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November 9, 2017

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

PROJECT NAME : K Street Substation #385 Modification  
PROJECT MUNICIPALITY : Boston  
PROJECT WATERSHED : Boston Harbor  
EEA NUMBER : 15766  
PROJECT PROPONENT : NSTAR Electric Company d/b/a Eversource Energy  
DATE NOTICED IN MONITOR : October 10, 2017

Pursuant to the Massachusetts Environmental Policy Act (MEPA, M.G.L. c. 30, ss. 61-62I) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **does not require** the preparation of an Environmental Impact Report (EIR). The ENF has sufficiently defined the nature and general elements of the project for the purposes of MEPA review and demonstrated that the project's environmental impacts will be avoided, minimized and/or mitigated to the extent practicable.

Project Description

As described in the Environmental Notification Form (ENF), the project consists of the installation of substation equipment and security fencing on land that lies to the south of the Reserved Channel which abuts the Proponent's (Eversource) substation (Station #385). The substation upgrades will improve operations, reliability and maintenance of the facility and will be constructed entirely within the Proponent's property. The upgrades include:

- Installation of a new voltage regulator (27 foot (ft) long by 27 ft high by 26 ft wide);
- New concrete foundation for the voltage regulator, four individual concrete pilings to support the foundation, and crushed stone to support the voltage regulator;
- A 100-foot mast to protect equipment from lightning strikes;

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- A perimeter security fence ranging in height from 15 to 26 ft; and,
- Construction of a concrete flood barrier extending from subgrade to 5 ft above ground level around the voltage regulator equipment.

In an email dated November 6, 2017, the Proponent has committed to construct a Harborwalk around the project shoreline to connect to the existing Harborwalk.

### Project Site

The installation of substation equipment will occur on a portion of the Eversource site located at 500 East First Avenue in the South Boston neighborhood of Boston. The site is currently used by Eversource for parking and equipment storage.

The site sits along the south side of the Reserved Channel between K Street and East First Street and is adjacent to the Boston Inner Harbor. There is the current Harborwalk that provides public access along the two parcels adjacent to the project site. However, the project site along the K Street substation site does not provide public access and is the missing link along the southern side of the Reserved Channel for the Harborwalk.

The project is located on filled tidelands and requires an amendment to an existing Chapter 91 License for the expansion of the non-water dependent use. The project site is partially located within Land Subject to Coastal Storm Flowage (LSCSF).

According to the Federal Emergency Management Agency's (FEMA) National Flood Insurance Rate Map (FIRM) (effective March 16, 2016), portions of the project site lie within a mapped A Zone with a base flood elevation (BFE) of 12 feet North American Vertical Datum of 1988 (NAVD88).

### Environmental Impacts and Mitigation

Potential environmental impacts associated with the project include: non-water dependent use of filled and flowed tidelands; alteration of 10,406 sf of LSCSF (permanent); and, alteration of 0.24 acres of land. In an email dated November 8, 2017, the Proponent clarified the volume of 100-year floodplain displaced by the voltage regulator and its appurtenances is approximately 702 cubic feet (26 cubic yards (cy)) and the installation of the replacement fence and concrete flood barrier amounts to approximately 328 cubic feet 12 cy for a total of 1,030 (38 cy) cubic feet of flood displacement.

Measures to avoid, minimize and mitigate environmental impacts include redevelopment of a previously developed site; removal of 0.24 acres of impervious area; elevation of the base of the voltage regulator above the 100-year flood elevation; installation and management of a stormwater management system; and, implementation of construction best management practices (BMPs). To provide consistency with Chapter 91 standards the Proponent has committed to creating a connection to the Harborwalk to enhance public access and provide public benefits.

### Jurisdiction and Permitting

The project is undergoing MEPA review and requires preparation of an ENF pursuant to 301 CMR Section 11.03(3)(b)(5) of the MEPA regulations because it requires State Agency Actions and proposes new or existing unlicensed non-water dependent use of waterways or tidelands. The project will require an amendment to a c. 91 license from the Massachusetts Department of Environmental Protection (MassDEP), and Federal Consistency Review from the Massachusetts Office of Coastal Zone Management (CZM). The project may also require a Temporary Construction Site Dewatering Discharge Permit from the Massachusetts Water Resources Authority (MWRA) and, if groundwater is anticipated, the project will require a Temporary Construction Site Dewatering Discharge Permit from the MWRA. The project will require an Order of Conditions (OOC) from the Boston Conservation Commission (or in the case of an appeal, a Superseding Order of Conditions (SOC) from MassDEP).

