



Are you on board?

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January 6, 2017

Via email to: Andrea.Langhauser@state.ma.us

Andrea Langhauser
MassDEP Waterways Regulation Program
One Winter Street, 5th Floor
Boston, MA 02108

Re: Clippership Wharf Development, Chapter 91 Amendment Application #w16-4838N

Dear Mrs. Langhauser,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Chapter 91 waterways license amendment application for the Clippership Wharf Project submitted by Lend Lease Clippership Wharf LLC, on December 7, 2016. Our organization, and previously as The Boston Harbor Association, has commented extensively on the original project, Notice of Project Changes, and Chapter 91 License. We strongly support the redevelopment of Clippership Wharf so that public access and water transportation are finally realized as part of this project.

The current version of the Clippership Wharf development proposes a mixed-use development that includes:

- A 70 foot, six-story building
- 478 residential units
- 525,000 gross SF of residential use
- 307 parking spaces and 300 bicycles spaces
- 31,193 SF of retail/facilities of public accommodation (993 SF increase)
- 189,837 SF of open space

The revised project proposes minor changes that should not have a significant impact on the final project. We see the expansion of the salt marsh terrace and relocation of the coastal beach as providing

higher quality and more easily accessible waterfront space that will benefit the visiting public from both the land and waterside.

Our comments are limited to the two major changes proposed for the waterfront features of the project: 1) Harborwalk amenities and 2) alterations to the living shoreline.

Harborwalk

It is clear from previous proposals and the revised NPC that the proponents have given careful thought to the amenities and enhancements along the Harborwalk. We are glad to see the revised project include a number of features that will serve to attract and invite the public to interact with the Harbor.

- Public kayak launch
- New dock for small vessels/short-term tie up
- “Bump out” features along Harborwalk to enhance pedestrian harbor views
- Pier overlook and pedestrian dock
- Large open spaces like the amphitheater, lawn, plaza, and dog park
- Planters that double as seating and hammocks
- Interpretive ecological planting area
- Public restrooms and parking at the cafe and restaurant area

Exposure to the elements and proximity to salt water may, over time, affect the aesthetic of these amenities. Continued maintenance will be essential to maintaining visitor interest and should be included as part of the site management plan for the Chapter 91 amendment application.

Living Shoreline

We look forward to experiencing the opportunities for public interaction with the intertidal zone that this project proposes. During the October and November 2016 King Tides, visitors flocked to Long Wharf to experience the flooding, took off their shoes and happily waded in the shallow water. We anticipate that people will want to do the same at Clippership Wharf.

The proposed living shoreline provides a rare, interactive experience for people to enjoy the water’s edge. It will also help stabilize the shoreline, lessen coastal flood risks to the inland building, and create intertidal habitat for native aquatic species. Based on the revised project site plan, we would like to see the following:

- Increase the interactive elements of the living shoreline such as creating impermeable tide pools, large irregular rocks and rock paths for people to jump among and sit on;
- Highlight the north-south elevation changes in topography with perhaps a small stones surface instead of planted surface so people can interact with a tidal flow; and
- Add some large rocks or other naturalized seating in the waterfront island area for people to enjoy a mini-island experience without intrinsically trampling the vegetation;

The proposed amendment does not include a maintenance plan for the living shoreline elements. Ongoing maintenance of the living shoreline will be critical for achieving the environmental and public

benefit goals of the resilient design. We look forward to reviewing a detailed management plan for the living shoreline and Harborwalk.

Given the expected level of foot traffic, proponents should commit to removing trash as needed, (e.g., at least daily from Memorial Day to Labor Day, and at least weekly from Labor Day to Memorial Day) to prevent debris from blowing into Boston Harbor. The Chapter 91 license terms should also require the proponents to maintain the "living shoreline" consistent with State and Conservation Commission requirements. Annual reports should provide updates on the ecological health of the salt marsh, details of any degradation or loss of planted salt marsh plantings, and any corrective measures taken by the proponents. As sea levels and storm intensity increase, new strategies and plant species will likely be needed. We also ask that the maintenance plan include the anticipated changes in sea level as predicted in Climate Ready Boston.

This proposal incorporates a novel design component and sets a new bar for "Living with Water" multiple benefit flood resilient design along Boston Harbor. We understand the proponent is working closely with MassDEP to develop the necessary procedures to implement and maintain the proposed living shoreline elements; we encourage the proponent to continue to closely collaborate with the permitting agencies to ensure the living shoreline component of the project is a resounding success. We look forward to the completion of the Clippership Wharf development project.

Sincerely,



Julie Wormser
VP of Policy & Planning



Jill Valdes Horwood
Director of Waterfront Policy