



Navigating our future.

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

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs (EEA)
MEPA Office, Attn: Alex Strysky EEA# 15547
100 Cambridge Street, Ste 900
Boston, MA 02114

Re: GE Headquarters Project Expanded Environmental Notification Form, EEA #15547

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Expanded Environmental Notification Form (EENF) submitted by General Electric and MassDevelopment. We have had the opportunity to view the presentation on several occasions. We hosted the GE team at the August Harbor Use Public Forum, sat in on the Boston Design Commission Sub Committee meeting, attended the MEPA site visit on September 6, 2016, and participated in a number of public hearings. Our specific comments follow.

We want to say upfront that we are looking forward to the completion of this project. We applaud GE's efforts to reach out to the public and integrate their campus into the neighborhood. We strongly support their work to provide substantial public access, showcase renewable energy technologies, mitigate greenhouse gas emissions and prepare for climate-related impacts such as sea level rise. We are looking forward to having another exemplary climate-resilient building in Boston.

Project Description

According to the EENF, the new GE Headquarters project is jointly proposed by GE and MassDevelopment and partially funded through the MassWorks infrastructure program. The project includes a rehabilitation of the 5 and 6 Necco Court historic buildings, the construction of a new 12-story office building, a pedestrian walkway, public realm improvements, and facilities of public accommodation.

The campus will encompass roughly 2.4 acres of land, including 388,700 SF of gross floor area spread out over three buildings. The two historic buildings and a portion of the outdoor public space will be owned by Massworks, a subsidiary of MassDevelopment, and leased to GE. As stated in the EENF, the project will provide over 61,940 square feet of outdoor public space, or 59% of the site.

The document recognizes that a percentage of this open space is not open to the sky, but does not distinguish between covered open space (i.e., the pedestrian walkway between the buildings and the overhang of the new building) and Chapter 91-defined open space. We would like to see these distinctions quantified.

Regulatory Context

Our comments in this section discuss the project proposal in the context of the requested MEPA waiver, the South Boston Waterfront District Municipal Harbor Plan, the 100-acre Neighborhood master plan and Chapter 91.

MEPA Phase 1 Waiver

MEPA review ensures that permitting agencies are fully cognizant of any negative environmental consequences of proposed actions. MEPA reviews require state agencies to evaluate the environmental consequences of permitting a development project and to require all feasible measures to be taken to avoid, minimize and mitigate potential damage to the environment. Project proponents are requesting a MEPA waiver for Phase 1 of this project to move forward before completion of the MEPA and Chapter 91 processes. Phase 1 would include:

- Immediate rehabilitation of the Necco Street brick buildings,
- The creation of a shared lobby-connection between the existing brick buildings,
- Minimal site work (including some waste generation and asbestos removal), and
- Use of public funds by the State and MassDevelopment for land acquisition and subsequent lease of the same by MassDevelopment to GE.

Under 301 CMR 11.11, the Secretary may waive any provision or requirement of the MEPA regulations and may impose appropriate and relevant conditions or restrictions, provided that s/he finds that strict compliance with the provision or requirement would not serve to avoid or minimize damage to the environment. We understand GE's interest in moving into their new headquarters by 2018, our concern is that there are too many fluid or incomplete sections in the EENF for the State to adequately evaluate whether the project would have negative environmental impacts. We encourage the proponent to continue to work with the State to resolve this matter.

South Boston Waterfront District Municipal Harbor Plan

The project site is subject to the provisions of the South Boston Waterfront District Municipal Harbor Plan as amended in 2009. As a result of the 100 Acres Master Plan for this area of Fort Point, the 2009 amendment supersedes all previous substitute provisions of the South Boston MHP.

Figure 5.3 of the EENF illustrates a proposed change to the WDUZ to increase the total square footage from 27,680 to 29,400; we are glad for the increase. The EENF indicates that the proponent has

requested clarification of the expanded WDUZ that was part of the amendment. As currently proposed, we understand there may be additional changes required to conform to the 2009 amendment.

Chapter 91

The Chapter 91 license for the entire project will ultimately include the two existing licensed structures, 5 and 6 Necco Court. The renovated brick buildings will include Facilities of Public Accommodation (e.g., a restaurant, makerspace and classrooms) across approximately 75% of their ground floors even though the amnesty license does not require proponents to do so.