MEPA jurisdiction extends to those aspects of the project that are within the subject matter of required or potentially required State Agency Actions and that may cause Damage to the Environment, as defined in the MEPA regulations. Because the project requires an amendment to a c. 91 License, subject matter jurisdiction is functionally equivalent to full scope jurisdiction in accordance with 301 CMR 11.01(2)(a)(3), and therefore extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment as defined in the MEPA regulations.

### Review of the ENF

The ENF provides a description of existing and proposed conditions, project plans, a brief discussion of project alternatives, and identifies resource areas and measures to avoid, minimize, and mitigate project impacts. Boston Planning and Development Agency (BPDA), Boston Harbor Now and CZM comments identify issues and information that must be addressed during the c. 91 permitting process.

### *Alternatives Analysis*

According to the ENF, the project is necessary to improve the reliability of the substation to reduce high voltages in the K Street area and is therefore required to be sited near current site. The ENF describes how voltage regulator installations are the best practice and most cost-effective technical solution to reduce high transmission voltages and thus are the Preferred Alternative. However, in addition to the Preferred Alternative, the ENF described a No Action Alternative and two non-traditional alternatives considered available to reduce high transmission voltages, a Switch-out 345-kiloVolt (kV) Cables to Control Voltage Under Light Load Conditions Alternative and a Dispatch Local Area Generation in Support of Area Voltages Alternative.

The No Action Alternative would not create new environmental impacts. However this alternative would not address reliability of the substation and was dismissed because it would not achieve project goals. The Switch-out 345-kV Cables to Control Voltage Under Light Load Conditions Alternative would require the Proponent to switch out certain 345-kV cables in order to control voltage under light-load conditions. However, this alternative would subject the electrical equipment to unnecessary loads of added voltages that can damage insulation and shorten the useful life of the equipment. Because of the high cost of replacement, this was not a considered a practicable solution to

meet the identified needs of the Proponent. The Dispatch Local Area Generation in Support of Area Voltages Alternative requires the dispatch of local area generation to control and reduce area voltages. This alternative was dismissed because no generation is available in the immediate K Street area that could effectively reduce K Street voltages and this alternative also introduces risks to system reliability.

The Preferred Alternative will result in the change in use of an existing licensed non-water dependent use but it will also complete a missing link in the Harborwalk. The environmental impacts associated with the Preferred Alternative include non-water dependent use of filled and flowed tidelands and alteration of LSCSF with the placement of the substation voltage regulator structure, fencing and concrete flood barrier.

#### *Waterways and Tidelands*

MassDEP comments indicate that, at a minimum, the project will require an amendment to the c.91 License. The Proponent should consult with MassDEP prior to filing an application. MassDEP permitting will provide opportunities for public review and comment of the project, including a public hearing. Pursuant to 310 CMR 9.55, Standards for Nonwater-dependent Infrastructure Facilities, the Proponent should take all reasonable measures to provide public open spaces and a full circuit of pedestrian access to the water's edge with connections to K Street. As part of permitting, the Proponent should submit updated plans and detailed information regarding size, location, and accessibility of the proposed Harborwalk connection.

#### *Wetlands and Stormwater*

The project will permanently impact LSCSF. The Boston Conservation Commission will review the project to determine its consistency with the Wetlands Protection Act (WPA), the Wetlands Regulations (310 CMR 10.00), and associated performance standards, including stormwater management standards (SMS). The ENF describes the project's consistency with the performance standards for Coastal Bank and Land Under Ocean (LUO).

#### *Climate Change and Resiliency*

As recognized in Governor Baker's recent Executive Order 569 "Establishing an Integrated Climate Change Strategy for the Commonwealth" and a suite of other state and municipal initiatives, the impacts of climate change must be an important consideration for development across the state, within the City of Boston, and in South Boston.

The ENF evaluates and describes the vulnerability of the site to the effects of climate change including sea level rise and extreme weather events. The Proponent evaluated the project site as outlined in CZM's December 2013 report entitled, "*Sea Level Rise: Understanding and Applying Trends and Future Scenarios for Analysis and Planning*". The project will include measures to limit the site's vulnerability to coastal flooding and storm events. As proposed in the ENF, the project includes design elements to elevate and protect the regulator. These elements will help to limit potential impacts of current and future flood events relating to increased sea levels, increased frequency and intensity of storms, and greater precipitation. I commend these efforts to make the project more resilient. Comments from CZM, BPDA, and Boston Harbor Now recommend the Proponent also evaluate impacts the

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proposed security fence and concrete storm barrier may have on adjacent properties and infrastructure. In addition, BPDA suggests that the Proponent consult the Boston Harbor Flood Risk Map (BH-FRM) developed by the Massachusetts Department of Transportation (MassDOT) to further assist the Proponent with the projections for both the 2030 and 2070 flood hazard in this K Street area.

