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January 6, 2025

Via email:susan.you@mass.gov

Susan You, Regional Planner
MassDEP Waterways Regulation Program
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: *Waterways License Requests for the 244-284 A Street G6 Development Parcel and Waterfront Open Space*

Dear Ms. You,

Boston Harbor Now respectfully submits the following comments on the *Waterways License Requests for the 244-284 A Street G6 Development Parcel and Waterfront Open Space* submitted by ChannelSide Acquisitions, LLC on behalf of Related Beal. Our organization has been following the development of Channelside (244-284 A Street) since its inception. Most recently, we submitted comments on the *244-284 A Street Chapter 91 Consolidated Written Determination* on October 23, 2023.

Boston Harbor Now's mission is to ensure that Boston's Waterfront, Harbor, and Islands are accessible, inclusive, and adapted to the risks of climate change. We advocate for climate resiliency measures that contribute to district-scale flood protection and improve ecosystem services, as well as waterfront activation that welcomes everyone, especially those who have been historically excluded. We do this to realize our [Harborwalk 2.0 vision](#) of a vibrant, welcoming, and resilient Boston coastline. As a part of our mission, in 2022, Boston Harbor Now conducted a series of community workshops to identify what a more accessible, resilient, and equitable Fort Point Channel could look like in the future. The resulting community-generated ideas and additional history and planning context have been compiled and organized into the [Fort Point Resource Guide](#) to help provide developers, community members, and regulators with a shared understanding of desired amenities and resilience measures for the future.

Resilience

This project is one in a series of recent developments that will help build a continuous line of coastal flood defense, resulting in flood protection not just for the site itself but, with the coordination of neighboring property owners, protection for the more inland neighborhood as well. We've appreciated the proponent's creative plans to integrate an amphitheater into the line of flood protection, helping to protect and simultaneously activate the site. As an organization that works to invite people to and protect people from the harbor, we appreciate the thoughtfulness of the proposal.

We would highly prefer to see the build-out of the coastal flood infrastructure outlined in the West Development Area before other phases of development move forward. However, if this is not possible, we want to ensure that regardless of the phasing of the site, the proponent guarantees that this flood infrastructure will be built. This project has two phases: the seaward "West Development Area"



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and the more inland “East Development Area”. During the December 10, 2024, East Development Area hearing, the proponent stated that they would elevate Necco Street should the East Development Area precede the development of the West Development Area and the City of Boston’s berm not move forward. Because this flood alignment would not connect to 15 Necco Street’s flood infrastructure or the proposed flood infrastructure at 232 A Street, the proponent or the City would need to deploy temporary flood barriers to prevent water from infiltrating further into the neighborhood. Should this be the case, we strongly suggest that the deployables be kept on-site. We also urge the property manager to regularly maintain the deployables and practice using them. They should also inform the neighboring properties of their plans for deployment to ensure that the selected deployables can tie into the adjacent properties’ flood infrastructure. However, it is imperative that this be an interim condition. We expect the proponents to build the flood infrastructure promised in the West Development Area regardless of whether or not Necco Street is raised or the City’s berm moves forward.

As noted in prior written feedback, we hope any newly constructed flood infrastructure can be adapted in the future. This pertains to the stage that will be located on the Harborwalk, which the proponent stated would be a permanent fixture. Though the final design of the stage is forthcoming, it should be constructed to allow for additional elevation of the Harborwalk in the future as sea levels continue to rise.

The Amphitheater and Art Launch/Dock

The proponent is to be commended for listening to the local community’s desires for the amphitheater and art launch/dock and designing these features to meet the local artist’s needs. We have been impressed by the proponent’s responsiveness and appreciate their commitment to creating amenities that will activate the waterfront at this site. We especially appreciate that the proponent has maintained the requisite 12-foot wide Harborwalk, even with the stage in the middle, and the proponent has stated that any performances utilizing the amphitheater will be free and open to the public.

Although an operator or the Boston Parks and Recreation Department will be managing the amphitheater in the future, we urge the future operator to ensure that the Harborwalk remain open for public access at all times. The Harborwalk is an amenity for all and should be available 24/7 regardless of whether a performance is setting up or taking place. Permanent, multilingual signage should be placed along the Harborwalk in visible locations, noting that the Harborwalk is always open, that there are alternative accessible routes available during performances should that be preferable, and that all performances are free and open to everyone.

Indoor Amenities

With the expected popularity of the amphitheater and art launch/dock, we would like to see additional and more inclusive restrooms. In the current designs, all restrooms on site are gendered, and there appear to be only four stalls within



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Building G4, two for women and two for men. It was unclear how many stalls were available in Building G6. We would like to see gender-inclusive bathrooms available in both buildings. Building G4 should contain many more stalls to accommodate the large crowds likely to come for performances. The bathrooms affiliated with Building G6 also seem quite small, and we encourage the proponent to add additional stalls at this location. Additionally, we have concerns about the location of the restrooms in G6. It is not clear whether they are accessible from the public lobby or if they are only accessible from the interior FPA space, but the proponent needs to ensure that they can be accessed by both. (For example, there are restrooms accessible to both indoor and outdoor visitors successfully executed by Atlantic Wharf. The Waterfront Square bathrooms are located by the Harborwalk entrance, allowing Harborwalk users and building users to navigate to the restrooms easily.) We also expect clear wayfinding signage to help visitors find the restrooms and other public amenities. With the ground floors of all three buildings not yet defined, as the proponent has elected to define them based on the needs of the civic/cultural RFP results, the restroom design should be flexible at this point in time.

As the proponent selects tenants for the site, including the operator of the civic/cultural space and amphitheater, we request that they select a diverse set of vendors capable of providing services with various price points to appeal to a broad audience. Retail and restaurants should offer low-cost options for patrons to reduce barriers that may lead to the exclusion of some members of the public. To go above and beyond, vendors should actively appeal to audiences who have historically felt unwelcome on the Boston waterfront and work to create a sense of belonging for everyone.

In conclusion, we have been impressed by the proponent's commitment to creating amenities that support the community's vision for an activated waterfront and watershed. Further supporting the marquee amphitheater and art launch/dock, we hope to see additional, inclusive restroom accommodations. Though the proponent should prioritize building permanent flood infrastructure, we appreciate that there are interim backup plans that can be implemented in case of flood. Even with the proposed interim solution, this site needs to contribute to district-level flood protection and expect that the proposed permanent flood infrastructure to be built with the construction of the West Development Area.

We are grateful for the opportunity to comment on this project and will continue to follow its progress toward implementation. We would be happy to speak with you or the proponent if you have additional questions and look forward to reviewing the forthcoming management plan.

Sincerely,

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

Kathy Abbott
President & CEO