



Are you on board?

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Via email to: Alexander.Strycky@ma.us.gov

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs (EEA)
100 Cambridge Street, Ste 900
Boston, MA 02114

Attn: MEPA Office: Alex Strycky, EEA# 15728

Re: Neponset Wharf, 24 Ericsson Street, Environmental Notification Form, EEA# 15728

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the MEPA Environmental Notification Form (ENF) for the Neponset Wharf project, submitted by City Point Capital on June 30, 2017.

After reviewing the ENF and attending the July 24, 2017 MEPA site visit, we ask that the proponent be required to submit a Draft Environmental Impact Report (DEIR) to address the following:

- The extent and type of dredging proposed within the Neponset River Estuary ACEC,
- Potential impacts to public access and open space,
- Site accessibility and traffic related impacts to the neighboring community,
- Impacts related to construction activities, and
- Proposed climate resiliency strategies.

Project Description

As presented in the Environmental Notification Form the proposal is for the construction of a new, mixed-used development project in the Port Norfolk neighborhood of Dorchester. The entire site is approximately 7.6 acres and is comprised of both land and watersheet areas. The Neponset Wharf project will include:

- A renovated 75-vessel marina with new reconfigured docks and piers,

- Maintenance dredging of the area near the marina,
- 185 new parking spaces and 152 bike storage spots
- The addition of 150 new condominium units,
- A 25-room seasonal hotel,
- A 4,000 SF restaurant/café, and
- Two acres of landscaped outdoor space.

Area of Critical Environmental Concern

The Neponset Wharf project falls squarely within the boundary of the Neponset River Estuary ACEC. Designated in 1995 by the Massachusetts Secretary of Environmental Affairs, the 1,300-acre Neponset River Estuary is a Massachusetts Area of Critical Environmental Concern (ACEC). (Neponset River Estuary Area of Critical Environmental Concern Resource Management Plan, 11). The ACEC begins at the Lower Mills Dam in Dorchester and extends to the mouth of the river at Commercial Point in Boston and Squantum Point in Quincy. These designated areas are places that receive special recognition because of the significance of their natural and cultural resources. Projects located within an ACEC and subject to MEPA jurisdiction require closer scrutiny than projects located outside of ACECs.

As one of the nonprofits named in the 1996 Neponset River Estuary ACEC RMP and responsible for advancing the long-term objectives of the ACEC designation, Boston Harbor Now is particularly interested in understanding how the proposed mixed-use project and dredging will affect the resource area. (Neponset ACEC RMP, 16-21).

Dredging within the ACEC

According to the proponents, renovations to the existing marina will require some dredging. Section 8.3 of the ENF refers to the 1911 Harbor and Land Commissioners License as the original authorization for dredging of the marina. To date, the original license plans cannot be found in the registry of deeds or DEP records.

We ask that the DEIR address the following items related to the proposed dredging:

- The relevancy of a 100+ year old dredging license and the existing ACEC Resource Management Plan
- Whether the proposed dredging is for improvement or maintenance purposes
- Impacts to marine habitat and resource areas resulting from the proposed dredging activities.

Section 1.1.1 and Figure 8.1 of the ENF address the ACEC designation. As presented in the ENF, the project will “embrace” the heightened ACEC performance standards. We are glad to see the proponent’s acknowledgement and commitment to complying with the ACEC standard. The DEIR should include additional details to address compliance and how the project proposes to meet or exceed this obligation.

Open Space and Public Realm

As presented in the ENF, the proposal will create nearly 2 acres of landscaped outdoor space that includes:

- A 28,000 SF Harborwalk,

- A public fishing pier,
- A kayak launch and storage,
- Public restrooms,
- The Shore Shack refreshment stand,
- A marina support building, and
- A pedestrian bridge across Pine Neck Creek (possibly)

The combination of open lawn, public seating, pet areas, fitness station, art installations and dedicated gathering areas has the potential to provide multi-use functionality of the area. We are encouraged by the addition of a new section of the Harborwalk and look forward to reviewing additional details of proposed amenities, signage, and public programming.

