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June 9, 2023

Via email: alexander.strysky@mass.gov

MEPA Office

Attn: Alexander Strysky
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: 244-248 A Street Final Environmental Impact Report

Dear Mr. Strysky,

Boston Harbor Now (BHN) respectfully submits the following comments on the 244-284 A Street Final Environmental Impact Report (FEIR) submitted on behalf of Related Beal. Our organization has been following this project since its inception and has previously provided oral and written comments, including a letter in response to the proponent's Draft Project Impact Report/Draft Environmental Impact Report (DPIR/DEIR) in August 2021. Most recently, BHN submitted written feedback to the Boston Planning and Development Agency in September 2022 regarding the proponent's Planned Development Area.

As longtime stewards of the Boston Harborwalk, Boston Harbor Now is committed to ensuring that the waterfront we build today is designed for a more resilient and inclusive future. We use the term "Harborwalk 2.0" to capture the aspirations of this work to ensure the waterfront and adjoining properties are accessible and welcoming; are prepared for the coastal impacts of climate change; and center equity and inclusion in the development of its design, construction, and programming. An accessible waterfront should have both linear and lateral connections between the city and the water, as well as numerous activation strategies to serve all Bostonians. A resilient waterfront includes a variety of climate adaptation strategies to protect and serve Boston at a district scale. To center equity in waterfront design is to focus on strategies that make the waterfront feel safe and inclusive through lighting, signage (preferably multi-lingual), full ADA accommodations, and the elimination of features that make users feel unwelcome or excluded.

This project is expected to deliver a number of community benefits that the neighborhood has anticipated since the 100 Acres Master Plan. In addition to contributing to district-wide flood protection, this project is anticipated to deliver new open space opportunities, cultural and civic space, and art activation along an underutilized waterfront area. One of the marquee features proposed is the amphitheater. We are pleased to read that the proponent has made design refinements to ensure proper access and sightlines will be achieved. To further support the success of the future park,



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programming, amphitheater, and performances, we recommend additional bathrooms and signage directing people to other nearby amenities. We hope to see the amphitheater and parks built expeditiously. The construction of the parks should happen ahead of or concurrent with the development of the three buildings, and we expect that this project's construction will be coordinated with the City's berm to ensure that district-wide flood protection is achieved.

Support for the Amphitheater

Since the DPIR/DEIR, the proponent has made improvements to the project. Notably, the proponent has stated that the amphitheater layout and geometry have been refined to create equal access and clear sightlines to support performances. We applaud the goal; however, based on conversations with local Fort Point residents and artists, we believe that additional design refinement is needed. We hope to see detailed amphitheater plans during the Chapter 91 licensing process and further community engagement and design transparency in the meantime. Amphitheater-like spaces occur in parks and public areas around Boston, but the number of facilities that can meaningfully support performances is quite limited.

We expect that performances at the anticipated amphitheater will be a boon for the neighborhood and the waterfront. Yet, with an expected capacity of 1000 people, according to the October 2022 BPDA board approval, we are concerned by the limited number of toilets available. We commend the proponent's decision to relocate the restrooms from G5 to G4. The move places the restrooms in a more visible location and one more central to the parks, where we expect members of the public to spend the most time. Relocation only facilitates people finding the facilities; it does not change the number of people the restrooms can accommodate. Since the specific configurations of the ground floors have yet to be refined, a process which will take place during the Chapter 91 licensing and BPDA Design Review, it seems there is still time to allocate more space for restrooms and other indoor amenities that can support the amphitheater and park.

Signage

In addition to settling the ground floor's final designs, we would like to see a signage and wayfinding plan established during the Chapter 91 process. The proponent has already committed to strategically integrating informational and interpretive signage into the project to assist with wayfinding and augment the overall narrative of the site, which includes signage for the South Bay Harbor Trail. When incorporating this signage, we strongly suggest that the proponents refrain from replicating the installation methods of the signposts currently marking the trail. The height of the existing signposts found along the path today are too short, and people using the sidewalk and bike facilities as part of



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the trail regularly report that the height poses a risk for collision via 311 and in verbal complaints.

We also expect the signage and wayfinding plan to include Harborwalk colors, language, and iconography in the signage across the site in addition to the signage for the South Bay Harbor Trail where it overlaps with the Harborwalk. Because the elevation of the berm is higher than the existing elevation of A Street and the paths leading to the Harborwalk do not have long and obvious site lines, it may be difficult for A Street users to see the water and Harborwalk. To ensure visitors are informed of all the amenities the site provides, including views of the Fort Point Channel, we recommend the proponent place Harborwalk signs at the park entrances and smaller icons throughout the site. We also would like to see signage highlighting other essential amenities, like restrooms and other FPA space, and can provide examples of best practices from around the waterfront.

Phasing

As a part of this project, the proponent will help realize two new large open spaces contemplated in the 100 Acres master plan. Once the proponent completes the construction of the Necco Street Park and Fort Point Channel Park, the surface of both parks and all park infrastructure will be conveyed to the City of Boston. We applaud the proponent's choice to transfer ownership of the park to the Boston Parks and Recreation Department and are thrilled the space will remain a public open space in perpetuity. A clear timeline for construction sequencing has not been shared, and we wish to better understand when the park construction is expected to occur.

According to the filing, the proponent intends to develop all three buildings simultaneously, subject to market conditions, and construction is anticipated to commence in 2023. The FEIR, however, does not mention when the parks will be constructed. Based on the 100 Acres Master Plan process, the neighborhood has been expecting open space here since 2006 and thus hopes to see the parks realized as quickly as possible. In the proponent's outlined schedule, we would like to see the two parks constructed ahead of or in tandem with the three buildings.

In addition to better understanding the timing of the Necco Street Park and Fort Point Channel Park, we also want to better understand the timing of the site construction in relation to the proposed berm. It is imperative that this coastal adaptation project, being led by the City of Boston and funded in part by FEMA, be constructed expeditiously. We want to ensure that any actions by the proponent do not hinder the City's progress to deliver district-wide flood protection and that this site's construction is coordinated with the City's efforts. If the City cannot complete the berm's construction, we would still like to see



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the proponent elevate their site as they have proposed. The park and amphitheater should continue to be built to the planned elevations, and the site should be graded accordingly.

We appreciate the opportunity to comment on this project and look forward to following its progress toward implementation. We anticipate that during the Chapter 91 licensing process, we will have further comments and questions regarding the ground floor uses in and around the buildings as well as the proposed park and watershed activation. We would be happy to speak with you or the proponent further if there are additional questions.

Sincerely,

A handwritten signature in black ink that reads "Kathy Abbott".

Kathy Abbott
President and CEO
Boston Harbor Now