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September 23, 2016

via email to: <u>Gary.Uter@boston.gov</u>

Brian Golden Boston Redevelopment Authority Boston City Hall, 9th Floor Boston, MA 02201

Attn: Gary Uter, BRA

Re: Marine Wharf Expanded Project Notification Form

Dear Mr. Golden,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Expanded Project Notification Form for the Marine Wharf Project submitted August 9, 2016. Boston Harbor Now previously commented on the Chapter 91 determination of applicability and attended the public hearing held by the Boston Redevelopment Authority on September 13, 2016. Our comments follow.

## **Project Description**

Located in the Marine Industrial 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 PNF, 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 Reserve 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 Reserve 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 carsharing 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.

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.

## **Climate Change Preparedness**

Based on the BRA climate change checklist submitted in the PNF, 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 our 100-year storm surge is about 5 feet.

According to research recently published by the City of Boston in its Climate Ready Boston program, sea levels are predicted to rise between 2.4 and 7.4 feet by the end of the century. With a 50/50 chance sea level rise will exceed three feet sometime after 2070, this site will need to be prepared to withstand repeated salt water flooding during its lifespan. We strongly encourage proponents to use the Climate Ready Boston 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 PNF, 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 including many, if not all, of these mitigation and preparedness measures in the final design of the project.

This proposal will provide much-needed services to the water-dependent operations of Black Falcon Terminal, Cruiseport Boston, and sections of the Marine Industrial Park. We look forward to reviewing more detailed plans as the project moves forward in the permitting process.

Sincerely,

Julie Wormser

VP of Policy and Planning

Jill Valdes Horwood

Director of Waterfront Policy