We understand from presentations at GE's public hearings that proponents are working with DEP to finalize the terms and special conditions of the Chapter 91 license, to be filed in the coming months. We look forward to reviewing more detailed project descriptions for public access, open space, climate preparedness, public amenities, maintenance responsibilities, and public programming. We will submit a detailed Chapter 91 comment letter following the filing of the formal license application.

100-Acres Master Plan

The Fort Point District 100 Acres Master Plan envisioned the Fort Point Channel as a great public space between the Downtown and South Boston Waterfront. The plan sought to strengthen the area's street connections, particularly those linking new and existing developments to the water. It also envisioned active edges, abundant water activities and multiple bridge crossings. We have included a photo from Sydney (Australia) Harbor as an example of a welcoming waterfront park (in GE's case, steps would slope toward the water).



As presented in the EENF, the plaza doubles as a gathering spot for concerts, lecture series, movies, and other uses, presumably for people entering via the Harborwalk along Fort Point Channel. We would like to see additional design elements do more to draw and connect people from Necco Street and down to the proposed plaza, Harborwalk, dock and watersheet.

In addition, future plans will connect the southwest side of the parcel with a larger planned greenway. As proposed, the building does not anticipate interacting with what will be one of the larger public open spaces along Fort Point Channel. We encourage proponents to create an entrance on the southwest side of the new building and create a mid-building passageway between GE Plaza and the future park.

Social Context

For decades, Fort Point Channel has been the site of a strong local artists community, which benefitted from inexpensive rentals of large loft spaces. In recent years, as the Fort Point neighborhood has attracted high-end restaurants and high tech companies, the area's popularity has rapidly grown as a

destination for both Bostonians and visitors. As mentioned above, the Campus' location along Fort Point Channel and commitment to integrating GE into the neighborhood provides a rare, wonderful opportunity for proponents to create a large, interactive civic space along the Harborwalk that draws the public in from both the land and water.

Members of the Boston Civic Design Commission have similarly encouraged proponents to make GE Plaza less of a pass-through space and more of a gathering place that promotes social activity among employees and visitors and physically connects them to the water. Suggestions include amphitheater seating facing the water, curated public art, landscaping that signals public space (vs. private campus), and robust warm-weather public programming.

Building on the strength of the resident art community, Fort Point Channel has the potential to be one of the more visible arts destinations in the city. For example, the Friends of the Fort Point Channel currently curate a range of short-term art installations. During our August Harbor Use Public Forum, the proponent and team expressed a desire to continue current programming and activities along the channel. We would encourage GE to partner with local organizations and nonprofits to create programming and public art throughout their campus, including on and around the watershed itself.

Climate Preparedness

Based on the BRA climate change checklist submitted in the EENF, the site elevation ranges from 14-19.5 feet Boston City Base (BCB) and the expected lifespan of the project is 50 years. Currently, Boston's high tide (mean higher high water) is approximately 11.2 feet BCB and our 100-year storm surge is about 5 feet.

As the proponents are aware, a report designed to achieve scientific consensus on the climate change impacts facing Boston in the years ahead was recently prepared for the City of Boston's Climate Ready Boston project by a team of highly credentialed scientists led by researchers at U Mass Boston. The Boston Research Advisory Group (BRAG) concluded that the amount of sea level rise over the first half of this century is "nearly independent" of the amount of greenhouse gas emissions produced worldwide. That is because there is already a large amount of inertia built into the ocean system. The BRAG scientists project that 4 – 8 inches of sea level rise is likely by 2030 and up to 1.5 feet by 2050 (all relative to the level of Boston Harbor in 2000).

For the latter half of this century, 2.4 to 7.4 feet can be considered likely. The lower end of this range assumes moderate cuts in greenhouse gas emissions worldwide, while the higher end reflects more of a "business as usual" scenario for future emissions. Reducing Boston sea level rise to less than 2.4 feet by the end of the century would require massive and unprecedented cuts in greenhouse gases worldwide, so prudence would suggest planning for at least three feet of sea level rise by 2100 - if not more.

Site and building design should also 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. According to the BRAG report, the possibility that such flooding will occur several times per week cannot be ruled out.

GE has indicated they will be using the new projections from the BRAG report in their design of the headquarters and not rely solely on current FEMA FIRM maps. We commend them for their foresight in doing so.

