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July 8, 2024

Via email: Nicholas.Perry@mass.gov

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

Re: 232 A Street FEIR

Dear Mr. Perry,

Boston Harbor Now respectfully submits the following comments on the 232 A Street Final Environmental Impact Report. Our organization has been following this project since its inception and most recently submitted written comments on their Planned Development Area filing with the Boston Planning and Development Agency (BPDA). We've also met with the proponent about the project and hosted them at a Harbor Use Public Forum, where 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. While the governmental entities are advancing the design of the RFPCI project, 232 A Street and other private developments along the east side of the channel have already begun implementing and designing their own plans for flood infrastructure at their respective sites. As a part of their project, the proponents of 232 A Street plan to build a vegetated berm that will be integrated into the Harborwalk and South Bay Harbor Trail along Fort Point Channel. The proposed berm will help protect against the City of Boston's current 2070 100-year storm event projections.



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We appreciate that the proponent has met with the City and BPDA to coordinate their efforts and project timing. We are especially pleased to see that “if, for some reason, the RFPCI project were not to be constructed by the City, the Project would still be constructed as described in the DEIR...” helping to build district-wide flood protection regardless of the City and BPDA’s timeline.

Future FPA Space

As a part of this project, the proponent has committed to providing approximately 17,300 SF of FPA space, over twice the required amount under Chapter 91. To help activate the proposed 8,000 SF of Civic/Cultural space, the proponent has committed to a transparent, public RFI and RFP process in collaboration with the Mayor’s Office of Arts and Culture to identify a tenant. Additionally, the proponent will “provide a financial contribution of up to \$800,000 to fund the initial tenant-specific buildout...” and “the space will be made available at a heavily subsidized base rent that will be determined with input from [MOAC].” According to the FEIR filing, “The Proponent has also committed that the Civic/Cultural space tenant will not be responsible for reimbursing its pro rata share of real estate taxes, an expense that is not economically feasible for many groups to cover (estimated to be upwards of \$23/SF as of FY 2024).”

We appreciate the proponent putting so much effort into finding a civic/cultural tenant who will activate the ground floor. We expect the remaining FPAs and other publicly accessible interior spaces to be similarly inclusive and activate the site and, by extension, support visitation to the waterfront. Boston Harbor Now believes that FPAs can play a vital role in creating a more equitable waterfront by introducing uses and amenities that support and encourage waterfront visitation for all. As the proponent selects tenants for their FPAs, we ask that they consider tenants who will create a more welcoming waterfront for everyone and further the idea of the waterfront as a destination. FPAs and other waterfront amenities should provide services at various price points, including low-cost and no-cost opportunities, to eliminate barriers that may deter visitors from coming to the area and make it accessible to all. Although we expect to see basic amenities that allow visitors to use the space comfortably, like water fountains and bathrooms, which the proponent has stated they will provide, we also want to see amenities that actively encourage audiences to visit the waterfront. FPAs should reflect both the local community and the communities we hope to bring to the waterfront and further appeal to audiences who have not historically been welcomed.

Watersheet

To support watershed activation, this project has demonstrated that it will comply with the 2002 Fort Point Channel Watersheet Activation Plan by preserving sightlines, providing waterfront vistas, building an accessible Harborwalk, and accommodating the South Bay Harbor Trail. The project will also provide supporting landside amenities like “on-site dragon boat storage, FPAs (which will be in excess of what is required by Chapter 91 and the SBMHP) that will attract people to the waterfront, wayfinding facilities, publicly accessible restrooms for use by boaters, cyclists and the transient public, a drinking fountain station, and spaces for public art.”

The Fort Point Channel Watersheet Activation Plan is outdated, and while it provides a solid foundation to work from, this development should strive to go above and beyond the requirements outlined for its site. We appreciate the



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proponent's efforts to create landside amenities that support usage of the watershed and that the width of the site and the adjacent pumphouse likely makes a touch-the-water moment challenging, but we are still disappointed by the lack of actual activation within the channel. Watersheet activation can anchor the site, giving the project a distinct personality compared to other projects along the channel. The proponent has stated that the park's primary character centers on its proximity to the water. With this in mind, we believe the proponent should work to activate the watershed and create stronger ties between the site and the water.

As a part of the larger trend of development along the southeastern end of the Fort Point Channel, it is important that this site contributes amenities that complement but are not duplicative of its neighbors. Though separate entities are developing the projects on different timelines, we encourage all the surrounding sites to create a cohesive regional destination that invites visitors from all over to explore this part of the waterfront.

In conclusion, we appreciate the coastal resilient infrastructure and landside amenities this project is expected to deliver. This project has the potential to bring unique amenities to the Fort Point Channel. If the proponents believe that the defining character of this site is its connection to the waterfront, we would like them to further strengthen this idea by activating the watershed. We'd like to see the channel become a regional destination that attracts local and regional visitors. To do this, the proponent should select FPAs and tenants that can appeal to a broad audience, as well as watershed activation that complements other amenities proposed by neighboring sites.

We are grateful for the opportunity to comment on this project and hope the Secretary will direct the proponent to incorporate these specific requests into the Chapter 91 licensing process. If you have 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