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March 25, 2024

Via email: Nicholas.Perry@mass.gov

MEPA Office

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

Re: 232 A Street DEIR

Dear Mr. Perry,

Boston Harbor Now respectfully submits the following comments on the *232 A Street Draft Environmental Impact Report* submitted by Parcel 3 Owner, LLC, an affiliate of Tishman Speyer. Our organization has been following this project since its inception and most recently attended the January 10th, 2024 Virtual Public Meeting. We've also met with the proponent about the project and hosted them at a Harbor Use Public Forum, in which they were able to share more about their project with the general public.

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, signage (preferably multi-lingual), full ADA accommodations, and the elimination of features that make users feel unwelcome or excluded.

Flood Infrastructure Design and Coordination

232 A Street is one of several recent projects proposed along the eastern side of the Fort Point Channel, one of the most flood-prone parts of Boston. To combat the coastal flooding expected, and at times already experienced, the City of Boston and Boston Planning and Development Agency have undertaken the Resilient Fort Point Channel Infrastructure Project (RFPCI project) to create a 2,090 linear feet mixed berm and floodwall structure that will help create district-wide flooding protection for the area. Although those governmental entities are currently advancing the design of the project, private developments with their own plans for flood infrastructure are simultaneously moving forward. The 15 Necco Street project site has been



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raised to help create a planned continuous line of flood protection, similar to what has been proposed through the RFPCI project, and the Channelside project, currently in the design and Chapter 91 licensing stage, is similarly planned to include complementary site grading/resiliency measures.

To match Channelside’s proposed elevation, the proponent has chosen to create a berm that reaches 15.0 NAVD88 (21.5 BCB). We agree with the proponent’s assessment that “...increasing the elevation of the berm above 15.0 NAVD88 would not provide increased protection, as water would flow onto the Project Site from the adjacent properties in an extreme future coastal storm event” and further elevation at this time is not necessary. However, as sea levels continue to rise and flooding is expected to become more severe, a higher line of defense may be needed. The proponent’s flood infrastructure should be designed so that it is capable of being adapted in the future to allow for additional protection if needed.

The proponent also has requested an “all-hands” meeting with abutting ownership groups, the BPDA, MassDOT, and the BPDA’s engineering design consultant for the RFPCI to ensure that their flood infrastructure design is coordinated. In this meeting, the proponent should discuss berm design best practices and their berm financing plan, which calls for reimbursement through the City of Boston and an associated FEMA grant should the proponent initially finance the berm as part of the project.

Memorializing FPA Space and Open Space

Conventionally, Commonwealth Tidelands are expected to consist primarily of Facilities of Public Accommodation (FPA). However, due to the configuration of the existing street network and the location of Channelside’s loading, the proponent has chosen to place their loading dock along Binford Street, where the Commonwealth Tidelands are located. Although this means that 43% of the ground floor in Commonwealth Tidelands will be used for Facilities of Private Tenancy (FPTs) the proponent is providing the requisite amount of FPA space in other ground floor locations in the building. In total, the proponent is proposing 17,341 SF of space devoted to FPAs, an excess of 9,473 SF above the requirements of Chapter 91.

We support the proponent’s decision to relocate FPAs from the Commonwealth Tidelands to other portions of the ground floor. FPAs should be located in areas of high visibility and pedestrian foot traffic so that they are easily accessible and found by the public. Placing public amenities along Binford Street could result in loading and pedestrian conflicts as well as a lower quality experience for FPA space users who would face the back-of-house operations for Channelside. We believe the proposed location for



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FPA is appropriate and appreciate that the proponent is creating additional FPA space above the required amount under Chapter 91.

We would like clarification on the difference between “Other Publicly Accessible Areas” which is expected to create approximately 8,513 SF of space “that will draw the community to the Project Site” and the 17,341 SF of space devoted to FPAs. If there is no functional difference between an “Other Publicly Accessible Area” and FPA space we hope the proponent will consider designating it as official FPA space in their Chapter 91 license to enshrine the public rights affiliated with the space. Along the same lines, we hope the proponent will offer to deed their open space to the City of Boston. This project is expected to provide approximately 54,962 SF of open space, an exceedance of 79 percent above the 30,625 SF required under Chapter 91. Such a meaningful amount of open space should be protected in perpetuity, and deeding the land to the city would do so. In the event the City is uninterested in acquiring the proposed parkland, we hope the proponent will take other measures to ensure that the open space they create remains available to the public in the future.

Watersheet

Since the ENF, the proposed dock located at the site has been removed due to a combination of site constraints and community disinterest. Although the elimination of the dock has resulted in the removal of the one touch-the-water opportunity proposed on-site, the proponent has made efforts to still encourage watersheet use by providing “ancillary support services for public enjoyment of the waterfront which will include public restrooms, drinking water station, and storage for Dragon Boats, a prominent use on the Fort Point Channel, in a to-be-determined location in the below grade garage.”

We appreciate the width of the site and the adjacent pumphouse likely makes touch-the-water moment challenging. However, the removal of the only opportunity to get people onto the water is disappointing. Though Boston Harbor Now felt the dock was duplicative of other amenities already found along the channel, we hoped it would be replaced with another feature like a barge or other creative water access opportunity. The Fort Point Channel is unique in that it offers a relatively calm stretch of water along the Boston Harbor making it a great place for stand up paddle boarding, dragon boating, and other non-motorized water activities. A creative touch-the-water moment could help the Fort Point Channel become a regional destination, attracting people from around Boston to this part of the waterfront. With minimal watersheet planning having taken place since the Fort Point Channel Watersheet Activation Plan (2002) we feel more attention needs to be given to in water activation and its implementation for not just this site, but the whole channel. We understand that permitting floating and in-water



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infrastructure is challenging at present, however, Boston Harbor Now would support the proponent's efforts to get such infrastructure approved.

In the meantime, we appreciate the proponent's work providing landside amenities that support watersheet use. We hope that public restrooms and water fountains are well-signed and easy to find for those who wish to use them. Boat storage provided on-site should be strategically located where it will be easy to transport the boats to the nearest boat launch. In addition to these opportunities, the proponent should contribute yearly funds to the Fort Point Operations Board for further activation of the watersheet.

In conclusion, this project has proposed numerous public benefits that go above and beyond the requirements of Chapter 91 that we'd like to see memorialized to ensure that they remain in service to the public for as long as possible. Coordination with the City and BPDA may be necessary to ensure these amenities, like the berm, are designed to the correct specifications and preserved, like the large waterfront open space. In the future, we hope to see watersheet activation on-site. Regardless of watersheet activation, we hope this site will be a welcoming destination for visitors from near and far.

We are grateful for the opportunity to comment on this project and will continue to follow its progress toward implementation. If there are additional questions, we would be happy to speak with you or the proponent.

Sincerely,
Kathy Abbott

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

President and CEO
Boston Harbor Now