEPA process.

Sincerely,

Jill Valdes Horwood