

April 5, 2021

Submitted via Electronic Mail: morgan.e.mcdaniel@boston.gov

Morgan McDaniel
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201

Subject: Comments on Pier 5 Redevelopment Proposals

Dear Ms. McDaniel:

Conservation Law Foundation (CLF) provides the following comments on the proposals for the redevelopment of Pier 5 in the Charlestown Navy Yard. Pier 5 was originally constructed in the 1910s, redesigned in the 1940s, and is currently in unusable condition. The Boston Planning & Development Agency (BPDA) published a Request for Proposals (RFP) for the redevelopment of the pier in September of 2020. As a result of the RFP, three development proposals are currently under evaluation: The Eco Pier submitted by 6M Development, LLC, Navy Blue submitted by Navy Blue, LLC, and the New Pier 5 submitted by Urbanica, Inc.

In accordance with our organization's expertise, we focus our comments on the city and state regulatory requirements imposed by The Public Waterfront Act ("Chapter 91"), its associated Waterways Regulations, and various city planning documents. Our comments will address overarching concerns regarding the alleged water-dependent use of two of the three proposals and will then discuss the merits of all the proposals under broad themes. When relevant, our comments will reference the RFP's stated Development Objectives and Comparative Evaluation Criteria.

The BPDA should not allow the Navy Blue or the Eco Pier project to move forward without substantial modifications to bring either proposal into compliance with regulatory requirements, including but not limited to: (1) adequate square footage devoted to Facilities of Public Accommodation (FPAs), (2) the protection of existing water-dependent uses of Courageous Sailing, (3) and sufficient open space, including setbacks along the perimeter and terminal end of Pier 5. While Urbanica's New Pier 5 proposal meets many of these regulatory requirements, the BPDA should require Urbanica to clarify certain aspects of the proposal, including open space calculations, to ensure it is in compliance with Chapter 91 requirements. Further, all proposals should be required to provide additional analysis and resilience measures to address climate change effects at the site including storm surge and sea level rise.

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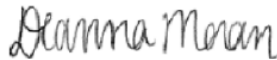
Navy Blue, LLC seems to misunderstand the dynamics of displacement and gentrification. Navy Blue claims that because no one currently lives on Pier 5, they do not need to explain how their proposed rental prices will meet the needs of Charlestown residents. Navy Blue Proposal at 20. This response falsely assumes that the Project will have no impact on the surrounding community. Since Members of the Navy Blue development team have experience with affordable housing developments through HOPE VI in Indianapolis, they should understand that high rental prices could drive up the cost of living in the surrounding area and displace current residents of Charlestown. CLF encourages Navy Blue to mitigate this risk by guaranteeing that a portion of their units will be affordable.

Although 6M Development lists a “Development without Displacement Plan” in the Table of Contents of their Design Submission, the Proponent appears to have neglected to include such a plan in their final proposal. CLF finds this omission troubling and hopes that it is not evidence of the Proponent’s disregard for this important RFP requirement. The Eco Pier proposal does not include any affordable housing. 6M Development’s Marketing Plan states that it will “aggressively target” wealthy Bostonians using coded language, which includes “[p]rofessionals who use air travel frequently for work” and “[r]enters in lifestyle buildings in North Station, Downtown, Waterfront, West End, *high paying renters* in South Boston, and North End.” New Pier 5 Proposal, Exhibit K (emphasis added). We strongly urge the BPDA to require the Eco Pier to make one fourth of their housing units affordable as mandated by the Harborpark Plan.

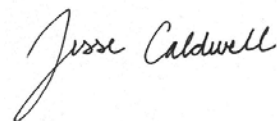
Likewise, Urbanica’s New Pier 5 proposal does not include an explicit Development without Displacement Plan. However, the Proponent addresses aspects of this requirement throughout their proposal. In particular, the New Pier 5 will create 100% affordable housing onsite. New Pier 5 Proposal at 11. The New Pier 5 development would create 89 housing units of various sizes ranging from 500 to 1,000 sq.

Thank you for your consideration of our comments. We look forward to coordinating with your office and other stakeholders throughout this process.

Sincerely,



Deanna Moran
Director of Environmental Planning
Conservation Law Foundation



Jesse Caldwell
Legal Fellow
Conservation Law Foundation