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July 14, 2017

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME	: L Street Station Redevelopment
PROJECT MUNICIPALITY	: Boston
PROJECT WATERSHED	: Boston Harbor
EEA NUMBER	: 15692
PROJECT PROPONENT	: HRP 776 Summer Street, LLC
DATE NOTICED IN MONITOR	: May 24, 2017

Pursuant to the Massachusetts Environmental Policy Act (M.G.L. c. 30, ss. 61-62I) and Section 11.03 of the MEPA Regulations (301 CMR 11.00), I hereby determine that this project **requires** the preparation of a mandatory Draft Environmental Impact Report (DEIR).

As described in the Environmental Notification Form (ENF), the project consists of the construction of approximately 2.1 million square feet (sf) of mixed use development, including 1.5 million sf of residential uses (approximately 1,588 units), 339,639 sf of office space, 68,077 sf of retail uses, a 150-room hotel and 987 parking spaces in below-grade garages and surface parking lots. It includes the rehabilitation and reuse of three turbine halls associated with the site's historic use as a power plant. The project will provide 104,500 sf (approximately 2.4 acres) of publicly accessible outdoor space, including a 1.15-acre waterfront park along Reserved Channel. Vehicular access through the site will be provided by an east-west roadway from Summer Street opposite Elkins Street and a north-south roadway from East 1st Street opposite M Street.

The project will be constructed in eight development blocks as described below. With the exception of Blocks G and H, the buildings are primarily residential:

- Block A: A 70-ft high, seven-story residential building with an at-grade parking lot, to be located at the southeastern corner of the site along East 1st Street;

- Block B: A 60-ft high, six-story residential building with below-grade parking, to be located in the southern portion of the site along East 1st Street;
- Block C: A 220-ft high, 21-story residential building to be located at the corner of East 1st Street and Summer Street, with retail uses on the ground floor and a below-grade parking garage extending north to the Block D site;
- Block D: A 170-ft high, 16-story residential and hotel building to be located along Summer Street north of Block C and adjacent to the waterfront open space, with retail uses on the ground floor and a below-grade parking garage;
- Block E: A 200-ft high, 20-story residential building to be located north of Block B in the center of the site, with below-grade and at-grade parking areas extending to Block G and the turbine halls;
- Block F: A 200-ft high, 20-story residential building to be located north of Block A, with an at-grade surface parking lot;
- Block G: A 79-ft high, six-story office building with retail uses on the ground floor, to be located adjacent to the waterfront open space north of Block E; and
- Block H: A 128-ft high, 10-story office building with retail uses on the ground floor, to be located adjacent to the waterfront open space north of Block F.

The three turbine halls are located at the center of the site and extend from the planned waterfront open space to East 1st Street. The buildings will be restored and programmed with retail and other community uses that will extend to outdoor patios. A small existing building located along Summer Street will be reused. All other existing buildings will be demolished.

Project Site

The 15-acre project site is bounded by Summer Street to the west, Reserved Channel to the north, land owned by the Massachusetts Bay Transportation Authority (MBTA) to the east, and East 1st Street to the south. The site is located between the primarily residential South Boston neighborhood to the south and commercial and maritime uses such as the Massachusetts Port Authority's (MassPort) Black Falcon passenger terminal, Massport's Dedicated Freight Corridor (DFC) cargo haul road serving the Conley Container Terminal to the east, and other commercial uses. The site was used as an electrical generating facility for over 100 years before being decommissioned in 2007. It consists of several buildings that housed generation equipment and associated infrastructure. The eastern portion of the site has been cleared of structures. The site is fenced and inaccessible to the public.

The site is located in the South Boston Designated Port Area (DPA), one of ten such areas designated by the Commonwealth to promote water-dependent industrial uses. The electric generating station was an allowed use within the DPA because of the necessity to withdraw large volumes of cooling water from the Reserved Channel. The Proponent has submitted a request to the Massachusetts Office of Coastal Zone Management (CZM) for a DPA Boundary Review pursuant to Designation of DPA Regulations at 301 CMR 25.00 to remove the site from the DPA.

A four-acre area of the site adjacent to Reserved Channel consists of filled tidelands subject to the Massachusetts Department of Environmental Protection's (MassDEP) jurisdiction under M.G.L. Chapter 91 (c. 91). According to the Federal Emergency Management Agency's

(FEMA) Flood Insurance Rate Map (FIRM) number 25025C0083J (effective March 16, 2016), a portion of the site is located within the 100-year floodplain (Zone AE) with a Base Flood Elevation (BFE) of 12 ft NAVD 88 (18.45 ft Boston City Base (BCB)) on land and 13 ft NAVD 88 (19.45 ft BCB) over water. The site is sloped from east to west and from south to north, with a grade change of approximately 15 feet.

The site was identified for mixed-use development in the Imagine Boston 2030 citywide plan. The site is located within the South Boston Marine Economy Reserve Subdistrict of the Harborpark Dorchester Bay/Neponset River Waterfront District and the Restricted Parking Overlay District (RPOD). The Boston Planning and Development Agency (BPDA) has commenced a public review process that included public meetings to solicit the community's vision for the site and the preparation of the South Boston Edison Power Plant Planning Process Report (PPR). According to the BPDA, the PPR will provide the foundation for its Large Project Review process under Article 80B of the City of Boston Zoning Code. The Proponent has indicated that it will submit a Planned Development Area (PDA) Development Plan for approval by the BPDA.

Environmental Impacts and Mitigation

The project will add 2.7 acres of impervious area, alter 93,000 sf of Land Subject to Coastal Storm Flowage (LSCSF), and create four acres of new nonwater-dependent use of tidelands. The new office, retail, and residential uses will generate 20,370 new unadjusted average daily trips (adt). The ENF indicated the number of new vehicular trips to be approximately 10,250 adt when adjusted to reflect the use of alternate modes of transportation, such as transit and walking, to access the site. The project will add 712 parking spaces to the site for a total of 987 spaces. The project uses will consume 329,890 gallons per day (gpd) of water and generate 299,900 gpd of wastewater. The project will release emissions of Greenhouse Gasses (GHG) and other air pollutants associated with the burning of fossil fuels for on-site energy use and automobile travel by residents and visitors to the site.

The project will employ stormwater Best Management Practices (BMPs) to improve the water quality and flow rate of stormwater discharged from the site, including infiltrating stormwater to the ground. The site will be raised to establish a first-floor elevation that is designed to withstand the effects of sea level rise and the project will incorporate other climate change adaptation measures. The project includes publicly accessible waterfront open space and other public interior and exterior spaces. It will minimize and mitigate transportation-related impacts through implementation of Transportation Demand Management (TDM) measures such as encouraging use of public transit and other alternate modes of travel. The project will employ measures to conserve water and contribute to Infiltration/Inflow (I/I) reduction to preserve sewer capacity. The project will mitigate GHG emissions by incorporating energy efficiency measures into the building design and potentially generating renewable energy on-site.

Permitting and Jurisdiction

The project is undergoing MEPA review and subject to preparation of a mandatory Environmental Impact Report (EIR) pursuant to Section 11.03(3)(a)(5) because it requires State Agency Permits and includes a new nonwater-dependent use of one or more acre of tidelands and will generate 3,000 or more new adt on roadways providing access to a single location. The

project exceeds the ENF thresholds at 301 CMR 11.06(b)(15) (construction of 300 or more new parking spaces at a single location) and 301 CMR 11.03(10)(b)(a) (demolition of any historic structure listed in or located in any historic district listed in the State Register of Historic Places or in the Inventory of Historic and Archaeological Assets of the Commonwealth). The project requires a c.91 License and it may require a Section 401 Water Quality Certificate (WQC) from MassDEP. It is also subject to the MEPA GHG Emissions Policy and Protocol and will require a Public Benefit Determination (PBD). The Proponent has requested a DPA Boundary Review from CZM.

The project requires an Order of Conditions from the Boston Conservation Commission (BCC) (or in the case of an appeal, a Superseding Order of Conditions (SOC) from MassDEP). It will require Article 80 Review by the BPDA and a Transportation Access Plan Agreement (TAPA) and Construction Management Plan approval from the Boston Transportation Department (BTD). The project requires a determination of no hazard to air navigation from the Federal Aviation Administration (FAA). It will require a National Pollutant Discharge Elimination System (NPDES) Stormwater General Permit from the United States Environmental Protection Agency (EPA) and may require a Section 10/Section 404 permit from the Army Corps of Engineers (ACOE). The project requires review by the Massachusetts Historical Commission (MHC) and development of a Memorandum of Understanding (MOU).

Because the Proponent is not seeking State Financial Assistance, MEPA jurisdiction extends to those aspects of the project that are within the subject matter of required or potentially required State Permits and that may cause Damage to the Environment, as defined in the MEPA regulations. Because the project requires a c.91 License, MEPA jurisdiction is broad in scope and extends to all aspects of the project that may cause Damage to the Environment, as defined in the MEPA regulations.

SCOPE

General

The DEIR should follow Section 11.07 of the MEPA regulations for outline and content, as modified by this scope. The DEIR should clearly demonstrate that the Proponent has sought to avoid, minimize and mitigate Damage to the Environment to the maximum extent feasible.

The project, as proposed, is dependent upon a change in the South Boston DPA Boundary. The Proponent has requested that CZM review the DPA Boundary for its site. CZM determined that a broader review of the South Boston DPA boundary for the planning area located south of the Reserved Channel, including the project site, is warranted. The review will consider recent changes in land ownership, uses, and improvements to transportation infrastructure including the DFC. Through its review, CZM will determine whether areas south of the Reserved Channel are in substantial conformance with the criteria that govern suitability of the waters and land to accommodate water-dependent industrial use. The Boundary Review may result in reconfiguration of the DPA boundary such that the site is excluded from the DPA. The July 12, 2017 edition of the *Environmental Monitor* included a Notice of Intent to Review the South Boston DPA from CZM. The request is subject to a 30-day public comment period, which ends on August 11, 2017, and a public meeting will be held on July 25, 2017.

I note comments requesting that MEPA review not proceed until a determination is made upon the Boundary Review process because of its relevance to the feasibility of the proposed project. Review of the DEIR may proceed concurrently with the Boundary Review process; however, it is predicated on inclusion of a DPA-Compliant Alternative in the alternatives analysis and a discussion regarding the substance and timing of the Boundary Review process. A determination must be complete prior to filing of the FEIR to ensure that any relevant terms and conditions of the Boundary Review inform the MEPA process and draft Section 61 Findings.

Public Comments

I received many thoughtful comment letters from elected officials, including Representative Stephen F. Lynch, State Senator Linda Dorcena Forry, State Representative Nick Collins, and City Councilor Michael F. Flaherty, state agencies, community groups and residents. While recognizing the benefits of redeveloping the site, commenters expressed concern about the significant impacts of the project on the already strained traffic and parking conditions in South Boston and the lack of clear mitigation to address these effects. The community, its representatives and Massport have worked constructively over many years to provide a buffer between the neighborhood and Massport's facilities to mitigate impacts while supporting economic growth associated with the DPA. Construction of the DFC and Butler Park was intended to mitigate the noise, air emissions, and truck traffic associated with the operation of Conley Terminal. Commenters are concerned that the project will introduce new impacts and may be incompatible with industrial uses along Reserved Channel.

Project Description and Permitting

The ENF described existing site conditions and provided a basic project description and conceptual plans. It identified the project's impacts on tidelands, transportation, water and sewer use, stormwater management, GHG emissions, and historic resources, and acknowledged the need to mitigate these impacts. The ENF reviewed short-term impacts anticipated during the construction period and identified potential mitigation measures. It evaluated an alternative project design and compared its potential impacts to the Preferred Alternative. The ENF acknowledged the site's location within the DPA and Maritime Economy Reserve zoning district and the project's inconsistency with the emphasis on maritime uses imposed by those designations.

The DEIR should include plans and a detailed description of existing conditions, including site topography, soil conditions, and infrastructure. The DEIR should describe the project and identify any changes to the project since the filing of the ENF. It should include updated site plans for existing and post-development conditions at a legible scale. Conceptual plans should be provided at a legible scale and clearly identify buildings, public areas, impervious areas, pedestrian and bicycle accommodations, and stormwater and utility infrastructure.

It should identify and describe State, federal and local permitting and review requirements associated with the project and provide an update on the status of each of these pending actions. The DEIR should include a description and analysis of applicable statutory and regulatory standards and requirements, and a discussion of the project's consistency with those

standards. It should identify and describe projects in the vicinity of the project site, including maritime-related uses at MassPort's facilities and the Raymond L. Flynn Marine Park, which may be constructed concurrent with or prior to the project and describe how roadway, transit and pedestrian improvements and construction phasing related to those developments may affect the project.

According to the ENF, the project will be developed over a 10-year period commencing in 2018, with the rehabilitation of the turbine halls and construction of the residential buildings along East 1st Street as the first phase. The DEIR should describe likely phasing scenarios, and discuss how mitigation measures will be implemented in the phasing scenarios to ensure that project impacts are appropriately mitigated as development proceeds.

Alternatives Analysis

The ENF compared the Preferred Alternative to a No Build Alternative and a reduced build option identified as Alternative B. The No-Build Alternative would maintain the existing buildings and continue their use for power generation. According to the ENF, this is the only realistic water-dependent industrial use of the site because the DFC blocks direct access to Reserved Channel. This alternative would comply with the c. 91 regulations for filled tidelands in a DPA, but would not provide any public access to the site. The No Build Alternative would not result in any new impacts related to traffic generation, wastewater and water use, or historic resources, but would continue impact water quality through cooling water withdrawals and discharges into Reserved Channel.

Alternative B would involve the reuse of the existing buildings to provide 1.5 million sf of office uses and the construction of a 1,500-space parking garage. This alternative would reactivate the site but would not meet the goals for a mixed-use development of the site with public access. It would include the nonwater-dependent use of tidelands and therefore would not be consistent with the c. 91 regulations for tidelands in a DPA and would provide limited public access with no interior Facilities of Public Accommodation (FPA). The office uses would generate over 1,000 vehicle trips during the morning and afternoon peak periods compared to 620 to 692 rush hour trips associated with the Preferred Alternative, and would include approximately 500 more parking spaces than the Preferred Alternative. Alternative B would use 123,750 gpd of water and generate 112,500 gpd of wastewater, compared with the expected use of 329,890 gpd of water and generation of 299,900 gpd of wastewater by the Preferred Alternative. Alternative B would add 3.2 acres of impervious area, approximately 0.5 acres more than the Preferred Alternative.

The Preferred Alternative was designed to provide a mixed-use development consistent with planning goals for the site. As with Alternative B, the Preferred Alternative cannot comply with the c. 91 regulations without a revision to the DPA boundary; however, it has been designed to provide greater public use of the site including the waterfront open space. In addition, the Preferred Alternative will result in a greater degree of remediation of contamination at the site compared to the other alternatives.

The DEIR should provide an expanded alternatives analysis including the following:

- A DPA-Compliant Redevelopment Alternative that reserves the waterfront portion of the site for use in connection with the transfer of goods between ships and land, including operational space for water-dependent industrial uses and/or access to land-based transportation and utilities while incorporating other uses into the non-DPA area of the site;
- A DPA-Compatible Redevelopment Alternative that maximizes the ability of the project to be compatible with nearby industrial and transportation-related uses, including the Conley Terminal and the MBTA bus facility adjacent to the site. This alternative may include: repositioning much of the open space away from the DFC; adding additional open space (including expanding Butler Park) to provide a greater buffer from industrial uses; removing, relocating or reorienting planned residential buildings away from the DPA side of the site; changes in use of the proposed buildings; and/or sound-proofing and other measures recommended by Massport. The analysis should be supported by existing noise data reflecting port operations and potential impacts of truck use of the DFC, such as dust, noise, and air quality; and
- A Reduced Density Alternative that minimizes traffic impacts by reducing the density of the development and/or by increasing the proportion of uses that generate fewer trips. This alternative may include measures that should be evaluated as components of the DPA-Compatible alternative, such as increasing the open space buffer along the eastern side of the site.

As noted in the GHG section, I strongly encourage the Proponent to review an alternative that employs passive design principles in the residential buildings to minimize GHG emissions and enhance the resiliency of the project to the effects of climate change.

The DEIR should provide a detailed comparison of the alternatives, including detailed descriptions and plans of each alternative. The DEIR should compare the environmental impacts of each alternative, quantitatively to the extent practicable, with respect to trip generation, traffic operations, pedestrian and bicycle access, water use, wastewater generation, impervious area, tidelands, wetlands resource areas and GHG emissions.

Tidelands and DPA

The entire site is located within the DPA, within which allowable uses under the c. 91 regulations are generally limited to water-dependent industrial uses, such as commercial fishing, marine cargo terminals, and industrial uses relying on proximity to the shoreline for ship-to-shore transfer of material or withdrawal of process water. The site's historic use for power generation was considered a water-dependent industrial use because it withdrew cooling water from Reserved Channel. The proposed project includes nonwater-dependent uses on tidelands in the DPA, which may not be permittable under the c. 91 regulations. As noted previously, the Proponent has requested that CZM review the boundary of the South Boston DPA. If the project site were removed from the DPA, the project would be required to comply with any other applicable c. 91 regulatory standards. According to CZM, it will conduct its review in accordance with the Designation of DPA Regulations at 301 CMR 25.00.

The DEIR should identify all water-dependent industrial uses in the vicinity of the site, including Massport's Flynn Cruiseport and the Conley Container Terminal, and describe any potential impacts to those uses or incompatibility between industrial uses and the proposed residential use. According to Massport, 900 trucks per day are expected to use the DFC once it is completed; this number is expected to rise to 2,410 trucks per day by 2022. The DEIR should propose mitigation measures for any impacts or potential conflicts, including buffering the residences from industrial activities, using a Residential Use Restriction, use of soundproofing materials in the construction of the residential units, and other measures indicated in Massport's comment letter.

Approximately four acres of the site adjacent to Reserved Channel are comprised of filled tidelands. According to the ENF, 18 c. 91 licenses have been issued authorizing all fill and structures at the site. The ENF reviewed the project's compliance with the c. 91 regulations, particularly those pertinent to nonwater-dependent uses, under the assumption that the project will not be subject to DPA use requirements in the future. The project design does not include any new buildings for nonwater-dependent use within the Water-Dependent Use Zone (WDUZ), which extends 100 feet landward of the mean high water mark. The project also would not include any nonwater- dependent Facilities of Private Tenancy (FPT) on the ground level within 100 feet of the shoreline. As required by the c. 91 regulations, the project has been designed to provide at least one square foot of tidelands outside the footprint of any building for each square foot of tidelands occupied by a building containing nonwater-dependent uses. A significant portion of this open space will be located on over an acre of filled tidelands adjacent to Reserved Channel and will be designed to promote public use of the open space. The project will also comply with c.91 limits on building height, which in this case will generally limit the height of new buildings on filled tidelands to no more than 130 feet, and as low as 55 feet at a distance of 100 feet from the shoreline.

The DEIR should clearly show all buildings and uses within tidelands and quantify ground floor uses on filled tidelands. The DEIR should include an overlay of c. 91 regulatory zones, such as the WDUZ, 100-ft setback from the shoreline, and building height limits, on a plan of proposed conditions. It should provide detailed designs of the public waterfront open space and other publicly-accessible exterior areas and facilities. The DEIR should describe how interior Facilities of Public Accommodation and exterior public open space will be designed in coordination to provide meaningful and desirable use of the site by the public. It should detail any proposed activities in Reserved Channel and alterations or changes in use of existing power plant structures located within Reserved Channel

The project will include a 1.15-acre waterfront park adjacent to the shoreline. According to the ENF, the open space will be designed to acknowledge the industrial nature of its setting with appropriate landscaping, programming, and pedestrian connections to other public areas and open spaces on the site. The DEIR should provide plans and renderings of the waterfront open space that will illustrate its proposed use and connections to other public spaces. It should specifically describe design elements intended to provide a buffer to truck traffic using the DFC.

The project exceeds EIR thresholds as defined in 301 CMR 11.03 and is subject to the provisions of *An Act Relative to Licensing Requirements for Certain Tidelands* (2007 Mass. Acts ch. 168) and the Public Benefit Determination regulations (301 CMR 13.00). Consistent with Section 8 of the legislation, I must conduct a Public Benefits Review as part of the EIR review of

projects located on landlocked tidelands that entail a new use or modification of an existing use. The ENF noted that the project will provide new public open space, interior FPAs, including publicly-accessible uses within the restored turbine halls, and improved pedestrian and bicycle facilities. The DEIR should provide an updated analysis of the project's public benefits and how it will address the PBD regulatory criteria. I will issue a PBD within 30 days of the issuance of the final Certificate.

Wetlands and Stormwater

Wetland resource areas at the site include 650 linear feet (lf) of Coastal Bank associated with the bulkhead along the shoreline, 3,500 sf of Coastal Beach, 37,500 sf of Land Under the Ocean (LUO) and 93,000 sf of LSCSF. The project will alter the entire area of LSCSF by raising the grade of the site and constructing the waterfront open space. The Proponent did not identify impacts to other wetland resource areas, but noted that potential changes to the shoreline to activate the waterfront for public use may impact the Coastal Bank and LUO. The DEIR should describe and quantify impacts to wetland resource areas and identify mitigation measures.

The project will add 2.7 acres of impervious surface to the existing 9.8 acres of impervious area. According to the ENF, there is currently no stormwater management system on the site. Untreated runoff is conveyed to the Boston Water and Sewer drainage system and discharged into Boston Harbor. The ENF generally described the elements of a new stormwater management system that will be installed to meet the requirements of the Stormwater Management Standards (SMS) of the Wetlands Regulations (310 CMR 10.00) as a redevelopment project. It will include deep-sump, hooded catch basins, stormwater treatment structures, and infiltration systems to maintain pre-development peak discharge rates and volumes and remove 80 percent of the Total Suspended Solids (TSS). The project will include construction-period sedimentation and erosion control measures and the Proponent will prepare and implement a Long-Term Operation and Maintenance Plan to ensure that the system operates as intended. The DEIR should provide a more detailed description of the proposed stormwater management system, including supporting documentation, calculations and data to demonstrate that it will comply with the SMS and BWSC standards, plans showing the locations of system components and connections to the BWSC system, and ultimate discharge points.

Traffic and Transportation

The ENF provided an overview of the project's trip generation and parking requirements. It identified a proposed study area for further analysis of the project's traffic impacts. It described existing and proposed transportation facilities in the vicinity of the project site, including public transportation services and pedestrian and bicycle facilities. The Proponent has committed to implementing TDM measures to reduce single-occupancy vehicle (SOV) trips to and from the site, but did not list any proposed measures.

The site is located within walking distance of five bus lines operated by the MBTA, including:

- Route 5: City Point to McCormack Housing, with a stop at the Andrew Station on the MBTA's Red Line subway;

- Route 7: City Point to South Station, which provides access to the Red and Silver Lines, MBTA Commuter Rail, and Amtrak rail service;
- Route 9: City Point to Copley Square, with a stop at the Broadway Red Line station and access to the Green and Orange Lines in Copley Square;
- Route 10: City Point to Copley Square with stops at the Andrew Station and Boston University Medical Center; and
- Route 11: City Point to Downtown Boston.

