



Are you on board?

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Via email to

anne.canaday@state.ma.us

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

Attention: Anne Canaday, MEPA Office

Re: K Street Substation #385 Modifications, EEA#15766

Dear Ms. Canaday,

Thank you for the opportunity to comment on the K Street Substation Environmental Notification Form. Boston Harbor Now staff has reviewed the accompanying project plans. Our comments follow.

Project Description

The current proposal is for the installation of substation equipment on a portion of the Eversource site located at 500 East First Avenue. The site sits along the south side of the Reserved Channel between K street and East First Street in the South Boston neighborhood. It is currently used by Eversource for parking and equipment storage.

The entire project area is within filled tidelands and subject to Chapter 91 jurisdiction. As proposed, the project will require an amendment to the existing Chapter 91 license number 10295 and includes the following changes:

- Installation of a new 27ft long x 27ft high x 26ft wide voltage regulator,

- New concrete foundation, four individual concrete pilings, and crush stone to support the voltage regulator,
- A 100-foot mast to protect equipment from lightning strikes,
- A perimeter security fence ranging in height from 15-26 feet, and
- Construction of an unspecified number of barriers 15-20 feet high around existing equipment.

While we understand and appreciate the importance of maintaining and updating the existing substation, we have initial concerns about the proposed section of the HarborWalk and climate resilient design.

Public Access

Boston Harbor Now has been a longtime advocate for public access along Boston Harbor and continues to be a champion for the Boston HarborWalk. Together with the Friends of the Boston HarborWalk, an all-volunteer group dedicated to enhancing enjoyment of Boston's public access way, we actively monitor and address public access issues along the waterfront.

In May of 2004, license number 10135 was issued to NSTAR Electric, now Eversource. Special condition #1 called for the construction and maintenance of "a pedestrian-accessible area seaward of the chain-link fence" along the property. A second license, number 10295, specifically calls out the requirement to provide a number of exterior amenities and maintenance obligations. Of particular relevance to this ENF is Special Condition #4 requiring the preparation of a maintenance plan for the publicly accessible areas that delineates trash removal, snow removal, and routine landscape maintenance on the property. It is unclear if such a maintenance plan exists.

The project site and abutting areas has been a problematic section of the HarborWalk for some time. The dead-end sections of the walk are consistently vandalized and trashed. Although the proponent has been open to resolving these issues and maintains an ongoing dialogue with our team, the issues persist. It is our sincere belief that completing the missing section of the HarborWalk will encourage increased foot-traffic and decrease the likelihood of problematic and unwanted behavior along this stretch of the waterfront.

Boston Harbor Now is the non-profit designated to receive and address all City of Boston 311 calls related to the HarborWalk. We would be glad to work with the Eversource team to ensure the new and existing HarborWalk sections on the project site consistently meet and exceed the requirements of Chapter 91.

We strongly recommend developing a maintenance plan for the project site. We will submit more detailed comments regarding the management plan, amenities to include along the HarborWalk, and wayfinding signage during the Chapter 91 licensing phase.

Climate Change

According to the ENF, the project site is located within FEMA's 100-year floodplain. The

proposal includes the following climate preparedness measures:

- Elevating the voltage regulator on a 5-foot podium,
- Erecting a fence around the perimeter of the property, and
- Constructing a number of concrete barriers along the site.

The same document fails to reference climate projections from any of the local climate change studies like the City's Climate Ready Boston, MassDOT's Boston Harbor Flood Risk Map, or CZM's report on climate change impacts.

We are concerned about the site's ability to adequately manage rising seas and coastal flooding for the lifespan of the proposed project. In the wake of Hurricane Harvey, it is critical for industrial businesses along Boston Harbor to assess their vulnerability to rising seas and storm surge. Understanding the flood risks associated with harbor-based industries is a crucial step to identify better preventative measures in anticipation for more intense and frequent flooding events. Harvey was Houston's third 500-year flood in three years. This demonstrates that flood risks can be more severe than the 1% storm used by FEMA.

It is our understanding that Eversource is a member of the advisory committee for Climate Ready South Boston, a project to develop coastal resilience measures for the Fort Point Channel and South Boston waterfront. We strongly encourage the proponent to use this opportunity to include resilient solutions resulting from the CRB project and become a model for climate resilient harbor-based industries.

100-foot Mast Proposal

The project filing refers to a 100-foot mast necessary to protect equipment from potential lightning strikes but does not include a rendering of the proposed mast. Without a rendering and additional information of the mast, we are unable to provide more detailed comments at this time. We ask that additional details including renderings and potential alternatives be distributed to commenting parties and interested stakeholders.

We remain optimistic that with the new connection and incorporation of the proposed suggestions by our organization and others, this HarborWalk segment will enhance the public's understanding and enjoyment of the waterfront and resolve ongoing public access and use issues at this site. Thank you for your consideration.

Sincerely,

Jill Valdes Horwood
Director of Policy