



Are you on board?

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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 Single Environmental Impact Report, EEA #15547

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Single Environmental Impact Report (SEIR) submitted by General Electric. We have had the opportunity to view presentations of the project on several occasions and participated in a number of public hearings.

As filed, the SEIR is intended to build on the information presented in the September 2016 expanded Environmental Notification Form for which Boston Harbor Now submitted extensive comments. We continue to be supportive of the GE headquarters proposal and look forward to the completion of the project. Our brief comments follow.

Project Description

According to the SEIR, the new GE Headquarters project includes the rehabilitation of the 5 and 6 Necco Court historic buildings, the construction of a new 12-story office building, a pedestrian only walkway, and public realm improvements. Since September of 2016 there have been a number of changes to the project including:

- Expansion of the project site to 2.7 acres

- Reconfiguration of existing water dependent use zone to increase on-site open space
- Reduction in new building height and photovoltaic system or the “Solar veil”
- Increased floor area in the historic buildings glass atrium
- Shifting the GE plaza canopy to highlight the Necco Street Campus entry
- Preserving of the Necco Court Bridge

Open Space

Since the filing of the EENF, the campus has expanded from 2.4 acres to encompass roughly 2.7 acres of land. This increase is the result of GE acquiring an additional 11,618 SF of open space to expand the Necco Street sidewalk and a 0.16 acre section of the Harborwalk to the South of the project site. The addition of open space on the campus is a welcomed change and will add to the accessibility of the site.

A 2009 amendment to the 2000 South Boston Municipal Harbor Plan (MHP) approved a substitution to reconfigure the Water Dependent Use Zone (WDUZ) within the GE headquarters planning area to border the parcel designated as “G1”. In December 2016, GE requested written clarification from the EEA Secretary Matthew Beaton to reconfigure and expand the WDUZ as amended in 2009. GE’s proposed configuration would expand the total WDUZ from 28,300 SF to 28,432 SF.

We are glad to see this increase and support the new configuration. This change will provide better pedestrian access, consistent site lines, and promote creation of more active and usable public space – all in accordance with the intent and purpose of Chapter 91. This change resulted in a 132SF addition to the WDUZ and a new Chapter 91 defined on-site open space total of 53,221 SF.

Chapter 91

Concurrent with this submission, the project proponents filed a Chapter 91 license application with MassDEP. The license will serve as the license for the entire campus and ultimately includes the two existing brick structures at 5 and 6 Necco Court, new building, the open space, and public dock. We are working on final comments and will submit a detailed letter to DEP before the closing of the public comment period on February 21st. Our comments will focus on:

- Maintaining access to the public dock, Harborwalk, and public spaces on site
- Open space management and programming via a detailed management plan
- Clearly defining the on-site areas reserved for public access
- Participation in the Seaport TAM and support for water transportation

We have met numerous times with the GE project team and applaud their efforts to reach out to neighbors, members of the public and interested advocacy groups. Through these discussions GE maintained open channels of communication and gave special attention to community

feedback. A clear example of this was the reduction of the Chapter 91 license term from 99-years to forty-two. We strongly support GE's incorporation of its guiding principles as community convener, performance enabler, and resiliency pioneer into the headquarters project. We look forward to the completion of this project and public benefits package offered by the project proponent.

Climate Preparedness

As we understand it, the site elevation of the GE Campus 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. 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.

As presented in the SEIR 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. In addition, 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. We see this as an excellent opportunity to work with abutters to ensure this section of the Harborwalk is adequately protected and remains accessible to the public during nuisance flooding.

Throughout the permitting process the GE team has made clear their commitment to building an energy efficient campus. Early on in the presentation phase, the Boston Civic Design Commission 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 extended the height of the building from 180 feet to 245 feet. As presented in the SEIR, the new building will be 173 feet at the highest occupied floor plus the 62-foot tall solar veil. We commend GE for incorporating design feedback from both the BCDC and interested stakeholders. The new design will result in an approximate new height of 235 feet and includes additional public benefits to mitigate the shadow created by the building and solar veil.

Thank you for your consideration of our comments.

Sincerely,



Julie Wormser
VP of Policy



Jill Valdes Horwood
Director of Waterfront Policy