The project site is approximately one-half mile away from Silver Line service along Drydock Avenue and Black Falcon Avenue. The ENF noted that the South Boston Waterfront Sustainable Transportation Plan (SBWSTP), completed in 2015, found that Bus Routes 7 and 11 exceed seated capacity in the weekday morning and evening peak periods. According to the ENF, the SBWSTP identified several short-term and long-term enhancements to public transportation service in South Boston, but the ENF did not elaborate or indicate which of the improvements would add capacity that would affect transportation options to and from the site. The ENF noted that the sidewalk along Summer Street adjacent to the site is in good condition, and indicated that the project will widen the sidewalk along East 1st Street. The only bicycle accommodation is on East 1st Street east of the site. The City's 30-year Bike Network Plan envisions a cycle track on Summer Street and East 1st Street.

The project will add 20,370 unadjusted adt based on trip generation estimates derived from the Institute of Transportation Engineers (ITE) *Trip Generation Manual (9th Edition)* for Land Use Codes (LUC) 220 (Residential), 710 (Office), 310 (Hotel), and 820 (Retail). The unadjusted trip generation was adjusted to account for the use of alternative modes of transportation based on data prepared by the Boston Transportation Department (BTD), as well as internal trips between uses at the site and pass-by trips to the proposed on-site retail uses by vehicles already on the area roadway network. As adjusted, the project will generate 10,250 new vehicles trips, 4,864 trips by public transportation, and 8,780 trips by walking, biking or other means. The project will generate 661 vehicle trips during the morning peak hour and 768 vehicle trips during the evening peak hour.

The project will include 987 parking spaces. The projected parking supply was determined by calculating 0.6 spaces per 1,000 sf of office space, 0.4 spaces per residential unit, and 0.5 spaces per hotel room. The DEIR should discuss how the amount of parking proposed in the ENF compares to the parking need and supply for several comparable facilities. It should describe the number of spaces used throughout the day and peak hours for uses of parking spaces. The TIA should evaluate the potential for space sharing at the project site.

The ENF identified a proposed study area, defined with preliminary input from BPDA and BTD, as the basis of further analysis of the project's transportation impacts. Existing and future traffic conditions will be analyzed at the following intersections:

- Summer Street at Drydock Avenue and Pappas Way;
- Summer Street at the DFC;
- Summer Street at L Street and East 1st Street; and
- L Street at East 2nd Street;
- L Street at East 3rd Street;

- L Street at East Broadway;
- East 1st Street at K Street;
- East 1st Street at M Street and the proposed site driveway;
- East 1st Street at West Street and Pappas Way;
- L Street at East 5th Street;
- L Street at East 8th Street; and
- L Street at Day Boulevard.

The DEIR should include a traffic study prepared consistent with the EEA/Massachusetts Department of Transportation (MassDOT) *Transportation Impact Assessment (TIA) Guidelines* issued in March 2014 and the City of Boston's requirements for traffic studies. It should provide the data and analysis requested in MassDOT's comment letter. The analysis should describe both existing and proposed roadway, pedestrian, and bicycle conditions; public transit capacity and infrastructure; roadway and intersection volumes; safety issues; and capacity analyses for the weekday morning and evening peak hours. The TIA should provide this analysis for Existing, No Build, Build, and Build with mitigation scenarios. The DEIR should clearly identify any mitigation measures that will be necessary to minimize impacts to the local road network, including improvements to bicycle and pedestrian facilities, public transportation services, and roadway improvements. The DEIR should evaluate the feasibility of providing or expanding safe pedestrian and bicycle facilities on area roadways and describe improvements that will be necessary to achieve the high pedestrian and bicycle mode shares anticipated in the ENF. It should summarize the SBWSTP and identify and conclusions or recommendations that are relevant to the project site or that may improve transportation options to the site, including water transportation. It should provide a trip distribution for the project, an analysis of vehicle crash data for study area intersections, and traffic signal warrants at any intersection where signalization may be proposed.

The DEIR should provide a detailed analysis of the project's impact to the MBTA bus network that serves the site. It should review the capacity of bus service to the site under existing conditions and upon completion of the project, taking into account other projects in the vicinity that are under construction or planned. The TIA should include a comprehensive review of measures to mitigate the project's impact on bus capacity and capacity of the local public transportation system in general. The Proponent should consult with MassDOT and the MBTA to identify the level of required transit improvements and a schedule for implementation. The effect of the mitigation measures identified through this process should be included in a comparison of future MBTA service operations under a No Build and Build with mitigation scenarios.

The DEIR should include a comprehensive TDM program that will provide incentives for using alternative transportation and discourage SOV trips. The TDM program should evaluate all feasible measures to reduce trip generation associated with the project. The TDM program should be based on specific measures that have been successful in reducing trip generation for similar projects. The Proponent should consult with MassDOT, MassRIDES and local Transportation Management Associations (TMA) to discuss specific measures that have been successful in reducing trip generation for similar projects in Boston. The DEIR should report on any existing shuttles that could serve the site or the feasibility of establishing new shuttle service. The TDM plan should seek to maximize the use of pedestrian and bicycle facilities, offer

incentives for using public transportation and local transportation and shuttle services, and encourage the use of low-emissions vehicles. The DEIR should review the potential for pedestrian and bicycle improvements to area roadways to promote non-vehicular access to the site.

The DEIR should include an outline of a Transportation Monitoring Program designed to evaluate the transportation-related assumptions made in the DEIR, the adequacy of mitigation measures, and the effectiveness of the TDM program.

Climate Change

Executive Order 569: Establishing an Integrated Climate Change Strategy for the Commonwealth (EO 569) was issued on September 16, 2016. EO 569 recognizes the serious threat presented by climate change and directs agencies within the administration to develop and implement an integrated strategy that leverages state resources to combat climate change and prepare for its impacts. The Order seeks to ensure that Massachusetts will meet greenhouse gas emissions reduction limits established under the Global Warming Solution Act of 2008 (GWSA) and will work to prepare state government and cities and towns for the impacts of climate change.

The GHG Policy and requirements to analyze the effects of climate change through EIR review is an important part of this statewide strategy. These analyses advance proponents' understanding of a project's contribution and vulnerability to climate change. I strongly encourage the Proponent to consider complementary approaches – such as passive design for residential buildings, incorporation of renewables and inclusion of low impact development in site design - which can improve the project's resiliency, reduce GHG emissions and conserve and sustainably employ the natural resources of the Commonwealth.

Adaptation and Resiliency

The ENF provided a review of the project's design measures for increasing its resiliency to extreme weather, extreme precipitation, and sea level rise caused by climate change. Future weather conditions are expected to include periods of drought, tropical rainfall patterns, and extreme heat and cold stretches, and increases in the number of days with extreme heat (over 90 degrees F and 100 degrees F). The project will include measures to withstand extreme heat events, such as landscaped open space to reduce heat island effects. The project will use native vegetation to minimize the need for irrigation. The project may reuse greywater and/or stormwater for irrigation.

The project will also include measures to add resiliency in response to flooding events caused by extreme precipitation and sea level rise. The ENF reviewed three reports that estimate the extent of sea level rise in the region: CZM's *Sea Level Rise: Understanding and Applying Trends and Future Scenarios for Analysis and Planning* (2013), the *MassDOT-FHWA Pilot Project Report: Climate Change and Extreme Weather Vulnerability Assessments and Adaptation Options for the Central Artery* (2015), and *Climate Change and Sea Level Rise Projections for Boston* (2016), prepared by the Boston Research Advisory Group (BRAG) for the City of Boston. According to the ENF, these studies generally predict that the elevation of the 100-year flood under future sea levels will be approximately 14.5 ft NAVD 88 to 16 ft

NAVD 88 at the end of this century (2070 to 2100) under high CO_2 emissions scenarios. The project will set the first-floor elevation at approximately 15 ft NAVD 88, which is three feet above the existing 100-year flood elevation. The project will include the following design measures to increase resiliency:

- The potential use of movable and permanent flood barriers at garage entrances;
- Elevating critical electrical system components and emergency generators;
- High-performance Heating, Ventilation and Air Conditioning systems that function efficiently under projected future conditions;
- Operable windows in the residential buildings;
- On-site energy generation, including a combined heat and power (CHP) system and solar photovoltaic systems;
- Retaining stormwater from the 1-inch precipitation event;
- Stormwater infrastructure designed for short-duration, high-intensity precipitation events;
- Landscaping with native, drought-resistant plants; and
- Installation of backflow preventers on connections to the sanitary sewer system.

In the DEIR, the Proponent should review any additional design features that may provide resiliency and support adaptation under future climate scenarios. At a minimum, the Proponent should consider adopting measures such as high albedo roofing material, water-tight conduits, and pervious pavement. The DEIR should provide additional analysis on the reuse of non-potable water for irrigation.

Sustainable Design

Article 37 of the Boston Zoning Code requires that the project be certifiable by the U.S. Green Building Council's Leadership in Energy and Environmental Design program. The ENF included a scorecard rating sheet evaluating the residential and hotel buildings according to the LEEDv4 for New Construction (BD + C) standards and a scorecard evaluating the office buildings according to the LEEDv4 for Core & Shell. At present, the project will meet the lowest LEED certification level. I encourage the Proponent to strive for certification at a higher level and note that adopting additional building energy efficiency measures, as discussed in more detail below, would contribute considerably toward that goal. The DEIR should include a full evaluation of sustainable design elements for the buildings and exterior site areas, including measures identified in the LEED rating system.

Greenhouse Gas (GHG) Emissions

This project is subject to review under the May 5, 2010 MEPA GHG Policy. The Policy requires Proponents to quantify carbon dioxide (CO_2) emissions and identify measures to avoid, minimize or mitigate such emissions. The analysis should quantify the direct and indirect CO_2 emissions of the project's energy use (stationary sources) and transportation-related emissions (mobile sources). Direct emissions include on-site stationary sources, which typically emit GHGs by burning fossil fuel for heat, hot water, steam and other processes. Indirect emissions result from the consumption of energy, such as electricity, that is generated off-site by burning of

fossil fuels, and from emissions from vehicles used by employees, vendors, customers and others.

Stationary Sources

The City of Boston has adopted the Massachusetts Stretch Energy Code (SC). Therefore, the project will be required to meet the applicable version of the Stretch Code in effect at the time of construction. The Stretch Code increases the energy efficiency code requirements for new construction (both residential and commercial) and for major residential renovations or additions in municipalities that adopt it. The current SC requires a reduction in energy use of 10 percent compared to that achieved by complying with the baseline energy provisions of the State Building Code.

The ENF provided a preliminary analysis of the project's stationary-source GHG emissions and reviewed potential mitigation measures, such as energy-efficient HVAC systems and on-site energy generation. The project will incorporate the following energy conservation measures:

- A high-efficiency condenser water plant that exceeds the base energy code;
- High-efficiency water-source heat pumps and water-cooled rooftop units;
- Low lighting power density (LPD);
- Ventilation air heat recovery;
- Condensing hot water boilers and water heaters; and
- Building commissioning to ensure that energy-related equipment has been correctly installed.

Compared to a base design case that meets Building Code energy requirements, these measures are expected to achieve energy savings of 15.4 percent, resulting in a reduction of GHG emissions of 10.7 percent (7,818 tons per year (tpy) compared to 8,700 tpy under the baseline design case). According to the ENF, rooftop solar PV systems and CHP systems will be further evaluated as the design of the buildings progresses.

The DEIR should include a full analysis consistent with the EEA GHG Policy. It should calculate and compare GHG emissions from: 1) a Base Case corresponding to the current Massachusetts Building Code and 2) a Preferred Alternative that achieves greater reductions in energy use and GHG emissions than required by the Building Code. The GHG analysis should clearly demonstrate consistency with the objectives of MEPA review, one of which is to document the means by which Damage to the Environment can be avoided, minimized and mitigated to the maximum extent feasible. The Proponent should identify the model used to analyze GHG emissions, clearly state modeling assumptions, explicitly note which GHG reduction measures have been modeled, and identify whether certain building design or operational GHG reduction measures will be mandated by the Proponent to future occupants or merely encouraged for adoption and implementation. The DEIR should include the modeling printout for each alternative and emission tables that compare base case emissions in tons per year (tpy) with the Preferred Alternative showing the anticipated reduction in tpy and percentage by emissions source (both direct and indirect). Other tables and graphs may also be included to convey the GHG emissions and potential reductions associated with various mitigation measures

as necessary. The DEIR should provide the information and formatted tables requested in DOER's comment letter.

The project is comprised primarily of residential buildings, which are well-suited to Passive design strategies that would significantly increase energy efficiency, minimize GHG emissions, and reduce utility costs for residents. A passive design residential building that was recently completed at 512 East 2nd Street in South Boston is expected to use 95 percent less energy for cooling and heating than a conventional building.[1] As noted by DOER, the use of passive design alone would reduce GHG emissions by over 40 percent. The DEIR should analyze an alternative project design that incorporates Passive design in the residential buildings. The Proponent should consult with staff from DOER and MEPA prior to submitting the DEIR.

The DEIR should present an evaluation of mitigation measures identified in the GHG Policy Appendix. In particular, the feasibility of each of the mitigation measures outlined below should be assessed for each of the major project elements, and if feasible, GHG emissions reduction potential associated with major mitigation elements should be evaluated to assess the relative benefits of each measure. The DEIR should explain, in reasonable detail, why certain measures, which could provide significant GHG reductions, were not selected – either because it is not applicable to the project or is considered technically or financially infeasible. The DEIR should assess the feasibility of the following mitigation measures:

- Minimize energy use through building orientation and evaluate its impacts on energy usage, including solar gain, day-lighting and viability of solar photovoltaic (PV) systems;
- Use of high-albedo roofing materials;
- Install high-efficiency HVAC systems and adequate numbers of thermal zones to support temperature controls;
- Reduce energy use through peak shaving or load shifting strategies;
- Maximize interior day-lighting through floor-plates, increased building perimeter and use of skylights, clerestories and light wells;
- Incorporate window glazing to balance and optimize daylighting, heat loss and solar heat gain performance;
- Incorporate roof and wall insulation to minimize heat loss and minimize uncontrolled infiltration through the building envelope;
- Incorporate lighting motion sensors, climate control and building energy management systems;
- Install energy efficient LED lighting, both exterior and interior;
- Evaluate additional measures to reduce project plug loads, including the use of more efficient equipment (such as Energy Star), consider energy consumption as a factor in the selection of special equipment, and consider power management techniques;
- Develop a tenant manual to encourage energy and water conservation, recycling, and use of Energy Star rated appliances to reduce plug loads; and
- Consider the development of a "green lease" program whereby tenants agree to pay the landlord recovery costs for energy efficiency improvements based on predicted cost savings to the tenant.

[1] According to the website for the building, http://www.distillerynorth.com

According to DOER, the extensive fenestration of the office buildings exceeds Building Code thresholds and negates energy-efficiency gains of the proposed HVAC system. The DEIR should include an analysis of wall/fenestration scenarios that exceed minimum Building Code specifications.

The DEIR should analyze the potential for on-site energy generation by rooftop solar PV and CHP systems and document the expected energy savings and reduction in GHG emissions from each generating technology. The Proponent should consider the use of one or more CHP systems for this project. Beyond providing efficient power for lighting and heating, CHP can also and produce off-grid power in the event of a black-out as a climate change resiliency measure. I encourage the Proponent to consult with DOER regarding this analysis to ensure that the analysis accurately reflects the benefits of CHP.

The solar feasibility analysis should consider solar PV for both a first-party and a third-party ownership structure. The analysis should:

- Estimate available roof area (excluding areas dedicated for mechanical equipment) or ground space for solar panel installation;
- State the assumed panel efficiency;
- Estimate electrical output of the potential system; and
- Estimate annual GHG reductions due to the use of renewable energy versus electricity or natural gas.

The analysis should include a narrative and data to support the Proponent's adoption (or dismissal) of solar PV systems as a feasible measure to avoid, minimize or mitigate project-related GHG emissions and Damage to the Environment. For those projects that choose not to implement the use of solar in conjunction with the project, the analysis should include:

- A commitment to construct the project as "solar-ready". At a minimum, this commitment should include design of a structure capable of supporting solar-related infrastructure. Such a commitment may also include provision of interconnection and inverter equipment, or other design features to facilitate future solar installations.
- Completion of cost analysis to determine the overall financial feasibility of installation of solar, including potential payback periods for first-party and third-party ownership systems.
- Discussion of potential environmental constraints (shading, presence of wetlands, etc.) limiting the application of solar on-site.

In addition, I encourage the Proponent to consider how solar may be incorporated into the open space design and surface parking. In particular, it could be incorporated in a way compatible with the goal that the open space acknowledge the industrial history and nature of the site while providing renewable energy and educational opportunities. I encourage the Proponent to consider design options that will allow for cost-effective integration of efficiency or renewable energy measures in the future when such measures may become more financially or technically feasible. The DEIR should include a review of available financial incentives offered by utility companies to help implement energy efficiency measures that would reduce GHG emissions. These incentives may be performance-based and tied to power and fuel avoided compared to a

building designed to Building Code requirements. Incentives may also be available to offset design charrette and energy modeling costs. For gas, more information is available on National Grid's website and in National Grid's New Construction Guide.[2] For electricity, more information can be obtained by contacting newconstructionMA@eversource.com. The GHG analysis should report on financial incentives that may be available from utility companies to help offset the cost of energy efficiency measures of this project.

Mobile sources

The GHG analysis should include an evaluation of potential GHG emissions from mobile emissions sources. The DEIR should follow the guidance provided in the Policy for *Indirect Emissions from Transportation* to determine mobile emissions for Existing Conditions, Build Conditions, and Build Conditions with Mitigation. The Proponent should thoroughly explore means to improve traffic operations and minimize overall single occupancy vehicle trips. Improvements in traffic operations that minimize idling time can minimize overall project-related mobile source emissions. The DEIR should also review measures to promote the use of low-emissions vehicles, including installing EV charging stations and providing designated parking spaces for these vehicles. The Build with Mitigation model should incorporate roadway improvements, TDM measures, and any other transportation mitigation to be implemented by the Proponent.

Mitigation

The DEIR should include a commitment to provide a self-certification to the MEPA Office at the completion of the project. It should be signed by an appropriate professional (e.g. engineer, architect, transportation planner, general contractor) indicating that all of the GHG mitigation measures, or equivalent measures that are designed to collectively achieve identified reductions in stationary source GHG emission and transportation-related measures, have been incorporated into the project.

Hazardous Waste

The ENF documented seven releases of oil and/or hazardous materials regulated under M.G.L. chapter 21E, the Massachusetts Contingency Plan (MCP). The releases have been assigned the following MassDEP Release Tracking Numbers (RTN):

- RTN 3-12817: Sulfuric acid;
- RTN 3-13007: Fuel oil containing Total Petroleum Hydrocarbon (TPH), Extractable Petroleum Hydrocarbon (EPH), volatile organic compounds (VOC), and polycyclic aromatic hydrocarbons (PAH);
- RTN 3-14575: Sulfuric acid;

[1] National Grid Commercial and Industrial Construction Services: https://www.nationalgridus.com/Trade/EE-Programs-Solutions/CI-New-Construction-Services?gclid=Cj0KEQjwrte4BRD-oYi3y5_AhZ4BEiQAzIFxn_VdWabqesqI52YlID4qJ0nC6a4rTuojTUh33NDqAeoaAmeb8P8HAQ

New Construction Guide: https://www.nationalgridus.com/media/trade/NewConstruction_Guide_Digital_Update.pdf

- RTN 3-17596: Petroleum with EPH and Volatile Petroleum Hydrocarbons (VPH);
- RTN 3-22165: Lubricating oil;
- RTN 3-26342: Sulfuric acid; and
- RTN 3-28038: Weathered oil stains containing EPH and polychlorinated biphenyls (PCB).

According to the ENF, all of the releases have been addressed in accordance with the MCP. Remediation of one of the releases of fuel oil included the adoption of an Activity and Use Limitation (AUL) restriction that allows industrial and commercial uses, but prohibits residential uses, playgrounds, and similar uses on part of the project site. A modification to the AUL to allow a currently prohibited use would require a determination of No Significant Risk (NSR) of harm to human health. According to MassDEP, additional remediation of the affected area will be required to achieve a condition of NSR. If capping the area of contaminated soil is proposed to achieve an NSR, at least three feet of clean soil should be placed over the contaminated area in unpaved areas, or one foot of clean soil in areas to be paved. Contaminated soil left in place under the cap must be separated from the clean material by a geotextile or other marker, and an AUL would be required to identify the maintenance requirements of the cap. Construction activities involving excavating or removing contaminated soil or groundwater must be conducted in accordance with the MCP, and would require additional sampling, analysis, and mitigation measures, such as dust control, that must be documented and submitted to MassDEP. MassDEP also identified a release associated with a fuel tank (RTN-4519) that was located near the project site's northwest property line. An AUL prohibiting residential and recreational use was placed on the land area affected by the release. The DEIR should identify the location and extent of the release and the area subject to the AUL and describe if any part of the project site or proposed uses are affected.

I note the concerns of the community about potential exposure to contaminated soils at the site. The DEIR should describe a proposed remediation strategy to achieve an NSR condition at the site. It should identify whether the existing AUL will be modified and describe any remaining use conditions or requirements that may be applicable. The DEIR should include a draft Soils Management Plan or at a minimum generally describe how excavation of contaminated soils at the site will be conducted to protect human health during the construction period. The DEIR should describe how material will be stored on-site, the process for determining the extent of contamination and disposal options, and measures to ensure the safe transfer of material to disposal sites. As noted by MassDEP, indoor air quality in buildings constructed over contaminated sites may be compromised by chemical or petroleum vapors. The DEIR should include an evaluation of contaminant concentrations, assess the potential for indoor air impacts, and identify mitigation measures.

Water and Wastewater

The project will generate 299,900 gpd of wastewater and consume 329,890 gpd of drinking water. Wastewater from the site will be directed to existing Boston Water and Sewer Commission (BWSC) sewer mains in East 1st Street and Summer Street. According to the Massachusetts Water Resources Authority (MWRA), the sewer mains are connected to a combined sewer that eventually discharges into BWSC's Boston Main Interceptor (BMI). The BMI conveys flow to the MWRA's Deer Island treatment plant via the Columbus Park

headworks. In large storms, the system may result in combined sewer overflow (CSO) discharges into Reserved Channel and Fort Point Channel. The project will be required to mitigate its contribution of flow into the BWSC sanitary system. MassDEP regulations at 314 CMR 12.04(2)(d) specify that communities with combined sewer overflows (CSOs), such as Boston, must require projects generating 15,000 gpd or more of new wastewater flow to remove four gallons of infiltration and inflow (I/I) for each gallon of wastewater. The DEIR should include a commitment to I/I removal and identify any mitigation projects or monetary contribution by the Proponent. The Proponent should consult with BWSC to identify appropriate I/I mitigation for this project. As noted by the MWRA, groundwater discharges into the sanitary system are prohibited. The DEIR should indicate whether the project will require a discharge permit from the MWRA's Toxic Reduction and Control (TRAC) Department.

The ENF tabulated wastewater generation for each building (Table 8-1). The DEIR should include a revised table that includes water use and, if necessary, updated wastewater generation for each building, including estimates of peak and continuous maximum water demand for each proposed use and for landscape irrigation and air conditioning make-up water. The DEIR should include information and plans describing the existing and proposed water and wastewater systems on site and in the BWSC system. The DEIR should analyze flow pressure and/or existing capacity of the BWSC water and sewer system that serve the site. The DEIR should describe the location and size of infrastructure, connections to the BWSC water and sewer systems, and the path and ultimate disposal of wastewater from the site. The DEIR should identify and describe water conservation measures that will be incorporated into design and operations. At a minimum, the DEIR should review the feasibility of installing low-flow fixtures and using rainwater or gray water for irrigation and other purposes.

