



Navigating our future.

15 State Street, Suite 1100
Boston, MA 02109
617 223 8104
bostonharbornow.org

July 12, 2016

Via email to: Holly.S.Johnson@state.ma.us

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
Attn: Holly Johnson, MEPA
100 Cambridge St., Suite 900 (9th Floor)
Boston MA, 02114

Re: Boston East Notice of Project Change, EEA #14123

Dear Secretary Beaton,

Thank you for the opportunity to comment on the Notice of Project Change for the Boston East Project. Boston Harbor Now, a new non-profit civic organization formed from the merger of The Boston Harbor Association and the Boston Harbor Island Alliance, brings more than six decades of waterfront, open space and recreational experience together to maximize recreational, cultural and social opportunities in and around Boston Harbor; promote an integrated water transportation system and foster mixed economic development that will be a model for climate change resiliency. Our specific comments follow.

We have commented on this particular project since it was first submitted to MEPA in October of 2007 and continue to follow its progress specific interests in public waterfront access, preservation of the Designated Port Area, and climate change resilient design. We will have more detailed comments on public waterfront access for Chapter 91 license application. Our comments follow.

Project Description

The proposal plans to redevelop 102 Border Street in East Boston into a mixed-use residential development with publicly-accessible open space, facilities of public accommodation, a Harborwalk, and a marine-industrial facility on the DPA portion of the site. The design of the project has changed on the Designated Port Area (DPA) portion of the site in order to increase its functionality for prospective marine industrial uses.

Following its original approval in 2013, the proponent is now requesting a revised project design that affects the DPA portion of the project and is the subject of the Notice of Project Change. The overall program of uses and the design of the marine facility remain unchanged. The proposed change includes reshaping the shoreline as a means to provide additional upland square footage to the site and creating a less fragmented DPA site.

Climate Resilient Design

The entire project site is within the FEMA “100-year” Flood Zone AE at 15.5 feet Boston City Base (BCB). We applaud proponents' efforts to address future sea level rise. Given Climate Ready Boston’s recently-released data indicating that Boston is expected to see between 3.5 and 7.5 feet of sea level rise by 2100, this clearly needs to be a priority on this site.

As presented in the NPC, the proposed alteration will straighten the waterfront edge of the DPA site. It also increases the height of the seawall along the Harborwalk portion of the DPA to 17 feet BCB, or six inches out of today’s flood zone. In order to achieve this the proponent plans to add 15,639 SF of new fill along the western edge of the site. As presented, raising the site grade will provide additional flood control with no negative impacts to water circulation or water quality. We strongly encourage proponents to build the wall in such a way that it can readily be incorporated into a higher/longer shoreline defense system in the future.

Public benefits and Harborwalk connection

The revised Notice of Project Change indicates a change from the original 490 linear feet bulkhead to an approximately 310-foot long stone riprap with a Harborwalk placed over it; we assume the reduction in linear feet is a direct result of the new proposed straight bulkhead. As indicated by the proponent, the Harborwalk has been designed to minimize seawater flooding landward of the walk.

We regret the removal of the marine railways as part of this project, as they provided a sense of history and place for the public along the Harborwalk. That said, we understand that weathering has caused serious physical damage to the structure. We ask that the maritime interpretive element be modified to include history, photos, educational details, and other elements focused on the marine railways to help preserve our maritime industrial history as the shoreline is redeveloped.

As presented in the Notice of Project Change, we do not think the proposed changes will significantly increase the environmental impacts of the proposed project. Thank you for the opportunity to comment.

Sincerely,



Julie Wormser
VP Policy



Jill Valdes Horwood
Waterfront Policy Analyst