The ENF proposal includes several renderings of proposed public access to the project site (Figures 2.7-2.9). The DEIR should clearly distinguish areas of the wharf and open green space that are open to the public from those that are reserved for private use. The Public Realm improvements will play an important role in ensuring the open space areas are fully activated and create a welcoming waterfront experience for residents, neighbors, and visitors. Part of the success includes maintaining adequate signage at appropriate locations to advise the public of its access rights and disclose access-related regulations.

The DEIR should also include details of the proposed watersheet and water's edge activation as an integral part of the transient public's experience of the overall project site. The proponent should consider programming and public amenities that will encourage the public's use and enjoyment of the waterfront on a year-round basis.

We note that during the MEPA site visit, the community expressed concern over some of the proposed public amenities. Specifically, the kayak storage area, dog park, and pedestrian bridge to Tenean Beach. We encourage the proponent to work with the local community to develop a public realm improvement plan that includes amenities that fit within the character of this area of the waterfront and adjacent neighborhood.

Transportation

Accessibility to the site should be a key focus of the DEIR. As presented in the ENF, the project is located on the northern edge of the Port Norfolk peninsula. The site has limited vehicular access, is not readily accessible by train, and is serviced by only two MBTA bus routes. The bus routes are located at Neponset Circle, about half a mile from the site.

We are strongly in favor a detailed traffic analysis of existing traffic concerns in Port Norfolk and adjacent areas as part of the DEIR. Without the proper improvements, additional daily trips will put pressure on an already strained system. Section 5.3 of the ENF includes a summary of daily trips anticipated for the project. The summary includes vehicular trips generated by condominium, hotel, and retail/restaurant users. The DEIR transportation analysis should also include trips generated by the general public's use of the new landscaped outdoor spaces.

Despite its waterfront location, the mitigation efforts described in Section 5.7 might be best focused on land-based transportation accommodations that 1) serve a wider group of riders over a greater geographic area and is 2) a more cost-effective option than a water taxi.

Construction Impacts

We ask that best practices be implemented to minimize construction impacts to the nearby community. Depending on the anticipated construction activities, increased traffic is likely both in size and frequency of vehicles entering and leaving the area. We expect that delivery of construction materials will also affect the number of trucks traveling through the surrounding community. In addition to providing a construction management plan, we ask that the proponent consider a comprehensive traffic plan to minimize traffic flow interference from construction activities (e.g. advanced public notice of road closures, alternate routes, and shifting operations affecting traffic to off-peak hours).

Climate Resilient Design

As completed by the proponent, the Boston Climate Change Resiliency and Preparedness Checklist, confirms the project site is within the FEMA “100-year” Flood Zone VE and AE with a Boston City Base (BCB) site elevation ranging from 14-18.8 feet.

As presented in ENF, possible measures to address future flooding on the site include elevating the ground floor and moving critical infrastructure above the floodplain. However, Page 7 of the BPDA Climate Checklist indicates that specific flood protection measures have not been considered for the site.

As part of its resiliency strategy, the waterfront portion of Building B will be raised on pilings – resembling a building on stilts and a design more typical of beach homes. The space underneath the pilings will open up view corridors and create a covered terrace that is accessible to the public. This is a building typology that is new to Boston Harbor. We applaud the proponent for incorporating this innovative design in their project proposal.

We look forward to reviewing the DEIR and additional details of the proponent’s climate resiliency strategy to limit storm damage, minimize wave action, and protect inland resource areas.

Community Engagement

Over a dozen members of the Port Norfolk community attended the July 24, 2017, MEPA site visit. Although the community expressed concerns about the proposed development, many expressed a willingness to consider a smaller scale redevelopment project that benefits the community and improves the existing conditions of the site. To ensure the community is heard throughout the planning process, we encourage the proponent to consider additional ways to engage interested neighbors and stakeholders as the project moves forward.

Thank you for your consideration of our comments.

Sincerely,



Jill Valdes Horwood
Director of Policy