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Brian P. Golden
Director Boston Planning & Development Agency
1 City Hall Square
Boston, MA 02201-2031

Re: Comments Regarding Proposed Amendments to Article 25A/Coastal Flood Resilience Overlay District (CFROD)

Director Golden:

On behalf of A Better City's 130 member companies and institutions, thank you for your continued efforts to ensure that Boston is well-positioned to grow and thrive in the face of worsening climate impacts. A Better City appreciates the intent of the September 9, 2020, draft of the Coastal Flood Resilience Overlay District (CFROD), which is designed to ensure that the majority of future development is protected from projected flooding caused by sea level rise and storm surge.

A Better City is pleased to see clarification regarding: how to measure building height; exclusions from gross area calculations; and the location of vertical circulation items in front, rear, and side yards. We also appreciate Section 25A-7 4 (d) that encourages realization of sustainability co-benefits and Section 25A-7 4 (c) that encourages individual parcel or project enhancements to support the goals and implementation of plans for coastal resilience throughout the CFROD.

A Better City respectfully requests the following amendments for the BPDA's consideration:

- **Board of Appeals Process:** The proposed Resilience Review component of Article 80, not the Board of Appeal process, is the more appropriate process for determining that all uses proposed within the CFROD are designed to address projected coastal flooding risks. There is no one size fits all design solution, and good design judgment will always be important to reconcile different objectives. The Article 80 process provides an opportunity for a solutions-oriented exchange. ***A Better City recommends revising relevant language to reflect this change.***



- **Below Grade Parking:** Section 25 A-6 (c)(i) of the draft CFROD, which defines various allowed uses below the Sea Level Rise – Design Flood Elevation (SLR-DFE), includes “parking accessory to non-residential uses,” but appears to exclude parking associated with residential uses. Commercial and residential parking garages should be treated equitably. Moreover, research shows that parking garages can be efficiently evacuated and either "dry" or "wet" floodproofed. Parking garages designed as smart, floodable spaces have the capacity to absorb, store, and slow the velocity of water during a major flooding event. ***A Better City recommends amending the language to allow for “parking accessory to residential and mixed-used uses,” if possible.***
- **Modeling Data:** It is our understanding that the BPDA Sea Level Rise Flood Hazard Map/CFROD Map, which is based on the Boston Harbor Flood Risk Model and Woods Hole Group data, applies to areas of the City of Boston anticipated to be impacted by a 1% chance storm event in 2070 with 40-inches of sea level rise. However, the rationale for using these datasets and omitting the Boston Water and Sewer Commission data is unclear. Additionally, it is unclear if and when the applied datasets and map will be updated. ***A Better City recommends amending the language to clarify the rationale for the selection of these datasets and the cadence for the update of the datasets and map.***
- **Relationship to District-Scale Resilience Solutions:** Section 25A-7 4 (c) states that enhancements at an individual parcel or project level should not worsen risk at adjacent parcels or restrict implementation of larger coastal resilience plans for the CFROD. However, no clarity is provided about how to ensure a property is not worsening risk on adjacent parcels. ***A Better City recommends clarifying this language and providing guidance on how to ensure a property is not worsening risk on adjacent parcels.***

A Better City would welcome the opportunity to review the next draft of the Proposed Amendments to Article 25A/Coastal Flood Resilience Overlay District (CFROD), that includes comments received, with member companies and institutions.

Thank you for your leadership and for the opportunity to comment on the draft.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard A. Dimino'.

Richard A. Dimino
President and CEO

cc: Sonal Gandhi, Chief of Staff, BPDA
Richard McGuinness, Deputy Director of Waterfront Planning, BPDA
Chris Busch, Assistant Deputy Director for Climate Change & Environmental Planning, BPDA