### *Construction Period*

Construction will commence with the installation of silt fence and in-water debris booms around the entire construction area, followed by removal of the existing parking lot. The project must comply with MassDEP's Solid Waste and Air Pollution Control regulations, pursuant to M.G.L. c.40, s.54. All construction and demolition activities should be undertaken in compliance with the conditions of all State and local permits.

The Proponent should continue to evaluate construction impacts, strive to minimize impacts and consider feasible measures that can be implemented to minimize and mitigate these impacts. The Proponent is committed to mitigating impacts from construction and demolition debris. The Proponent is advised that if oil and/or hazardous material are identified during the implementation of this project, notification pursuant to the Massachusetts Contingency Plan (MCP, 310 CMR 40.0000) must be made to MassDEP. If contaminated groundwater is encountered, the Proponent will be required to apply for a Remediation General Permit from EPA.

### Conclusion

The ENF has sufficiently defined the nature and general elements of the project for the purposes of MEPA review and demonstrated that the project's environmental impacts will be avoided, minimized and/or mitigated to the extent practicable. Based on the information in the ENF and after consultation with State Agencies, I find that no further MEPA review is required. The ENF has demonstrated that the project is generally consistent with c. 91. MassDEP has sufficient regulatory authority to address outstanding issues, including the development of details related to the Harborwalk. No further MEPA review is required.



November 9, 2017

Date

Matthew A. Beaton

### Comments received:

10/23/2017 Massachusetts Water Resources Authority  
10/30/2017 Boston Planning & Development Agency  
10/31/2017 Boston Harbor Now  
10/31/2017 Massachusetts Department of Environmental Protection (MassDEP)  
11/03/2017 Massachusetts Office of Coastal Zone Management

MAB/ACC/acc



# MASSACHUSETTS WATER RESOURCES AUTHORITY

Charlestown Navy Yard  
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Frederick A. Laskey  
Executive Director

October 23, 2017

Telephone: (617) 242-6000  
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Matthew A. Beaton, Secretary  
Executive Office of Energy and Environmental Affairs  
100 Cambridge St, Suite 900  
Attn: MEPA Office, Anne Canaday  
Boston, MA 02114

Subject: EOEEA #15766 – Environmental Notification Form  
K Street Substation #385 Modifications, Boston, MA

Dear Secretary Beaton:

The Massachusetts Water Resources Authority (“MWRA”) appreciates the opportunity to comment on the Environmental Notification Form (“ENF”) submitted by NSTAR Electric Company (Eversource Energy) (the “Proponent”) for the K Street Substation #385 Modifications (the “Project”). The Project consists of the installation of electric substation equipment on a portion of a parcel of land purchased in 2007 that abuts the northwest corner of the Proponent’s existing K Street Substation (“Station #385”), located at 500 East First Street in South Boston.

MWRA comments focus specifically on the possibility that the Proponent may need a Temporary Construction Site Dewatering Discharge Permit from the Toxic Reduction and Control (TRAC) Department. If groundwater is anticipated during the installation and construction phase in the upland portion of the route (near L street through Massport’s Conley Terminal property, to the eastern end of Conley Terminal), the project will require a Temporary Construction Site Dewatering Discharge Permit pursuant to 360 C.M.R. 10.091-10.094. For assistance in obtaining this permit, both the Proponent and the Contractor (the individual that will conduct the construction) should contact Mr. Keary Simmerman, Industrial Coordinator in the TRAC Department at (617) 305-5638. The Proponent will need the Discharge Permit from MWRA and the Boston Water & Sewer Commission prior to any discharge of groundwater into the sanitary sewer system.

Sincerely,

A handwritten signature in black ink that reads "Marianne Connolly". The signature is written in a cursive, flowing style.

