



*Charlestown Waterfront Coalition
P.O. Box 290533
Charlestown, Massachusetts 02129*

Rachel Madden, Undersecretary
Executive Office of Administration & Finance
State House, Room 373
Boston, MA 02133
Dear Secretary Madden

Re: Comments on Executive Order 562

October 19th, 2015

Dear Ms Madden:

The Charlestown Waterfront Coalition has a long history of advocacy for the Charlestown waterfront. Our mission is to protect and enhance public access and enjoyment of our shoreline, including the Mystic & Charles Rivers and Boston Harbor. We have participated in the redevelopment proposals of virtually every site in the area, and in general have been pleased with the developers' response to community input.

Chapter 91 preserves and protects the right of the public participation, and helps to guarantee that private tidelands & waterways use serve a proper public purpose. It also supports development of city and town harbor plans which act as master plans for shoreline development.

These rights are protected and evaluated in the critically important MEPA process which enhances regular public review of development proposals, as exemplified in the current and exhaustive Wynn Casino review process. That process allowed for a dynamic, robust public discussion of environmental impacts.

Finally, the Chapter 91 regulations produce a high level of economic benefit in Boston, Charlestown, Somerville and Cambridge, and have many heavily used public amenities. Never the less, one aspect of the Chapter 91 regulations should be studied: the requirement that developments must reserve virtually 100% of ground floor space for facilities of public accommodation (FPA's).

In areas like the Charlestown Navy Yard, where density of residential populations do not support substantial retail and public services, the requirement for FPA on the entire ground floor should be modified. In far too many buildings, the space is left vacant for years, adding nothing to the community city-scape. A somewhat reduced percentage

based on population density and accessibility should be negotiated among the developer, the community and the Environmental Secretariat through the MEPA process. However, wherever FPA space is modified, and office, research or other uses are allowed, there should be an absolute prohibition of blank windows. Visible people and activities must be mandatory.

As was stated above, the Charlestown Waterfront Coalition's mission is to protect and enhance public access to and enjoyment of the entire Charlestown waterfront. We have been an important presence since the 1980's when the New England Aquarium & the BRA proposed using Shipyard Park and Dry Dock 2 for a new Aquarium location. That proposal energized the Charlestown community to resist such a massive destruction of a public space and an historic maritime facility. That same energy has continued in the ensuing years. CWC remains a powerful advocate for community driven development, and Chapter 91 & the MEPA process continue to be an important tool to accomplish our objectives.

Sincerely,

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