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bostonharbornow.org

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April 25, 2023

Via email: susan.you@mass.gov

MassDEP-BWR Waterways Regulation
Attn: Susan You
100 Cambridge Street, 9th Floor
Boston, MA 02114

Re: 295 Eastern Avenue Waterways License Application

Dear Ms. You,

Boston Harbor Now respectfully submits the following comments on the *295 Eastern Avenue Waterways License Application* prepared by 295 Eastern Chelsea, LLC. Boston Harbor Now staff has been following this project and most recently attended the March 22, 2023 Chapter 91 Public Meeting.

As longtime stewards of the Harborwalk in and around Boston, Boston Harbor Now is committed to ensuring that the coastline changes built today are designed for a more resilient and inclusive future. We use the term “Harborwalk 2.0” to capture the aspirations of this work to ensure the waterfront is accessible and welcoming; is prepared for the coastal impacts of climate change; and centers equity and inclusion in the development of its design, construction, and programming. An accessible waterfront should have connections between the community and the water as well as numerous activation strategies to serve all residents. A resilient waterfront includes a variety of climate adaptation strategies to protect and serve Chelsea at a district scale. To center equity in waterfront design is to focus on strategies that make the waterfront feel safe and inclusive through lighting, multilingual signage, full ADA accommodations, and the elimination of features that make users feel unwelcome or excluded.

The redevelopment of this site will create waterfront access in an area that has been cut off and underutilized. We appreciate the proponent’s community engagement efforts that have resulted in a thoughtfully designed waterfront open space that is inclusive and responsive to community needs. Although the site is engaging and provides ample opportunities for education and waterfront activation, we are concerned about the site’s coastal flood resilience measures relative to the length of the license. While we believe the Extended Term Chapter 91 License to be a reasonable request, we hope to see flood resilience measures that extend over the same time horizon. Designing flood protection for 2070 sea level rise in this case is not sufficient for the suggested 65-year time frame. We also hope to see the incorporation of public restrooms on site. Although it is not a Chapter 91 requirement based on the location of the



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building, we believe that this amenity will help support visitation, especially if school children are the intended audience of the education nature walk.

Outdoor Amenities and Climate Preparedness

In addition to the 114,000-square foot (sf) light manufacturing / warehouse, the redevelopment of 295 Eastern Ave is expected to create approximately 2.2 acres of enhanced public access open space with a roughly 0.7-mile-long, publicly accessible trail. The trail, which circles the perimeter of the site, will connect a variety of outdoor amenities, including outdoor learning spaces, seating areas, and a wheelchair accessible fishing area. The trail will also include pergolas and trellises for shade, seating, trash receptacles, lighting, and other amenities to help engage and attract the public to the site on a year-round basis. We especially applaud the proponent's integration of community input, which has led to the inclusion of bi-lingual signage and the preservation and enhancement of existing vegetation.

While the proponent has made efforts to prepare the site for storm water and heat island effects through the addition of storm water landscaping and green space, we have concerns about the longevity of the proponent's flood resilience strategy. As noted by the Conservation Law Foundation during the Chapter 91 public meeting, Boston Harbor Now would expect to see coastal flood resilience measures that will match the extended fixed license term of 65 years. Although the project is "designed to accommodate anticipated sea level rise over the design life of the structures (2070)," an extended 65-year license will surpass this timeframe. We recommend that the proponent take measures to protect their site to match projected coastal flood impacts through the allotted license period or devise a management plan that will allow for additional flood resilience measures to be incorporated over time. Although we appreciate the inclusion of flood adaptive salt tolerant native plantings that can withstand temporary flooding, more needs to be done to protect the site from anticipated coastal inundation. Since the site abuts regional transit infrastructure, it is imperative that it is appropriately able to contribute flood resilience protection for the district and ideally tie into adaptation measures on adjacent properties in the future.

Indoor Amenities

Although there are no ground floor interior areas proposed within 100 feet of mean high water and therefore no requirements to provide facilities of public accommodation under Chapter 91, we believe that the inclusion of public restrooms would be a useful amenity on the site. To create a welcoming waterfront, it is not enough for public waterfront spaces to simply exist; there



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must be amenities to support visitors to the area. From our experience around the region's waterfront and out on the Boston Harbor Islands, we've consistently heard that the availability of public restrooms is a primary factor in determining whether families are able to visit a space for a meaningful amount of time. Bathrooms are particularly vital for those with certain medical conditions. The proponent has identified Burke Elementary School students and educators as key intended audience members for their education nature walk. Given the age of the students who are expected to frequent the site, we believe that public restrooms will help facilitate their visits and support local families who want to spend time in this unique new waterfront space.

We appreciate the opportunity to comment on this project and look forward to following its progress toward implementation. 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". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Kathy Abbott
President and CEO
Boston Harbor Now