



Are you on board?

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January 10, 2020

Via email: aisling.kerr@boston.gov

Boston Planning and Development Agency
Attention: Aisling Kerr
One City Hall Square
Boston, MA 02201

Re: Notice of Project Change - 15 Necco Street (EEA 15547)

Dear Ms. Kerr,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Notice of Project Change submitted by ARE-MA No. 74 LLC and ARE-MA No. 72 LLC regarding the proposed changes to the project known as the General Electric Company Headquarters (GE project) located at 5 Necco Street and 15 Necco Street in the Fort Point Neighborhood of South Boston. The GE project was previously approved by the Boston Redevelopment Authority, d/b/a the Boston Planning & Development Agency (BPDA) on November 1, 2016 pursuant to Article 80B of the Zoning Code. Boston Harbor Now has actively monitored this project, submitting comment letters on both the EENF and the SEIR to the MEPA office on the GE project. More recently, we had the opportunity to hear about the proposed changes to this project at our December 18, 2019 Harbor Use Public Forum as well as at the January 6, 2020 public meeting. We continue to be generally supportive of this project and look forward to its completion as part of the creation of an active and engaging waterfront. We submit the following comments on the revised project.

Project Change

As described in the Notice of Project Change (NPC), the project involves the construction of a 12-story (173 feet high) building with a gross floor area of approximately 316,100 square feet (sf). The building will include 295,100 sf of office/laboratory space and 18,150 sf of retail uses.

The project will provide exterior public realm elements, including publicly accessible open space, waterfront access facilities, pedestrian and bicycle amenities, signage, and landscaping. The NPC will result in an increase of 6,745 sf of additional open space accessible to the public as well as an increase in 650 sf for ground floor Facilities of Public Accommodation (FPA).

Open Space/Public Access

As noted above, the proposed changes to the project will result in an additional 6,745 sf of open space accessible to the public. This is mainly due to the removal of the previously proposed large building canopy over the pedestrian plaza area that will run between the 5 Necco Street and the 15 Necco Street buildings. In addition, there will be improved pedestrian connectivity through the new building to enhance access to new open spaces to be constructed by others south of the new building (these future parks and open spaces are currently the subject of a BPDA-commissioned design process as part of the 100 Acres Master Plan). We commend the proponent for their efforts to increase the pedestrian flow on the site as well as the connection to the anticipated adjacent open space.

We further commend the proponent for their goal to open up access to the site and activate the adjacent water sheet, including reconstructing the Harborwalk to meet the width envisioned by the South Boston Waterfront District Municipal Harbor Plan amendment dated May 2009 and providing water and electricity infrastructure to support public programming at the site. We encourage continued community outreach to determine the best ways to activate the watersheet.

Facilities of Public Accommodation

The proposal outlined in the NPC complies with the Chapter 91 requirement that at least 75% of the ground floor areas of both 5 Necco Street and 15 Necco Street will constitute public uses. The proponent has offered that potential ground floor uses may include café/restaurant, retail, gym, lobby gathering space, gallery space, and public restrooms.

At the Harbor Use Public Forum, representatives of the proponent also suggested that they were working with a marketing firm to identify potential lessees that will create a destination, as well as programming that will attract public use. We encourage this continued exploration, noting that the area already offers many eating options for the public to enjoy. Working with the community to identify and fill existing needs with respect to these public spaces will be critical to achieving the kind of destination that is desired. At the January 6th public meeting, many commenters noted the lack of civic space in the area, and expressed a desire for a place like a community work-lounge and cafe, and not just another restaurant and retail. Additionally, whatever use is decided upon to activate the site, we encourage the proponent to dedicate enough interior space to sufficiently support the outdoor programming that they provide. For example, if kayak rental is going to be provided, on-site seasonal storage may be required.

Climate Preparedness/Resilience

The NPC provides an updated analysis of the site's vulnerability to climate change and a review of design measures incorporated into the project to make the project more resilient. We are encouraged that many of the resiliency measures included in the approved GE Project are incorporated into the NPC. Since the initial analysis, the City of Boston suggests including one foot of freeboard to the 19.5 ft. Boston City Base (BCB) elevation to prepare for the 1% storm with forty inches of sea level rise as anticipated by 2070. Instead of raising the elevation to 20.5 ft. BCB (the NPC cites ADA accessibility and other reasons for not building to this elevation now), the project uses multiple strategies to allow for flexible adaptation over time. These strategies **may** include increasing the height of landscaped areas, adding modular blocks to seat walls to make up additional feet of elevation, and utilizing deployable flood barriers when necessary with a minimum elevation of 20.5 ft. BCB at entry points to the Harborwalk to preserve access to the Harborwalk during extreme weather conditions. While these measures are commendable, we remain uncertain as to which may be used, and concerned about their long-term viability and efficacy as mitigation measures. We would therefore encourage the Proponent to formalize in the approval of the project a commitment to implement some or all of the above-referenced measures by a given date or with a specific amount of sea level rise. Most importantly, we would encourage the proponent to be clear about how these adaptable measures will be tied in with adjacent properties on both sides to ensure a continuous line of protection to 20.5 feet BCB along the entire Fort Point Channel.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron Toffler', with a stylized flourish at the end.

Aaron Toffler
Director of Policy
Boston Harbor Now