Historic Resources

According to the ENF, the Massachusetts Historical Commission (MHC) has included the site in the Inventory of Historic and Archaeological Assets of the Commonwealth (BOS.12943) and determined that the entire site is eligible for listing on the National Register of Historic Places. The ENF described the long history of power generation at the site. The power plant was among the earliest facilities of its kind and was at the forefront of advances in generating technology. Among the most notable buildings at the site are the three turbine halls to be restored and reused as part of the project for public uses such as retails markets and cultural activities. The project includes large openings in the building walls to encourage pedestrian flow and connections to exterior plazas. In addition, the project includes the removal a portion of Turbine Hall 2 to construct an internal street across the site and a portion of Turbine 3 adjacent to East 1st Street to expand the sidewalk through the building.

The DEIR should include the additional information requested by MHC to assist in evaluating the effects of the project on historic resources. The DEIR should include photographs of the interior of the buildings keyed to a site plan, information on the structural and historic integrity of the buildings, and greater detail about the proposed reuse and modification to the turbine halls. As suggested by the Boston Preservation Alliance, the DEIR should describe the 1898 masonry building and evaluate its potential for reuse or preservation.

Air Quality

In accordance with the State Implementation Plan (SIP) for ozone attainment, the proponent must conduct an indirect source review analysis. This analysis should be conducted in accordance with MassDEP *Guidelines for Performing Mesoscale Analysis of Indirect Sources.* The Proponent should consult with MassDEP for guidance and for confirmation of the appropriate study areas. The purpose of the analysis is to determine whether and to what extent the project will increase the amount of volatile organic compounds (VOC) and nitrogen oxides (NO_x) emitted in the project area and to determine consistency with the SIP. The analysis should model emissions under No Build and Build conditions. If VOC emissions are greater than the No Build scenario, the proponent must provide measures to mitigate this impact, including a TDM Program.

Solid Waste

The DEIR should characterize the solid waste expected to be generated by the project. In 2014, Massachusetts banned the disposal of commercial organic wastes by businesses and institutions that generate a ton or more of organic materials per week. Business subject to the ban must use composting, conversion (such as anaerobic digestion), recycling or reuse of organic waste. The DEIR should indicate whether any proposed uses may be subject to the waste ban and how it may dispose of its organic waste.

The DEIR should describe measures to reduce and recycle organic and other wastes through waste diversion and recycling programs. As noted by MassDEP, incorporating the design, infrastructure, and contractual components of the project's solid waste facilities at this stage will help ensure the success of future waste reduction and recycling efforts. The Proponent should refer to MassDEP's comment letter for additional information and links to web sites providing technical assistance.

Construction Period

The DEIR should provide drafts of the Construction Management Plan (CMP) and Transportation Access Plan Agreement (TAPA). It should identify the schedule for construction of various elements and phases. It should identify construction-period impacts and mitigation relative to noise, air quality, water quality, and traffic, including pedestrians, bicyclists and transit riders. The DEIR should document any contaminated soil or groundwater regulated under the Massachusetts Contingency Plan (MCP) and describe remediation and mitigation measures if necessary. The DEIR should confirm that the project will require its construction contractors to use Ultra Low Sulfur Diesel fuel, and discuss the use of after-engine emissions controls, such as oxidation catalysts or diesel particulate filters. More information regarding construction-period diesel emission mitigation may be found on MassDEP's web site at http://www.mass.gov/dep/air/diesel/conretro.pdf.

The DEIR should provide more information regarding the project's generation, handling, recycling, and disposal of construction and demolition debris (C&D) and identify measures to reduce solid waste generated by the project. I strongly encourage the Proponent to commit to C&D recycling activities as a sustainable measure for the project. Demolition of any structures must comply with the MassDEP Asbestos Regulations (310 CMR 7.15) that became effective on

June 20, 2014. These regulations require a pre-demolition and post-abatement surveys and inspections by a licensed asbestos monitor. The Proponent should consult the MassDEP comment letter with regard to regulatory requirements and potential mitigation measures for the removal, handling, and disposal of asbestos containing material (ACM) and other demolition debris during the construction period. The Proponent is reminded that any contaminated material encountered during construction must be managed in accordance with the MCP and with prior notification to MassDEP.

The DEIR should describe potential construction period dewatering requirements, discuss how dewatering will be conducted in a manner consistent with MWRA, MassDEP and/or BWSC regulations/guidelines, and identify any necessary permits. The draft CMP should include appropriate erosion and sedimentation control BMPs. I encourage the Proponent to adopt erosion and sedimentation controls consistent with a Stormwater Pollution Prevention Plan prepared in accordance with the NPDES Construction General Permit requirements.

Mitigation and Draft Section 61 Findings

The DEIR should include a separate chapter summarizing proposed mitigation measures. This chapter should also include draft Section 61 Findings for each permit to be issued by State Agencies. The DEIR should contain clear commitments to implement these mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and a schedule for implementation. The DEIR should clearly indicate which mitigation measures will be constructed or implemented based upon project phasing, either tying mitigation commitments to overall project square footage/phase or environmental impact thresholds, to ensure that measures are in place to mitigate the anticipated impact associated with each development phase.

Responses to Comments

The DEIR should contain a copy of this Certificate and a copy of each comment letter received. In order to ensure that the issues raised by commenters are addressed, the DEIR should include direct responses to comments to the extent that they are within MEPA jurisdiction. This directive is not intended to, and shall not be construed to, enlarge the Scope of the DEIR beyond what has been expressly identified in this certificate.

Circulation

The Proponent should circulate the DEIR to those parties who commented on the ENF, to any State Agencies from which the Proponent will seek permits or approvals, and to any parties specified in section 11.16 of the MEPA regulations. Per 301 CMR 11.16(5), the Proponent may circulate copies of the EIR to commenters in CD-ROM format or by directing commenters to a project website address. However, the Proponent must make a reasonable number of hard copies available to accommodate those without convenient access to a computer and distribute these upon request on a first-come, first-served basis. The Proponent should send correspondence accompanying the CD-ROM or website address indicating that hard copies are available upon request, noting relevant comment deadlines, and appropriate addresses for submission of comments. The DEIR submitted to the MEPA office should include a digital copy of the

complete document. A copy of the DEIR should be made available for review at the Boston Public Library (BPL) and the South Boston branch of the BPL.

July 14, 2017
Date

Matthew A. Beaton

Comments received:

06/232017	Massachusetts Water Resources Authority (MWRA)
06/30/2017	Army Corps of Engineers (ACOE)
06/30/2017	Boston Water and Sewer Commission (BWSC)
07/06/2017	Massachusetts Office of Coastal Zone Management (CZM)
07/06/2017	Massachusetts Port Authority (Massport)
07/06/2017	Department of Energy Resources (DOER)
07/07/2017	Representative Stephen F. Lynch, 8th District
07/07/2017	Senator Linda Dorcena Forry, First Suffolk District
07/07/2017	Representative Nick Collins, 4th Suffolk District
07/07/2017	City Councilor Michael F. Flaherty
07/07/2017	South Boston Neighborhood Development Corporation (SBNDC)
07/07/2017	Massachusetts Department of Environmental Protection (MassDEP)/ Northeast Regional Office (NERO)
07/07/2017	Massachusetts Department of Environmental Protection (MassDEP)/Waterways Regulation Program (WRP)
07/07/2017	Boston Planning and Development Agency (BPDA)
07/07/2017	Conservation Law Foundation
07/07/2017	Boston Preservation Alliance
07/07/2017	Massachusetts Historical Commission (MHC)
07/07/2017	Boston Harbor Now
07/07/2017	Eileen Smith
07/07/2017	WalkBoston
07/11/2017	Massachusetts Department of Transportation (MassDOT)

MAB/AJS/ajs

Strysky, Alexander (EEA)

From: Helms, Joshua M CIV USARMY CENAE (US) <Joshua.M.Helms@usace.army.mil>
Sent: Friday, June 30, 2017 10:30 AM
To: Strysky, Alexander (EEA); Flaherty, Erin (EEA)
Cc: Newman, Barbara H CIV CENAE CENAD (US)
Subject: L Street Station Redevelopment - NAE-2017-01614

Alex,

Please be advised that any proposed work on the seawall or bulkheads, the existing piers, and intake/outfall structures associated with this project would require a permit from the US Army Corps of Engineers. Additionally, any future work or construction taking place from the water may also require a permit from the Corps of Engineers as would the storage of any construction materials within the waterway. This may also trigger the need for Section 408 review from the Corps of Engineers Navigation Branch and permission from the District Engineer as the project is directly abutting a Federal Navigation Project.

Since the project is eligible for listing under the National Register of Historic Places, the project would at minimum require a PCN under Section 106 of the National Historic Preservation Act. It is more likely that this project would require an Individual Permit.

Finally, please consider the need for the follow permits and authorizations:

MA Office of Coastal Zone Management - Individual Federal Consistency - Required MA DEP - Chapter 91 License - Required If the project involves expansion or removal of the existing seawall, the project would trigger the need for a Section 401 Water Quality Certification at the state level as it would require a permit from the US Army Corps of Engineers under Section 404 of the Clean Water Act. Any additional placement of dredge and fill material within the channel may also trigger the need for a 401 WQC.

In addition to permitting requirements for this project, I would ask that the MEPA office requests transportation studies in relation to this project. The Corps would request that waterway impacts be included in these studies. With the proposed expansion of Conley Terminal and future projects at Black Falcon Terminal, there may concerns with increased recreational boating and commercial ferry vessel traffic within the waterway that may be attributed to the construction at this location. As the project is likely to require an individual permit from the USACE, the Corps must consider navigation impacts within the area and cumulative impacts to the waterway that may result from the construction of the project.

If you have any questions comments, or concerns, do not hesitate to contact myself or Barbara Newman, Chief - Permits and Enforcement Branch A. Please continue to involve USACE in the planning process for this project and include the file number NAE-2017-01614 on any future correspondence.

Sincerely,

Josh Helms

Josh Helms
Project Manager
U.S. Army Corps of Engineers
New England District
Regulatory Division
696 Virginia Road

Concord, MA 01742-2751
978-318-8211

BOSTON HARBOR NOW

Are you on board?

15 State Street, Suite 1100
Boston, MA 02109
617.223.8671
bostonharbornow.org

July 7, 2017

Via email to: Alexander.Strysky@state.ma.us

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs (EEA)
MEPA Office, Attn: Alex Strysky, EEA# 15692
100 Cambridge Street, Ste 900
Boston, MA 02114

Re: L Street Station Environmental Notification Form, EEA# 15692

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Environmental Notification Form (ENF) submitted by HRP 776 Summer Street LLC (HRP). Our policy team has reviewed the project presentation at a series of open house meetings, participated in the community design charrettes, and was present during the MEPA site visit on June 21, 2017.

We want to acknowledge the BPDA for hosting early community outreach events and walking tours of the Turbine Hall. Through its company representatives and community engagement, HRP has shown a willingness to listen and include public input in the early planning and design stages. We support increased public participation throughout the planning process and look forward to continued collaborations as the project moves forward through permitting and licensing.

As presented in the ENF, the proposed filing is for the redevelopment of the former Exelon Site located in a Designated Port Area along the Reserved Channel in South Boston. On June 20, 2017 HRP submitted a request to the Office of Coastal Zone Management (CZM) for a boundary review of this portion of the South Boston Designated Port Area.

Defined as "land and water areas with certain physical and operational features that have been reserved by the Commonwealth for maritime-industrial uses," Designated Port Area policy is intended to protect and promote water-dependent industries and prevent the loss of the areas and infrastructure required to support such industry. As longtime advocates of the working port,

Boston Harbor Now is concerned about the piecemeal de-designation of these limited land areas. We will submit a more detailed comment letter responding to the boundary review request. It our position that until the Secretary has reviewed and issued a final determination of the DPA boundary review request, it is premature to engage in a detailed discussion of the proposed redevelopment.

The following four areas will require more careful consideration should the project move forward through the permitting process:

- Compatibility with existing maritime industrial uses
- Open space and access
- Transportation, and
- Climate Preparedness

Project Description
As described in the ENF, the campus will encompass 15 acres of land along the Reserved Channel in the South Boston waterfront. Of the total land area, 4.1 acres are on filled tidelands and within Chapter 91 jurisdiction. Because the proposed development is for a non-water dependent use, the project will require a new Chapter 91 license.

There will be several buildings on site ranging in height from 80 feet to a maximum 220 feet. These buildings will include 339,639 SF of office space spread across two buildings, 68,077 SF for retail use, 1.5 million SF of 1,588 residential units across five residential blocks, and a 150-key hotel. The parking needs for these new structures will be serviced by 987 on-site parking spaces with the possibility for additional street parking.

The entire project will be phased over a 10-year period starting in 2018. Project construction will begin with the rehabilitation of the Turbine Hall and residential areas along First Street.

Existing Maritime Industrial Uses
The campus is bordered by the South Boston neighborhood to the south, the Conley Terminal Dedicated Freight Corridor (DFC) to the north, and maritime industrial uses to the immediate East and West. The Massport operated Conley Terminal runs along East First Street and is an active working port. In anticipation of projected future growth in container activity at Conley and to address neighborhood concerns over noise and dust, Massport invested nearly $35 million on a series of facility and operational improvements:

1. Acquisition of the former Coastal Oil site
2. Construction of the 2/3-mile Thomas J. Butler Freight Corridor to move container truck traffic away from residents along East First Street and portions of Summer Street; and
3. Construction of the new 4.2-acre Thomas J. Butler Memorial Park to serve as a significant noise and visual buffer.

To our knowledge, no other mixed-used Boston Harbor waterfront development has a dedicated truck route running through a section of the parcel. Trucks are the lifeline of Boston's working port and the Dedicated Freight Corridor is the major truck route serving Conley Terminal with heavy industrial traffic at all hours of the day and night. It is essential that, before project plans are finalized and approved, the proponents work with the Massport maritime

department to ensure that the proposed mixed-use development does not impact truck access to Conley Terminal and other working port businesses. To minimize potential conflicts of use, future filings should include additional details of truck traffic to and from Conley Terminal as well as truck loading/offloading activities planned on the abutting Coastal Oil site.

Finally, due to the proximity of the proposed development to marine industrial properties, we suggest exploring a covenant or alternative agreement in property leases and sales to acknowledge baseline levels of noise and other impacts resulting from truck traffic and other marine industrial businesses. Additional opportunities for soundproofing should also be explored.

Public Benefits

The redevelopment of this site will make a currently inaccessible waterfront area available for public use and enjoyment. The project will include the following public benefits:

- Cleanup and abatement of contaminated project site
- Creation of Arts and Industry space
- Publicly accessible open space
- New retail space
- Outdoor dining areas
- Bicycle and pedestrian oriented streets, and
- Two additional vehicular access points/driveways into the Site

Figures 3.9a and 3.9b include a dozen examples of outdoor spaces and construction materials used in similar industrial areas around the country. We appreciate the proponent's efforts to present a potentially diverse set of open space experiences for the general public. We are especially encouraged by the focus on arts and culture.

The proposed project will include approximately 104,500 SF of total public open space, a little over 50,000 SF will be located along the waterfront and adjacent to the existing Dedicated Freight Corridor.

We are concerned about the ENF's characterization of current maritime-industrial activities at DFC and nearby Conley Terminal operations. These areas have active industrial uses that add a significant amount of noise, dust, and vibrations to the area. The design and programming of the public areas along the northern edge of the site must reconcile two very different uses--general public use and the continued industrial operations of Conley Terminal and other working port businesses. A successful design and activation plan will minimize negative impacts to existing water-dependent industrial uses.

Transportation

We strongly support Mayor Walsh's commitment to a carbon-neutral Boston by 2050. This is an ambitious goal that requires significant collaborations between the public sector and private development. This proposal will add a substantial number of new residents and workers to an already overburdened transportation and parking system in South Boston.

Currently, the project site has 275 existing parking spaces. The ENF states the proponent will add 712 new spaces for a total of 987 on-site parking spaces. Preliminary traffic studies expect an increase from zero trips per day to 20,370 unadjusted/8,780 adjusted vehicle trips per day. Of these new trips, 661 are expected during the morning rush hour and 768 in the evening rush hour.

Table 5-4 of the ENF points to five existing MBTA bus routes within walking distance of the project site. Only one, Route 7, has a stop immediately adjacent to the property along Summer Street and is the only bus option for inbound service across the Reserved Channel to the Seaport and Downtown. During peak commuting hours this route consistently operates over capacity and does not operate at all on Sundays. With the nearest T stations more than a 10-minute walk from the site, increased access to public transportation is a critical issue that must also be addressed in future project filings.

Section 5 of the ENF explores a number of options to alleviate transportation related concerns:

- Creation of bicycle accommodations in accordance with the Boston Transportation Department Guidelines.
- Creation of a shared-use path along East 1st Street
- Increased reliance on ride sharing services as an alternative method of transportation
- Shuttle services to and from the Project site
- Enhancements to Route 7 and reinstatement of the Silver Line 3 to City Point, and
- Implementation of a robust program of TDM strategies

After reviewing the Transportation section of the ENF, the collective traffic impacts of the proposed development remain unclear. Addressing the traffic and parking needs are high on the priority list for the South Boston neighborhood. The additional density and daily trips anticipated from the proposed project are likely to exacerbate a growing problem. Moving forward, the project must do more to address transportation concerns.

Future project filings and the DEIR should include a traffic impact analysis that acknowledges commercial, truck, public transit and commuter vehicle traffic, especially for intersections that will experience increased congestion at Summer Street and East First Street.

Climate Resilient Design

We note that the ENF discussion of climate preparedness is thoughtful and appropriately conservative. We appreciate the inclusion of climate change data from several sources including the Office of Coastal Zone Management, MassDOT, the Boston Research Advisory Group (BRAG), and the City's Climate Ready Boston Report. We support the proponent's use of BRAG's more conservative "business as usual" high emissions scenario predicted for late century (2070). As presented in the ENF, the finished floor elevation for the project is proposed at 21.5' BCB, three feet above the FEMA 100-year flood elevation.

As described in the ENF the proponent may also consider the following:

- Movable and permanent flood barriers to protect certain vulnerable sections of the project
- Emergency generators located on the roof

- Operable windows for residential spaces
- Back-up power generation capabilities
- Electrical systems located above the floodplain
- Improvements to stormwater infrastructure
- Saltwater tolerant plantings, and
- Installation of backflow preventers

Given the significant risk of flooding in South Boston, we encourage the proponent to incorporate a number of these resiliency strategies into the final project design. This particular site and building design should consider the possibility that today's 1% storm could have a frequency of 10% by mid century, and that chronic flooding associated with monthly and seasonal high tides will become more and more prevalent during the latter half of the century. According to the BRAG report, the possibility that such flooding will occur several times per week cannot be ruled out.

Thank you for the opportunity to comment.

Sincerely,

Jill Valdes Horwood
Director of Policy

BOSTON PRESERVATION ALLIANCE

The Otis House
141 Cambridge Street
Boston, MA 02114
617.367.2458
bostonpreservation.org

July 7, 2017

Mr. Alexander Strysky
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114
Re: L Street Station Redevelopment, South Boston, EEA No. 15692

Dear Mr. Strysky,

The Boston Preservation Alliance is Boston's primary, non-profit advocacy organization that protects and promotes the use of historic buildings and landscapes in all of the city's neighborhoods. With 40 Organizational Members, 98 Corporate Members, and a reach of 35,000 friends and supporters we represent a diverse constituency advocating for the thoughtful evolution of the city and celebration of its unique character. We appreciate the opportunity to offer comments on projects that impact the historic character of the city.

The Alliance has had the opportunity to visit the power plant site at 776 Summer Street and participate in a recent public meeting. We applaud the proponent's efforts to add vibrancy and energy back to this site through the proposed mixed-use redevelopment, and appreciate their extensive community outreach early in the process.

This large industrial and engineering complex was the site of important developments of the electrical industry not just for Boston but for the nation. The evolution and growth of the site and its buildings reflect the changes and innovation in the technology of power generation as demand grew here in Boston. Evidence of those developments are visible in the buildings themselves both inside and out. From the late 19th to just a decade ago, from early D.C. power to modern generation, this site still speaks to the critical importance of industrial infrastructure to our social and economic development. In an age when so much of our technology exists in small, black boxes it is not surprising that there is great interest in the unique, mechanical, and industrial physicality of places such as this. Additionally, many aspects of this property reflect an age when industrial sites were framed within buildings that paid greater attention to design and detail than they do today. Decorative tiles, lighting fixtures, and other adornments tell an important lesson of how culture embraced technology. Many significant architectural, engineering, and design elements of the existing structures are important parts of the redevelopment of the site, and we believe will play an essential role in the differentiation, marketing, and exuberance for

this property in its new use. We are confident that preservation will play an important and necessary role in the success of this project.

Therefore, while we recognize that redevelopment of the site and its transformation from a heavy industrial use requires significant removal of equipment and demolition of portions of the site, we also encourage the proponent to incorporate as much of the historic fabric into the project as possible. We understand that power plants in particular present unique challenges; structure and mechanical equipment can be integral to each other and the demolition of interior contents to provide available space for new uses may necessitate the loss of exterior walls. However, we also recognize that there are many instances where important, contributing structure can be saved for new uses.

We agree with the proponent that the most significant features of the site are within the three turbine halls and we greatly appreciate the proposal for their restoration and reuse. We strongly encourage and support the sensitive incorporation of the turbine halls into the project. Doing so not only would integrate the history of the site into the new development, but would salvage many interesting architectural features such as vibrant green tile, arched windows, and several pieces of historically significant machinery. This unique space could be the centerpiece of the development and create a sense of place for the site. We do feel, however, that if the turbine halls are the only buildings of the power plant to remain on the site and were to be engulfed by new development, their context would be lost.

Therefore, we encourage the proponent to rehabilitate the oldest building on the site, the c. 1898 masonry building beside the turbine halls, as well. This would retain visual continuity between the surviving structures and maintain the industrial context that makes this site unique from the exterior. We look forward to dialog with the proponent, review agencies, and the community about how these historic buildings can become an important part of the project and its success.

The Alliance also has concerns about the proposal to insert an interior street for vehicular traffic through the turbine hall. While we understand that site circulation is important, we are concerned that this intervention may have a significant adverse effect to the historic spaces, their visual continuity, and their use. We encourage the proponent to present more information about why this interior street is necessary and what impacts it will have across the site. Similarly, discussion of new penetrations into the walls of the turbine halls for new windows requires further discussion. With reopening of the windows of the clerestory monitor of the roof we feel there is opportunity to generate significant natural light without disruption of the character-defining tile walls.

We are encouraged in many ways by the initial proposal and the skilled team working on the project, including members with significant experience adapting industrial sites to modern uses. While we cannot fully embrace all aspects of the initial filing, we look

forward to engaging further as this project evolves. We are confident that our recommendations will be seriously considered and we will have opportunity to discuss them further.

