



Are you on board?

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September 27, 2019

Via email: Ebony.DaRosa@Boston.gov

Boston Planning and Development Agency
Attention: Ebony DaRosa
One City Hall Square
Boston, MA 02201

Re: The Residences at Coleridge Coast

Dear Ms. DaRosa,

We appreciate the opportunity to comment on the proposed project at 181–183 Coleridge Street. Boston Harbor Now has been following the development of this project and previously submitted comments to the Massachusetts Environmental Protection Act (MEPA) Office in July 2018 and to the Waterways Regulation Program at Massachusetts Department of Environmental Protection (MassDEP) in October 2018.

This project is being developed on a privately-owned waterfront site for a non-water dependent use, so it will require a Chapter 91 license. Boston Harbor Now is submitting this letter during the Article 80 process to highlight the project's efforts to ensure the resilience of the site and provide potential future flood protection for the neighborhood. We commend the proponent for proactively including design responses to the threats of climate change that go beyond the City's existing recommendations.

Project Description

As presented at the public meeting on September 10, the proponent will construct a 24,000 SF multi-family residential development with 15 residential units, 19 below-grade parking spaces, bicycle racks, and a 1,111 SF facility of public accommodation. The project sits on filled private tidelands and includes 9,477 SF of open space, which is 56.3% of the lot area subject to Chapter 91. The design includes a mini-Harborwalk and accessible connections from the sidewalk.

Resilience

According to maps in the Climate Ready Boston report Coastal Resilience Solutions for East Boston and Charlestown, this site is a future flood pathway into the Harborview neighborhood with sea level rise combined with future storms. Even today, with the existing site condition, it is subject to flooding during extreme storms like the bomb cyclone in March 2019. The Boston Planning and Development Agency's own recently-released *Coastal Flood Resilience Design Guidelines* recommends a Sea Level Rise - Base Flood Elevation (SLR-BFE) of 18' to 19.50' BCB (11.54' - 13.04' NAVD88) and a Sea Level Rise - Design Flood Elevation (SLR-DFE) of 19' to 20.50' BCB (12.54' - 14.04' NAVD88).

A 12-foot wide Harborwalk is being proposed along the waterfront edge of this site at an elevation of 16.46' BCB (10' NAVD88). This raised walkway will remain above high tide even with 40 inches of sea level rise and provide new public access to the harbor on the site. Landward of the Harborwalk, salt-tolerant plantings are proposed. Above that is a public plaza, level with the ground floor of the building, with elevation 21.96' BCB (15.5' NAVD88), which keeps most of the open space and all of the residential units above all high tides and the majority of flood waters now and well into the projected future. This also provides an elevation that serves as a natural flood barrier.

Below the Harborwalk in the intertidal zone the debris will be removed in order to support and improve the marine ecosystem and habitat. The site plan also includes permeable decks and plantings (bioswales) that can absorb rain water, and the proposed building has passive cooling strategies that can be important for dealing with an increased number of extremely hot days.

Public Access

With the inclusion of a facility of public accommodation, a section of Harborwalk, and waterfront open space, Boston Harbor Now will continue to monitor this project and comment further on public access with the finalization of the Chapter 91 permitting process.

We want to ensure that the ultimate design fulfils its promise for providing resilience and public access on the East Boston waterfront.

Sincerely,



Kathy Abbott
President and CEO