Marianne Connolly  
Sr. Program Manager  
Environmental Review & Compliance

cc: Kattia Thomas, TRAC Permitting  
C:MEPA:15766KStreetSubstaionModificationsBostonENF.docx



October 30, 2017

Secretary of Energy and Environmental Affairs  
Executive Office of Energy and Environmental Affairs  
ATTN: MEPA Office  
Ms. Anne Canaday, EEA #15766  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: Environmental Notification Form EEA #15766  
K Street Substation #385 Modifications, 500 East First Street, Boston

Dear Ms. Canaday,

Boston Planning & Development Agency ("BPDA" or the "Agency") staff have received and reviewed Environmental Notification Form EEA #15766 (the "ENF") for modifications to the K Street Substation #385 in South Boston (the "Project") proposed by NSTAR Electric Company d/b/a Eversource Energy (the "Proponent"). The Project would expand the existing Substation and comprises a new voltage regulator on a concrete foundation, a 100-foot mast, and security fence. Though the Agency recognizes the necessity of the project, there are significant concerns related to the public access to the waterfront, climate resilience, and urban design.

The ENF states that the Proponent "is continuing to advance a mitigation plan...that look to improve the existing public access along the shoreline of the Reserved Channel." Via email correspondence, the Proponent confirmed that Eversource Energy intends to connect two segments of existing Harborwalk along the Channel, as contemplated by Special Condition #1 of c. 91 License No. 10135 for the Substation. Currently, the lack of connection between the two dead ends of Harborwalk fosters activities that limit the public's enjoyment of the waterfront, such as vandalism, underage drinking, and more. Agency staff, non-profit stakeholders, and residents have worked with both the Proponent and the Boston Police Department to reduce the frequency of these activities with some success. Completing the Harborwalk will not only improve pedestrian access to the waterfront and between points of interest along it, but, with proper lighting and increased thru-traffic, also ameliorate adverse conditions and promote the public's use of the waterfront. Approval of the Project require the Proponent to provide this long-awaited public benefit as a component of the Project and certify compliance with the special conditions of existing c. 91 licenses for the Substation, including interpretive signage and seating.



Relatedly, the BPDA requests that the Proponent consider the feasibility of elevating the entirety of the Harborwalk beyond the future floodplain to ensure its use by the public through the design-life of the Substation and the c. 91 license term. As a non-water-dependent use and based upon the existing licenses for the Substation, the BPDA expects that the Proponent will seek a 30-year term for its c. 91 license, which would be renewable for another 30 years. Therefore, the Proponent should consult the Boston Harbor Flood Risk Map (BH-FRM) developed by the Massachusetts Department of Transportation, which outlines both the 2030 and 2070 flood hazard areas. With nine inches of sea level rise (expected by 2030), portions of the site will be inundated in a ten-year storm event; with thirty-six inches (expected by 2070), portions of the site will be inundated annually. The ENF expresses the Proponent's interest in protecting the new equipment with a five-foot concrete podium and perimeter fence, but also a willingness to divert flood flows to adjacent open areas, including the Harborwalk, rather than elevating the site. The Proponent is engaged in the recently launched *Climate Ready South Boston* – a joint initiative of the Agency and City of Boston's Climate Ready Boston Program that will identify potential district-scale flood defense interventions – and is aware of the both the impacts of climate change and the opportunity to prepare for them. As a waterfront property owner, the Proponent is the first line of this defense and is presented with an opportunity to advance the resilience not only of their site, but also of their neighborhood.

Finally, Agency staff are concerned by the Proponent's plans for a 100-foot mast to protect the proposed equipment from lightning strikes and fencing to shield the equipment. Without renderings, the Agency's ability to understand and comment on the potential urban design and view corridor impacts are limited. Conceptually, a 100-foot structure is out of context with the immediate neighborhood context, but not necessarily inappropriate if vital to the Substation's operation. Agency staff requests additional information from the Proponent, including renderings of the 100-foot mast.

We appreciate the opportunity to comment and for your consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read "Richard McGuinness", with a small "RM" monogram at the end.

Richard McGuinness  
Deputy Director for Climate Change and Environmental Planning

cc: Lisa Berry Engler, Boston Harbor Regional Coordinator, CZM  
Ben Lynch, Program Chief, MassDEP Waterways  
Mia Mansfield, Climate Ready Boston Program Manager, City of Boston





Are you on board?

15 State Street, Suite 1100  
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bostonharbornow.org

October 31, 2017

*Via email to*

[anne.canaday@state.ma.us](mailto:anne.canaday@state.ma.us)

Secretary Matthew A. Beaton  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Ste 900 (9th Floor)  
Boston, MA 02114

Attention: Anne Canaday, MEPA Office

Re: K Street Substation #385 Modifications, EEA#15766

Dear Ms. Canaday,

Thank you for the opportunity to comment on the K Street Substation Environmental Notification Form. Boston Harbor Now staff has reviewed the accompanying project plans. Our comments follow.