Sincerely,

Greg Galer
Executive Director

CC:
Brona Simon, Massachusetts Historical Commission
Gregory Bialecki, Redgate
Albert Rex, MacRostie Historic Advisors
Elizabeth Grob, VHB

AS

boston planning & development agency

July 7, 2017

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs
ATTN: MEPA Office
Mr. Alex Strysky, EEA #15692
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Environmental Notification Form/Expanded Project Notification Form EEA #15692
L Street Station Redevelopment, 776 Summer Street, Boston, MA 02127

Dear Mr. Strysky,

Waterfront Planning staff of the Boston Planning & Development Agency (BPDA, or the "Agency") have received and reviewed the above-reference Environmental Notification Form/Expanded Project Notification Form ("ENF") submitted by HRP 776 Summer Street LLC (the "Proponent") for the proposed redevelopment of the decommissioned Boston Edison L Street Power Station (the "Project") located at 776 Summer Street in South Boston (the "Project Site"). The Project includes the cleanup and abatement of the 15-acre Project Site and existing buildings, 2.1-million square feet of mixed-use development, including the adaptive reuse of portions of the former power station, and more than two acres of public open space, including on the Project's shoreline. The Project Site consists of approximately four acres of private filled tidelands and approximately eleven acres of upland on the Reserve Channel; it is also within the South Boston Designated Port Area (DPA). As a result, the portions of the site that are filled tidelands are subject to the state's Waterways Regulations, as applicable.

Following the sale of the Project Site by the Exelon Corporation to the Proponent in 2016, the Agency initiated a public engagement process earlier this year. The purpose of the process was, given the prominence of the Project Site within South Boston and opportunities inherent in its redevelopment to significantly enhance the community, to better understand the priorities and aspirations of the neighborhood and affected stakeholders. The Agency hosted an open house, walking tours of the Edison Turbine Hall, and two community workshops, which altogether culminated in a planning process report (the "Report"), which is enclosed. The Report outlined a vision for the redevelopment of the Project Site and concepts intended to assist the development plan for the Project. The Project is generally consistent with the Report, which provides the foundation for the Agency's review of the Project through Article 80B of the City of Boston Zoning Code.

boston planning & development agency

During the concurrent MEPA Office and Agency review periods, the Proponent submitted a request to the Massachusetts Office of Coastal Zone Management (CZM) to initiate a review of the South Boston Designated Port Area (DPA) boundary ("Boundary Review"), which the Agency supports. While the Project Site originally met the criteria for inclusion within the DPA, the decommissioning of the power station and construction of the Conley Dedicated Freight Corridor, which will provide a direct connection for trucks between Summer Street and Conley Terminal – a long-standing City and neighborhood objective in order to remove truck traffic from East First Street – and effectively limit access to the Reserve Channel from the Project Site, have significantly diminished the Project Site's capacity for future water-dependent industrial use. Further, removal of the Project Site from the DPA will also advance the vision of Imagine Boston 2030, the City of Boston's first citywide plan in fifty years, which identified the site as a potential mixed-use growth area for much-needed new housing and job growth. (The latest draft of the plan is available at imagine.boston.gov/imagine-boston-plan/.) As a part of Imagine Boston 2030, the City also published an assessment of its waterfront and vision for its future. The Waterfront Assessment and Vision (available at imagine.boston.gov/imagining-bostons-waterfront/) developed nine principles to achieve a climate-resilient, sustainably managed waterfront for all. Those applicable to the Project Site include the creation of new open spaces on the water's edge; ensuring diverse experiences along the waterfront; improving connections between neighborhoods and the waterfront; and expanding waterfront housing and job centers. With its mixed-use development program and unique water open space that will preserve industrial artifacts of the site, the Project will significantly contribute to the realization of the goals of Imagine Boston 2030 according to the principles outlined by the Waterfront Assessment and Vision, provided it is removed from the DPA.

Agency staff will provide comment to CZM and testimony as a part of the Boundary Review process.

We appreciate the opportunity to comment and for your consideration.

Very truly yours,

Richard McGuinness
Deputy Director for Climate Change and Environmental Planning

Encl: *South Boston Edison Power Plant Planning Process Report*, BPDA

boston planning &
development agency

cc: Tim Czerwienski, Project Manager, BPDA
Lisa Berry Engler, Boston Harbor Regional Coordinator, CZM
Ben Lynch, Program Chief, MassDEP Waterways

Boston Water and Sewer Commission

980 Harrison Avenue
Boston, MA 02119-2540
617-989-7000

June 30, 2017

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Alex Strysky, EEA No. 15692
100 Cambridge Street, Suite 900
Boston, MA 02114

and

Mr. Gary R. Uter
Project Manager
Boston Planning and Development Agency
One City Hall Square
Boston, MA 02201

Re: L Street Station
Environmental Notification Form /
Expanded Project Notification Form

Dear Secretary Beaton and Mr. Uter:

The Boston Water and Sewer Commission (Commission) has reviewed the Environmental Notification Form (ENF) and the Expanded Project Notification Form (EPNF) for the proposed redevelopment project located at 776 Summer Street in the South Boston neighborhood of Boston.

The proposed project is located on a 15-acre site bordered by the Reserve Channel, Summer Street and East First Street. The site was formerly occupied by Boston Edison's electric generating facility and has several buildings and support structures that were used for electric generation. The ENF/EPNF summarizes an alternative development scenario to the preferred scheme. The project proponent HRP 776 Summer Street, LLC's (HRP), proposed preferred alternative is to raze the existing structures with the exception of the Turbine Hall and construct a mixed use development over a ten year period. The project will include rehabilitation of the exiting Turbine Hall and construction of eight buildings totaling 2.1 million square feet (sf). The building heights will vary from 44 to 220 feet. The eight buildings will have approximately 339,639 sf. of office space, 68,077 sf. of retail space, 1,588 residential unit, a 150 room hotel and parking spaces for 987 vehicles. Site improvements include approximately 104,500 sf of outdoor public space.

For water service, the Commission owns and maintains a 12-inch water main in East First Street and a 12-inch water main in Summer Street. The water mains are part of the Commission's Southern Low Pressure Zone.

Sewer and drainage of the site is provided by a 12-inch sanitary sewer and an 18-inch storm drain in East First Street. Summer Street has an 30- inch by 24-inch combined sewer overflow pipe that increases to a 30-inch pipe and an 15-inch sanitary sewer that increases to an 18-inch pipe.

The ENF/EPNF states water demand for the proposed development is estimated to be 329,890 gallons per day (gpd) and wastewater generation is estimated to be 299,900 gpd.

The Commission has the following comments regarding the proposed project:

General

1. Prior to demolition of any buildings, all water, sewer and storm drain connections to the buildings must be cut and capped at the main pipe in accordance with the Commission's requirements. The proponent must then complete a Termination Verification Approval Form for a Demolition Permit, available from the Commission and submit the completed form to the City of Boston's Inspectional Services Department before a demolition permit will be issued.

2. All new or relocated water mains, sewers and storm drains must be designed and constructed at HRP's expense. They must be designed and constructed in conformance with the Commission's design standards, Water Distribution System and Sewer Use Regulations, and Requirements for Site Plans. To assure compliance with the Commission's requirements, the proponent must submit a site plan and a General Service Application to the Commission's Engineering Customer Service Department for review and approval when the design of the new water and wastewater systems and the proposed service connections to those systems are 50 percent complete. The site plan should include the locations of new, relocated and existing water mains, sewers and drains which serve the site, proposed service connections as well as water meter locations.

3. The Department of Environmental Protection (DEP), in cooperation with the Massachusetts Water Resources Authority and its member communities, is implementing a coordinated approach to flow control in the MWRA regional wastewater system, particularly the removal of extraneous clean water (e.g., infiltration/inflow (I/I)) in the system. In April of 2014, the Massachusetts DEP promulgated new regulations regarding wastewater. The Commission has a National Pollutant Discharge Elimination System (NPDES) Permit for its combined sewer overflows and is subject to these new regulations [314 CMR 12.00, section 12.04(2)(d)]. This section requires all new sewer

connections with design flows exceeding 15,000 gpd to mitigate the impacts of the development by removing four gallons of infiltration and inflow (I/I) for each new gallon of wastewater flow. In this regard, any new connection or expansion of an existing connection that exceeds 15,000 gallons per day of wastewater shall assist in the I/I reduction effort to ensure that the additional wastewater flows are offset by the removal of I/I. Currently, a minimum ratio of 4:1 for I/I removal to new wastewater flow added is used. The Commission supports the policy, and will require proponent to develop a consistent inflow reduction plan. The 4:1 requirement should be addressed at least 90 days prior to activation of water service and will be based on the estimated sewage generation provided on the project site plan.

4. The design of the project should comply with the City of Boston's Complete Streets Initiative, which requires incorporation of "green infrastructure" into street designs. Green infrastructure includes greenscapes, such as trees, shrubs, grasses and other landscape plantings, as well as rain gardens and vegetative swales, infiltration basins, and paving materials and permeable surfaces. The proponent must develop a maintenance plan for the proposed green infrastructure. For more information on the Complete Streets Initiative see the City's website at http://bostoncompletestreets.org/

5. For any proposed masonry repair and cleaning HRP will be required to obtain from the Boston Air Pollution Control Commission a permit for Abrasive Blasting or Chemical Cleaning. In accordance with this permit HRP will be required to provide a detailed description as to how chemical mist and run-off will be contained and either treated before discharge to the sewer or drainage system or collected and disposed of lawfully off site. A copy of the description and any related site plans must be provided to the Commission's Engineering Customer Service Department for review before masonry repair and cleaning commences. HRP is advised that the Commission may impose additional conditions and requirements before permitting the discharge of the treated wash water to enter the sewer or drainage system.

6. The Commission will require HRP to undertake all necessary precautions to prevent damage or disruption of the existing active water and sewer lines on, or adjacent to, the project site during construction As a condition of the site plan approval, the Commission will require HRP to inspect the existing sewer lines by CCTV after site construction is complete, to confirm that the lines were not damaged from construction activity.

7. It is HRP's responsibility to evaluate the capacity of the water, sewer and storm drain systems serving the project site to determine if the systems are adequate to meet future project demands. With the site plan, HRP must include a detailed capacity analysis for the water, sewer and storm drain systems serving the project site, as well as an analysis of the impacts the proposed project will have on the Commission's water, sewer and storm drainage systems.

8. HRP should be aware that the US Environmental Protection Agency issued the Remediation General Permit (RGP) for Groundwater Remediation, Contaminated Construction Dewatering, and Miscellaneous Surface Water Discharges. If groundwater contaminated with petroleum products, for example, is encountered, HRP will be required to apply for a RGP to cover these discharges.

Water

1. HRP must provide separate estimates of peak and continuous maximum water demand for residential, commercial, industrial, irrigation of landscaped areas, and air-conditioning make-up water for the project with the site plan. Estimates should be based on full-site build-out of the proposed project. HRP should also provide the methodology used to estimate water demand for the proposed project.

2. The Commission supports HRP's commitment to explore opportunities for implementing water conservation measures in addition to those required by the State Plumbing Code. In particular, HRP should consider outdoor landscaping which requires minimal use of water to maintain. If HRP plans to install in-ground sprinkler systems, the Commission recommends that timers, soil moisture indicators and rainfall sensors be installed. The use of sensor-operated faucets and toilets in common areas of buildings should be considered.

3. HRP is required to obtain a Hydrant Permit for use of any hydrant during the construction phase of this project. The water used from the hydrant must be metered. HRP should contact the Commission's Meter Department for information on and to obtain a Hydrant Permit.

4. The Commission is utilizing a Fixed Radio Meter Reading System to obtain water meter readings. For new water meters, the Commission will provide a Meter Transmitter Unit (MTU) and connect the device to the meter. For information regarding the installation of MTUs, HRP's should contact the Commission's Meter Department.

Sewage / Drainage

1. In conjunction with the Site Plan and the General Service Application HRP will be required to submit a Stormwater Pollution Prevention Plan. The plan must:

   - Identify specific best management measures for controlling erosion and preventing the discharge of sediment, contaminated stormwater or construction debris to the Commission's drainage system when construction is underway.

   - Include a site map which shows, at a minimum, existing drainage patterns and areas used for storage or treatment of contaminated soils, groundwater or stormwater, and

the location of major control structures or treatment structures to be utilized during the construction.

- Specifically identify how the project will comply with the Department of Environmental Protection's Performance Standards for Stormwater Management both during construction and after construction is complete.

2. As stated in the ENF/EPNF, a NPDES General Permit for Construction from the Environmental Protection Agency and the Massachusetts Department of Environmental Protection is required. A copy of the permit and any pollution prevention plan prepared pursuant to the permit must be provided to the Commission's Engineering Services Department, prior to the commencement of construction. The pollution prevention plan submitted pursuant to a NPDES Permit may be submitted in place of the pollution prevention plan required by the Commission provided the Plan addresses the same components identified in item 1 above.

3. The Commission encourages HRP to explore additional opportunities for protecting stormwater quality on site by minimizing sanding and the use of deicing chemicals, pesticides, and fertilizers.

4. The discharge of dewatering drainage to a sanitary sewer is prohibited by the Commission. HRP is advised that the discharge of any dewatering drainage to the storm drainage system requires a Drainage Discharge Permit from the Commission. As stated previously, if the dewatering drainage is contaminated with petroleum products, HRP will be required to obtain a Remediation General Permit from the Environmental Protection Agency (EPA) for the discharge.

5. HRP must fully investigate methods for retaining stormwater on-site before the Commission will consider a request to discharge stormwater to the Commission's system. The site plan should indicate how storm drainage from roof drains will be handled and the feasibility of retaining their stormwater discharge on-site. Under no circumstances will stormwater be allowed to discharge to a sanitary sewer.

6. Sanitary sewage must be kept separate from stormwater and separate sanitary sewer and storm drain service connections must be provided. The Commission requires that existing stormwater and sanitary sewer service connections, which are to be re-used by the proposed project, be dye tested to confirm they are connected to the appropriate system.

7. The Commission requests that HRP install a permanent casting stating "Don't Dump: Drains to Boston Harbor" next to any catch basin created or modified as part of this project. HRP should contact the Commission's Operations Division for information regarding the purchase of the castings.

8. If a cafeteria or food service facility is built as part of this project, grease traps will be required in accordance with the Commission's Sewer Use Regulations. HRP is advised to consult with the Commission's Operations Department with regards to grease traps.

9. The enclosed floors of a parking garage must drain through oil separators into the sewer system in accordance with the Commission's Sewer Use Regulations. The Commission's Requirements for Site Plans, available by contacting the Engineering Services Department, include requirements for separators.

10. The Commission requires installation of particle separators on all new parking lots greater than 7,500 square feet in size. If it is determined that it is not possible to infiltrate all of the runoff from the new parking lot, the Commission will require the installation of a particle separator or a standard Type 5 catch basin with an outlet tee for the parking lot. Specifications for particle separators are provided in the Commission's requirements for Site Plans.

Thank you for the opportunity to comment on this project.

Yours truly,

John P. Sullivan, P.E.
Chief Engineer

JPS/rja

C: R Cox, Redgate
M. Connolly, MWRA via e-mail
M. Zlody, BED via e-mail
P. Larocque, BWSC via e-mail

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For a thriving New England

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July 7, 2017

Via email: alexander.strysky@state.ma.us

The Honorable Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Attn: MEPA Office, Alex Strysky
Boston, MA 02114

Subject: Comments on L Street Station Redevelopment Environmental Notification Form EEA# 15692

Dear Secretary Beaton:

Conservation Law Foundation ("CLF") would like to submit brief comments at this stage concerning the L Street Station Redevelopment project at 776 Summer Street in South Boston. Generally, we are pleased that the proposed project appears to meet the standards of Chapter 91 and that the proponent is taking climate change into consideration for the design of the site. We do believe that the proponent could go further in making the waterfront open space a "world class public space" and should put more consideration into how this space will be accessed and activated. We look forward to seeing new iterations of the proposal in the subsequent permit processes that lie ahead. However, we have chosen to keep our comments brief at this time because we believe that review of the proposal at this stage is premature. The site is in a Designated Port Area ("DPA") and would require de-designation in order for the current proposal to be considered.

It is our understanding that the proponent has submitted a request to the Massachusetts Office of Coastal Zone Management ("CZM") for DPA boundary review with the intention of having the site de-designated. While we do not necessarily disagree with the proponent on the merits of their de-designation request, we are concerned that this process is moving forward prior to CZM rendering a decision on their request. We are also concerned that this request may make way for more site-by-site de-designation requests, which would create an undesirable process for evaluating non-maritime uses in DPAs and have a deleterious effect on this scare and non-renewable resource.

We will be submitting more in-depth comments to CZM outlining our concerns regarding DPA de-designation and our priorities for assessing alternative non-maritime uses in DPAs. At this time, we request that you delay your review of the Environmental Notification Form ("ENF") for the L Street Redevelopment project until CZM has rendered a decision on the boundary review.

Thank you for your consideration of these comments. Please contact me at dmoran@clf.org with any questions you may have.

Sincerely,

Deanna Moran

Deanna Moran
Director of Environmental Planning

AS
15692

STEPHEN F. LYNCH
8TH DISTRICT, MASSACHUSETTS

COMMITTEE ON FINANCIAL SERVICES
SUBCOMMITTEE ON CAPITAL MARKETS, SECURITIES, AND INVESTMENTS
SUBCOMMITTEE ON TERRORISM AND ILLICIT FINANCE

COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM
RANKING MEMBER, SUBCOMMITTEE ON NATIONAL SECURITY
SUBCOMMITTEE ON GOVERNMENT OPERATIONS

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LYNCH.HOUSE.GOV

July 7, 2017

Hon. Matthew A. Beaton, Secretary
Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: 776 Summer St., South Boston (Edison Power Plant) Proposal

Dear Secretary Beaton:

I am writing to you regarding the proposed 15.2 acre project located at 776 Summer St., South Boston formally known as the former L St. Power Plant. As the Congressman from the Eighth Massachusetts District, I represent the families of South Boston.

This proposal raises many serious neighborhood concerns including density, traffic, public safety and parking. Further, there are maritime and environmental issues that need to be addressed.

While this proposal would add approximately 1,500 additional housing units as well as retail and commercial shops and a possible hotel, it would overwhelm the neighboring residential area unless thoughtful and careful countermeasures are included. Currently such mitigation has not been suggested.

Moreover, as Conley Terminal has expanded, we have worked with MASSPORT over several years to create a Dedicated Freight Corridor (DFC) to relieve East First Street of over 1,000 daily tractor-trailer truck trips. As part of this process, Thomas Butler Park was created to act as a buffer zone mitigating noise and carbon emissions from the truck traffic which will soon be redirected onto the DFC.

This proposed project according to the proponents PNF and MEPA filings would negate the neighborhoods efforts and generate an additional 10,000 to 21,000 vehicle trips through the South Boston Neighborhood. This would reverse the progress that has been made in this area and leave the neighborhood in worse condition after all the work and investment by the Commonwealth of Massachusetts and Massport. From a neighborhood standpoint, this simply cannot be allowed to happen.

Neighborhood parking has become a major concern to residents, and this proposal would contribute to an already unmanageable situation. Other issues of concern include public safety and environmental issues during the demolition and cleanup process, with potential health risks of contaminants drifting into the surrounding homes as well as onto the parks directly across the street.

Notably, over a billion dollars has been invested through Federal and State partnerships for the dredging of Boston Harbor and the Reserved Channel to increase the international shipping industry and make the Port of Boston more competitive. This development would negatively impact all the advancements made to the Port of Boston and to Conley Terminal by further harming traffic flow and air quality by adding vehicular traffic onto local streets which are not able to sustain the additional traffic flow in and out of the South Boston community.

Meanwhile we have several other developments that are coming on line which are likely to exacerbate traffic and density issues.

While the people of South Boston have been very cooperative and supportive of the many developments in our neighborhood, that support and cooperation has been the result of a two way conversation between the developer, local leaders and community groups.

Therefore, I respectfully request that MEPA does not sign off on this project at this time. Further I would strongly recommend that a comprehensive community process be undertaken by the developer at times that are convenient to local residents (NOT the middle of August) to fully engage the neighborhood residents to discuss the impacts of the project on the South Boston community.

Mr. Secretary, thank you for your time and consideration in this matter. The Baker Administration has been a good partner to our neighborhood as we have tried to manage all the development projects in our area in a way that allows for responsible projects to move forward while protecting the quality of life in our neighborhood. We thank you for your role in that success and we trust that this partnership will continue.

Sincerely,

STEPHEN F. LYNCH
Congressman
8th District
Massachusetts

cc: Deirdre Buckley, MEPA Director
C. Stolle Singleton, EOEEA Legislative Affairs Director

AS
15692

MICHAEL F. FLAHERTY
BOSTON CITY COUNCIL AT-LARGE

July 7, 2017

Matthew A. Beaton, Secretary
Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston MA 02114

Re: L Street Station (Edison Power Plant) Proposal

Dear Secretary Beaton:

I am writing to you to express my reservations about a development proposal in a Designated Port Area in the neighborhood of South Boston. The project, which proposes to be 15.2 acres and encompass the former Edison Power Plant (located at 776 Summer Street), has raised serious concerns from the surrounding neighborhood. Based on the project's PNF and MEPA filings, the project would generate a multitude of quality-of-life issues that need to be addressed beforehand through an exhaustive neighborhood engagement process.

The proposal calls for 1,500 housing units as well as retail space to be developed in an already dense area. As we have seen over the past decade, the rapid development in South Boston has overwhelmed the neighborhood numerously. Further, 10,000 and 21,000 new vehicle trips are projected to take place both in and out of the neighborhood on a daily basis. If this project is approved, significant financial investments made by both the Commonwealth of Massachusetts and the Massachusetts Port Authority ("Massport") for traffic and noise alleviation – which the stakeholders of South Boston have advocated for via the Thomas J. Butler Haul Road and Buffer Zone Park – would be countered.

Massport, the Federal Government, and the Commonwealth of Massachusetts have jointly invested over $1 billion to dredge Boston Harbor and expand Conley Terminal so that Massachusetts is more viable for the international shipping industry. If this project is approved, traffic flow and air quality would be negatively impacted, and the local streets in the neighborhood of South Boston would feel the burden. Further, given that this site used to be a power plant, there are serious environmental, health and safety concerns that need to be acknowledged. If this project is approved, there is potential for contaminants affecting the surrounding community during the demolition and cleanup process. Lastly, there needs to be preservation of and access to the surrounding greenspaces and waterfront.

Boston City Hall - 5th Floor, Boston, MA 02201 • (617) 635-4205 • FAX: (617) 635-4203 • michael.flaherty@boston.gov

The stakeholders of South Boston have been supportive and accommodating to the many developments that have taken place in the neighborhood. But the support and accommodation is reached as a result of a thorough community process – a factor that has not taken place with regards to this proposed project. It is for the above mentioned reasons that I respectfully request that MEPA does not sign off on this project at this time. Thank you for your consideration of this request.

Regards,

Michael F. Flaherty

THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS
OFFICE OF COASTAL ZONE MANAGEMENT
251 Causeway Street, Suite 800, Boston, MA 02114-2136
(617) 626-1200 FAX: (617) 626-1240

MEMORANDUM

TO: Matthew A. Beaton, Secretary, EEA
ATTN: Alex Strysky, MEPA Unit
FROM: Bruce Carlisle, Director, CZM
DATE: July 6, 2017
RE: EEA-15692, L Street Station Redevelopment, Boston

The Massachusetts Office of Coastal Zone Management (CZM) has completed its review of the above-referenced Environmental Notification Form (ENF), noticed in the *Environmental Monitor* dated May 24, 2017. According to the ENF, the project exceeds the threshold for a mandatory Environmental Impact Report (EIR) for a new non-water dependent use occupying one or more acres of tidelands, traffic generation, proposed parking spaces, and the demolition of the exterior part of any historic structure. CZM recommends that the proponent address the issues identified below in the EIR.

