



Navigating our future.

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October 25, 2016

Via email to: Alexander.Strysky@state.ma.us

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs (EEA)
MEPA Office Attn: Alex Strysky, EOEEA #12556
100 Cambridge Street, Ste 900
Boston, MA 02114

Re: Clippership Wharf Development, Notice of Project Change

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Notice of Project Change for the Clippership Wharf Project submitted by Lend Lease Clippership Wharf LLC, on September 30, 2016. Our organization, and previously as The Boston Harbor Association, commented extensively on the original project, the Chapter 91 License, and the 2015 Notice of Project Change. We continue to strongly support the redevelopment of Clippership Wharf so that public access for all and water transportation are finally realized as part of this project.

The 2015 version of the Clippership Wharf project proposed a mixed-use development that included:

- 492 residential units
- 555,000 gross SF of residential use
- 321 parking spaces (300 underground and 21 surface spaces)
- 30,200 SF of retail/facilities of public accommodation
- 189,837 SF of open space

The current NPC proposes a number of changes to the building specifications including overall reduction in the residential units (478), surface parking spaces (7), and GFA (525,000 SF). The building height, footprint, and program remain unchanged. We see these as minor changes that should not have a significant impact on the final project.

Our comments will focus on two major changes proposed for the waterfront features of the project: 1) Harborwalk amenities and 2) the alteration 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 recent King Tide (October 17-19), 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; our comments reflect suggestions to optimize such interactions.

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 recommend the following:


- Increase the interactive elements of the living shoreline such as creating impermeable tide pools that will fill with small crabs, periwinkles and aquatic plants and adding more, larger, 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 revised NPC did not include a maintenance plan for the newly proposed living shoreline elements. Ongoing maintenance of the living shoreline will be critical for achieving the environmental and public benefit goals of the resilient design.

For example, we encourage proponents to provide naturalized stone paths and seating to prevent on-going trampling of vegetation. We also request that the proponents conduct routine cleanup of all marine debris by the property. 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 all 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 encourage the proponent to work closely with CZM, MassDEP, Division of Marine Fisheries and the Boston Conservation Commission to carefully consider, implement, and maintain the proposed living shoreline elements. 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