



Navigating our future.

15 State Street, Suite 1100  
Boston, MA 02109  
617 223 8104  
[bostonharbornow.org](http://bostonharbornow.org)

October 11, 2016

*via email to: [Alexander.Stryisky@state.ma.us](mailto:Alexander.Stryisky@state.ma.us)*

Secretary Matthew A. Beaton  
Executive Office of Energy & Environmental Affairs  
Attn: Alex Stryisky, MEPA Office  
100 Cambridge Street, Ste 900  
Boston, MA 02114

Re: Marine Wharf Environmental Notification Form, EEA #15585

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Environmental Notification Form for the Marine Wharf Project submitted September 15, 2016. Boston Harbor Now previously commented on the Chapter 91 determination of applicability, the Expanded Project Notification Form and attended the public hearing held by the Boston Redevelopment Authority on September 13, 2016. Our comments follow.

**Project Description**

Located in the Raymond Flynn Marine Park, the 50,993 SF site is one of two sites within the Park that is not in a Designated Port Area and therefore may be developed for residential and commercial uses. The Boston EDIC owns the project site and is negotiating the terms of a long-term ground lease with the proponent.

As described in the ENF, the proposal involves the construction of a 320,000 SF, 411-room, 15-story hotel co-branded Hampton Inn/Homewood Suites by Hilton. The plans also call for ground-floor retail and restaurant space, second-floor level parking for 75 vehicles, public open space and access to an existing water transportation dock along the Reserved Channel.

The entire project site sits on filled tidelands, though only a portion falls within the Chapter 91 boundary line. As currently configured, the proposal design complies with Chapter 91 as-of-right building height,

open space, and ground floor uses. We understand the proponent is working to finalize additional project details before completing the Chapter 91 license application request. We look forward to submitting more extensive comments regarding public access, open space, and robust public benefits once they have submitted their license application.

### **Public Access**

Although the Marine Wharf site is not immediately adjacent to the Reserved Channel, it is in a prime position to improve access to the existing public dock located parallel to Summer Street. Currently, the dock is used by the Thompson Island Outward Bound program and is not well marked. We support the concept of enhancing signage and access to the existing dock for use by both the Thompson Island Ferry and other water transportation. We ask that proponents, as part of the public benefits package, consider making a contribution towards upgrading the dock to a fully ADA-compliant so that in the future it can support scheduled public ferries, not just water taxis.

The project will provide bike racks, an electric charging station for two cars, and three preferred parking spaces for cars or vanpools. There are currently two Hubway stations and three car-sharing stations within walking distance of the site. In the future, and with the expected increased foot traffic, it may be necessary to include a third Hubway station at the intersection of Drydock Avenue and Summer Street.

Given how flood-prone this portion of Boston's waterfront is, we support the project's plans for second floor parking and hope that this also means the project will minimize below-ground construction that can be harmed by salt water inundation. As public transit, car-sharing and driverless cars become more prevalent, the hotel may need fewer parking spaces in the future. We suggest that the design include options for converting a portion of the parking garage to alternative uses.

The proposed development sits between Summer Street, the major truck route serving Conley Terminal and the main entrance to the Marine Park with heavy industrial traffic at all hours of the day and night. Due to the proximity of the proposed development to marine industrial properties, we suggest including a covenant or alternative clause in property leases and sales that preclude subsequent owner complaints regarding truck traffic, noise, and other impacts resulting from the marine industrial properties. Additional opportunities for soundproofing should also be explored.

### **Climate Change Preparedness**

Based on the BRA climate change checklist submitted by the proponents earlier in the permitting process, the site elevation ranges from 15-17.5 Boston City Base 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 the predicted 100-year (1% annual probability) storm surge is about 5 feet.

UMass Boston's Boston Research Advisory Group (BRAG) recently prepared a report for the City of Boston's Climate Ready project designed to achieve scientific consensus on the climate change impacts facing Boston in the years ahead. 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. These predictions have a higher level of uncertainty, as they are highly related to future greenhouse gas 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. Prudence would suggest planning for between three and seven feet of sea level rise by 2100, depending on the design life and level of risk deemed acceptable for particular structures, property and infrastructure.

Marine Wharf's site design should consider the possibility that today's 1% storm could have a frequency of 10% by mid-century, and that chronic flooding (i.e., multiple times monthly) associated with astronomical high tides will become more and more prevalent after 2070. According to Climate Ready Boston, the possibility that such flooding will occur several times per week cannot be ruled out. We strongly encourage proponents to use these projections and not rely solely on FEMA FIRM maps, as they do not include sea level rise predictions.

As presented, the building flood proof elevation will be 16.46 and 18.46 BCB with the first floor elevation at 17.5 and 19.0 BCB. According to the ENF, the proponent is considering a number of potential mitigation and preparedness measures including placing vital mechanicals above future flood levels, watertight utility conduits, wastewater backflow prevention, resilient first-floor materials, and increasing the height of the ground floor so that it can be raised in the future. We strongly support the use of these mitigation and preparedness measures in the final project design.

This proposal will provide retail opportunity, food services, and public meeting spaces to support the water-dependent operations of Black Falcon Terminal, Cruiseport Boston, and sections of the Raymond Flynn Marine Park. We look forward to reviewing more detailed plans during the Chapter 91 license application process.

Sincerely,



Julie Wormser  
VP Policy & Planning



Jill Valdes Horwood  
Director of Waterfront Policy