



Are you on board?

15 State Street Suite 1100
Boston, MA 02109
617 223 8667
bostonharbornow.org

Board of Trustees

Meaghan Hooper-Berdik
Grace Macomber Bird
Kevin Clarke
Robert Delhome
Jamie M. Fay
Robert Gолledge
Greg Herrema
Ann Lagasse
Malia Lazu
Mary Kay Leonard
Shelagh Mahoney
Andrew McElwee
James Miner
Martin O'Neill
Elaine Richardson
Bud Ris
Demetriouse Russell
Nalini Sharma
Cathy Douglas Stone
Kishore Varanasi
Richard Walker
Betsy Wall

Ex-Officio Members

Katherine F. Abbott
Rev. Mariama White-Hammond
Michael Creasey
Fred Laskey
Rebecca Tepper
Andrew Hargens

Lifetime Trustees

Governor Michael Dukakis
Governor William Weld

President & CEO

Katherine F. Abbott

July 6, 2023

Via email: alexander.strysky@mass.gov

MEPA Office

Attn: Alexander Strysky
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Neponset Wharf SFEIR

Dear Mr. Strysky,

Boston Harbor Now (BHN) respectfully submits the following comments on the Neponset Wharf Supplemental Final Environmental Impact Report submitted by CPC Ericsson Street LLC on behalf of City Point Capital. Our staff has been tracking this project since its inception, and we previously submitted comments on the proponent's Boston Planning and Development Agency (BPDA) supplemental filing in March 2021.

As longtime stewards of the Boston Harborwalk, Boston Harbor Now is committed to ensuring that the waterfront we build today is designed for a more resilient and inclusive future. This project has the potential to advance the goals of Harborwalk 2.0, a vision for a waterfront that is accessible and welcoming, prepared for the coastal impacts of climate change, and centers equity and inclusion in its design, construction, and programming. An accessible waterfront development should have linear and lateral connections between the city and the water and numerous activation strategies to serve all Bostonians. A resilient waterfront development includes a variety of climate adaptation strategies to protect and serve Boston at a district scale. To center equity in waterfront development is to focus on strategies that make the waterfront feel safe and inclusive through lighting, multilingual signage, full ADA accommodations, affordability, community relevancy, and the elimination of features that make users feel unwelcome or excluded.

As outlined by the proponent, Neponset Wharf is expected to convert a property that currently has surface parking, industrial buildings, and an inaccessible waterfront into a mixed-use development with boat storage, office, residential, and publicly accessible open space through the site and along the water's edge. While we appreciate the proponent's efforts to respond to local community concerns, we are concerned about the quality of Harborwalk and waterfront design as it is proposed and hope to see



Are you on board?

15 State Street Suite 1100
Boston, MA 02109
617 223 8667
bostonharbornow.org

more information about the other amenities further fleshed out. Elsewhere in Boston, waterfront best practices elevate the Harborwalk above anticipated high tide flooding, and if it may be submerged during a storm, there is an alternate path further inland that provides public access and allows for egress from the site on foot during a storm. We also expect the physical Harborwalk path to have a minimum width of 12 feet and allow visual access to the waterfront, while this design creates a narrow waterfront path and a wider official Harborwalk inland and without a view. The lack of a clear emergency egress or access plan for the buildings during a 2070 1% chance flood is concerning, as is the lack of a plan for creating district-scale protection. The design fails to fully address what increased site flooding would mean for the safety of the residents who would live in this space, the public access required by Chapter 91, and the longevity of the development itself. Should the project move forward through the regulatory process, we hope to see an improved Harborwalk design as well as clear guidelines on accessing the public amenities that will be created through this development during the Chapter 91 review.

Flooding

While the proponent has stated that there is no record of past coastal flooding on the project site, Neponset Wharf is located in an area with substantial flood risk that is expected to increase over time with projected sea level rise and other climate change impacts. Not only is the site at risk of flooding during the 1% chance flood today, but maps of future risks show that it will be entirely surrounded by water during the 2070 1% chance flood. To mitigate the effects of coastal storm flooding, the proponent has chosen to maintain the existing dumped riprap and elevate a portion of the existing bulkhead to reach a final elevation of 12 feet NAVD88 or lower. The City of Boston's 2070 BFE and FEMA's Zone AE is 13 foot NAVD88, a foot higher than the flood protection created by the elevated bulkhead. Although some portions of the site will be elevated as high as 14 foot NAVD88 and damage from future climate conditions will be reduced by designing buildings A, C, and the Boathouse to be wet-floodproofed, the majority of the site will be inundated, as will much of the surrounding Port Norfolk peninsula. According to the proponent, "Floodwaters in 2070 are expected to overtop the raised access road", and other diagrams show that the Harborwalk and other public pathways will be underwater as well, making the site impassable for both residents and emergency vehicles in the event of a storm.