Project Description

With this ENF filing, HRP 776 Summer Street, LLC proposes to redevelop the 15 acre former Edison power plant site, locally known as L Street Station, into a 2.1 million square foot mixed-use development comprised of office, hotel, residential, and commercial uses with supporting underground parking, public open space, and internal roadways. As currently proposed, the development will be arranged around two new internal roadways supporting seven new buildings while maintaining the historic turbine hall. The project is located at the intersection of Summer and East First Streets along the south side of the Reserved Channel within the South Boston Designated Port Area (DPA). Massport's Dedicated Freight Corridor (scheduled for completion in summer 2017) forms the parcel boundary along the Reserved Channel. The project is located on filled tidelands and proposes impacts to Land Subject to Coastal Storm Flowage (LSCSF).

Project Comments

Coastal Resiliency

The ENF indicates that a portion of the project site lies within the 100-year floodplain (elevation 18.45 Boston City Base (BCB)). The proposed project will be elevated such that the finish floor will be located at 21.5 BCB. The ENF states that by elevating the finish floor elevation by three feet, the project is accounting for future increases in the intensity and frequency of storm events as well as for projected increases in sea level rise. The EIR should provide plan view and cross section plans which show the exiting topography, proposed fill, underground parking, and proposed finish floor with respect to the FEMA Base Flood Elevation in NAVD88 and BCB datum.

The ENF also states that the Massachusetts Wetlands Protection Act (WPA) does not prescribe performance standards for LSCSF. However, the proponent should evaluate how potential alterations to LSCSF will affect the ability of the floodplain to provide storm damage prevention and flood control interests of the WPA. The EIR should assess how the proposed development may

impact the flow of floodwater across the project site and contribute to potential flooding on adjacent properties and roadways.

Designated Port Area

As previously noted, the project site is located within the South Boston DPA. DPAs are areas of local, state, and regional significance which support and promote current and future water dependent industrial uses. Water dependent industrial uses share the need for a waterway and associated waterfront which has been developed to facilitate the transfer of goods from ship to shore, upland area which is conducive to industrial facilities and operations, and access to land-based transportation and utilities. To support these areas of maritime commerce, development within DPA's are subject to use requirements as specified in MassDEP's Chapter 91 Waterways regulations. Although the ENF acknowledges the location of the project within the South Boston DPA, the ENF does not evaluate a redevelopment program which would comply with the Chapter 91 standards for DPAs. In the EIR, the proponent should fully evaluate a DPA-compliant project alternative.

Since the filing of the ENF, the proponent has filed a request with CZM for the review of the boundary of the South Boston DPA. The boundary review process will proceed according to the Designation of DPA Regulations at 301 CMR 25.00.

Federal Consistency

The proposed project may be subject to CZM federal consistency review. For further information on this process, please contact, Robert Boeri, Project Review Coordinator, at 617-626-1050 or visit the CZM web site at www.state.ma.us/czm/fcr.htm.

BKC/bw/lbe

cc: Rich McGuiness, Chris Busch, Erikk Hokenson, BPDA
Mia Goldwasser, City of Boston Environment Department
Ben Lynch, MassDEP
Andrew Hargens, Stewart Dalzell, Massport

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

Memorandum

To: Matthew Beaton, Secretary, EEA

Att'n: Alex Strysky, MEPA

From: Ben Lynch, MassDEP/Boston

Re: **Comments from the Chapter 91 Waterways Regulation Program — EEA #15692 - EENF - L Street Station Redevelopment, Filled Tidelands of Boston Harbor & Reserved Channel, Boston, Suffolk County.**

Date: July 7, 2017

The Department of Environmental Protection Waterways Regulation Program ("Department" or "WRP") has reviewed the Expanded Environmental Notification Form ("EENF") submitted by HRP 776 Summer Street, LLC ("Proponent") on May 15, 2017 for the redevelopment of the former Edison L Street Power Station site. The EENF describes a project that will include residential, commercial office, hotel, and underground parking uses, as well as public open space and internal roadways. It will also repurpose and integrate an existing, historically significant turbine hall into the overall project. In total, the proposed project would be comprised of approximately seven new buildings and two renovated historic structures totaling 2.1 million square feet, approximately 987 structured parking spaces, two internal roadways, and 104,500-square feet of new, publicly accessible open space. The 15-acre project site is located at the intersection of East First Street and Summer Street in South Boston, situated within the South Boston Designated Port Area ("South Boston DPA"). The northern site boundary of the site is the Dedicated Freight Corridor ("DFC") which serves as the roadway exclusively reserved for trucking to and from the Massachusetts Port Authority ("Massport") Conley Terminal to the east.

Water Dependency:

The Department has determined that this project is a nonwater-dependent use project pursuant to 310 CMR 9.12(2)(f)(2), (3), (5), and (8).

Chapter 91 Jurisdiction:
Said project will require authorization through a Chapter 91 (c.91) Waterways License as the approximately four acres of project site is located on filled and flowed tidelands of Boston Harbor. Therefore, the project will be reviewed under the nonwater-dependent performance standards at 310 CMR 9.51 through 9.52.

Chapter 91 Regulatory Analysis:
Because the filled tidelands on the project site are within a DPA, only Water-Dependent Industrial and Supporting Uses are currently allowed within c.91 jurisdictional areas. Since the submission of the EENF, the Proponent has filed a request with the Massachusetts Office of Coastal Zone Management ("MassCZM") for a Boundary Review of the South Boston DPA, pursuant to 301 CMR 25.00. The EENF asserts that if the subject tidelands were not within the DPA, the project would be fully compliant with the relevant nonwater-dependent use and dimensional standards of 310 CMR 9.00. Until the Boundary Request has been fully evaluated by MassCZM, the project's compliance with the nonwater-dependent standards of 310 CMR 9.51–9.53 cannot be determined. In the EIR filing, the Proponent should evaluate a fully compliant project alternative in which the project site remains within the South Boston DPA.

Regardless of the findings of the Boundary Request, the Department recommends that the Proponent consult with MassCZM, and Massport as it determines appropriate water sheet activation facilities at the project shoreline in the Reserved Channel in order to meet the compliance standards of 310 CMR 9.52(1)(a).

Coastal Resiliency:
The EENF identifies that certain portions of the project site is located within a 100-year floodplain. In the EIR, the Proponent should provide more detailed analysis on how the project design will comply with the Engineering and Construction standards pursuant to 310 CMR 9.37(1)&(2).

c.91 Application Status:
Given the time frame that a project of this scope and size will likely require, the Department recommends that in the EIR, the Proponent describe how it plans to proceed with the c.91 authorization process, including whether it plans on requesting a Consolidated Written Determination for discrete elements of the overall project pursuant to 310 CMR 9.14(4). In the event that such an approach is considered, the Proponent should carefully evaluate and propose the timely delivery of related public benefits with each license application to ensure that the overall public benefits will exceed public detriment as each portion of the project is completed.

If you have any questions regarding the WRP's comments, please feel free to contact Ben Lynch at ben.lynch@state.ma.us or at (617) 292-5615.

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF
ENERGY AND ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENERGY RESOURCES
100 CAMBRIDGE ST., SUITE 1020
BOSTON, MA 02114
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Lt. Governor

Matthew A. Beaton
Secretary

Judith F. Judson
Commissioner

6 July 2017

Matthew Beaton, Secretary
Executive Office of Energy & Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02114
Attn: MEPA Unit

RE: L Street Station Redevelopment, Boston, Massachusetts, EEA #15692

Cc: Arah Schuur, Director of Energy Efficiency Programs, Department of Energy Resources
Judith Judson, Commissioner, Department of Energy Resources

Dear Secretary Beaton:

We've reviewed the Environmental Notification Form (ENF) for the above-referenced project. The purpose of this this letter is to identify emission reduction measures worthy of evaluation for future submissions, consistent with the objective of MEPA policy to avoid, mitigate, and reduce greenhouse gas emissions.

We are pleased to share that a potentially feasible pathway exists to improve GHG Mitigation Level[1] from currently-planned 3% to 55% by using the following strategies:

- Passive design for the multifamily portion of the development (which makes up a vast majority of the development);
- Roof-top solar PV;
- Eliminating efficiency tradeoffs caused by exceeding Building Code thresholds for fenestration.

Other measures, such as CHP for the hotel and solar thermal should also be investigated.

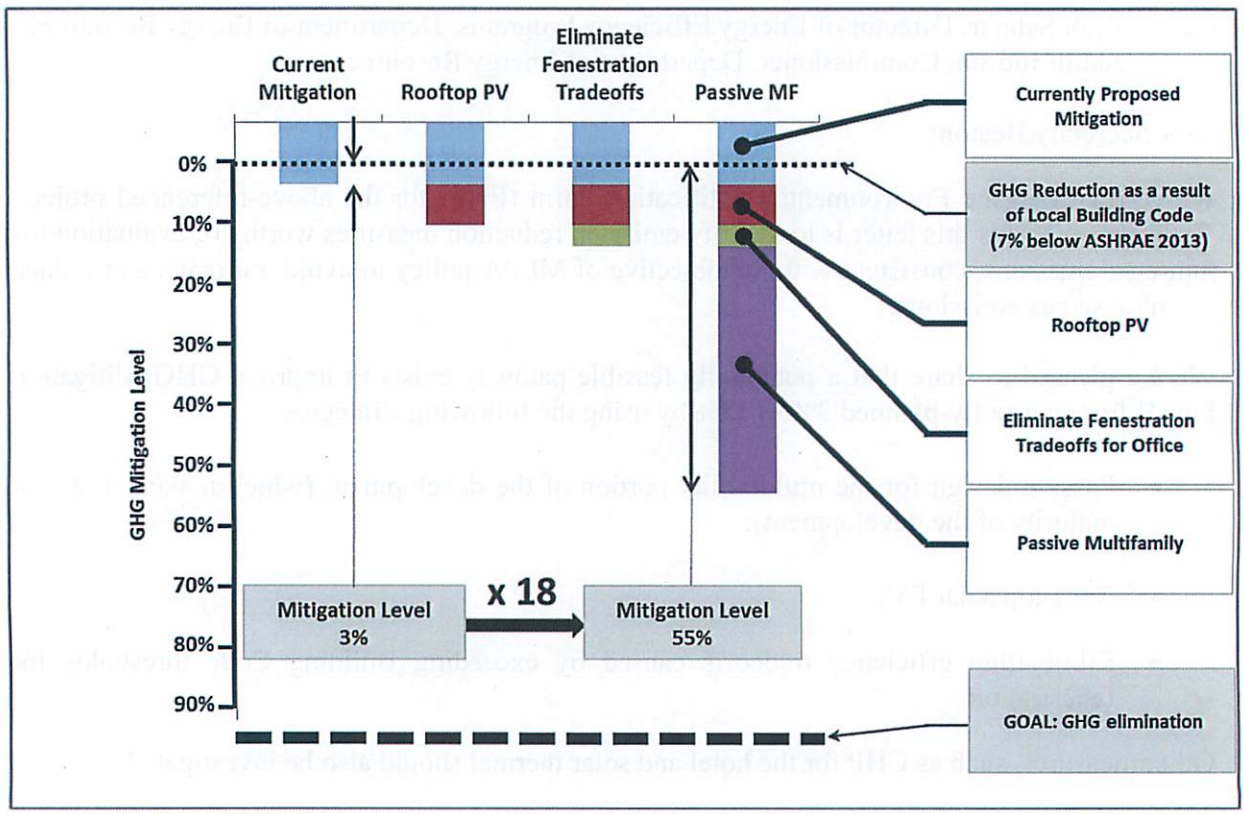
[1] GHG Mitigation Level is the percent GHG reduction beyond the reduction that would occur as a result of following local Building Code. A GHG Mitigation Level of 0% means no GHG mitigation is proposed.

The above measures are supported by generous incentives, tax advantages, and grants. In addition, avoiding efficiency tradeoffs as a result exceeding code thresholds for fenestration can help optimize these incentives.

Pathway from 3% to 55% Mitigation Level

The currently-planned GHG Mitigation Level is 3%. (The currently planned mitigated development is 3% GHG reduction beyond the level of GHG reduction that would occur as a result of following local Building Code.) Mitigation Level can be improved to 55%, an 18-fold increase, as illustrated below:

- Solar PV on the roof would improve Mitigation Level to 10%.
- For the office, the benefits of planned HVAC mitigation are being traded-off as a result of exceeding code thresholds for fenestration. (Planned fenestration area for office is 150% larger than code thresholds.) We estimate that staying within code fenestration thresholds would improve Mitigation Level to 14%.
- Use of Passive design strategies for the multifamily would improve Mitigation Level to 55%.



L Street Station Redevelopment, EEA #15692
Boston, Massachusetts

Savings and Incentives

Significant savings and incentives are potentially available, as follows:

- With Passive design, annual gas and electric utility costs for the multifamily buildings could be reduced by $1.3M per year.
- Alternative Energy Credits associated with qualified air source heat pumps (or VRFs) in a passive multifamily would be worth approximately $0.8M (at $20/alternative energy credit).
- Rooftop solar PV (estimated 1,500 kW) would have a NPV of $1,200,000.
- Utility incentives are also potentially available, including incentives specifically for CHP and high performing (including passive) buildings.
- Massachusetts Clean Energy Center incentives are potentially available, for both heat pumps and VRFs.

City of Boston Goals: Resilience & Housing Affordability

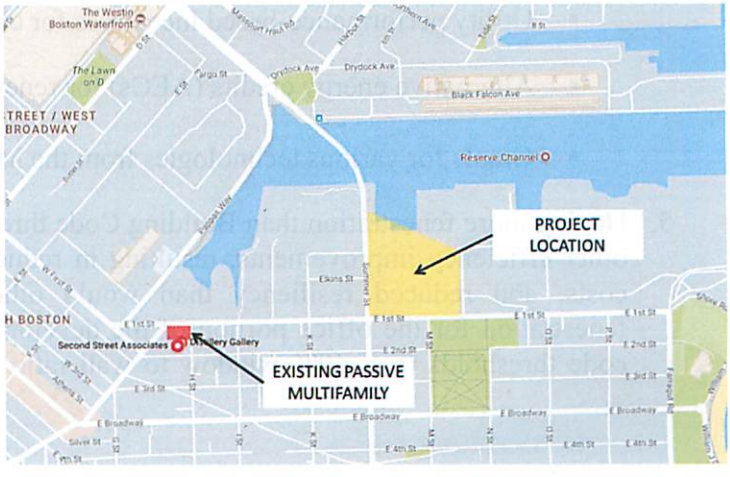
In addition to greenhouse gas mitigation, the above package of mitigation would also help advance the City of Boston's goals for resilience and housing affordability:

- Resilience: Passive buildings require near-negligible active and heating and cooling, and thus perform well during power outages and extreme weather. In fact, residents of an existing Passive multifamily a few blocks down the street from the proposed project (see below) report not having to turn on their heat through winter of 2016-2017. PV, CHP, and reduced glazing also contribute to resilience.
- Affordability: A Passive Multifamily would cost residents an average of $900/unit less for gas and electricity per year, an 85% reduction in utility costs.

Passive Multifamily in South Boston

The subject project is located in close proximity to a completed Passive multifamily, also located on East 1st Street in South Boston. (See locus on right.) Information is available here: http://www.distillerynorth.com/.

This project is completed and operating, with plans for additional expansion.

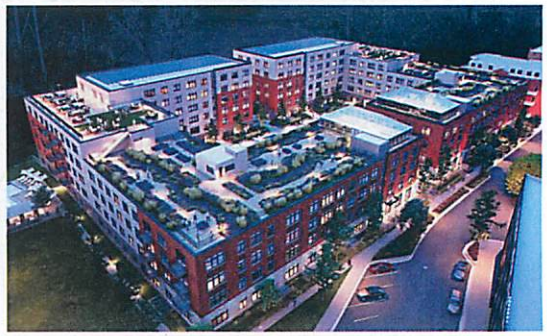


Recommendations for Future Submissions

Our recommendations for future submissions are as follows:

1. Future submissions should demonstrate that the project is taking all feasible measures to avoid, minimize and mitigate GHG emissions. The GHG Policy and supporting documentation is available at http://www.mass.gov/eea/agencies/mepa/greenhouse-gas-emissions-policy-and-protocol-generic.html.

2. Passive design should be thoroughly evaluated for the multifamily portion of the development. Passive design methods are available here: http://www.phius.org/home-page. Multifamily specific information is available here: http://multifamily.phius.org/. An extensive study on financial and feasibility of Passive residential towers is available here: http://www.fxfowle.com/projects/182/feasibility-study-to-implement-the-passivhaus-standard-on-tall-residential-buildings/. See right for examples of Passive multifamily projects, including both low rise and high rise examples.



Second and Delaware Project – Passive Low Rise
http://multifamily.phius.org/case-study/second-and-delaware

Mott Haven Project – Passive High Rise
https://ny.curbed.com/2016/4/29/11540744/nyc-largest-passive-house-mott-haven-241-affordable-apartments

3. When evaluating Passive cost feasibility (and cost evaluations, in general), we recommend netting additional envelope costs against reduced HVAC costs. The Second and Delaware project reportedly costs $4/sf less to construct than conventional construction.

4. In addition, we recommend further netting of costs against potential financial benefits derived from the following sources, which can also reduce first costs:

   - Utility performance-based incentives for energy efficiency improvements
   - Alternative energy credits (AECs) for renewable thermal production
   - Grants for various technologies from the Massachusetts Clean Energy Center

5. Having more fenestration than Building Code thresholds necessarily results in trading off other efficiency improvements, resulting in reduced GHG benefits, increased operating costs, and reduced resiliency than would otherwise occur. We recommend that fenestration for the office portion of the development be maintained to within building code thresholds (e.g. 40% window to wall ratio for the office portion, or as otherwise

specified on Table G3.1.1-1 for other building uses). Currently, planned fenestration for the office portion is 150% larger than these thresholds.

If the proponent chooses to continue to evaluate an option that exceeds these thresholds, we recommend submitting the following energy model scenario results:

- Code building with Code-threshold fenestration
- Code building, with planned fenestration
- Planned building with Code-threshold fenestration
- Planned building with planned fenestration

The above scenarios will help reveal the extent to which other efficiency measures are being traded-off by exceeding fenestration thresholds.

6. Evaluate lower-than-code lighting power densities.

7. Evaluate CHP for the hotel, including utility rebates and credits.

8. Evaluate solar thermal for hotel and multifamily water heating, including benefits of MCEC grants.

9. Evaluate heat pump water heating for multifamily, hotel, and office, including benefits of Mass Save rebates.

Recommendations for Submission:

In order to expedite the DOER review, we recommend the following accompany the submission:

A. A table similar to the example below should be included:

Measure/Area	Base Code 2013 90.1 App. G or 2015 IECC	Proposed	% Change	Comment
Roof Assembly U-value (Btu/hr-Ft^2-f)				
Bldg 1	*code value*	*design value*	%	
Bldg 2	*code value*	*design value*	%	
(Additional rows for each bldg.)	*code value*	*design value*	%	
Wall Assembly U-value (Btu/hr-Ft^2-f)				
Bldg 1	*code value*	*design value*	%	
Bldg 2	*code value*	*design value*	%	
Area Window/Area Wall (%)				
Bldg 1	*code value*	*design value*	%	
Bldg 2	*code value*	*design value*	%	
Window U-value (Btu/hr-Ft^2-f)				
Bldg 1	*code value*	*design value*	%	
Bldg 2	*code value*	*design value*	%	
AC Efficiency (EER)				
Bldg 1	*code value*	*design value*	%	

Bldg 2	*code value*	*design value*	%	
ERV Effectiveness (%)				
Bldg 1	*code value*	*design value*	%	
Bldg 2	*code value*	*design value*	%	
Boiler (% efficiency)				
Bldg 1	*code value*	*design value*	%	
Bldg 2	*code value*	*design value*	%	
LPD (Watts/sq ft)				
Bldg 1	*code value*	*design value*	%	
Bldg 2	*code value*	*design value*	%	
(continue to include service water, equipment, etc)				

B. A description of the proposed building envelope assembly: report both component R-values and whole assembly U-factor. Utilize the pre-calculated relationships between R-Value and U-factor contained in Appendix A in the code.

C. A description of the building energy simulation model and procedures utilized.

D. A detailed and complete table of modeling inputs showing the item and the input value for both the base and as-designed scenarios. The area of the building should be included.

E. The output of the model showing the monthly and annual energy consumption by major end use system.

F. Baseline (e.g. Code) energy use intensity and proposed mitigated building energy use intensity.

G. Project modeling files are to be submitted to the DOER with the submittal on a flash drive or may be transmitted via electronic file transfer to paul.ormond@massmail.state.ma.us.

H. Separate "side calcs" may be required for non-building energy consuming site improvements which are not included in the building energy modeling software (e.g. parking lot lighting).

I. Estimate area of roof potentially usable for solar development (e.g. 'Usable Roof Area" (URA)). Estimate resulting power production and associated GHG reduction if all this URA was utilized.

J. A description of the proposed project building usage and size, including a site plan and elevation views, should be included.

K. Provide a summary of discussions with MassSave.

L. We recommend cross-examining produced model results' total and individual end uses with representative, prototype buildings developed by Pacific Northwest National Labs/Department of Energy found here:

- https://www.energycodes.gov/sites/default/files/documents/BECP_901_2013_Progress_Indicator_0_0.pdf
- http://www.energycodes.gov/sites/default/files/documents/2013EndUseTables.zip
- https://www.energycodes.gov/commercial-energy-cost-savings-analysis

Sincerely,

Paul F. Ormond, P.E.
Energy Efficiency Engineer
Massachusetts Department of Energy Resources

Strysky, Alexander (EEA)

From: Eileen Smith <eileensmith776@yahoo.com>
Sent: Friday, July 07, 2017 5:07 PM
To: Strysky, Alexander (EEA)
Cc: Tim Czerwienski
Subject: Edison - L Street Station Redvelopment, South Boston, MEEA No. 15692

July 7, 2017
Alex Strysky
MEPA Office, Mass Dept of Energy & Environmental Affairs

RE: Edison - L. Street Station Redevelopment, South Boston, EEA No. 15692

Dear Mr. Strysky,

In no particular order I would like to make comments as requested by you on June 21, 2017. Never having participated in an IAG I am hopeful that the following suggestions, concerns, needs and wants are workable interests for Redgate and Hilco and to the future of our South Boston community. The community as a whole must be continuously involved and informed with public meetings as to the development stages, plans and potential problems.

The construction/decommission period of 10-15 years will impact City Point for years with additional concerns; traffic, lack of public transportation, noise, dirt and pollution. Measurements must be taken ensuring quality of life. Equally concerning is the Massport/Conley terminal expansion in a densely populated residential area. The added planes coming and going to Logan airport are now flying over our residential areas to runways. Currently, East Broadway (between L&P Streets) has over **225** buses traveling on our streets on a daily basis. With the Edison residential proposal, there must be a plan which provides for additional transportation and the elimination of added buses and or transportation services to the overwhelmed E. Broadway Street. The noise, dirt, traffic, planes and pollution are already at unacceptable levels. Previously, as suggested by members of the IAG, a noise monitoring system should be installed before the initiation of the Edison development. I hope you will support this issue.

