



Via email to Andrea.langhauser@state.ma.us

Ben Lynch
Program Chief
Waterways Regulation Program
Department of Environmental Protection
One Winter Street, 5th Floor
Boston, MA 02108

ATTN: Andrea Langhauser

Re: Waterways License Application, #W15-4419-N
Clippership Wharf 25-65 Lewis Street, East Boston, Inner Harbor

Dear Mr. Lynch,

On behalf of The Boston Harbor Association, thank you for the opportunity to comment on the proposed draft management plan for the Clippership Wharf Project submitted by Lend Lease Development and Noddle Island Limited Partnership on October 21, 2015. The Boston Harbor Association commented extensively on the original project, the Chapter 91 License, and the Notice of Project Change. We continue to strongly support the redevelopment of Clippership Wharf so that public access for all and water transportation are finally realized as part of this project. Our comments follow.

Interior Facilities of Public Accommodation

Public Parking Facility and Bicycle Storage Areas

Given the immediate proximity to the MBTA subway stop and Lewis Mall future water transportation dock, we commend the proponents for continuing to make this a truly transit-oriented development, with at least three spaces dedicated to a shared-car option. We continue to advocate for the provision of electric car charging stations and additional secured storage space for bicycles beyond what is already proposed. Availability of these bicycle spaces to the public as well as the bicycle maintenance station should be clearly indicated with outside signage.

We strongly support the proponents' validation program to ensure that commuters do not monopolize the parking spaces reserved for users of the FPA spaces. Once again, we ask that signage be included to ensure the availability of short-term public parking spaces for use by daytime visitors.

Public Art

We commend the proponents for inclusion of the gallery space in the social and fitness club, including the proposed rotating art exhibits to be curated by nearby HarborArts. The Chapter 91 license should clearly provide for an alternative local partnership if HarborArts cannot or does not want to continue in this role. We encourage proponents to expand as possible their commitment to collaborate with local art and community organizations and to provide additional free spaces for free, public, community activities.

Canoe and Kayak Center

We strongly support recreational boating and water-dependent activities and are pleased that Charles River Canoe and Kayak (CRCK) will be leasing the retail FPA on the western wharf.

Additional water-dependent uses such as recreational boating are appropriate and welcome provided they are done safely and away from large commercial vessels in the navigational channel.

We encourage CRCK to work closely with organizations like the Coast Guard and the Boston Harbor Pilots Association to ensure safe operations for recreational boaters using its center.

The draft management plans indicates that the adjacent kayak launch and Harborwalk, ramp, dock and float in the living shorelines will be managed by CRCK. We understand that all CRCK locations close for the winter season. The Chapter 91 license needs to provide for off-season maintenance either by CRCK or another responsible entity.

Western Dock

A floating dock will be provided on the western side of the western wharf, which we strongly support. Please indicate the number of slips that will be made available to transient vessels. We also encourage proponents to provide more details about the activities for the proposed dock including security of vessels, estimated costs of use, and any other time limits within the dawn-midnight operating hours. Please also add signage that clearly states space is available at the western dock for water taxi use.

Exterior Facilities of Public Accommodation

Harborwalk

We commend the proponents for the construction of approximately 1,400 linear feet of Harborwalk, as well as the 12-foot+ wide path along the shoreline, providing the first ever ADA-compliant public access on the project site.

Proponents state that trash will be cleared and removed at least twice weekly and trash receptacles will be made available to help control loose trash as needed. Given the expected level of foot traffic, proponents should commit to removing trash as needed, (e.g., at least daily from Memorial Day to Labor Day, and at least weekly from Labor Day to Memorial Day) to prevent debris from blowing into Boston Harbor.

Chapter 91 requires clear, prominent HarborWalk signage that indicates that it is a public walkway and points out any associated FPAs, parks, public restrooms and other public amenities. We ask that the proponents go beyond the proposed minimum BRA-approved HarborWalk signs and also provide clearly stated, meaningful wayfinding and interpretive signs that help visitors locate nearby attractions and provide a sense of history and place. The ongoing maintenance of Harborwalk amenities and signage are perpetual requirements of the Chapter 91 license. We appreciate the proponents' continued cooperation in keeping East Boston's public waterfront land a clean and accessible area for the enjoyment of the public.

Beyond signage, please restore the full detailed list of Harborwalk amenities as included in the proponents' original Chapter 91 license submission. These amenities include lighting, benches, directional and HarborWalk signage, interpretive signage, free binoculars, additional mutt mitt stations, and drinking fountains.

Waterfront Lawn (West) / Dog Park

The draft management plan includes a dog park at the intersection of the Harborwalk and pedestrian connection from Havre Street. The proposed dog park provides a much-needed space specifically designed for dogs and their owners. We commend the proponents for including this dedicated space and providing mutt mitt stations as well as a doggie drinking fountain. Making sure there is a way to rid the space of dog waste via receptacles is a must and adds to the overall appeal of the waterfront area both for residents and visitors. We further encourage the proponents to choose plantings that will soften the look of a smaller dog park and strategically place trees to provide much-needed shade during the hot summer months while maintaining visual sightlines to the water.

Living Shoreline

The project's draft management plan includes the creation of a new coastal wetland area. Page one of the draft plan points to the creation of 27,276 square feet of new coastal wetland while page

two states the proposed living shoreline will constitute approximately 29,276 square feet of new coastal wetland; we hope the latter calculation is the accurate count. (Exhibit 2, Wetland Maintenance Plan, Page 1-2).

With the existing conditions of broken pavement, gravel, and deteriorated timber wharfs and given the potential benefits of this new living shoreline, TBHA strongly supports the creation of a well-researched and beneficial wetland maintenance plan. The proposed living shorelines will not only provide an opportunity for users to interact with the waterfront but also provide additional environmental benefits such as stabilization of the shoreline, site-specific flood resilience, protection of surrounding riparian and intertidal movement, improvement of water quality, and creation of habitat for both aquatic and terrestrial species.

The Chapter 91 license terms should require the proponents to conduct an annual cleanup of all marine debris by their property, as well as maintain the "living shoreline" consistent with State and Conservation Commission requirements. Annual reports should provide updates on the ecological health of the salt marsh, details of any degradation or loss of planted salt marsh plantings, and any corrective measures taken by the proponents.

Proposed Flood Barrier System

It is clear from the proposed flood barrier system that the proponents have done their due diligence and incorporated climate resilient measures into the Clippership Wharf site. This proposal sets a new high bar for flood preparedness along Boston's waterfront. We congratulate the proponents for going beyond current requirements and including both higher base elevation levels and employing quality flood protection barriers to prevent storm-related coastal flood damage.

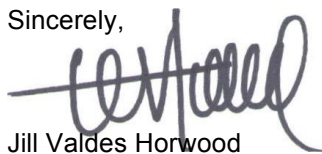
We encourage proponents to further anticipate up to six feet of sea level rise during the lifespan of this building and anticipate what investments should be made during initial construction that will make further flood preparedness less costly in future decades.

Water Transit

In the past the proponents have stated that it would help subsidize water transportation at the Lewis Mall dock; we assume this is still part of the proposed project, but were unable to find additional details regarding the proposed subsidy for water transportation or any additional subsidies for tenants/residents of the development. The Chapter 91 license should at least require an annual operating subsidy for public water transportation at Lewis Mall.

Thank you again for the opportunity to comment. We look forward to the redevelopment of the Clippership Wharf project.

Sincerely,



Jill Valdes Horwood
Waterfront Policy Analyst



Julie Wormser
Executive Director