



November 30, 2015

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Ste 900
Boston, MA 02114

Attn: Alex Strycky, MEPA Office

Re: 585 Commercial Street / Eliot School Phase III

Dear Secretary Beaton,

On behalf of The Boston Harbor Association, thank you for the opportunity to comment on the MEPA Environmental Notification Form (ENF) for the Eliot School Phase III project, submitted by Bourne Consulting Engineering on November 11, 2015. After reviewing the ENF and attending the November 17, 2015 MEPA site visit, our comments follow.

The Eliot Innovation School in the North End of Boston is comprised of three separate properties: 16 Charter Street, 39 North Bennet Street, and 585 Commercial Street. The proposed renovations at the 585 Commercial Street site will be located 0.82 acres and provide 42,000 gross square feet of space. The project sits on land that is fully outshore of the historic high water line and is subject to Chapter 91 jurisdiction. As proposed, the school will accommodate grades 2-4 of the Eliot Innovation School and includes 18 regular classrooms, two special classrooms, a media center, administrative offices, a cafeteria/multi-purpose area, and 20 parking spaces. Construction is set to begin in the summer of 2016 with expected completion in the fall of 2017.

Climate Change Resilient Design

The recently revised preliminary FEMA Flood Insurance Risk Map (FIRM) for Boston set the 100-year flood zone elevation at 14 feet above mid-tide (NAVD88), or 20.46' Boston City Base datum. It is our understanding that these maps will be formally adopted in the early part of 2016.

This proposal refers to the old FEMA coastal flood maps. The BRA and City of Boston are committed to decreasing the risk of coastal flood damage to people and property. Part of this commitment must be to ensure that any new waterfront development proposals are prepared for coastal flooding through the lifespan of their structures.

Developers should start by using the provisional revised FEMA maps to understand their current risk of coastal flooding. These maps by law rely on retrospective data. As Boston's climate changes, FEMA maps are less and less valid for use in prospective planning. Ultimately, regulators should begin requiring that developers look at the flood risk maps developed by UMass Boston for the Massachusetts Department of Transportation (MassDOT). We have posted the maps on our

website for easy access: <http://tbha.org/massdot-boston-flood-risk-maps>. The MassDOT maps combine data on historic hurricanes and Nor'easters with tide data to provide the most accurate and precise flood risk maps for Boston we have ever had. Even now, waterfront developers should be using these more accurate maps--especially for facilities such as schools, hospitals and other critical infrastructure--to prevent costly retrofits later.

A brief review of the MassDOT maps showing Boston's projected flood zones in 2030 and 2070 shows that the Eliot School site is on the edge of today's and 2030's flood zone and is not projected to be at risk of flooding in a 1% flood until around 2070. While the Eliot School has time to adapt, it is no longer appropriate to forego performing a site-specific analysis to understand and minimize current and future flood risks, especially for institutions as long lasting and important as schools.

Until recently, most of Boston's new waterfront developments had been permitted well before Superstorm Sandy made coastal flooding a more present-day concern. Shovel-ready projects understandably made minimal changes to adapt to new findings of climate change-related flooding. At this point, however, information on Boston's flood risk and options for flood preparedness is robust and well known. Going forward, all new projects and major retrofits must include measures to manage current and long-term exposure to climate related flooding and temperature extremes.

During the site visit, the project team indicated the mechanical equipment will be above flood zones on the second floor of the building. Additionally, there will not be a basement space for this property. We commend the proponent for taking these initial measures to address climate change vulnerability at this site. We strongly encourage the team to incorporate additional climate resilient designs into this project and look forward to reviewing the design as the project moves ahead in the permitting process.

Project Mitigation Measures

Walkway from Commercial Street to Harborwalk

In an area such as the North End with limited opportunities for public waterfront use, new projects should incorporate a robust public access plan that maximizes public use of the water's edge. We commend the proponent for reducing the parking spaces from 32 to 20. This reduction allows for construction of a new public sidewalk and connection to the Harborwalk, play area, and the water's edge. As proposed, the sidewalk improvement will run adjacent to the school building and connect Commercial Street to the Harborwalk resulting in direct pedestrian access to the waterfront.

Chapter 91 requires that any project providing public access maintain adequate signage at all entryways. In addition to the standard blue Harborwalk sign, we request that at least one sign advise the public of its access rights, disclose access-related rules, and include hours of operation. Furthermore, proponents should consider wayfinding and interpretive signs to help visitors locate nearby attractions and provide a sense of history and place.

Exterior Play Area and Green Space

The school is, by Chapter 91 standards, a non-water dependent use. As such, it should maintain substantial public activity on the site on a year-round basis. Furthermore, the project should include exterior open space for active and passive public recreation. This space should be located at or near

the water to the maximum reasonable extent and include related pedestrian amenities such as lighting, seating facilities, restrooms, and trash receptacles.

As proposed, the site includes plans for an exterior play area. It is our understanding that the school is actively fundraising for the playground but has been unable to secure proper funding. In the event funds cannot be obtained in time, proponents plan to create a small green space. At this site, a playground would be an ideal use of space and provide a benefit to both the school and the surrounding community. To ensure proper benefit to the public, we ask that no gates, fences, or other structures be placed around the play area in a manner that impedes or discourages free flow of pedestrian movement. Proponent should create a balance between maintaining student safety while also encouraging public access.

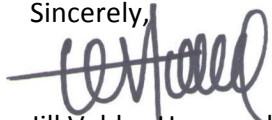
There is a small waterfront plot that sits between the Eliot School and the Harborwalk. At this time, the space remains largely inactive and is devoid of lighting, signs, benches, and other public amenities. When asked about the space, the school representative confirmed that the staff is willing to work with the Department of Recreation, the current owners of the space, to activate the space. We encourage the Eliot School to continue reaching out to the Department to explore additional ways to activate the space. A potential collaboration or similar agreement with the Department would provide the school with much needed access to open space for the students and ensure the space becomes an active waterfront area for students, residents, and visitors.

First Floor Multi-purpose Room

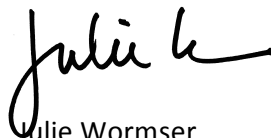
As part of the required mitigation, the Eliot School will open the first floor multi-purpose room to the general public. This area can be used for scheduled public events and meetings after regular school hours. We commend the school for opening this space to the public. We also ask that the surrounding community be made aware of this amenity to ensure it provides a true public benefit as intended under the Chapter 91 regulations.

Thank you again for the opportunity to comment. We look forward to the completion of the third and final property of the Eliot Innovation School renovation project.

Sincerely,



Jill Valdes Horwood
Waterfront Policy Analyst



Julie Wormser
Executive Director