Are you on board?

15 State Street Suite 1100
Boston, MA 02109
617 223 8667
bostonharbornow.org

Introducing new development at this site without addressing district flood concerns and, by extension, access and egress from the site seems to lack foresight both from a permitting and insurance perspective. The Port Norfolk peninsula is highly vulnerable to coastal flooding, and this project introduces new residents and businesses to these risks. To solely wet floodproof the lobby of a residential building in an area with an insufficiently elevated site fails to address the safety of those that will reside there and does nothing to contribute to future district-wide flood protection that would reduce risk for existing residents on the peninsula. Because this development commenced prior to the establishment of the Coastal Flood Resilience Overlay District, the project does not comply with the BPDA's current guidance, which only permits wet floodproofing for parking, access, crawl space, and storage. Allowing this development to move forward as currently proposed sets an uncomfortable precedent that wet floodproofing is a sufficient climate resilience measure for new residential developments.

Although the proposed adaptation strategies would protect the individual buildings, evacuation or emergency access feels concerning. These challenges are only exacerbated as the ocean continues to rise. When considering the longevity of this development, there is no clear path to adapt the proposed flood strategy to address further sea level rise and, by extension, more extensive flooding. At this location, in particular, flood protection infrastructure may be unable to adapt to rising sea levels at a sustainable pace, raising the question of whether managed retreat would be necessary. While the proponent has laid plans for flooding in the next 50 years, we also hope they consider the following 50 years as well.

Chapter 91 and Public Amenities

Several community benefits are anticipated as a part of this development. The proponent will provide a new community/flex space comprising 11,600 square feet that will be available for use by the public, a renovated marina and dredging to maintain navigability and a new boathouse that will better contain dust and noise during boat maintenance and repair. The proponent has also stated that the project will result in approximately 2.17 acres of new landscaped outdoor space, which will include a new publicly accessible Harborwalk and public walking paths along much of the shoreline, a flexible-use lawn, a working waterfront viewing area, and a water taxi landing.



Are you on board?

15 State Street Suite 1100
Boston, MA 02109
617 223 8667
bostonharbornow.org

We appreciate the proponent's thoughtful amenities and are especially pleased to see a new boathouse, open space, and public walking paths on this site. The boathouse is a valuable water-dependent asset that, paired with the marina, will facilitate members of the public accessing the water. Similarly, we welcome the additional green space created on this site. The new public open space and affiliated amenities, like the viewing station and public pathways, create a more welcoming experience for the public and encourage exploration of the waterfront.

Although we are excited by the wide range of amenities, in anticipation of Chapter 91, we want to ensure that these spaces meet existing regulatory standards and are accessible to the public. In particular, we are concerned by the location of the designated Harborwalk. The proponent has selected an inland pathway as the official Harborwalk, a poor precedent that does not afford easy views of the water. To create a more compliant Harborwalk we suggest the proponent widen the already proposed public walking paths to at least 12 feet wide, elevate them such that there is an accessible path in all weather conditions, and designate these improved walkways as the official Harborwalk. Elsewhere on the waterfront, paths not designated as the official Harborwalk have not been held to the same standard of public access and protection, and we want to avoid any future privatization of uses. Additionally, all the amenities available to the public, including the Harborwalk, should be clearly identified with signage and may require protocols or guidance for accessing them. For example, if the proponent intends to make the flex space available to rent by the public, we expect them to provide clear guidelines on how neighborhood groups and nonprofits can sign up to use the space and what rental discounts they may be eligible for.

As this project continues through Chapter 91 and other permitting processes, we would like to see improvements to both the Harborwalk and site resilience. We expect the Harborwalk along the water's edge to meet the 12-foot-wide minimum and be accessible to the public 24/7. Some of the project site should be elevated so that it can tie into future district-wide flood measures that will be needed to protect the Port Norfolk neighborhood, and clear evacuation protocols should be put in place. Finally, the length of the proponent's Chapter 91 License should reflect the timeline for anticipated future flooding in this area. The duration of their



Are you on board?

15 State Street Suite 1100
Boston, MA 02109
617 223 8667
bostonharbornow.org

license should be aligned with the time horizon through which the site's resilience and adaptation measures are confirmed.

We are grateful for the opportunity to comment on this project and will continue following its progress toward implementation. We would be happy to speak with you or the proponent 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