



Are you on board?

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September 11, 2020

Via email: alex.strysky@state.ma.us

Ms. Kathleen Theorharides, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Attn: Alex Strysky

Re: EEA #16250 – 244-284A Street (EEA16250)

Dear Mr. Strysky,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Environmental Notification Form (ENF) submitted by Related Beal on behalf of its affiliate, Channelside Acquisitions LLC, regarding the 244-284A Street project in the Fort Point Neighborhood of South Boston. The project site is currently occupied by a surface parking lot, and it is roughly bounded by Necco Street to the northeast, A Street to the southeast, Binford Street to the southwest, and the Fort Point Channel to the northwest. The ENF proposes approximately 1.1 million square feet of residential, office, lab and mixed-use space in three buildings, as well as below-grade parking. The project meets or exceeds several mandatory Environmental Impact Report (EIR) thresholds, including expansion of an existing non-water dependent use on tidelands. Boston Harbor Now participated in the Boston Planning and Development Agency's public meeting on this project on August 26, 2020 as well as the MEPA consultation session held on September 1, 2020. We submit the following comments based on the information provided in the ENF as well as in those public meetings.

Project Plan

As described in the ENF, the project involves the construction of three buildings: a 180 foot tall (17 floors) residential building, referred to as G4, which includes approximately 336,100 square feet of residential space and mixed-use space with approximately 370 residential units; a 180 foot tall (13 floors) office building, referred to as G5, which includes approximately 332,192 sf of office and mixed-use space; and a 123 foot tall (8 floors) lab/R&D building, referred to as

G6, of approximately 400,000 sf of lab/R&D and mixed-use space.

The project will provide improvements to the public realm, including new streets, public open space, new pedestrian connections to the Fort Point Channel and enhancement of the Harborwalk along the project's edge. The design of the upgraded Harborwalk section is currently being evaluated and coordinated with the City, the Massachusetts Department of Environmental Protection, and other stakeholders. A berm planned by the City of Boston will be integrated into the site design to provide resilience to the site and neighborhood.

Open Space/Public Access

The project will include approximately 161,049 sf of open space, including an enhancement of Fort Point Park along with an additional network of open spaces that increase the open space provided on the site by approximately 22,684 sf over the amount required by the Master Plan for Planned Development Area No. 69/The 100 Acres (January 10, 2007). Recognizing that expanding the proposed park footprint allows for a greater diversity of open space uses, we commend the proponent for increasing the size of Fort Point Park, as well as for increasing the porosity of the site to provide better visual and actual connection to the Harborwalk and Fort Point Channel through the site. In looking at the design drawings, we would encourage the proponent to incorporate pervious surfaces and trees to the extent practicable for both aesthetic and stormwater retention purposes.

The final design of the Harborwalk has not been identified. The ENF indicates that the proponent is exploring two alternatives: one that creates 1,413 new square feet of pile-supported Harborwalk over the existing stormwater outfall and a second alternative that follows the alignment of the shoreline. Either alternative appears to be feasible within the constraints of the project as put forward in the PNF. The pile-supported alternative, however, has been identified as the preferred option. While this will create a larger Harborwalk, we do not believe that there is a good reason to establish a precedent like this by building out the Harborwalk over the water unless there is a clear coastal resilience benefit. It might be acceptable, or even recommended, if it would provide significant benefits to flood protection for this property and the adjacent neighborhood, but that does not appear to be the case for this project. Instead, in alignment with Chapter 91, additional open space should be incorporated into the site. There has been no indication that the pile-supported Harborwalk will provide any resiliency benefits or, indeed, anything other than a slightly larger site footprint. We therefore encourage the proponent to fully analyze these alternatives in the EIR and to avoid covering the water sheet for this purpose.

Further, as the proponent moves through the design process, we encourage them to ensure that sufficient Harborwalk width is provided at all points along the water, particularly at the connections to other properties and the South Bay Harbor Trail. As the Harborwalk moves between building G5 and the Gillette pump house, there appears to be a pinch point which may make continuous access difficult. With the anticipated improvements and completed connections along other sections of the South Bay Harbor Trail, a significant increase in bicycle traffic is anticipated on this protected route from the Roxbury neighborhood to the Seaport. In addition to creating linear access along the Fort Point Channel that is well-connected to other networks like the South Bay Harbor Trail, this project should contribute to the implementation of the Fort Point Channel Watersheet Activation Plan. The ENF is silent on any plans to activate the watersheet adjacent to this development. A well-developed plan to activate the watersheet will be critical to creating a destination that will attract people from around the City and from all walks of life. The EIR should clearly address the elevation and

width of the Harborwalk, as well as the plan for watersheet activation.

Finally, the mix of uses that will represent the interior Facility of Public Accommodation space has not yet been determined. We would encourage the proponent to work closely with the neighborhood and the City to ensure that this space provides a mix of uses at different price points and that will appeal to a wide range of users, including some free or low-cost options. There have also been repeated requests by residents for public meeting and convening space in the neighborhood. The promise of creating a destination for all people can be fulfilled with careful attention to the interior space.

Consistency with Area Planning

According to the Master Plan for Planned Development Area No. 69 South Boston/The 100 Acres, (January 10, 2007), which is applicable to this site, the allowable building heights for this development are 180 feet for G4, 100 feet for G5, and 100 feet for G6 (Exhibit I: Buildout Plan in PDA 69). The ENF suggests a project where some of the height from G4 is allocated to G5, creating two 180-foot tall buildings along the Fort Point Channel. This is not consistent with the Municipal Harbor Plan Amendment/PDA which explicitly call for height setbacks from the waterfront to create a higher quality Harborwalk experience. We are concerned that the proposed massing creates too much of a barrier between the neighborhood and the Channel. If a change to the height requirements that were established by the MHP and PDA processes is to be made, an amendment to both the MHP and the PDA would be the appropriate mechanism to accomplish such a change. This would ensure that the public has an opportunity to weigh the benefits and burdens of the change in height and the reasons given therefor, and to give a thorough public vetting of this decision.

Additionally, from the shadow analysis presented in the Project Notification Form submitted to the Boston Planning and Development Agency, it appears that the proposed buildout shifts shadows from the interior of the site to the Harborwalk and water sheet. The EIR should consider alternative building alignments and massing so as to minimize this impact.

Climate Preparedness/Resilience

The project presents a thoughtful approach to climate resilience in the ENF. The City's planned berm along the Channel will be integrated into the site to provide open space as well as resilience benefits. Climate Ready Boston provides a target design elevation of 20.46 BCB for the site, based on information from the 2015 Boston Harbor Flood Risk Model. The finished grade of most of the site, and the first floor elevation of buildings will be raised to an elevation of 21.5 feet BCB. Further, the site will be graded such that people can still see and get to the Channel. Overall, we are pleased with the elevations that will be achieved on the site, as well as the efforts made to maintain visual and actual access to the water.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron Toffler', with a stylized flourish extending to the right.

Aaron Toffler
Director of Policy
Boston Harbor Now