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July 28, 2022

Via email: [purvi.patel@state.ma.us](mailto:purvi.patel@state.ma.us)

Ms. Purvi P. Patel, EIT  
Massachusetts Environmental Policy Act (MEPA) Office  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Re: 605 Chelsea Street Notice of Project Change

Dear Ms. Patel,

Boston Harbor Now respectfully submits the following comments on the 605 Chelsea Street MEPA Notice of Project Change submitted by 605 Chelsea Street LLC. Our organization has been following this project and has had the chance to meet with Jacob Citrin to discuss the project as well as changes from prior submissions.

We appreciate the unique public benefit that this project brings by restoring a dilapidated historic pump house building along Chelsea Creek. Understandably, working with such an old building that is confined to strict design guidelines brings unique challenges to the project as well as a unique public benefit in its preservation. We hope that despite these constraints, the proponent will be able to create a high quality public Harborwalk along the restored wharf that is accessible, equitable, and resilient. In anticipation of the Chapter 91 process, we want to note that future projects along Chelsea Creek should be held to higher standards where new buildings will not have the same design constraints, and we will continue to track the progress of this project.

*Understanding Climate Resilience*

605 Chelsea Street is located within the City of Boston's Coastal Flood Resilience Overlay District, areas of the City where coastal flooding is likely to occur during a 1% annual chance storm with 40 inches of sea level rise. Following the *Coastal Flood Resilience Design Guidelines* from the Boston Planning and Development Agency, the proponent of the site has elected to wet flood proof the building, given the building's industrial nature. While the coastal storm flooding resilience plan for the building is straightforward, we would like to learn more about the proponent's proposed elevation and flood plan as it relates to the proposed boardwalk that will serve as the Harborwalk.



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Fortuitously, this development, according to *Coastal Resilience Solutions for East Boston and Charlestown (Phase II)*, is not located in a major flood pathway. However, we hope the repaired seawall and replacement wharf are able to tie into future flood resilience measures that will be needed to protect other properties adjacent to this site, some of which are also controlled by the proponent. At minimum, we expect that the seawall and wharf will be built in such a manner that the newly created Harborwalk on this property remains dry, and we will continue to track elevations of the wharf to ensure that the future Harborwalk remains accessible during projected future high tides through the end of the century.

#### *The Harborwalk and FPA space*

By restoring an historic building along the Chelsea Creek, the proponent is preserving a legacy building on the industrial shoreline that has fallen into disrepair and captures a period that has otherwise been erased from the built fabric of the area. In order to meet the requirements of the historic preservation standards while bringing a contemporary industrial use to the site, the proponent will be providing the first waterfront public access on the site in more than a century, but they will not be able to meet other criteria of the Chapter 91 process, including the requirements for lot coverage ratio, or provide any indoor facilities of public accommodation. Because of this, it is vital that the publicly accessible space on the waterfront and pedestrian access to it are both well-signed and easy to navigate in order to feel inclusive and welcoming to all.

We hope that the future Harborwalk signage provides the public with information about their rights to use the space as well as historic interpretation. This is especially important since the site is located in an industrial area that will likely remain industrial and where pedestrians may traditionally feel unwelcome for safety reasons. As noted in our recent comment letter about the Chelsea Creek DPA Boundary Review, the residents of the Eagle Hill, Harborview, and Brandywyne Village communities would benefit from access to the waterfront at this point. Their access to Chelsea Creek has been previously restricted by marine and other industrial uses.

The proponent has also released redevelopment plans for some of the adjacent parcels along McClellan Highway, which serves as a great opportunity to create future public waterfront access and FPA space along more of Chelsea Creek. To better understand what amenities should be provided along and on the Harborwalk, the developer should look to implement the plans developed for *Vision Chelsea Creek* and emulate other waterfront spaces available elsewhere in the Chelsea Creek DPA.



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We appreciate the opportunity to comment and will continue to remain engaged in the permitting of 605 Chelsea Street and other projects along this corridor. We would be happy to speak with you further if there are additional questions.

Sincerely,

A handwritten signature in black ink that reads "Kathy Abbott".

Kathy Abbott  
President and CEO  
Boston Harbor Now