



Navigating our future.

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

via email to andrea.langhauser@state.ma.us

Andrea Langhauser, Senior Planner
Massachusetts Department of Environmental Protection
Waterways Regulation Program
One Winter Street, 5th Floor
Boston, MA 02108

July 26, 2016

Re: Chapter 91 License Application UMass Boston Residence Hall 1

Dear Ms. Langhauser,

Thank you for the opportunity to comment on the joint MEPA/Chapter 91 project commencement notice and license application for the UMass Boston 25-Year Master Plan. Boston Harbor Now has commented extensively during the various permitting processes for the Master Plan and the individual components of the Plan. We participated at the July 13th public hearing held at the Integrated Sciences Complex. Our comments will focus on the Chapter 91 license portion of the application.

Project Description

The 25-Year Master for the UMass Boston Campus identifies a number of campus-wide improvements that include construction of academic and residential buildings, parking garages, open spaces, and facility and infrastructure upgrades. The proposed Residential Hall 1 (R-1) is part of the long term 25-Year Master Plan.

Construction for R-1 is scheduled to begin this fall and to be completed September 2018 for the 2018-2019 academic school year. Of the 2,045 SF site only 0.05, or approximately 2%, is subject to Chapter 91 jurisdiction. Per the Consolidated Written Determination issued in 2014, the proposed student housing falls within an authorized structure type.

Located on the northwest corner of the campus, the residences are in a prime location to connect the University and transient public, to existing public accessways, open spaces, waterfront areas, and the campus. Currently the site of a surface parking lot, the proposed construction will add 1,000 student units to the campus, open space areas, public restrooms, and eliminate 300 parking spaces.

Public Benefits

On the ground floor, the R-1 project will provide restrooms and a cafeteria both of which will be open to the public. We ask that in balancing the need for student safety and providing public access, the residence hall clearly indicate the areas designated for public use on the ground floor along with set rules and hours of operation.

The proposed project is not only an opportunity to improve the student experience at the University but also to enhance the Columbia Point neighborhood, ease connections to neighboring institutions like the John F. Kennedy Presidential Library Museum, The Edward M. Kennedy Institute, and the Massachusetts Archives and Commonwealth Museum, and the Harborwalk.

We commend the University for incorporating accessible slopes for building access, eliminating the need for stairs and ramps. Continuing to improve the connective tissue of the campus will serve the important function of enhancing bicycle and pedestrian connections from the campus to the surrounding neighborhood, the waterfront, and islands.

Chapter 91 requires that projects providing public access maintain adequate signage at all entryways. To promote connectivity, we request that at least one sign advise the public of its access rights and disclose access-related rules. Furthermore, proponents should consider wayfinding and interpretive signs to help students and the transient public locate nearby attractions and public amenities.

Public participation at the July 13th hearing was sparse. For a project of this magnitude, length of time, and financial commitment, we encourage the University to continue exploring ways to further engage the surrounding community in discussions about public benefits. This will ensure the remainder of the University's Master Plan incorporates elements encouraged by the Secretary in the 2010 Public Benefits Determination.

Climate Change Adaptation

UMass Boston scientists Dr. Paul Kirshen, Dr. Ellen Douglas, and Mr. Chris Watson have been at the forefront of developing a hydrodynamic model that predicts the probability of future coastal flooding due to sea level rise and storm surges. Looking at their maps for 2030 and 2070, it appears that the project site for R-1 and its surroundings will be susceptible to coastal flooding in coming decades (See pp. 167-74, https://www.massdot.state.ma.us/Portals/8/docs/environmental/SustainabilityEMS/Pilot_Project_Report_MassDOT_FHWA.pdf). This team has also completed a vulnerability assessment called Climate Ready Boston, for which maps are available and will be published shortly. Drs. Paul Kirshen and Ellen Douglas should be consulted to determine the extent to which coastal flooding is expected to affect this site during its intended lifespan.

Given the campus' proximity to the Harbor, the proponent references the importance of climate change resiliency but does not include detailed plans or a discussion about what measures are being taken to make the project climate resilient. Such designs, including elevating building mechanicals above the first floor and using flood resilient materials, are becoming the norm along Boston's waterfront. Instead, for example, page 298 of the plan indicates that mechanical and electrical equipment will be located on the ground floor. We encourage UMass to incorporate best practices from e.g., A Better

City's Building Resilience Toolkit (<http://challengeforsustainability.org/resiliency-toolkit/>) into the final design for this building.

In May and June of 2015, our comment letters asked the University to include a detailed analysis of flooding vulnerability and the plans the University has to prepare and protect its structures, students, and faculty from climate related flooding. (See Joint Project Commencement Notice and Chapter 91 License Application pages 81-85 and 119-123.)

In the October 15th, 2010 Expanded Environmental Notification Form, Secretary Bowles, recommended that, "in all subsequent permit filings related to the Master Plan development the University consider flooding in the designs of buildings, utilities, and infrastructure. Furthermore, that appropriate mitigation measures be incorporated into the projects to ensure the University is prepared to handle predicted increases in sea level and minimize flood damage potential."

We look forward to the completion of the R-1 project as part of the continued implementation of the University's 25-Year Master Plan.

Sincerely,

Julie Wormser
VP of Policy

Jill Valdes Horwood
Waterfront Policy Analyst