**Project Description**

The current proposal is for the installation of substation equipment on a portion of the Eversource site located at 500 East First Avenue. The site sits along the south side of the Reserved Channel between K street and East First Street in the South Boston neighborhood. It is currently used by Eversource for parking and equipment storage.

The entire project area is within filled tidelands and subject to Chapter 91 jurisdiction. As proposed, the project will require an amendment to the existing Chapter 91 license number 10295 and includes the following changes:

- Installation of a new 27ft long x 27ft high x 26ft wide voltage regulator,

- New concrete foundation, four individual concrete pilings, and crush stone to support the voltage regulator,
- A 100-foot mast to protect equipment from lightning strikes,
- A perimeter security fence ranging in height from 15-26 feet, and
- Construction of an unspecified number of barriers 15-20 feet high around existing equipment.

While we understand and appreciate the importance of maintaining and updating the existing substation, we have initial concerns about the proposed section of the HarborWalk and climate resilient design.

### **Public Access**

Boston Harbor Now has been a longtime advocate for public access along Boston Harbor and continues to be a champion for the Boston HarborWalk. Together with the Friends of the Boston HarborWalk, an all-volunteer group dedicated to enhancing enjoyment of Boston's public access way, we actively monitor and address public access issues along the waterfront.

In May of 2004, license number 10135 was issued to NSTAR Electric, now Eversource. Special condition #1 called for the construction and maintenance of "a pedestrian-accessible area seaward of the chain-link fence" along the property. A second license, number 10295, specifically calls out the requirement to provide a number of exterior amenities and maintenance obligations. Of particular relevance to this ENF is Special Condition #4 requiring the preparation of a maintenance plan for the publicly accessible areas that delineates trash removal, snow removal, and routine landscape maintenance on the property. It is unclear if such a maintenance plan exists.

The project site and abutting areas has been a problematic section of the HarborWalk for some time. The dead-end sections of the walk are consistently vandalized and trashed. Although the proponent has been open to resolving these issues and maintains an ongoing dialogue with our team, the issues persist. It is our sincere belief that completing the missing section of the HarborWalk will encourage increased foot-traffic and decrease the likelihood of problematic and unwanted behavior along this stretch of the waterfront.

Boston Harbor Now is the non-profit designated to receive and address all City of Boston 311 calls related to the HarborWalk. We would be glad to work with the Eversource team to ensure the new and existing HarborWalk sections on the project site consistently meet and exceed the requirements of Chapter 91.

We strongly recommend developing a maintenance plan for the project site. We will submit more detailed comments regarding the management plan, amenities to include along the HarborWalk, and wayfinding signage during the Chapter 91 licensing phase.

### **Climate Change**

According to the ENF, the project site is located within FEMA's 100-year floodplain. The

proposal includes the following climate preparedness measures:

- Elevating the voltage regulator on a 5-foot podium,
- Erecting a fence around the perimeter of the property, and
- Constructing a number of concrete barriers along the site.

The same document fails to reference climate projections from any of the local climate change studies like the City's Climate Ready Boston, MassDOT's Boston Harbor Flood Risk Map, or CZM's report on climate change impacts.

We are concerned about the site's ability to adequately manage rising seas and coastal flooding for the lifespan of the proposed project. In the wake of Hurricane Harvey, it is critical for industrial businesses along Boston Harbor to assess their vulnerability to rising seas and storm surge. Understanding the flood risks associated with harbor-based industries is a crucial step to identify better preventative measures in anticipation for more intense and frequent flooding events. Harvey was Houston's third 500-year flood in three years. This demonstrates that flood risks can be more severe than the 1% storm used by FEMA.

It is our understanding that Eversource is a member of the advisory committee for Climate Ready South Boston, a project to develop coastal resilience measures for the Fort Point Channel and South Boston waterfront. We strongly encourage the proponent to use this opportunity to include resilient solutions resulting from the CRB project and become a model for climate resilient harbor-based industries.

#### **100-foot Mast Proposal**

The project filing refers to a 100-foot mast necessary to protect equipment from potential lightning strikes but does not include a rendering of the proposed mast. Without a rendering and additional information of the mast, we are unable to provide more detailed comments at this time. We ask that additional details including renderings and potential alternatives be distributed to commenting parties and interested stakeholders.

We remain optimistic that with the new connection and incorporation of the proposed suggestions by our organization and others, this HarborWalk segment will enhance the public's understanding and enjoyment of the waterfront and resolve ongoing public access and use issues at this site. Thank you for your consideration.