Equally concerning, increased truck traffic, noise and pollution utilizing the Tommy Butler Bridge. We have thousands of trucks travel our streets every day with the possibility of Boston Harbor dredging to facilitate bigger container ships. Traffic,

noise, pollution and parking problems are continuously increasing without a definitive plan and must be addressed before this process proceeds. These environmental issues are once again in a densely populated residential area. Removal of hazardous materials and air quality changes should be publicly posted.

The proposed parking accommodations for the Edison are unrealistic, appalling and unacceptable. The Edison proposal includes fifteen hundred eighty eight (1588) residential units (no detail given as to how many bedrooms in each unit), office space, retail space and a hotel with a projected total of 987 parking spaces. On this issue alone the project should be denied as inadequate. Initial discussions included sufficient parking with the potential of residential parking. Community benefit discussions have included the possibility of residential parking as well as access during snow emergency postings for all South Boston residents. The Edison project has to increase their parking space numbers or change their development proposal to be acceptable and equal to the number of residential units. Parking in South Boston is forcing residents to leave the City and affecting quality of life. Parking on private property with such limited access should be structured in a way to mandate parking on Edison land only. Said land is private and residents should have special parking permits reflecting Edison residency and be allowed two hour local parking only permit. This should help satisfy the discussions regarding new residents using alternative transportation. This will guarantee that what City Point currently has for parking and a lack thereof, will not be eliminated to accommodate Edison residents. Otherwise, as discussed, new residents will be ride sharing, biking, skate boarding and should be willing to sign parking permit waivers. I did not see the designated amount of bike parking spaces. Hopefully, these spaces are not included in the 987 allotted parking spaces. There is a greater need for public and community parking than community arts.

The proposed towers should be lowered and not have offensive lighting that will affect the surrounding residential areas. These proposed high rise buildings are not welcoming to the current residential community.

I believe that preservation of the buildings histories and structures are relevant. The Edison electric Illuminating Company of Boston is the only plant of its kind in existence dating back to 1886. There is talk of saving the turbine halls which is appreciated. The windows on the L street side of

property should also be saved. It would be helpful to have a complete tour (hard hat style) of all the buildings to review their historical relevance.
The suggested architecture shown for the new eight (8) building developments is disturbing and has no relation or historical significance to the homes in the City Point area. This will have to be discussed separately. Said proposal does not meet the standards and historical design of the neighborhood.
Proposals do not include two and three family homes of which this neighborhood reflects. Proposals do not specify low income housing and or availability of over 55 housing. Development requires further clarification.
The private development of the Edison is promising access to newly created streets that will remain public. Does this mean that the City will not be responsible for services such a garbage removal, snow removal, police and fire response, ticketing and towing? Therefore, who will be allowed to park on these streets?
I look forward to working with you regarding the Edison development project. It would be helpful for the IAG members to have a 24 hour contact in place for all matters.
Thank you,
Eileen Smith

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

July 7, 2017

Matthew A. Beaton, Secretary
Executive Office of
Energy & Environmental Affairs
100 Cambridge Street
Boston MA, 02114

RE: Boston
L Street Station Redevelopment
776 Summer Street
EEA #15692

Attn: MEPA Unit

Dear Secretary Beaton:

The Massachusetts Department of Environmental Protection (MassDEP) has reviewed the Environmental Notification Form (ENF) submitted by the HRP 776 Summer Street, LLC, c/o Hilco Real Estate for the proposed construction of a mixed use project consisting of 2.1 million square feet of development on 15 acres along the Reserved Channel in South Boston. MassDEP provides the following comments.

Wastewater

The ENF indicates that the proposed project will generate an estimated 299,900 gallons per day (gpd) of new wastewater flow. MassDEP regulations at 314 CMR 12.04(2)(d) require sewer authorities with permitted combined sewer overflows, including the Boston Water & Sewer Commission (BWSC), to require removal of four gallons of infiltration and inflow (I/I) for each gallon of new wastewater flow generated for any new connection to their system where greater than 15,000 gallons per day of new wastewater flows will be generated. Accordingly the proponent should meet with staff from BWSC to ensure that this mitigation requirement is met. In addition, the proponent should also identify any deficiencies in the wastewater system serving the project site and confirm that the system has sufficient capacity to accept the flow.

Hazardous Waste/ MCP

Several releases of fuel oil occurred in the vicinity of former Fuel Oil Tank Number 3, an above-ground 5.5 million gallon tank. On September 27, 2016, a Notice of Activity & Use Limitation (AUL) was recorded for RTN 3-4519 consistent with MassDEP Bureau of Waste Site Clean-up regulations at 310 CMR 40.0000, the Massachusetts Contingency Plan (MCP). The AUL applies to the area of the property formerly occupied by Fuel Oil Tank Number Three. The AUL may require MCP response actions during, and/or after, the L Street development project. The AUL obligations and conditions are described below.

The following AUL activities and uses are allowed within the AUL area:

1. Industrial and Commercial use;
2. Improvements, demolition, construction of buildings or infrastructure, or emergency utility work provided that soil management and health and safety plans are prepared prior to such activities;
3. Any development of a building or infrastructure that would disturb the Engineered Barrier, provided that the structure is designed and approved by a Licensed Site Professional (LSP);
4. Construction of new buildings provided that an LSP evaluates the potential for vapor intrusion from LNAPL, soil, and groundwater into indoor air in the proposed building. If the LSP evaluation indicates the potential for vapor intrusion, the proposed buildings shall be designed to mitigate the vapor intrusion pathway;
5. Any emergency utility work, provided that the any damage to the Engineered Barrier is repaired;
6. Activities and uses which are not identified in the Opinion as being inconsistent with maintaining a Condition of No Significant Risk.

The following AUL activities and uses are restricted within the AUL area:

1. Any activity or use that would compromise the integrity or functionality of the Engineered Barrier:
2. All excavations into or below the Engineered Barrier, unless reviewed and approved by a Licensed Site Professional;
3. Residence, school, day care center, park, playground, or other recreational area;
   Gardening or other agricultural uses for the cultivation of edible plants destined for human consumption

The activities and uses that are restricted by the AUL, such as residences, schools, daycares and recreational areas, can be implemented at the site if they are evaluated by an LSP and determined to pose No Significant Risk of harm to human health, based on a re-evaluation of the risk characterization and/or the completion of additional response actions necessary to achieve and maintain a condition of No Significant Risk for the new use(s). If activities currently restricted by the AUL are allowed at the site based on such an LSP evaluation, an amended AUL shall be recorded describing the change in the allowed activities within the AUL area.

Contaminated Soil and Groundwater:

The project proponent is advised that excavating, removing and/or disposing of contaminated soil, pumping of contaminated groundwater, or working in contaminated media must be done under the provisions of MGL c.21E (and, potentially, c.21C) and all other applicable federal, state, and local laws, regulations, and bylaws. If permits and approvals under these provisions are not obtained beforehand, considerable delays in the project can occur. The project proponent cannot manage contaminated media without prior submittal of appropriate plans to MassDEP, which describe the proposed contaminated soil and groundwater handling and disposal approach, and health and safety precautions. If contamination at the site is known or suspected, the appropriate tests should be conducted well in advance of the start of construction and professional environmental consulting services should be readily available to provide technical guidance to facilitate any necessary permits. If dewatering activities are to occur at a site with contaminated groundwater, or in proximity to contaminated groundwater where dewatering can draw in the contamination, a plan must be in place to properly manage the groundwater and ensure site conditions are not exacerbated by these activities. Dust and/or vapor monitoring and controls are often necessary for large-scale projects in contaminated areas. The need to conduct real-time air monitoring for contaminated dust and to implement dust suppression must be determined prior to excavation of soils, especially those contaminated with compounds such as metals and PCBs. An evaluation of contaminant concentrations in soil should be completed to determine the concentration of contaminated dust that could pose a risk to health of on-site workers and nearby human receptors. If this dust concentration, or action level, is reached during excavation, dust suppression should be implemented as needed, or earthwork should be halted. A Licensed Site Professional (LSP) must be employed or engaged to manage, supervise or actually perform the necessary response actions at the site.

Capping of Contaminated Soil:

If capping of contaminated soil is needed to achieve a level of No Significant Risk, MassDEP recommends the following capping design criteria. In unpaved areas, a minimum of three feet of clean soil should be placed over the contaminated soil. This protective layer of clean soil should be separated from the underlying contaminated soil by a geotextile or combination of materials, which will provide both a brightly colored visual marker and a permeable fabric to separate the clean soil from the contaminated soil. In paved areas, a minimum one-foot cap consisting of clean soil, road base and the pavement layer should be placed over the contaminated soil. Similar to unpaved areas, the contaminated soil should be separated from the clean soil or road base using a visual marker and geotextile. In such cases, an Activity and Use Limitation (AUL), prepared in accordance with 310 CMR 40.1012 would be necessary to identify the maintenance requirements of the cap. It should also be noted that a cap constructed as a Release Abatement Measure will not be considered a Permanent Solution until a Phase III completed in accordance with 310 CMR 40.0850 demonstrates the lack of a feasible alternative, as required by 310 CMR 40.0442(4).

Potential Indoor Air Impacts:

Parties constructing and/or renovating buildings in contaminated areas should consider whether chemical or petroleum vapors in subsurface soils and/or groundwater could impact the indoor air quality of the buildings. All relevant site data, such as contaminant concentrations in soil and groundwater, depth to groundwater, and soil gas concentrations should be evaluated to determine the potential for indoor air impacts to existing or proposed building structures. Particular attention should be paid to the vapor intrusion pathway for sites with elevated levels of chlorinated volatile organic compounds such as tetrachloroethylene (PCE) and trichloroethylene (TCE). MassDEP has additional information about the vapor intrusion pathway on its website at http://www.mass.gov/eea/agencies/massdep/cleanup/regulations/vapor-intrusion-and-indoor-air-contamination-waste-sites.html.

New Structures and Utilities:

Construction activities conducted at a disposal site shall not prevent or impede the implementation of likely assessment or remedial response actions at the site. Construction of structures at a contaminated site may be conducted as a Release Abatement Measure if assessment and remedial activities prescribed at 310 CMR 40.0442(3) are completed within and adjacent to the footprint of the proposed structure prior to or concurrent with the construction activities. Excavation of contaminated soils to construct clean utility corridors should be conducted for all new utility installations.

Activity and Use Limitations:

An Activity and Use Limitation (AUL) is a legal document that is recorded or registered at the appropriate Registry of Deeds and identifies site conditions that are the basis for maintaining a condition of No Significant Risk at a property where contamination remains after a cleanup. The AUL identifies permitted and allowable site uses and activities that may occur at a property while maintaining No Significant Risk. The AUL also identifies restricted uses and activities, which could result in the exposure of people at or near the disposal site to remaining contamination if such activities were to occur. The project proponent is advised that in cases where proposed activities would not be consistent with a level of No Significant Risk and/or an existing AUL, additional cleanup and the amendment or termination of the initial AUL and implementation of a revised AUL would be necessary before the proposed activities could occur.

Recycling Issues

MassDEP encourages the project proponent to make a significant commitment to C&D recycling activities as a sustainable measure for the project, consistent with comparable projects that have undergone MEPA reviews. In addition, the proponent is advised that demolition activities must comply with both Solid Waste and Air Pollution Control regulations, pursuant to M.G.L. Chapter 40, Section 54, which provides:

"Every city or town shall require, as a condition of issuing a building permit or license for the demolition, renovation, rehabilitation or other alteration of a building or structure, that the debris

resulting from such demolition, renovation, rehabilitation or alteration be disposed of in a properly licensed solid waste disposal facility, as defined by Section one hundred and fifty A of Chapter one hundred and eleven. Any such permit or license shall indicate the location of the facility at which the debris is to be disposed. If for any reason, the debris will not be disposed as indicated, the permittee or licensee shall notify the issuing authority as to the location where the debris will be disposed. The issuing authority shall amend the permit or license to so indicate."

For the purposes of implementing the requirements of M.G.L. Chapter 40, Section 54, MassDEP considers an asphalt, brick, and concrete (ABC) rubble processing or recycling facility, (pursuant to the provisions of Section (3) under 310 CMR 16.05, the Site Assignment regulations for solid waste management facilities), to be conditionally exempt from the site assignment requirements, if the ABC rubble at such facilities is separated from other solid waste materials at the point of generation. In accordance with 310 CMR 16.05(3), ABC can be crushed on-site with a 30-day notification to MassDEP. However, the asphalt is limited to weathered bituminous concrete, (no roofing asphalt), and the brick and concrete must be uncoated or not impregnated with materials such as roofing epoxy. If the brick and concrete are not clean, the material is defined as construction and demolition (C&D) waste and requires either a Beneficial Use Determination (BUD) or a Site Assignment and permit before it can be crushed.

Pursuant to the requirements of 310 CMR 7.02 of the Air Pollution Control regulations, if the ABC crushing activities are projected to result in the emission of one ton or more of particulate matter to the ambient air per year, and/or if the crushing equipment employs a diesel oil fired engine with an energy input capacity of three million or more British thermal units per hour for either mechanical or electrical power which will remain on-site for twelve or more months, then a plan application must be submitted to MassDEP for written approval prior to installation and operation of the crushing equipment.

Asbestos removal notification on permit form BWP AQ04 (ANF 001) and building demolition notification on permit form BWP AQ06 must be submitted to MassDEP at least 10 working days prior to initiating work. If any asbestos-containing materials will need to be abated through non-traditional abatement methods, the proponent must apply for and obtain approval from MassDEP, through Application BWP AQ36 - Application for Non-Traditional Asbestos Abatement Work Practice Approval. Except for vinyl asbestos tile (VAT) and asphaltic-asbestos felt and shingles, the disposal of asbestos containing materials within the Commonwealth must be at a facility specifically approved by MassDEP, (310 CMR 19.061). No asbestos containing material including VAT, and/or asphaltic-asbestos felts or shingles may be disposed at a facility operating as a recycling facility, (310 CMR 16.05). In addition, the demolition project contain asbestos, the project proponent is advised that asbestos and asbestos-containing waste material are a special waste as defined in the Solid Waste Management regulations, (310 CMR 19.061). The disposal of the asbestos containing materials outside the jurisdictional boundaries of the Commonwealth must comply with all the applicable laws and regulations of the state receiving the material.

The demolition activity also must conform to current Massachusetts Air Pollution Control regulations governing nuisance conditions at 310 CMR 7.01, 7.09 and 7.10. As such, the proponent should propose measures to prevent and minimize dust, noise, and odor nuisance conditions, which may occur during the demolition. Again, MassDEP must be notified in writing, at least 10 days in

advance of removing any asbestos, and at least 10 days prior to any demolition work. The removal of asbestos from the buildings must adhere to the special safeguards defined in the Air Pollution Control regulations, (310 CMR 7.15 (2)).

Waste Ban Regulation – 310 CMR 19.017

Section 310 CMR 19.017 *Waste Bans* of the Massachusetts Solid Waste regulations prohibit the disposal of certain wastes in Massachusetts. These wastes include, but are not limited to, recyclable paper (including cardboard). The Massachusetts Organics Waste Ban on the disposal of commercial organic wastes by businesses and institutions also is in effect. It prohibits the disposal of organic wastes from businesses and institutions that generate a ton or more of organic materials per week, which necessitates the composting, conversion (such as anaerobic digestion), recycling or reuse of organic the waste.

As the lead state agencies responsible for helping the Commonwealth achieve its waste diversion goals, MassDEP and EEA have strongly supported voluntary initiatives by the private sector to institutionalize source reduction and recycling into their operations. Adapting the design, infrastructure, and contractual requirements necessary to incorporate reduction, recycling and recycled products into existing large-scale developments has presented significant challenges to recycling proponents. Integrating those components into developments such as the Ashland Rail Transit Apartments at the planning and design stage enables the project's management and occupants to establish and maintain effective waste diversion programs. For example, facilities with minimal obstructions to trash receptacles and easy access to main recycling areas and trash chutes allow for implementation of recycling programs and have been proven to reduce cleaning costs by 20 percent to 50 percent. Other designs that provide sufficient space and electrical services will support consolidating and compacting recyclable material and truck access for recycling material collection.

By incorporating recycling and source reduction into the design, the proponent has the opportunity to join a national movement toward sustainable design. Sustainable design was endorsed in 1993 by the American Institute of Architects with the signing of its *Declaration of Interdependence for a Sustainable Future.* The project proponent may be aware of organizations that provide additional information and technical assistance, including Reuse Marketplace (http://www.reusemarketplace.org/), USEPA's WasteWise Program (www.epa.gov/wastewise/), and MassRecycle (http://www.massrecycle.org/). The listed organizations and programs are notable for offering valuable and effective waste reduction and recycling assistance, web-based resources, case studies, and tools for C&D projects.

The MassDEP Northeast Regional Office appreciates the opportunity to comment on this proposed project. Please contact Kevin.Brander@state.ma.us at (978) 694-3236 for further information on the wastewater issues. Please contact Jack.Miano@state.ma.us at (978) 694-3357 for further information on the waste site cleanup issues. If you have any general questions regarding these comments, please contact me at John.D.Viola@state.ma.us or at (978) 694-3304.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

John D. Viola
Deputy Regional Director

cc: Brona Simon, Massachusetts Historical Commission
Eric Worrall, Jack Miano, Kevin Brander, MassDEP-NERO

Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Stephanie Pollack, MassDOT Secretary & CEO

massDOT
Massachusetts Department of Transportation

TO: David J. Mohler, Executive Director
Office of Transportation Planning

FROM: J. Lionel Lucien, P.E, Manager
Public/Private Development Unit

DATE: July 11, 2017

RE: Boston: L Street Station Redevelopment – ENF
EEA # 15692

The Public/Private Development Unit has reviewed the Environmental Notification Form (ENF) for the L Street Station Redevelopment project in Boston. The development program involves a mixed-use project consisting of approximately 2.1 million square feet of retail, residential, office, hotel, and cultural space in several buildings. The proposed project would construct 1,588 residential apartments and condominiums, 68,077 square feet of retail space, 339,639 square feet of office space, a 150 room hotel and additional recreation space. The project would provide 987 parking spaces to serve the proposed uses.

The site currently contains several old buildings and infrastructure associated with the Boston Edison L Street Power Station. It comprises 15 acres of developed land along the Reserved Channel in South Boston located at 776 Summer Street, and is bounded on the west by Summer Street, on the south by East 1st Street, on the east by a land parcel owned by the Massachusetts Transportation Authority (MBTA), and on the north by the Reserved Channel and the Conley Dedicated Freight Corridor (DFC).

The project is categorically included for the preparation of an Environmental Impact Report (EIR) because it would generate in excess of 3,000 daily vehicle trips. The following scope of work for the transportation section of the required Draft EIR is recommended and described as follows:

Scope of Work

The DEIR should include a Transportation Impact Assessment (TIA) prepared in conformance with the current MassDOT/EOEEA *Transportation Impact Assessment Guidelines*. The study should include a comprehensive multimodal assessment of the transportation impacts of the project. The TIA should provide transit and capacity analyses, and evaluate bicycle and pedestrian facilities for the existing conditions, future No-Build conditions, and future Build conditions within the study area. The future Build conditions should include an analysis of operations both with and without any improvements suggested to mitigate project impacts. The study should propose an integrated multimodal mitigation package intended to improve vehicular traffic operations while supporting increased use of walking, bicycling, and transit by employees, patrons, and residents. Items listed below should be accounted for in preparing the TIA.

Trip Generation

Based on the information presented within the ENF, the Full-Build project would generate 20,370 unadjusted vehicle trips on an average weekday, including 1,576 vehicle trips during the AM peak hour and 2,015 vehicle trips during the PM peak hour. This estimate is based on the Institute of Transportation Engineers (ITE) Trip Generation Manual using trip generation rates for the appropriate land use codes. When adjusted for mode shares from the Boston Transportation Department Area 13, the project is expected to generate 10,250 net vehicle trips, 8,730 new pedestrian/bicycle trips, and 4,864 new transit trips on an average weekday. During the weekday AM peak hour, the project is estimated to generate 661vehicle trips (405 entering, 256 exiting), 605 pedestrian trips (240 entering, 365 exiting), and 354 transit trips (142 entering, 212 exiting). During the weekday PM peak hour, the project is expected to generate 768 vehicle trips (284 entering and 484 exiting), 761 pedestrian/bicycle trips (441 entering, 320 exiting) and 423 transit trips (250 entering, 173 exiting).

We generally concur with the mode shares used as they appear consistent with this section of Boston and the City of Boston Transportation guidelines.

Trip Distribution

The DEIR should provide a trip distribution for the project based on a gravity model or similar model that uses factors such as census data, origin-destination, travel time, and distance to determine trip characteristics for employees and residents of the project. The DEIR should provide all appropriate back up documentation to verify how the different percentages are calculated and assigned to the roadway network and the transit system.

Vehicle Crash Data

The DEIR should include a safety evaluation for all intersections within the study area. Specifically, the DEIR should conduct analysis for any study area intersections having crash rates higher than the State and/or District 6 average. The analysis should include a discussion of causality, suggestions for mitigation, and commitment to implementing this mitigation.

Traffic Operations

Capacity analyses should be conducted for the weekday AM and PM peak hours for both existing and future conditions. In addition, capacity analyses for Build with mitigation conditions should be provided for all intersections. The DEIR should provide illustrations depicting the peak hour 50th (average) and 95th percentile queue lengths for each lane group/turning movement at each study area intersection, for all analysis scenarios. The information contained in these illustrations should clearly demonstrate that the project would not result in any extended queues that would block vehicle movements to/from study area intersections. Appropriate mitigation should be identified at any locations where queue blockages occur. Color-coded illustrations should also be prepared depicting the level of service (LOS) for each lane group/turning movement for each case.

A traffic signal warrant study (TSWS) should be performed and the need documented for any locations where signalization is being proposed, including site driveway intersections with the public roadway system. A left-turn lane warrant analysis should be conducted and the need documented for any locations where the addition of such a lane is being proposed, including at site driveways.

Conceptual Plans

The DEIR should include sufficiently detailed conceptual plans (minimum of 80-scale) for proposed roadway improvements in order to verify the feasibility of constructing such improvements. These plans should clearly show proposed lane widths and offsets, layout lines and jurisdictions, and land uses adjacent to areas where improvements are proposed.

Transit

The project is located within walking distance to MBTA route numbers 5, 7, 9, 10, and 11. These routes provide connections to major MBTA transportation hubs such as South Station that provides access to the MBTA Commuter Rail, the Red Line, the Silver Line, and AMTRAK. The DEIR should contain an analysis of what additional demand will be generated by the project and document its impacts on these routes.

In January 2015, MassDOT in partnership with the Massachusetts Convention Center Authority, Massachusetts Port Authority, and the City of Boston completed a planning study (the South Boston Waterfront Sustainable Transportation Plan) that evaluates the transportation impacts of future growth and vitality in the South Boston Waterfront. The study is both a strategic plan—providing a blueprint for the transportation system improvements over a 20 year planning horizon—and an action plan defining more immediate/short-term strategies to address existing transportation and mobility issues, capacity constraints, transit, pedestrian and bicycle needs, and operational enhancements. The study conducted a comprehensive analysis of the capacity of bus routes servicing the project's area, and the findings of the study indicate that some of the bus routes are currently operating over capacity.

