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Secretary Robert Golledge

Executive Office of Environmental Affairs

100 Cambridge Street, Suite 900

Boston, MA 02114

Re: Spaulding Rehabilitation Hospital; Environmental Notification Form

Dear Secretary Golledge:

The Friends of the Charlestown CNY (the "FCNY") is a non-profit, public interest organization that works to improve the quality of life for residents of and visitors to the Charlestown Navy Yard (the "CNY"). The FCNY has over 300 members who are Charlestown residents. We promote responsible development in the CNY consistent with the historical character of the CNY and its National Historic Landmark Designation. Consistent with our mission, the FCNY has reviewed and now comments on the Environmental Notification Form ("ENF") recently filed for Spaulding Rehabilitation Hospital ("Spaulding") for proposed development on Parcel 6 in the Charlestown Navy Yard. We qualify our comments by recognizing that the ENF is a start to the process and that we will supplement these comments as more information becomes available in subsequent submittals during the MEPA process.

### **Planning**

It is our understanding that EOEPA has previously determined in the Certificate for the Harborview Point project on Parcel 4 that Parcels 6 and 7 should be reviewed in conjunction with each other. This makes perfect sense. This type of review eliminates the de facto "spot planning" that has been in effect in the Charlestown Navy Yard for many years.

FCNY believes that the lack of planning for the Navy Yard unduly benefits developers and is causing community access to and enjoyment of the waterfront to be diminished significantly. FCNY hopes that EOEPA takes this opportunity to require, as part of the Parcel 6 project, more detailed planning regarding Chapter 91 regulations and the community's right to the use public lands, as well as take into consideration the uniqueness of the historical Charlestown Navy Yard, view corridors and other issues. It appears that several agencies need to be consulted to assess the project and we trust that such review is rigorous and thorough. We also look forward to more detail in the Environmental Impact Report ("EIR") regarding the HarborWalk, public access, facilities of public accommodation and special public destination facilities.

### **Vehicular Trips and Traffic**

Vehicle trip and traffic generation estimates in the ENF seem to be based on only one component, in-patient beds, and does not consider medical offices for outpatient visits, research and training facilities, and facilities intended to attract the general public. The EIR should more fully describe all of the use components and should provide accurate traffic generation projections based on all proposed uses. Future studies for the EIR need to include all affected intersections and estimates traffic generation from other Navy Yard and Chelsea Street projects currently in construction or planning.

FCNY also notes that public transit, as a practical matter, is lacking in the project area and we would like to see a more comprehensive plan in place to mitigate vehicular traffic along the waterfront, as well as provide appropriate pedestrian cues which serve to increase public enjoyment of the waterfront, not discourage its use.

### **Environmental Issues**

Regardless of the ENF's contention that the project will not trigger any MEPA hazardous and solid waste thresholds, it is noted as a Brownfields site and the environmental legacy of the Navy Yard in that area suggests that a tar house, significant storage tanks and associated piping and industrial uses associated with ship building and repairs of all types were conducted on or proximate to the site. This information suggests that the steps need to be taken to adequately insure the safety of the significant residential population around Parcel 6.

### **Impacts**

The EIR should more fully address if and how the proposed project can be modified to eliminate adverse impacts to the existing Historic Monument Area and to the Navy Yard National Register District -- including building design, mass, scale, setback, noise, lighting, traffic and use components that will adversely impact the Historic Monument and National Register/National Historic Landmark District.

### **Infrastructure**

The ENF assumes that there is adequate city infrastructure and utility capacity. The EIR should document this assumption and provide assurances that the need for any additional infrastructure or utility capacity will not result in repeated or long-term disruption of services to Navy Yard residences and small businesses.

Thank you for your careful consideration of these comments. We look forward to more discussion of this Project and other issues impacting the quality of life in the Charlestown Navy Yard.

Very truly yours,



Michael Parker  
Chairperson

Friends of the Charlestown Navy Yard



Marion Dancy Cullen  
President