Sincerely,

Jill Valdes Horwood  
Director of Policy



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

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Charles D. Baker  
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Karyn E. Polito  
Lieutenant Governor

Matthew A. Beaton  
Secretary

Martin Suuberg  
Commissioner

### Memorandum

**To:** Anne Canaday, MEPA Analyst

**From:** Jerome Grafe, Waterways Regulation Program, MassDEP/Boston *JG*

**Cc:** Ben Lynch, Program Chief

**Re:** **Comments from the Chapter 91 Waterways Regulation Program –  
ENF, K Street Substation #385 Modifications, 500 East First Street, Boston  
Suffolk County, EEA #15766**

**Date:** October 31, 2017

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The Waterways Regulation Program (WRP) has reviewed the above referenced ENF (EEA #15766), submitted by Eversource Energy (“the Proponent”) for the expansion of Station #385 and installation of new security fencing around the perimeter of the site with associated appurtenances located on filled tidelands of the Reserved Channel, Boston, Suffolk County.

**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).

**Chapter 91 Jurisdiction:**

The proposed project will require at a minimum, authorization through a Chapter 91 Waterways License Amendment of License No. 10295 for site perimeter fencing. Pursuant to 310 CMR 9.55, Standards for Nonwater-dependent Infrastructure Facilities, the Chapter 91 Waterways License Amendment application review process, the proponent shall take all reasonable measures to provide public open spaces and a full circuit of pedestrian access to the water’s edge with connections to K Street.

**If the project requires an EIR, the WRP recommends that the Proponent overlay the Mass GIS c.91 Presumptive Line overlay onto their site plan. If an EIR is not required, then the WRP will perform a full review of the project during licensing and will require the Proponent to submit a Chapter 91 Waterways License Application which meets the minimum filing standards as set forth in 310 CMR 9.11(3) and includes the Secretary's Certificate concluding the MEPA review process.**

**If you have any questions regarding the WRP's comments, please feel free to contact Jerome Grafe at (617) 292-5708 or at [jerome.grafe@state.ma.us](mailto:jerome.grafe@state.ma.us)**



THE COMMONWEALTH OF MASSACHUSETTS  
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MEPA

MEMORANDUM

TO: Matthew A. Beaton, Secretary, EEA  
ATTN: Anne Canaday, MEPA Unit  
FROM: Bruce Carlisle, Director, CZM  
DATE: October 30, 2017  
RE: EEA-15766, K Street Substation Modification, 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 October 10, 2017, and offers the following comments.

**Project Description**

With this filing, Eversource proposes the installation of substation equipment and security fencing on land that lies to the south of the Reserved Channel which abuts an existing Eversource substation (Station #385). The proposed substation equipment includes a 27 ft long x 27 ft high x 26 ft wide voltage regulator with concrete foundation and spill containment system, a 100 ft high mast to protect equipment from lightning strikes, new security fencing surrounding the regulator, and replacement fencing around the entire substation. The fencing will be 20 ft high, including a concrete flood/storm barrier extending from subgrade to 5 ft above ground level. The project is located on filled tidelands and requires an amendment to an existing Chapter 91 license for the expansion of the non-water dependent use. The project site is partially located within Land Subject to Coastal Storm Flowage (LSCSF).

**Project Comments**

The project site is located along the southern bank of the Reserved Channel in South Boston between K Street and the Summer Street Bridge. A harborwalk provides public access along the two parcels adjacent to the project site. However, the K Street Substation site does not provide public access and is the missing link along the southern side of the Reserved Channel. As part of the licensing process with MassDEP's Waterways Program, the proponent should develop a strategy to provide public access along the water and connect to the existing harborwalk segments on either side of the Eversource property.

According to the ENF and current FEMA floodplain map, portions of the project site lie within a mapped A zone (BFE 12 ft NAVD88). As proposed in the ENF, the project includes design elements to elevate and protect the regulator. These elements will help to limit potential impacts of current and future flood events relating to increased sea levels, increased frequency and intensity of storms, and greater precipitation. We commend these efforts to make the project more resilient and also recommend the proponent evaluate impacts the proposed security fence and storm barrier may have on adjacent properties and infrastructure through the filling of the coastal flood plain (LSCSF).



**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](http://www.state.ma.us/czm/fcr.htm).

BKC/lbc

cc: Rachel Lewis, Boston Conservation Commission  
Erikk Hokenson, Boston Planning and Development Agency  
Ben Lynch, MassDEP