The DEIR should include a presentation of the impacts of the project to the MBTA bus network with a summary table for the anticipated demand in terms of MBTA Service Standards for bus volumes, capacity. The TIA also should include a comprehensive discussion of mitigation measures to address the L Street Station Redevelopment project's transit impacts on the transit system within the study area. Based on the DEIR transit analysis, the Proponent should consult with MassDOT and the MBTA to identify the level of transit improvements required along with a schedule of implementation to address future constrained capacity conditions of the transit system. These improvements could be of a capital and/or operational nature, and should be consistent with (and not preclude implementation of) those identified in the South Boston Waterfront Sustainable Transportation Plan. The EIR should present a summary of the transit analysis to demonstrate that the proposed improvements would maintain or improve MBTA Service Standards compared to future No-Build conditions.

Pedestrian Access

The project is expecting a high pedestrian mode share; therefore the Proponent should provide a mitigation package that ensures that walking and bicycling will be an attractive way to access the site. The DEIR should provide an inventory of existing sidewalks and crosswalks within the study area, and should address the quality and condition of those facilities. The DEIR should include a commitment to improvements in any areas that are structurally deficient or not meeting current codes for accessibility. Special attention should be given to linking the proposed development to adjacent complementary land uses and to transit facilities.

Any proposed mitigation within the state highway layout and all internal site circulation must be consistent with a Complete Streets design approach that provides adequate and safe accommodation for all roadway users, including pedestrians, bicyclists, and public transit riders. Complete Streets design guidelines are included in the MassDOT *Project Development and Design Guide*. Where these criteria cannot be met, the Proponent should provide justification, and should work with the MassDOT Highway Division to obtain a design waiver.

Bicycle Access

The ENF includes a map of the existing bicycle network within the vicinity of the project. The DEIR should include a detailed inventory of the bicycle network to include bikeway types, bikeway widths, and bicycle number and speeds. The Proponent should identify the likely travel routes for bicyclists within the study area. The degree to which these routes can safely support bicycle travel should also be examined. The DEIR should reevaluate these routes based on the origin-destination of potential employees and residents. Based on this analysis, the Proponent should consider the feasibility of expanding some of these existing routes or consider new routes to encourage bicycle travel in and around the site. Similarly for pedestrian access, the project should work closely with MassDOT and the City of Boston to provide a seamless connection between the existing and planned bicycle facilities in the study area.

Parking

According to the ENF, the project at full build would include the provision of a parking garage to accommodate up to 987 vehicles. The DEIR should clarify how the parking needs of the project were determined and explain the methodology used to determine the total parking required. The Institute of Transportation Engineers' *Parking Generation* generally provides a reasonable basis for comparison to parking requirements under local zoning, but this reference does not present parking rates for this type of mixed-use.

The DEIR should include a summary of parking need and supply for comparable facilities based on multiple data sources. It should also determine the number of parking spaces occupied at various times of the day and identify the periods of peak use.

Transportation Demand Management

The DEIR should include a comprehensive Travel Demand Management (TDM) program that would implement measures aimed at reducing site trip generation. The TDM program should further investigate measures that would maximize usage of existing and new pedestrian, bicycle, and transit facilities. Such measures may include subsidizing transit passes, limiting the available parking supply, providing on-site amenities and conveniences that would reduce the need for automobile travel, and providing seamless pedestrian access between the L Street Redevelopment project and nearby bus stops. In any mixed-use development, the range of TDM measures varies widely to meet the specific needs of each of the proposed land uses.

We urge the Proponent to meet with MassRIDES and A Better City Transportation Management Association to discuss TDM measures that have been successful in limiting single occupant vehicle trips at similar projects within the urban core of Boston. The Proponent should also promote ridesharing through NuRide, the Commonwealth's web-based trip planning and ridematching service that enables participants to earn rewards for taking "green" trips. The Proponent should provide information on the substance and outcomes of its consultations in the DEIR.

Transportation Monitoring Program

The Proponent will be required to conduct an annual traffic monitoring program for a period of five years, beginning six months after occupancy of the full-build project. It would include:

- Simultaneous automatic traffic recorder (ATR) counts at each garage entrance for a continuous 24-hour period on a typical weekday and Saturday;
- Travel survey of employees and patrons at the site (to be administered by the Transportation Coordinator);
- Weekday AM and PM peak hour turning movement counts (TMCs) and operations analysis at "mitigated" intersections, including those involving garage entrances; and
- An update on TDM effectiveness and transit ridership.

The goals of the monitoring program will be to evaluate the assumptions made in the Environmental Impact Report (EIR) and the adequacy of the mitigation measures, as well as to determine the effectiveness of the TDM program.

The Proponent should continue consultation with MassDOT PPDU, the MBTA, and the District 6 office during the preparation of the DEIR. If you have any questions regarding these comments, please contact me at (857) 368-8862.

Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Stephanie Pollack, MassDOT Secretary & CEO

massDOT
Massachusetts Department of Transportation

July 11, 2017

Matthew Beaton, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2150

RE: Boston: L Street Station Redevelopment – ENF
(EEA #15692)

ATTN: MEPA Unit
Alex Strysky

Dear Secretary Beaton:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the proposed L Street Station Redevelopment project in Boston, as prepared by the Office of Transportation Planning. If you have any questions regarding these comments, please contact J. Lionel Lucien, P.E., Manager of the Public/Private Development Unit, at (857) 368-8862.

Sincerely,

David J. Mohler
Executive Director
Office of Transportation Planning

DJM/jll

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cc: Jonathan Gulliver, Acting Administrator, Highway Division
Patricia Leavenworth, P.E., Chief Engineer, Highway Division
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Boston Transportation Department
Boston Region Metropolitan Planning Organization
PPDU Files

Massachusetts Port Authority
One Harborside Drive, Suite 200S
East Boston, MA 02128-2090
Telephone (617) 568-5000
www.massport.com

July 6, 2017

Matthew A. Beaton, Secretary
Executive Office of Energy and Environmental Affairs
Attn: Alex Strysky EEA 15692
100 Cambridge Street
Boston, MA 02114

Subject: L Street Station -776 Summer Street (EEA #15692) ENF Comments

Dear Secretary Beaton:

On behalf of the Massachusetts Port Authority (Massport), we are pleased to have the opportunity to review and provide comments on the *Environmental Notification Form* filed by HRP 776 Summer Street LLC (the Proponent) to commence joint review of the proposed L Street Station redevelopment at 776 Summer Street in South Boston under both MEPA and the City of Boston's Article 80B process. As outlined in the ENF/EPNF, this project proposes to build a total of 2.1 million sf on the 15 acre site, including 1.4 million sf of residential development (±1,500 units), 987 structured parking spaces hotel, retail and office space.

As a major landowner in the South Boston Waterfront, and the owner and operator of the Conley Container Terminal which abuts the 776 Summer Street property, Massport appreciates the opportunity to comment on this filing and to provide context on the critical port operations that occupy 2 sides of the site. We recognize the unique urban and economic redevelopment opportunity this project represents and the community's strong interest in replacing the former power plant and remediating this site. Massport's primary interest is ensuring the long-term viability of the Conley terminal and The Port of Boston's over 7,000 jobs as this project moves ahead.

Proposed Project's Context on the Port of Boston

Conley Container Terminal, which is located immediately adjacent to the project site, and maritime uses in the Port generally have a significant regional economic impact; over 1,600 businesses throughout New England rely on Conley to import and export raw materials and finished products. It is a critical link in both the region's supply chain and the overall economy.

Container activity at Conley processed a record high mark of over 250,000 TEUs (Twenty Foot Equivalent Units, a standard industry measurement of throughput) in FY2017, coming off back to back record volume in both FY15 and FY16. In conjunction with the Commonwealth and the federal government, Massport is now embarking on a comprehensive Conley Terminal modernization and harbor dredging project to accommodate the new, larger post-Panamax ships that are already beginning to call on Boston following expansion of the Panama Canal. In addition to the Boston Harbor dredging project, Massport has been particularly focused on improving and expanding Conley's landside terminal and transportation facilities to increase terminal capacity and efficiency necessary to remain

competitive as a regional port. Critical among these projects are the Butler Dedicated Freight Corridor (DFC) which is scheduled to open in 2017, improvements to Berths 11/12, and creation of a new deepwater berth, Berth 10, to allow Conley to receive the larger container vessels now servicing the East Coast. A key motivation for Massport's construction of the DFC was to move Conley truck traffic off East First Street and away from the adjacent residential neighborhoods.

The landside improvements will also include the purchase of three new ship-to-shore cranes to be located between the current cranes and the proposed project site, and the expansion of the Conley container yard on the former Coastal Oil site, which Massport invested in cleaning up. Also, although not in the immediate terminal plans, Massport is preserving a 5-acre site immediately adjacent to the 776 Summer Street site for future maritime industrial use to support Conley operations. These projects, and others not detailed in this letter, are all part of the large scale investment in Conley Terminal that collectively represent an investment in the Port of over $850 million by Massport, the Commonwealth, and the Federal government to continue to support this regional economic asset, while also minimizing its impact on existing residential neighbors. These projects are illustrated on the attached map.

The 776 Summer Street project site is also immediately across the Reserved Channel from the Raymond L. Flynn CruisePort Boston at Black Falcon Terminal. The terminal hosts a robust and growing cruise ship industry each season from April to November. This year, the CruisePort will set a record with more than 150 ships visiting and docking in close proximity to 776 Summer Street, another example of the level of maritime activity that occurs in this area of the Port of Boston.

Several of Massport's improvements listed above, particularly the DFC and upcoming Berth 10 work, will move essential Conley operations west, away from Logan airspace restrictions, and closer to the 776 Summer Street site. When it opens in the fall of 2017, the DFC will carry approximately 900 container trucks a day past the project site.

It will be critically important to evaluate the 776 Summer Street redevelopment in the context of these existing and planned maritime activities. Conley Terminal operates 24/7. Container ships regularly call Conley Terminal on nights and weekends, leading to active unloading activities throughout the facility outside of typical work hours.

In light of Massport's work to protect and grow these Maritime assets, we are pleased to provide the following specific comments on the ENF:

Buffering Conley Terminal Operations. Due to the 24/7 nature of activity at Conley Container Terminal and on the DFC, Massport believes that this development must be designed to minimize conflicts between the site and the adjacent industrial port. The allocation of land uses should be designed to buffer and protect Conley operations from potential development that is incompatible with adjacent maritime industrial uses. Massport understands that there is strong interest in accommodating residential units on the site. Particularly given the close proximity to certain 24/7 Conley Terminal activities, a thoughtful review of specific residential proposals in the context of an overall plan will need to be assessed. In particular, we recommend the following:

- Residential uses should be limited to portions of the site that do not abut the Butler Dedicated Freight Corridor or adjacent industrial uses. We concur with the current proposal to buffer the port by avoiding residential uses on blocks D, G, and H. We also have concerns that any residential units in Block F, particularly along the property line, could be too close to the industrial activities at Conley.
- Condominium ownership should be restricted to interior blocks and along East First Street.
- Massport's standard Residential Use Restriction Language, which describes the adjacent freight corridor and active industrial uses, should be included in all legal documentation signed for any residential units

- Construction of any residential units should be designed to meet noise standards (not to exceed 45 dBA day-night average interior sound level).
- Additionally, we recommend minimizing active lower level commercial use on the ground floors of office and hotel blocks fronting on the Butler Dedicated Freight Corridor, which will likely generate noise and vibrations from the more than 900 truck trips per day that may be incompatible with commercial activities.

Limit Public Access near Secure Zones and Terminal Operations. Once opened and under Massport Police surveillance, the DFC will be a restricted access roadway, providing critical freight access between Conley Terminal and nearby truck routes such as Summer Street, Massport Haul Road, and the South Boston Bypass Road. The proponent has the right to construct and use a single driveway connecting to the DFC into the project site for delivery and service access to the site only; this connection is shown on plans included in the ENF. It is imperative that this connection remains gated to maintain the security of the DFC and that it is used only for service purposes.

Limit Transportation Impacts. Mixed use development of the L Street Station site will increase multi-modal traffic and bring 10,250 new vehicle trips in the East First Street/Summer Street neighborhood and the surrounding community. The ENF form on page 3 lists 8,780 vehicle trips. However, we understand from the ENF's data tables that this is the number of new bicycle and pedestrian trips, not vehicle trips. We understand that this development intends to create a grid of streets on the parcel and to provide above ground on-site parking on several parcels. As part of the continued environmental review process, Massport will look forward to reviewing a more detailed analysis of the project's projected traffic impacts and operating characteristics to ensure they will not negatively impact Conley operations. In particular, we will be seeking to maintain the safe, efficient, and timely operations of the new signalized intersection at the DFC and Summer Street. It is imperative that freight movement on Summer Street is not adversely impacted by the additional vehicle trips generated by the project.

Open Space and Waterfront Access. The ENF describes a concept for a highly programmed active waterfront open space along the northern edge of the site. Due to the need to maintain security of the DFC, Massport requests that waterfront open space be designed with landscaped buffer to provide separation from the DFC in all locations. Public recreation plans should be evaluated for their compatibility with the noise, light, and truck traffic of the active port. Additionally, Massport is soon to open the 4.5-acre Thomas Butler Memorial Park along East First Street to the east of the 776 Summer Street site, which will buffer the community from Conley Terminal noise and will include many amenities for the local community. We support the developers' plans to continue the spine of public access along East First Street through the development site to the intersection of East First Street and Summer Street and would support additional connections leading from the interior of the site to the park.

Building Heights. In coordination with the Federal Aviation Administration (FAA), Massport has prepared and widely circulated the *Logan Airspace Map* that defines the critical airspace around Boston Logan International Airport to protect the flight corridors in and out of the Airport (see attached map). Created by Massport, with input from airlines, pilots, city officials, and the FAA, it helps guide developers and regulatory authorities to safely build to maximum structure heights without compromising air travel safety. The map aids developers in their planning and assists the FAA in its review of individual projects to determine if they present a potential hazard to air navigation.

As noted above, the ENF describes an increase in the maximum building heights surrounding the L Street Station site. The project building heights presented in the ENF are based on Boston Zoning Code rather than an elevation of the tallest building structure compared to elevation above mean sea level (AMSL – NAVD88). Accordingly, additional information on the proposed building heights using the *Logan Airspace Map* baseline is needed to determine if the Project is consistent with the Airspace Map. We are pleased to hear that the project will involve removal of the two

stacks that have historically penetrated Logan's protected airspace and that all site buildings will remain below the critical FAA surfaces, thereby removing an obstruction to Logan Airspace.

Massport recommends that the Proponent coordinate closely with FAA and Massport during the remainder of the design process to ensure that individual building heights remain consistent with the *Logan Airspace Map* and also early in the construction phase, which is particularly important to minimize the extent and duration of impacts of the crane(s) on the airspace. The Proponent will be required to submit multiple Form 7460s to the FAA, one for each permanent building and a separate filing for construction cranes.

Thank you again for your consideration of our comments. We look forward to continued collaboration as the L Street Station proceeds. Please feel free to contact me at (617) 428-2815 or at lwieland@massport.com if you wish to discuss any of our comments.

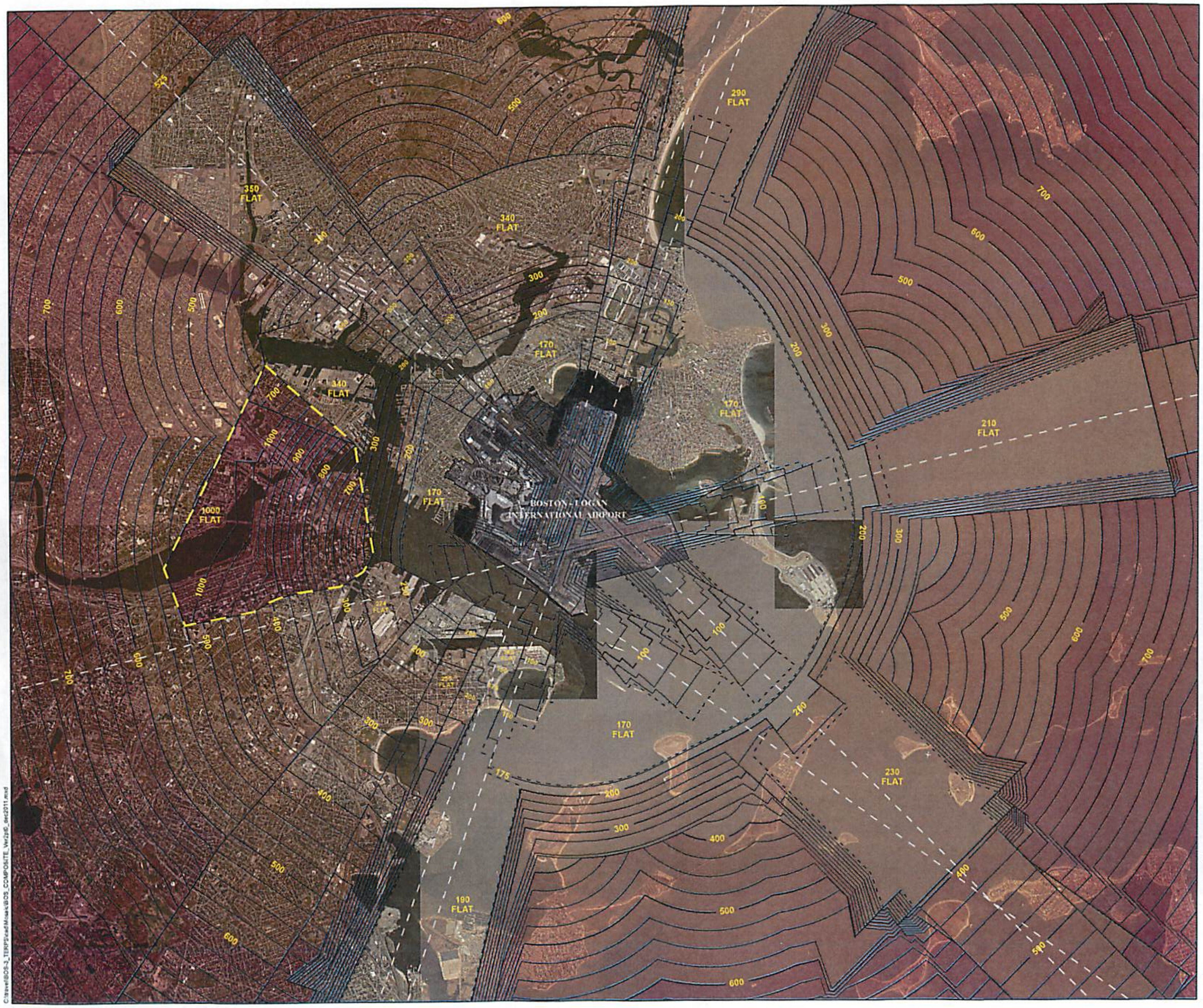
Sincerely,

Massachusetts Port Authority

Lisa Wieland
Port Director

CC: T. Glynn, J. Doolin, G. Carr, A. Hargens, S. Dalzell, H. Morrison, L. Gilmore, F. Leo, M. Gove/Massport
B. Golden/Boston Planning & Development Agency
D. Koh/Office of Mayor Martin Walsh
R. Cox/Redgate Capital Partners

Enclosures: Logan Airspace Map
Conley Terminal Master Plan



Boston – Logan International Airport
Composite of Critical Airspace Surfaces

Legend

Surface Elevations (MSL)

- 801' to 1,000'
- 601' to 800'
- 401' to 600'
- 201' to 400'
- up to 200'
- Downtown Zone Area

Dashed lines identify transition from "Flat" to "Sloping" surface.

Contour Interval = 25 FT

Notes:

1. This Composite Map is intended for informational and conceptual planning purposes only and does not represent actual survey data nor should it be used in the development of a FAA Form 7460. Massport does not certify the accuracy, information or title to the properties contained in this plan nor make any warranties of any kind, express or implied, in fact or by law, with respect to boundaries, easements, restrictions, claims, overlaps, or other encumbrances affecting such properties.

2. This Composite Map does not replace the FAA's 7460 review process. Consistency with the surfaces shown on this map does not ensure that the proposal will be acceptable to the FAA and air carriers. Massport reserves the right to re-assess, review and seek modifications to projects that may be consistent with this Composite Map but that through the FAA 7460 process are found to have unexpected impacts to Boston Logan's safety or efficiency.