According to the EENF, the Harborwalk extends 350 feet along the entire site at an average elevation of 14.13 feet BCB. We note, however, that 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. Parts of the seawall may therefore be lower than 14 feet BCB, or may flood due to wave action.

During the September 21, 2016 public meeting, the GE team spoke about potentially collaborating with adjacent neighbors to elevate the Harborwalk to 15.5 feet BCB. We support the use of the Harborwalk as a first line of coastal flood defense, as long as the design does not trap water inland or increase flooding of adjacent parcels. In addition, as presented in the EENF and at public hearings, the proponent plans to raise the first floor of both the existing brick buildings and the new facility to 19.5 BCB. This is a good idea and appears to be consistent with the projections from the BRAG report.

According to the EENF, proponents will consider additional climate preparedness measures for the remainder of the site including elevating vital mechanicals, increasing stormwater management capacity, and using flexible HVAC systems and salt/flood-tolerant landscaping materials. Ideally, these initial design elements will postpone the need for additional temporary flood barriers (except, for example, for the entry to below-ground parking).

The GE team has, from the beginning, made clear their commitment to building an energy efficient campus. BCDC members supported the solar veil design, both for its energy production and aesthetic appeal. During several community meetings, neighbors expressed concern over the proposed height of the veil, which extends the height of the building from 180 feet to 245 feet. This is an usually large increase from what is typically expected for rooftop “mechanicals”. We ask that proponents show, through a sun study, that such a steep angle is required for the solar veil to perform optimally; abutters and the neighboring community would prefer a shallower angle. If such an increased height is justified, we ask that some form of mitigating public benefit be considered.

Pedestrian Access

ADA-accessibility continues to be a challenge for this site. We would like to see a more thoughtful solution to the problem than to require people with limited mobility to take a long detour from Summer Street down Melcher Street to Necco Street. As long as the stairs remain the only accessible point from Summer Street to the Harborwalk, the Necco Street entrance becomes an important entry point to the Harborwalk. We encourage proponents to modify the design to make the entryway feel more inviting and open to the public, especially those with limited mobility.

Watersheet Activation

Fort Point Channel provides a rare opportunity for GE and MassDevelopment to significantly enhance this portion of the waterfront as a vibrant destination for both small boats and pedestrians. Fort Point

Channel is sheltered both from rough waves and large commercial boats. The Summer Street Bridge, with its four-foot clearance at high tide, limits full-access boating to small craft (kayaks, row boats, small motorboats).

While this means that water taxis are likely limited to the Atlantic Wharf and Children's Museum docks, the Summer Street Bridge creates a highly sheltered stretch of harbor close to downtown that can be used for such activities as dragon boat races, a floating swimming pool, or public art installations and musical performances on the water. Once the US Post Office moves from across the channel, we can imagine this neighborhood becoming a vibrant new pedestrian and small boat destination for the neighborhood and city as a whole.

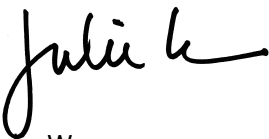
Easy access to the water contributes directly to the success and sustainability of watersheet programming. Expanded public use and enjoyment of the watersheet requires landside support structures such as small boat storage, signage and possibly changing rooms. The existing public landing license calls for four public parking spaces near the dock. To launch small crafts and kayaks for recreational activities, visitors frequently 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. We hope that the final landscape design will preserve the existing public benefits and incorporate new additional amenities to anticipate expanded Fort Point Channel activities.

Water Transportation

Section 3.6.2 cites the Fan Pier dock as the nearest water taxi station (EENF page 3-8). In fact, Fort Point Channel includes five additional stops closer to the proposed GE campus: Moakley Courthouse, Barking Crab, Griffin's Wharf, Atlantic Wharf, and Children's Wharf.¹ With an anticipated 800 new employees and few private parking spots, water transportation will be an excellent option for travel to and from North Station, Logan Airport and other waterfront locations. (Although not currently an option, others and we are working to expand scheduled inner harbor ferry routes to and from an ADA-accessible dock along Fort Point Channel.)

We look forward to reading the more detailed project proposal to come as part of GE's Chapter 91 license submission. Thank you for your consideration of our comments.

Sincerely,



Julie Wormser
VP of Policy



Jill Valdes Horwood
Director of Waterfront Policy

¹ http://www.bostonharborcruises.com/media/1366/water-taxi_map.pdf