



March 10, 2026

MEPA Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114  
Attn: Kate Harson  
*Via electronic mail:* Kate.Harson@mass.gov

*RE: EEA No 17040 - 111 Eastern Avenue Garage*

Dear Ms. Harson,

Thank you for the opportunity to comment on 111 Eastern Ave. Garage Environmental Notification Form (ENF) submitted by Fort Point Associates on behalf of the Proponent, UGP-PreFlight Boston, LLC, and affiliate of InterPark Holdings, LLC.

The undersigned organizations (Boston Harbor Now, Conservation Law Foundation, Mystic River Watershed Association, and Save the Harbor/Save the Bay) are waterfront advocates who currently live, work, recreate, and/or program in and around the Boston Harbor. We offer the following comments:

### **Site and District Resilience**

The proposed project is consistent with the City of Chelsea’s resiliency plans for the Eastern Avenue Corridor. The Boston Waterfront Partners advocate for resiliency planning that address heat islands, sea level rise, storm surge infrastructure, stormwater run-off, plantings, and site remediation concerns. We appreciate the Proponent’s plan to create a net reduction in impervious surfaces compared to existing conditions, to create expanded habitat for birds and other local wildlife, and to establish new trees and groundwater to address urban heat island effects. While we support the addition of new plantings and tree canopy in waterfront development projects, we would also like to see these solutions “strive to provide co-benefits that enhance the waterfront space for all, including providing a destination for those who live in neighborhoods disproportionately impacted by heat islands.” ([Boston Waterfront Partners’ Equity Rubric for Waterfront Development, 2024](#)). The Proponent should consider the following additional remedial measures: [cool roof](#) or top level of the garage, [green walls](#) for the garage facade, and off-site tree planting in nearby EJ community hotspots.

Public access is a key component to heat island mitigation, and we urge the Proponent to take this planning further by detailing plans for ensuring the surrounding community benefits from this increased green space, such as by adding a Harborwalk by the Southern Parcel. Please see **Project Design and Waterfront Access** below for more detail.

## **Environmental Justice Analysis**

We appreciate the Proponent’s research into the Project’s potential effects on Environmental Justice communities and the ENF’s compiled record of outreach attempts and meetings held with local organizations and representatives. While it is great to see community outreach taking place, we hope to see even more local groups involved. Details of further public information sessions publicized to surrounding EJ community members in their different languages, and details of those meetings allowing attendees to provide meaningful input, would prove beneficial to the community.

The Proponent concedes that the Project’s biggest potential long-term impact to EJ populations in the area is increased vehicular traffic and the resulting associated mobile source pollution emissions. While it is noted that the effects will be relatively spread out during the average day, this is an added strain to the local community without a benefit intended to even out the damage post-construction. We are pleased to see the list of measures to be employed to mitigate potential public health impacts during the Project’s construction, but additional remedial measures (see above) are warranted to ensure public health is not negatively impacted once construction is complete.

## **Designated Port Area Implications**

Designated Port Areas (DPAs) in Boston’s Inner Harbor deeply impact many of the communities we work in and support. DPAs provide critical support for Massachusetts’ maritime economy and cultural history. At the same time, Inner Harbor DPAs also struggle with disinvestment, competing market pressures, climate risks, split jurisdiction and governance, a legacy of polluting industries, and limited coastal access that have burdened the Environmental Justice communities surrounding DPAs.

This project illustrates several challenges facing some Inner Harbor DPAs and the limitations of current DPA regulations.

- Uses on the parcels in the DPA are reconfigured, shifting from Temporary Use for a surface parking lot and truck rental facility to permanent allocation of some land for a parking garage. Car parking will increase by 294 spaces, with “up to 28 spaces” available for public use.
- Under this project, the two parcels will continue to host no water-dependent industrial use (WDIU). As the Proponent notes, these sites have not hosted WDIU since the 1990s or earlier.
- 41,966 square feet in the Northern Parcel is reserved along Chelsea Creek shoreline for WDIU or Temporary Use. This project seeks to license that space for Temporary Use for surface shuttle bus parking and circulation until a viable maritime tenant is found.
- 128,935 square feet in the Southern Parcel is reserved for WDIU or Temporary Use. The Proponent conceptualizes a light industrial warehouse, although that is not a formal part of this project proposal.
- The Supporting Use component of this project offers economic support rather than operational support for WDIU, via anticipated payments to the Waterfront Improvement Fund.
- How this economic support will benefit WDIU, the DPA, or the neighboring communities is unknown at this time.

Continued management of DPAs in this fashion compromises the system designed to protect water-dependent industrial use for the region while also preventing projects that might provide more benefits for their neighboring communities - through local jobs, climate resilience investments, municipal tax support, equitable public access, and more. We encourage the Commonwealth to lead a process to revitalize the DPA regulations to reconcile conflicting jurisdictional authority and reflect the modern maritime industrial character of Massachusetts.

### **Project Design and Waterfront Access**

Lower-income populations and communities of color “have not seen the same benefits from waterfront investment compared to affluent white residents. Despite the Public Waterfront Act’s (Chapter 91) requirement for public benefits and access to the waterfront, Boston’s waterfront has remained largely inaccessible to environmental justice populations.” ([Boston Waterfront Partners’ Equity Rubric for Waterfront Development, 2024](#)).

The filing mentions that the Proponent will “maintain the recently constructed existing public point accessway along the Project Site’s southern property line to facilitate public pedestrian access to the Chelsea Creek shoreline” as part of mitigation measures, which we appreciate given that the local community, which includes 56 Environmental Justice block groups within a mile of the site, has been cut off from this stretch of the waterfront for generations (111 Eastern Avenue Garage ENF, 2026). We believe that this project can and should expand access to the Chelsea Creek, and suggest that the Proponent consider adding a Harborwalk along the water’s edge of the Southern Parcel. This will allow more people to reach the water, and adding well-designed landscaping and trees along a waterfront walkway will aid the project’s stated goal of installing a “stormwater management system designed in compliance with the Massachusetts Stormwater Management Standards to reduce runoff and improve water quality flowing to Chelsea Creek” (111 Eastern Avenue Garage ENF, 2026).

A walkway along the Chelsea Creek on the Southern Parcel could be maintained until the area is needed to support a WDIU in the future. Given that the specific redevelopment of the Southern Parcel is currently under consideration, we support the creation of new Harborwalk as a more impactful and meaningful way for this project to respond to the City of Chelsea’s MHP and DPA Master Plan by increasing public access to Chelsea Creek.

In conclusion, we are grateful for the opportunity to comment on this project and hope to see improvements in the areas outlined above. We look forward to participating in the upcoming regulatory processes.

Sincerely,



Kathy Abbott  
President and CEO  
Boston Harbor Now



Philip Papiasvili  
Staff Attorney  
Conservation Law Foundation



Patrick Herron  
Executive Director  
Mystic River Watershed Association



Chris Mancini  
Executive Director  
Save the Harbor / Save the Bay