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September 5, 2023

via email: Nicholas.Perry@mass.gov

MEPA Office
Attn: Nicholas Perry
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: 232 A Street ENF/PNF

Dear Mr. Perry,

Boston Harbor Now (BHN) respectfully submits the following comments on the 232 A Street Environmental Notification Form/Project Notification Form, submitted by Parcel 3 Owner LLC, an affiliate of Tishman Speyer. Our staff has been following this project since its inception and met with the proponent prior to filing as they worked to learn more about the neighborhood and collect resident ideas. Most recently, we attended the virtual and in-person site visits on August 22 and 23.

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 is accessible and welcoming; is prepared for the coastal impacts of climate change; and centers 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, clear signage, full ADA accommodations, and the elimination of features that make users feel unwelcome or excluded.

Open Space Plan

During one of our last discussions with the proponent, they had intended to conduct an open space planning process that would evaluate the existing and proposed types of open space in the neighborhood. Since then, they have completed their evaluation and paired their findings with Fort Point stakeholder conversations to shape their open space plans. We applaud the proponent’s community engagement efforts and resulting community-responsive design. The initial open space concepts include a thoughtful mix of uses that fill existing gaps within the neighborhood and reflect the



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community's desires for a mix of quiet and restful areas and other spaces that can be used for flex space to support special events. We hope the same thoughtfulness and ongoing engagement leads to the creation of an activated waterfront and watershed at their site.

We also commend the proponent's flood resilience proposal that creates a significantly more welcoming waterfront than previous plans had outlined for the parcel. At the behest of the community, the proponent has offered an alternative coastal flood solution that replaces the Boston Planning and Development Agency's (BPDA) proposed seawall and floodgate with a more inland berm offering the same level of flood protection but is now embedded in the landscape. The gate has been replaced by accessible slopes on both sides of the line of higher elevation. We are in full support of the change to a proposed berm design, as it will create a higher quality waterfront experience for people to travel and relax while still maintaining a continuous line of defense from sea level rise and storm surge. In the event that weather conditions at high tide temporarily disrupt use of the Harborwalk, we recommend an alternative elevated path of travel be provided so that people can still navigate across the site even if the area immediately adjacent to the channel is temporarily under water. In this same vein, we recommend that the proponents use materials that weather the potential damage from storms and coastal flooding at the lowest elevation so that they can bounce back quickly.

Facilities of Public Accommodation

The proponent intends to place community uses, such as publicly accessible retail/restaurant establishments and civic and cultural uses, on the ground floor; the final uses have yet to be decided. The proponent has stated they intend to vet their Facilities of Public Accommodation (FPAs) through "a transparent public process, which will include the BPDA Staff, City and State agencies, elected officials, abutting owners, neighborhood groups...and other stakeholders." We applaud these efforts, which will allow for additional public input in the development process and hopefully creative new tenants in the neighborhood. Should the proponent pursue the model set by the neighboring Channelside development, we suggest they coordinate the processes with Related Beal to ensure they incorporate best practices and lessons learned from their experience. Notably, Channelside has engaged with a DEI consultant to help ensure the RFI/RFP process is accessible to a range of potential tenants and further plans to offer technical and financial assistance to those groups that may not have the in-house capacity or expertise to apply to an RFI/RFP, a practice that the proponent may want to implement here as well. Should the proponent's RFP process



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begin after the completion of the Channelside project, the proponent may also want to encourage unselected applicants to apply for their FPA space.

Although the ground floor uses have yet to be decided, it seems the proponent has determined where they will be located within the building. Lobby space for the office/lab tenants will be situated at the intersection of Necco Street and Binford Street and retail/amenity space will be placed along A Street, the Gillette property, and the new park. Like Channelside, the proponent has put back-of-house operations along Binford Street, concentrating loading in one area. While the space fronting A Street will be highly visible, the retail/amenity spaces facing Gillette and the park are less visible, in part because they are not yet facing a street or along a primary pedestrian route. The proponent may want to explore additional wayfinding and activation along the Gillette side of the building, and the arcaded design suggests they have begun to explore strategies to ensure that the pathway feels inviting.

The proposed project is a thoughtful design that is a reflection of the proponent's receptivity to community suggestions and experiences elsewhere on the waterfront. We appreciate the efforts the proponent has put into engaging with the community and balancing complex infrastructure needs on the site, especially with regard to the design of the outdoor space, which will include space for quiet appreciation of nature while also providing an elegant coastal flood intervention. The uses and configuration of indoor spaces, while yet to be decided, will also be heavily guided by community input. We look forward to remaining engaged in the state and local processes that will continue to shape this project and hope that lessons from Channelside can be iteratively applied to the site as the neighboring park and buildings are constructed and leased.

We are grateful for the opportunity to comment on this project, and we will continue to follow its progress toward implementation. 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