3. Surface elevations are referenced in feet Above Mean Sea Level (AMSL - NAVD88)

COMPOSITE MAP PARAMETERS

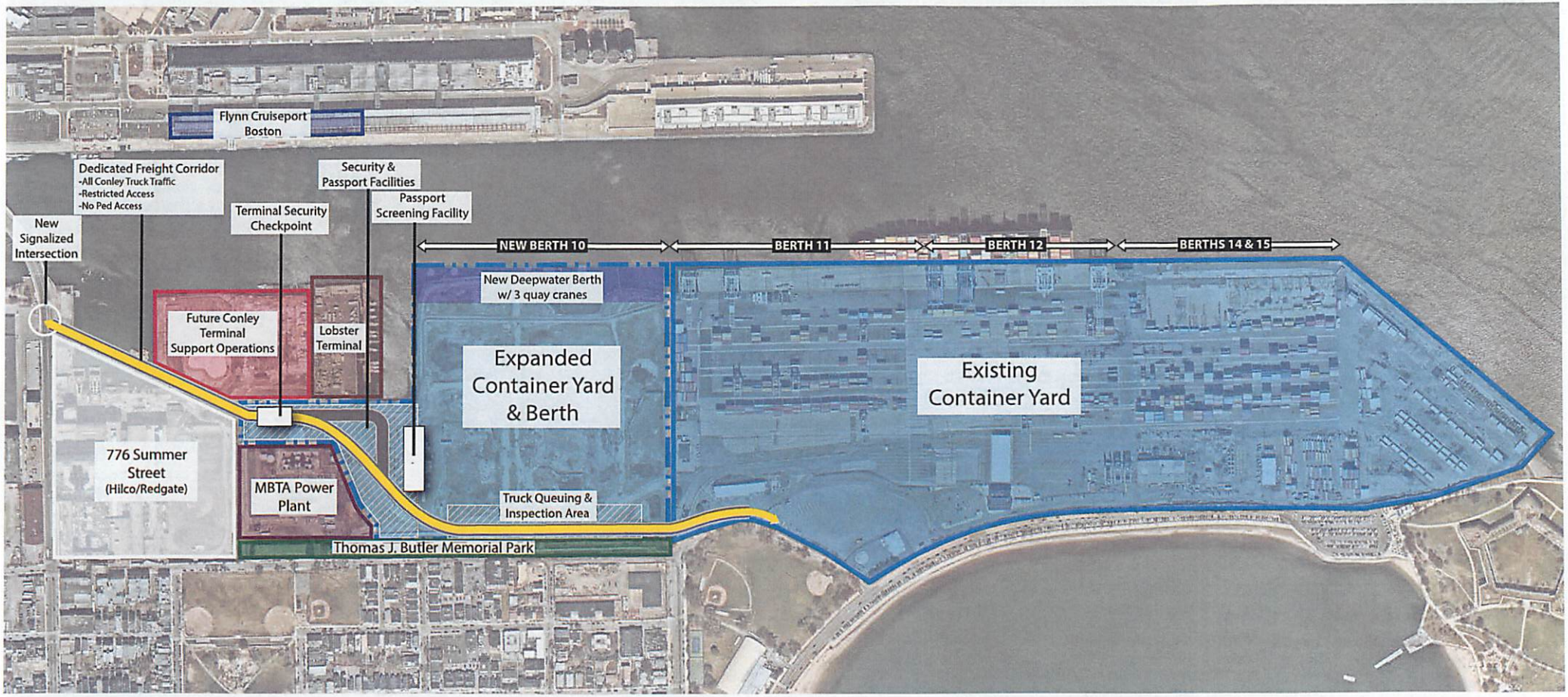
SURFACE TYPES	RUNWAYS
CIRCLE-TO-LAND	ALL RUNWAYS (EXCEPT 14)
ICAO/AC ONE ENGINE INOP.	4R, 4L, 9, 14, 15R, 22L, 22R, 27, 33L
IFR STND DEPARTURE	4R, 9, 14, 15R, 22L^, 22R^, 27^, 33L
IFR NON-STND DEPARTURE	4L
ILS APPROACH	4R, 15R, 22L, 27, 33L
ILS MISSED APPROACH	4R*, 15R, 22L, 27, 33L*^^
LOCALIZER APPROACH**	4R, 15R, 22L, 27, 33L
LNAV APPROACH**	4R, 15R, 22L, 27, 32, 33L
LNAV MISSED APPROACH	4R, 15R, 22L, 27, 32, 33L
PART 77 - STANDARD	EAST OF 4R/22L
PART 77 - VFR ONLY	WEST OF 4R/22L (N. OF DOWNTOWN)
VISIBILITY (CIRCLING)	ALL RUNWAYS (EXCEPT 14)
VISIBILITY (STRAIGHT-IN)	4R, 15R, 22L, 27, 32, 33L
VNAV APPROACH	4R, 15R, 27, 33L
VNAV MISSED APPROACH	4R, 15R, 27, 33L

* INCLUDES TRANSITION FROM PREVIOUS CRITERIA
^ CAT 1 AND CAT 3
^^ CAT 3 SHIFTED 200'NW
** ACCOUNTS FOR 7:1 DRIFT DOWN

massport

VERSION 2.0

December 2011



Massachusetts Port Authority
Real Estate & Asset Management
April 2017

0' 500' 1000' 2000'

Conley Terminal Master Plan
(2018-2023 Implementation)
South Boston

RECEIVED
JUL 13 2017
MEPA

The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

July 7, 2017

Secretary Matthew A. Beaton
Executive Office of Energy & Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Attn: Alex Strysky, MEPA Analyst – MEPA UNIT

RE: Boston Edison L Street Power Station Redevelopment, 776 Summer Street, Boston (South Boston), MA; MHC# RC.62038; **EEA# 15692**

Dear Secretary Beaton:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the Environmental Notification Form (ENF) that was submitted for the proposed L Street Power Station Development. The staff of the MHC have the following comments.

The proposed project includes the demolition of portions of the Boston Edison L Street Power Station and the construction of a number of new buildings on the site.

A Project Notification Form (PNF) was received at the MHC on March 30, 2017, for the project referenced above. The PNF submitted was incomplete for the purpose of MHC's review (950 CMR 71.07). The MHC responded to the PNF in a letter dated May 5, 2017 and enclosed with this letter. To date, the information MHC requested has not been submitted.

The information provided in the ENF is inadequate. The MHC requests the following information be submitted in order to evaluate the potential effects of the work proposed on this property:

- Interior photographs of all sections of the building keyed to a site plan and labeled to match the names of the building areas labeled on the site plan.
- Information on the structural and historical integrity of the different sections of the complex.
- Clarification on the proposed rehabilitation of the turbine halls.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 (36 CFR 800), M.G.L. Chapter 9, sections 26-27C (950 CMR 71.00), and MEPA (301 CMR 11). Please do not hesitate to contact Elizabeth Sherva of my staff if you have any questions.

Sincerely,

Brona Simon

Brona Simon
State Historic Preservation Officer
Executive Director
Massachusetts Historical Commission

Enclosure

xc (w/out enclosure): Ralph Cox, Redgate Capital Partners
Benjamin Spera, Hilco Redevelopment Partners
Elizabeth Grob, VHB
Jennifer McCarthy, US Army Corps of Engineers
Department of Environmental Protection – MassDEP Headquarters
Marianne Connolly, MWRA
Boston Landmarks Commission
Albert Rex, MacRostie Historic Advisors
Greg Galer, Boston Preservation Alliance
South Boston Historical Society

220 Morrissey Boulevard, Boston, Massachusetts 02125
(617) 727-8470 • Fax: (617) 727-5128
www.sec.state.ma.us/mhc

The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

May 5, 2017

Benjamin Spera
Hilco Redevelopment Partners
99 Summer Street, Suite 500
Boston, MA 02110

RE: Boston Edison L Street Power Station Redevelopment, 776 Summer Street, Boston (South Boston), MA; MHC# RC.62038

Dear Mr. Spera:

Thank you for submitting a Project Notification Form (PNF) for the project referenced above, which was received at this office on March 30, 2017. The staff of the Massachusetts Historical Commission (MHC) have reviewed the information submitted and have the following comments.

It is unclear from the information submitted if the project will require Federal licensing, permitting, or funding and will therefore be reviewed under Section 106 of the National Historic Preservation Act of 1966 (36 CFR 800). It is also unclear from the information submitted if the project will require State licensing, permitting, or funding and will therefore be reviewed under M.G.L. Chapter 9, sections 26-27C (950 CMR 71.00). Please be aware that Section 106 review can substitute for the state register review in the case that the project will require both reviews. The state register review cannot substitute for Section 106 review. The staff of the MHC recommends that initial planning phases of the project identify licensing, permitting, and funding sources to identify which regulations MHC review will occur.

The PNF is incomplete (950 CMR 71.07). MHC looks forward to receiving an Environmental Notification Form or revised PNF with information pertaining to licensing, permitting, or funding. The submission should include interior photographs of all sections of the building keyed to a site plan and labeled to match the names of the building areas labeled on the site plan. A future submission should also include information on the structural and historical integrity of the sections of the building with corresponding photographs.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 (36 CFR 800), M.G.L. Chapter 9, sections 26-27C (950 CMR 71.00), and MEPA (301 CMR 11). Please do not hesitate to contact Elizabeth Sherva of my staff if you have any questions.

Sincerely,

Brona Simon

Brona Simon
State Historic Preservation Officer
Executive Director
Massachusetts Historical Commission

xc: Albert Rex, MacRostie Historic Advisors

220 Morrissey Boulevard, Boston, Massachusetts 02125
(617) 727-8470 • Fax: (617) 727-5128
www.sec.state.ma.us/mhc

MASSACHUSETTS WATER RESOURCES AUTHORITY

Charlestown Navy Yard
100 First Avenue, Building 39
Boston, MA 02129

Frederick A. Laskey
Executive Director

Telephone: (617) 242-6000
Fax: (617) 788-4899
TTY: (617) 788-4971

June 23, 2017

Matthew A. Beaton, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge St, Suite 900
Attn: MEPA Office, Alex Strysky
Boston, MA 02114

Subject: EOEEA #15692 – Expanded Environmental Notification Form
L Street Station Redevelopment, South Boston, MA

Dear Secretary Beaton:

The Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to comment on the Environmental Notification Form (ENF) submitted by HRP 776 Summer Street (the "Proponent") for the L Street Station Redevelopment Project (the "Project") proposed for a 15-acre site of developed land along the Reserved Channel at 776 Summer Street in South Boston.

The key components of this 2.1 million SQ-FT development project include the cleanup and abatement of the Project Site and Power Plant buildings; reuse of portions of the existing power plant buildings for their historical and architectural significance; transformation of the site into a public waterfront destination with new dining and retail, as well as community arts and business use; and, the addition of 104,500 SQ-FT of new outdoor public space, landscaping, waterfront activation, open areas, and 1.15 acres of public amenities and accessible waterfront space.

The power plant is recognized as an architectural and engineering landmark; therefore, preserving and enhancing the public value of the Site's historic structures an equipment is a central theme of this project. The project will create an active pedestrian oriented area that will include five residential blocks, one hotel, commercial buildings, residential buildings, office space, and 987 structured parking spaces.

MWRA's comments focus on Stormwater and Wastewater issues emphasizing the need for Infiltration/Inflow (I/I) Removal and potential need for Discharge Permitting from the Toxic Reduction and Control (TRAC) Department.

Stormwater and Wastewater

The ENF reports that there is no evidence of stormwater treatment or infiltration systems on site. Stormwater appears to be collected on site and conveyed primarily to the existing Boston Water and Sewer Commission (BWSC) stormwater infrastructure in Summer Street, including a storm drain on East 1st Street constructed by BWSC a few years ago as part of the

Reserved Channel Sewer Separation project. Stormwater flows are conveyed to CSO outfalls BOS078 and BOS079 for discharge to the Reserved Channel. A portion of the Project Site's stormwater runoff appears to discharge directly into the Reserved Channel either over land runoff or via private stormwater conveyance infrastructure on site.

According to the ENF, the Project will generate approximately 299,900 gallons per day (gpd) of new wastewater flow. The ENF reports that BWSC owns and maintains the sanitary sewer infrastructure serving the project site. According to BWSC record drawings, an 18-inch sewer main lies along Summer Street, and a 12-inch combined sewer main lies along East 1st Street. Both of these BWSC sewers connect to BWSC's 24-inch by 36-inch South Boston Interceptor (SBI) North Branch at the intersection of Summer and East 1st Streets. The 24-inch by 36-inch BWSC combined sewer connects to a 36-inch by 48-inch BWSC combined sewer at the intersection of East 1st Street and I street. The SBI North Branch carries wastewater and some stormwater eventually to BWSC's Boston Main Interceptor (BMI). The BMI conveys flows to MWRA's Columbus Park Headworks, which in turn directs flow to the Deer Island treatment plant. In large storms, combined wastewater and stormwater flow can exceed the hydraulic capacity of the BWSC system, contributing to combined sewer overflows (CSO) to Fort Point Channel at Outfall BOS073, and to Reserved Channel at outfalls BOS076, BOS078 and BOS079.

To ensure that the Project's wastewater flow does not increase system surcharging or CSO in wet weather, the Proponent should continue to work with BWSC to develop a plan for ensuring a 4:1 offset of the Project's wastewater flow as required by Massachusetts Department of Environmental Protection regulation. To comply, four gallons of stormwater and/or infiltration and inflow (I/I) should be removed from a hydraulically related sewer system(s) for every gallon of new wastewater flow. Increasing wastewater flow to the South Boston sewer systems without the state-required offset can compromise the sewer system and water quality benefits of MWRA's $910 million region-wide CSO control plan, including water quality improvement in Reserved Channel and Fort Point Channel.

TRAC Discharge Permitting

The MWRA prohibits the discharge of groundwater to the sanitary sewer system, pursuant to 360 C.M.R. 10.023(1) except in a combined sewer area when permitted by the Authority and the Boston Water Sewer Commission (BWSC). The Project site has access to a storm drain; therefore, the discharge of groundwater to the sanitary sewer system associated with the Project is prohibited. The Proponent will need to secure a USEPA-NPDES General Permit for Storm Water Discharges from its construction activities.

Once the hotel is completed and if the Owner/Operator intends to operate a laundry on the premises, a Sewer Use Discharge Permit will be required for the discharge of laundry effluent into the sanitary sewer system. For assistance in obtaining this permit, the Owner/Operator from the hotel should contact Mr. George Riley, Industrial Coordinator in the TRAC Department at (617) 305-5664. The Sewer Use Discharge Permit must be issued prior to the Owner/Operator discharging any wastewater from laundry operations into the MWRA sanitary sewer system.

If the Proponent intends to install gas/oil separator(s) in the structured garage planned for the site they must comply with 360 C.M.R. 10.016 and 360 C.M.R. 10.000, the regulations of the Board of State Examiners of Plumbers and Gas Fitters, 248 C.M.R. 2.00 (State Plumbing Code), and all other applicable laws. The installation of gas/oil separator(s) will require MWRA approval and may not be back filled until inspected and approved by the MWRA and the Local Plumbing Inspector. For assistance in arranging an inspection, the Proponent should contact Mr. Stephen Howard, Source Coordinator in the TRAC Department at (617) 305-5675.

Sincerely,

Marianne Connolly

Marianne Connolly
Senior Program Manager
Environmental Review and Compliance

cc: David Kubiak, E&C
Solomon Wondimu, E&C
Kattia Thomas, TRAC
Adam Horst, BWSC

C:15692LStreetStationRedevSouthBosENF.docx

The Commonwealth of Massachusetts
HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON 02133-1054

NICK COLLINS
REPRESENTATIVE
4TH SUFFOLK DISTRICT

VICE CHAIR
Economic Development and Emerging Technologies

STATE HOUSE, ROOM 39
Boston, MA 02133
TEL: (617) 722-2014

Hon. Matthew A. Beaton, *Secretary*
Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston MA 02114

July 7, 2017

Re: L Street Station (Edison Power Plant) Proposal

Dear Secretary Beaton:

I am writing to you to express my concerns about a development proposal in a Designated Port Area in my district. The project is located at 776 Summer Street and encompasses the former Edison Power Plant.

After reviewing this proposal, it is clear that the density proposed is simply unfeasible. According to their PNF and MEPA filings, this project would generate between 10,000 and 21,000 new car trips in and out of the neighborhood daily. Currently, the Massachusetts Port Authority (Massport) is wrapping up a $75 million investment in the Thomas J. Butler Haul Road and Buffer Zone Park. This was done in preparation of the expansion of Conley Terminal to get roughly 1,000 commercial trucks off of East First Street to alleviate the environmental and noise impacts on area residents. To follow that effort, Massport, the Federal Government, and the Commonwealth of Massachusetts have joined forces to invest roughly $1 billion to dredge Boston Harbor and expand Conley Terminal to make Massachusetts more competitive in the international shipping industry. If the proposal for 776 Summer Street were approved as is, it would fly in the face of that significant public investment, negatively impact the port of Boston, our transportation infrastructure, air quality, and further exacerbate the gridlock on our streets.

Additionally, I have concerns about public access to the waterfront and green space. Any and all green space and open space on the waterfront should be publically owned and protected in perpetuity to ensure preservation and access for generations to come.

It is for these reasons that I respectfully request that MEPA does not sign off on this project at this time. Thank you for your consideration of this request. If you have any questions regarding this matter, please do not hesitate to contact my office.

Sincerely,

Nick Collins

NICK COLLINS
State Representative-4th Suffolk District

CC: Deirdre Buckley, MEPA Director; C. Stolle Singleton, EOEEA Legislative Affairs Director

365 West Broadway
South Boston, MA 02127
tel 617.268.9610
fax 617.268.4813

July 7, 2017

Matthew Beaton, Secretary
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office, Alexander Strysky
100 Cambridge Street, Suite 900
Boston, MA 02114
Re: 776 Summer Street, South Boston (L Street Station Redevelopment)

Dear Secretary Beaton:

Please accept this comment letter regarding the proposal to redevelop the former Boston Edison plant at 776 Summer Street in South Boston. I am a South Boston resident who lives within .2 miles of the site, and I am the Executive Director of the South Boston Neighborhood Development Corporation, a non profit developer of affordable housing .

South Boston has seen dramatic changes over the past several years, as development across the neighborhood has displaced low and moderate income residents. As a long-tem resident of the community, I have seen many neighbors forced to move because of high rents. I have serious concerns about the negative impacts of the proposed development.

Housing units:

I personally attended several community meetings for this project. **At no time did the proponent discuss a density of 1500 units and only 900 parking spaces on this site.** Affordable housing should be a much higher percentage of the total development to mitigate the impact on the neighborhood. Both lower income and middle income residents are being displaced in South Boston because of rapidly increasing real estate prices. The City's minimum 13% affordability on this site is not adequate to address this critical neighborhood need.

Transportation:

The proposed number of units will place a huge burden on existing roadways and public transportation. Without sufficient parking on-site, the project residents will park on the existing over-crowded streets. It is unrealistic for the developer to suggest that the traffic and parking challenges will be resolved all by themselves, because people will change their driving habits. That is not a transportation plan! Without adequate public transportation, it is simply not possible for this site to support the proposed number of units. The developer is asking for variances, but proposing little public benefit.

The site has very limited public transportation and is served by only 2 public roads. South Boston is a small peninsula. Because it is surrounded by water, vehicle access is limited. The proposed development would significantly increase the traffic burden on the existing roadways. The developer offers no mitigation for this increase and offers no plan to pay for improved public transportation. Over the past decade, significant increases in [illegible] neighborhood have resulted in the over-burdening the public transportation infrastructure.

This area of South Boston is located 2 miles from the Red Line and is served only by MBTA buses. While the developer claims proximity to public transportation, that statement is simply incorrect! Bus service is inadequate now, with buses so over-crowded that passengers are stranded every day. The #7 bus route to South Station does not operate on Sundays. The MBTA has very clearly stated to the City of Boston that it does not have the resources to increase service. Therefore, the developer must pay for transportation improvements.

Open Space:

The developer proposes a 1- acre park on the site, much too small for the proposed 1500 housing units, hotel and commercial space. The park should be increased in size to 2 acres and should connect pedestrian access to the nearby Massport Thomas Butler Park, on East First Street. While the proposed development will enable public access to the waterfront, the size of the development will continue to wall-off the views to the water from the existing neighborhood, offering little improvement over current conditions.

Thank you for this opportunity to comment on the proposed L Street Station Redevelopment.

Best Regards,

Donna Brown

Executive Director

AS 15692

RECEIVED
JUL 10 2017
MEPA

The Commonwealth of Massachusetts
MASSACHUSETTS SENATE

SENATOR LINDA DORCENA FORRY
First Suffolk District
LINDA.DORCENAFORRY@MASENATE.GOV
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STATE HOUSE, ROOM 410
BOSTON, MA 02133-1053
TEL. (617) 722-1150
FAX (617) 722-2191

July 7, 2017

Honorable Matthew A. Beaton, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Beaton,

I am writing in regards to a development proposal in a Designated Port Area (DPA) in my district. The L Street Station Redevelopment proposal is located at the former Edison Power Plant site at 776 Summer Street. Currently, this project is undergoing a robust community engagement process led by the Boston Planning and Development Agency (BPDA); and I ask decisions not be made by MEPA until this process has concluded.

Immediately adjacent to the L Street Station Redevelopment proposal, Massachusetts Port Authority is in the final stages of completing the $75 million construction of the Thomas J. Butler Haul Road and Buffer Zone Park. This project was aimed at increasing efficiency at Conley Terminal as well as removing approximately 1,000 commercial trucks from residential streets to reduce both air and noise pollution in the community. Additionally, the Commonwealth of Massachusetts, in partnership with the Federal government and Massport, has teamed up to commit $1 billion to dredge Boston Harbor and expand Conley Terminal in order to help Massachusetts grow as a leader in the international shipping industry. According to the developer's PNF and MEPA filings, this project would generate between 10,000 – 21,000 new vehicle trips daily. A full vetting of the transportation logistics should be completed prior to approvals.

This project has great potential in transforming an old power plant into a mixed use development with significant green and open, public space on the waterfront. As this process continues to move forward, I want to ensure these important, accessible spaces on the waterfront are maintained, publicly owned and protected in perpetuity to ensure preservation and access for generations to come.

While I am hopeful about this project, I ask MEPA not to take any action at this time so the community has ample time to help shape and inform the L Street Station Redevelopment. Thank you for your attention to this matter; if you have any questions, please do not hesitate to contact my office.

Sincerely,

Linda Dorcena Forry
State Senator

CC: Deidre Buckley, MEPA Director
C. Stolle Singleton, EOEEA Legislative Director

July 7, 2017

Secretary of Energy and Environmental Affairs Matthew A. Beaton
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office, Alex Strysky
100 Cambridge Street, Suite 900
Boston MA 02114

Brian Golden, Director
Boston Planning and Development Agency
Boston City Hall
Boston, MA 02201

Re: EEA No. 15692, L Street Power Station Redevelopment, South Boston
ENF/Expanded PNF

Dear Secretary Beaton and Director Golden:

WalkBoston is pleased to see the proposal for a mixed use development of the large South Boston waterfront site that will include the re-use of the historically and architecturally interesting L Street Power Station. Putting this portion of the City back into a productive use that invites public access is a positive change for the City and for South Boston.

The overall site design will help to integrate this large parcel into the neighborhood, and create new opportunities for people to walk from East 1st Street to the waterfront and help to link the residential portions of South Boston into the site which was long cut off from the community by fences and other obstructions. The partial extension of the local street network onto the site and between and around new buildings proposed for the site seems appropriate in scale. With sidewalks that are sufficiently wide and landscaped, both community residents and people living on-site will be served by the new connections.

Our comments below are focused on questions that we hope the proponent will respond to in subsequent filings about the project.

1. Waterside Pedestrian and Open Space Environment
   We understand that the new dedicated harborside freight corridor that will connect Summer Street to Massport's Conley Terminal and remove heavy truck traffic from East 1st Street will provide very important, and long-desired improvements to the South Boston neighborhood. But this shift will also present challenges; the new harborside route will place an access barrier and significant truck traffic (with its accompanying noise and air pollution) between the development site's primary open space and the harbor.

   We urge the developer to consider creative ways to mitigate the truck route's impact on the open space. This could include grade changes that place the open space higher than the truck route (Figure 3.5b may hint at this); landscaping that both masks and frames views, soundscapes to mask truck noise, and the addition of viewing platforms that allow open space users to gain unimpeded views of the water. There may also be ways to capitalize on the site's

industrial past and on-going use through interpretive elements. WalkBoston is concerned that without such special treatment the open space will not be very attractive to the public.

If possible, the proponent might also explore with Massport whether it would be possible to schedule truck traffic so that is interferes less with daytime and weekend use of the open space.

2. Encouragement of walking and walking-transit trips
   At the direction of the City, the proponent has used South Boston adjusted trip generation rates to develop trip tables for walking/biking, transit and vehicles. However, the site is at a significant distance from other land uses that would seem to justify such significant numbers of walking trips, and to suffer from overused bus lines and significant distances to the Red and Silver Lines. Figure 5-1 illustrate the 5 and 10-minute walking zones, neither of which include a great many retail, job and civic land uses.

   We urge the proponent to develop mitigation measures to make the development a more realistically mixed mode project. These could include such things as: subsidies to the MBTA to provide more frequent bus service, or creation or partnering with other South Boston developments to provide shuttle services to the Silver and/or Red Lines.

3. Bicycle facilities
   The proponent mentions that Boston has flagged both East 1st Street and Summer Street for protected bicycle facilities, however Figure 3.5a shows an on-street bike lane.

   We urge the proponent to work with the City, and perhaps provide funding for, separated bicycle facilities on both East 1st Street and Summer Street. The distance of the site from transit and a mix of retail, job and civic facilities will make bicycling a more likely mode of off-site trips than walking.

We look forward to working with the City and Redgate as the project plans are developed in greater detail.

Sincerely,

Wendy Landman

Wendy Landman
Executive Director

Cc Ralph Cox, Greg Bialecki, Megha Vadula, Redgate
Elizabeth Grob, VHB