



Are you on board?

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Via email to: Holly.S.Johnson@state.ma.us

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

Attn: Holly Johnson, MEPA

Re: Boston East Notice of Project Change

Dear Secretary Beaton,

Thank you for the opportunity to comment on the Notice of Project Change for the Boston East Project. Boston Harbor Now has commented on this particular project since it was first submitted to the Massachusetts Environmental Protection Agency (MEPA) in 2007. On August 10, 2016 we took part in an interagency site visit organized and led by the proponent and its consulting team. During the site visit we witnessed first-hand the severe deterioration of the site, increasingly hazardous conditions, and susceptibility to coastal flooding.

As presented in the most recent Notice of Project Change (NPC), the revised project is for the redevelopment of 102 Border Street along the East Boston waterfront. The proposed project is approximately 14.2 acres and divided in two sections, 1) a mixed-used residential development and 2) a Designated Port Area (DPA) section exclusively for marine industrial use. The revised plans included in this NPC are the result of a design change within the DPA site. If permitted, the revised changes would create site conditions better suited to accommodate future marine industrial uses and include:

- Clean up of broken piles, piers, pavements, and debris in the watershed and uplands

- Stabilize existing failing seawalls
- Secure the DPA shoreline with riprap, and regrade the upland site for DPA use, and
- Add 11,226 SF of fill to increase the overall site elevation

As presented in the NPC, the proponent is currently working to secure a boat storage and repair facility as a potential tenant. Although the operator was not specified, we strongly support this maritime use for the DPA site.

Alternatives

Section 1.6 of the NPC describes three potential build scenarios to improve the functionality of the project site.

Pedestrian Bridge

In one scenario, a timber pile-supported pedestrian bridge would be constructed over the former marine railways and serve as the Harborwalk connection to the Boston East Residential Site. Because the approximately 73-foot bridge connection would be constructed over the marine railway and salt marsh it will increase the usable space on the uplands by 1,950 SF.

We appreciate the proponent's efforts to extend the existing Harborwalk through the DPA site, though recognize why DPAs do not legally require this access. Water-dependent industrial uses have the potential to create real public safety hazards for pedestrians on the Harborwalk. There needs to be a careful balance between creating a continuous Harborwalk through a marine industrial site and maintaining an appropriate level of public safety.

Until we have a basic set of rules for creating public access through a DPA, we are hesitant to recommend committing to a permanent, all-access pedestrian bridge on the project site. Instead, the bridge could function as a temporary point of access with a more permanent Harborwalk extension constructed in the future when a tenant has been secured. Final DPA management and Harborwalk design would need to ensure that such a public safety hazard does not occur.

FEIR Plan

Under the original proposal, site improvements would remove 1,320 LF of marine railways, armor the shoreline with vertical walls, and minimal amount of fill would be used to raise the site. We have long advocated for minimizing encroachment into Boston Harbor. We do not believe the FEIR plan is the best option to increase the functionality of the site and improve coastal flood protection.

No build alternative


Under the no build proposal, the property would continue to sit vacant and underused. We would prefer to see the site improved for future maritime uses instead of the current deteriorated structures that are susceptible to coastal flooding and erosion. Given the recent release of the Climate Ready Boston report, prudence would suggest planning for between three and seven feet of sea level rise by 2100 depending on the design life and level of risk deemed acceptable for the proposed structure. As we've

stated before, due to its strategic location along the waterfront preparing this site for sea level rise needs to be a priority.

Marine Railway

The Chapter 91 license #13905 issued January 13, 2016 included the removal of the marine railway remnants on the site. In our previous comment letter, we hoped that the marine railways would be maintained on site to provide a sense of history for Harborwalk users. We are glad to see that consultations between the Massachusetts Historical Commission, the Board of Underwater Archaeological Resources and the proponent have resulted in keeping approximately 1,400 LF of the marine railway. We would like to offer our assistance in working with project proponents to develop and install 3-5 interpretive signs along this section of the Harborwalk that speak to our maritime industrial history.

Sincerely,



Julie Wormser
VP Policy and Planning



Jill Valdes Horwood
Director of Waterfront Policy