



Are you on board?

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November 18, 2019

Via email: frank.taormina@mass.gov

Frank Taormina
Waterways Regulation Program
Department of Environmental Protection
One Winter Street, 6th Floor
Boston, MA 02108

Re: Commonwealth Pier, 200 Seaport Boulevard, Waterways License Application

Dear Mr. Taormina,

We appreciate the opportunity to comment on the Chapter 91 License Application for the Commonwealth Pier Revitalization submitted by Commonwealth Pier Trust II on July 29, 2019. We submitted comments to MassDEP on the Preliminary Commonwealth Pier Waterfront Development Plan (WDP) in March of 2019, and a member of our team was present for the October 24th public hearing held at MassDEP.

We commend the proponent for its public engagement initiative and commitment to presenting the project plans earlier this year to Boston Harbor Now and its stakeholders at the Harbor Use Public Forum held on March 20th. We are pleased to see a substantial increase in the quality and quantity of publicly accessible space on the site and the creative solutions to address the climate resilient challenges posed by the historic building and underlying pier structure.

Project Description

This proposal is for the revitalization of the World Trade Center (WTC) located at Commonwealth Pier. The existing 1,200-foot-by-400-foot pier consists of the historic headhouse, three rear sheds, a Harborwalk, and the “viaduct”—a pedestrian/vehicular access bridge that stretches over Seaport Boulevard and connects with the second floor of the WTC.

The project site is on filled and flowed tidelands subject to Chapter 91. Although under the jurisdiction of Chapter 91, this portion of the South Boston Waterfront is governed by a Memorandum of Understanding (MOU) between DEP and Massport, the current landowner. As provided in MCR 9.03(3), certain Special Planning Areas within the existing MOU may develop a Waterfront Development Plan (WDP). Massport's goals for the final WDP at this project site are spelled out on page 11 of Supplemental Information (Attachment A) in the Chapter 91 license.

Public Open Space & Access

The project site in the South Boston Seaport District is surrounded on three sides by the Harbor and is the closest parcel to downtown in the South Boston Designated Port Area (DPA). The proposal to create a large visible cutout that provides a public plaza and a welcoming entrance walking east along Seaport Boulevard or the Harborwalk is a laudable design concept. We are further pleased to see that the project will include 170,445 SF of outdoor public space, a 43% increase over the existing site conditions. The proposed 56,478 SF of interior facilities of public accommodation are a nearly fourfold increase of this space use.

In combination, the new design will improve the pedestrian and visitor experience around the entire waterfront edge with an improved and expanded Harborwalk, better lighting, new furnishings, wayfinding signage, planters, and public art. The project will also incorporate the following inviting elements:

- A recessed ground floor and relocated loading bays to improve pedestrian-access along Seaport Blvd.,
- Five publicly accessible cutout “niches” along the perimeter of the building, each to be covered and programmed,
- An improved elevated pedestrian connection across Seaport Blvd. on the viaduct, and
- A grand stairway as well as a public elevator to link the Harborwalk to the elevated street and linked plaza areas.

Since portions of the Harborwalk on the east side of the building will share truck access with the relocated loading bays, we recommend incorporating pavement materials and rumble strips that clearly define pedestrian access. This will promote both safe pedestrian access and truck operations at Commonwealth Pier.

We applaud the proponent for their willingness to incorporate signage into the revitalization project. The Friends of the Boston Harborwalk, a group dedicated to promoting the use of the Boston Harborwalk, has created a successful neighborhood signage master plan that tells the story of Boston Harbor through interpretive signage placed throughout eight waterfront neighborhoods. To further improve the pedestrian experience at Commonwealth Pier, we continue to

recommend a robust interpretive signage program in addition to wayfinding for the Boston Harborwalk.

Finally, as a champion of the Harborwalk and close partner of both the Boston Planning and Development Agency (BPDA) and MassDEP on issues related to maintenance and access, we respectfully request that a management plan be drafted and incorporated into the final Chapter 91 license. Specifications on the frequency of private events along the Harborwalk and in the public plaza as well as the types of programming in the niches will help to preclude some of the pitfalls encountered elsewhere on the Harborwalk.

Water-Dependent Uses & Water Transportation

Water-dependent business operations at Commonwealth Pier are a critical component of Boston Harbor's working waterfront. We support the proponent's commitment to minimizing detrimental effects and disruptions to the existing water-dependent industries during and after construction and the support they have articulated for continuing and expanding these commercial vessel operations.

As part of the project improvements, the apron surrounding the building will be expanded by approximately 20,395 feet. This will enhance the experience for water transportation passengers, particularly with improvements to queuing, ticketing, and ADA access to the floats. While we typically would not encourage covering additional areas of watersheet, the proposed expansion of the Pier will serve to improve access to, and operations of, existing water-dependent maritime businesses and does not create space on which new buildings will be constructed. By blending maritime uses and expanded public access, while also considering the engineering needs of the apron in response to climate change and sea level rise, we believe this is an appropriate expansion.

We are particularly enthusiastic about the potential for a wider range of vessels, and potentially ferries, to dock on the east side of the pier. We hope that this site can become part of a more robust and accessible network of ferries and other public water transportation options. In particular, to establish a future public ferry service that provides high quality transit to the district, a designated docking facility for such services should be reserved on the eastern apron as close to Seaport Boulevard as possible.

Resilience

The project site is within FEMA AE and VE flood zones at a base flood elevation of 17.46 BCB. We commend the proponent for voluntarily exceeding the Massport resiliency guidelines for existing facilities and the BPDA's Flood Resiliency Building Guidelines by protecting the building envelope up to 21.5 feet BCB and elevating critical equipment to 23.5 BCB. The further incorporation of

deployable flood barriers and a barrier-ready façade are also forward looking. We commend the explicit note that the resiliency measures are designed to be compatible with potential district level improvements as proposed by Climate Ready South Boston.

We wish to remind the proponent that permanent flood protection measures should be designed so as not to restrict public access to the Harborwalk along the perimeter of the site. Further, although the proponent has prepared the site for predictable flooding over the next 50 years, the application requests an extended term license with a term of 87 years, at which point the proposed resilience strategies will likely be insufficient.

Recent studies from the IPCC appear to indicate that climate change is occurring at a more rapid rate than prior studies had anticipated. For this reason, we support the proponent's initiative to examine the possibility of incorporating additional flood protection measures along the apron perimeter. Strategies for keeping the Harborwalk resilient over the coming decades and protecting the building into the next century will require vigilance and likely additional modifications.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Kathy Abbott
President and CEO