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Sept 29, 2023

via email: Nick.Carter@boston.gov

Boston Planning and Development Agency

Attn: Nick Carter

1 City Hall Square, Floor 9
Boston MA. 02203

Re: 232 A Street ENF/PNF

Dear Mr. Carter,

Boston Harbor Now (BHN) respectfully submits the following comments on the 232 A Street Environmental Notification Form/ Project Notification Form (ENF/PNF), submitted by Parcel 3 Owner LLC, an affiliate of Tishman Speyer. Our staff has been following this project since its inception and have met with the proponent prior to and since filing as they worked to learn more about the neighborhood and collect resident ideas. We have attended the public meetings hosted by the Boston Planning and Development Agency (BPDA) in April and September 2023 regarding the project's Letter of Intent (LOI) and ENF/PNF, respectively.

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.

Understanding Elevations and Grading

As noted in our recent letter to the Massachusetts Environmental Policy Act Office (MEPA) about the project's Environmental Notification Form



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(ENF), we are pleased by the proponent's alternative coastal flood solution that replaces the BPDA's proposed seawall and floodgate with a more inland-aligned berm that improves the public experience of this climate adaptation feature. The design, which offers the same level of flood protection but now embeds the wall within the landscape, is an elegant solution, allowing better circulation between the water and the neighborhood. The removal of an operable floodgate also ensures that protection is not dependent on human actions.

The improved design grading, however, is not without its challenges. A constantly sloping grade, even if gentle, may preclude some uses. It will be important that the site's grading works with the anticipated flexible uses outlined by the proponent. It is also essential to understand how the future elevations of the abutting sites will create a seamless experience for visitors traveling between locations and amenities along the Fort Point Channel. A 3-D model showing the anticipated grading and elevation of the site will help members of the public better understand the paths of travel, possible uses, and flood protection connections to abutting sites.

Aligning site grading and elevation is especially important for flood infrastructure, which must connect to create a continuous line of flood protection. While the proponent has already shown that the berm will connect to the high point elevation of the abutting development at 244-284 A Street (Channelside), we want to ensure that the connections make sense on the southern end as well. Although there are no public plans for Gillette's site, we recommend that the 232 A Street berm be designed so that it can be adapted to meet a few different flood infrastructure scenarios, including the seawall described in the BPDA's Fort Point Resilience Plan. We want to ensure that the proponent's berm design can align with the BPDA's proposal while allowing potential redevelopers of the Gillette site some flexibility to improve upon the those plans if Proctor and Gamble sells, leases, or redevelops the property.

In addition to ensuring that the grading of this site complements the proposed grading of the abutting sites, the proponent should also ensure that the grading works with the building. Current designs show the ground floor entrances are not located in places that would be intuitive if the ground plane was flat. We suggest the proponent move the doors to more central locations and adjust the grading to meet the updated locations. We hope that by reconfiguring entrances and improving the plaza, ground floor activation can spill out of the building, bringing life to outdoor space around the requisite facilities of public accommodation.



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Waterfront and Watersheet Activation

We appreciate that the proponent has designed a thoughtful open space that reflects the local 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. The current configuration responds to the community engagement efforts the proponent has undertaken in the design process, and we hope they will continue and expand their outreach efforts to reach an even broader audience as they advance their watersheet activation planning.

The open space design of new parks along the Fort Point Channel provides unique opportunities to create new amenities and destinations that serve local residents and workers as well as the broader Boston community. Access to this body of water offers artistic and recreational opportunities that benefit from minimal wave action and little to no motorized boat traffic. These conditions make the Fort Point Channel an asset that, if properly activated, could become a special destination for waterfront visitors and provide additional benefits to the neighborhood. As the project proponents continue refining their plans for the watersheet and the reimaged Binford Street Park, they should select uses that will make long time tenants and first time visitors feel welcomed. The current design is vague in its programmed intent and flood elevation.

Additional landside amenities should support visitation as well. Plans for drinking fountains, public restrooms and wayfinding should be included in future filings.

This project has significantly evolved through stakeholder feedback, resulting in improved public realm and flood infrastructure. The improvements, though, come with design challenges that still require refinement and visualizations (or models) that can facilitate deeper conversation. The proposed flood infrastructure and grading will need some tweaking to ensure that visitors can use the space as the proponents have envisioned. Notably, the grading and topography of the various ramping and flood protection systems throughout the site should be clarified. Waterfront and watersheet activation, which has yet to be refined, should invite visitors from all over to explore and enjoy the waterfront. We suggest the proponent expand and target their community engagement efforts to capture audiences they may not have reached yet. This site has the capacity to activate both the water and land around the Fort Point Channel. We hope this project uses its enormous potential to bring residents and visitors from further afield to the water.



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We are grateful for the opportunity to comment on this project and will continue following 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