

Are you on board?

August 7, 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 Joint Draft Environmental Impact Report (DEIR) and Chapter 91 License Application submitted by Fort Point Associates on behalf of the Proponent, UGP-PreFlight Boston, LLC, and affiliate of InterPark Holdings, LLC.

We appreciate the improvements to the proposed project since the Environmental Notification Form filing and clarifying information provided in the Proponent's DEIR. However, the project as designed still falls short in many aspects which, if addressed, could greatly improve the project and its community benefits with a reasonable effort.

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

Site and District Resilience

Chelsea is a frontline Environmental Justice city in which every neighborhood is classified as an Environmental Justice population, as defined by the Massachusetts Executive Office of Energy and Environmental Affairs. Moreover, Chelsea faces significant urban heat impacts with data demonstrating some areas of the city can be 40 degrees hotter than Greater Boston suburbs. As such, it is imperative that every new development in Chelsea, particularly those with significant

impervious surfacing, maximize all available means to mitigate heat impacts.

We appreciate the additional details provided in the DEIR regarding the Proponent's proposed mitigation measures to reduce the Project's extreme heat impacts, including 75 new trees to be planted onsite across 50,795 sf of landscaped area, and light-colored rooftops on the garage's headhouses. The FEIR must more adequately consider broader utilization of cool surfaces and available on- and off-site tree planting mitigation measures, as well as confirm measures to protect and retain existing on-site trees and ensure longevity of newly planted trees (including a maintenance and replacement plan for newly planted trees).

- The headhouses represent a small proportion of the sun-exposed roof level of the proposed garage. While vehicles will cover a substantial portion of the parking deck surface during daytime, high albedo treatments, as simple as standard light colored concrete (white Portland cement), would further reduce heat gain and emittance as compared with bituminous asphalt or standard gray concrete. The FEIR should identify what surface material is proposed for the roof level parking surface and commit to a white Portland cement surface as a mitigation measure.
- At maturity (i.e., in 20-40 years), 75 medium-sized urban trees may produce 1 acre of tree canopy¹, or just 5% canopy cover across the 19.2 acres of the Project Site uplands. This is far less than the existing city-wide average of 14% canopy cover², and Chelsea has the second lowest canopy cover in the metro Boston region. Therefore, a more ambitious tree planting and maintenance plan should be implemented.
- The Proponent should evaluate options to increase on-site tree planting, for example by increasing the tree planting density along the north, east, and south perimeters of the northern parcel. The City of Chelsea's Design Guidelines³ call for 25-30 foot spacing between street trees, which the Proponent could achieve within the perimeter landscaped strips. While these design guidelines do not apply in Chelsea's Port zoning district in which the Project is located, parking structures are only allowed by special permit in this district, and these guidelines do apply in two other zoning districts in which special permits for parking structures may be granted.
- Further, the Secretary's Certificate on the ENF specifically called for the DEIR to describe mitigation measures aimed at reducing extreme heat impacts "off-site" such as "off-site tree plantings" and to "consider off-site tree plantings to improve air quality and reduce heat exposure." The DEIR does not describe any proposed off-site tree planting as part of its mitigation measures, nor does the Proponent address the issue in its response to MEPA comments (MEPA-20 and MEPA-22). The only indication that off-site planting has been considered comes in Section 8.2.3: "The Proponent will coordinate with the City of Chelsea regarding potential roadway improvements, including opportunities for new street trees, when the recommendations of the Eastern Avenue Resilience Vision document are implemented in the future." Nearly all residential Census Blocks within 1,500 feet of the Project Site (all Environmental Justice, all mapped "hot spots") have less tree canopy cover than the city-wide average. The Proponent's consideration of

¹ <https://www.treeequityscore.org/methodology>

² <https://www.treeequityscore.org/insights/place/chelsea-ma>

³

https://cms5.revize.com/revize/chelseama/Document_Center/Departments/Permitting%20and%20Land%20Use%20Planning/Application%20form/chelsea_design_review_applicationrev2013.pdf

off-site mitigation options should not be limited to a speculative future City-led flood resilience project along Eastern Avenue, particularly considering the near-decade it has taken to get the higher priority Island End River flood resilience project shovel ready and the ongoing challenge the City is facing with securing funds for its construction.

- Finally, the RMAT report submitted with the ENF indicates that the project includes “No tree removal”, and the ENF and DEIR narratives do not indicate that any trees will be removed. However, the DEIR Site Preparation and Erosion Control Plan shows 3 trees to be removed (5-in, 6-in, and 8-in diameter). Taken alongside the Planting Plan’s plant schedule, which calls for 78 trees (2.5-in to 3-in diameter, by comparison), we assume that the “75 new trees” are net new trees. However, considering the diameter difference between removed and new trees, the net effect is more like a net increase of 71 to 72 trees. When comparing the DEIR Existing Conditions plan and Planting Plan, it appears that an additional 9 existing, mostly mature trees are located within or adjacent to the proposed Eastern Ave sidewalk. The Proponent should confirm that these trees will be retained and protected during construction.

Massachusetts Coast Flood Risk Model (MC-FRM) coastal flooding projections show that the southern parcel is highly exposed to coastal flooding in 2030, by which time flooding is expected to flow over the parcel's shoreline and inundate Eastern Avenue and Marginal Street even in a 20-year storm. Near the end of the project’s useful life in 2070, this coastal flooding is projected to occur about daily. The DEIR coastal flood flow analysis section describes a conceptual redevelopment of the southern parcel that includes a light industrial warehouse with an elevated first floor as its primary coastal resilience strategy. “No substantial grading improvements are proposed for the Southern Parcel under the current design.” The flow analysis shows (white flow path indicators in Figures 8-3 and 8-7) that, in these proposed conditions, coastal flooding from Chelsea Creek would pass through the southern parcel onto Eastern Avenue. This conceptual design for the southern parcel, assuming a special permit is required under Chelsea’s Zoning Ordinance⁴, would not be in compliance with the ordinance’s Performance Standard, Sec. 34-110(p)⁵, which states:

“(p) *Inundation pathways*. Any parcel requiring a special permit, variance, or site plan review shall eliminate any pathway through which floodwaters could access a public right-of-way for the design life of the project. The appropriate design height of storm surge shall be determined using the best available science and take into account projected sea-level rise using conservative emission reduction assumptions.”

- The FEIR should select an alternative conceptual coastal resilience strategy for the southern parcel’s redevelopment that meets this standard, such as “substantial grading improvements”, structural measures like berms of flood walls, or others. The alternative selected should be compatible with DPA standards and water-dependent uses. Notwithstanding that alternatives to meet this performance standard will likely increase impacts in other environmental categories, and that the City of Chelsea has yet to develop

⁴ Few commercial and industrial uses are allowed by-right in the Port district:

https://library.municode.com/ma/chelsea/codes/code_of_ordinances?nodet=PTIICOR_CH34ZO_ARTXIIIITAPRUSRE

⁵

https://library.municode.com/ma/chelsea/codes/code_of_ordinances?nodet=PTIICOR_CH34ZO_ARTVGEASURE_S34-110PEST

concepts for extending coastal flood protections from Eastern Avenue to Marginal Street, an alternative for the southern parcel that meets the City's performance standard will be needed when it seeks City of Chelsea approval. The City recently applied for a state resiliency grant to begin the process of developing a strategy for Marginal Street, as evidence of need and intent.

Environmental Justice Analysis

We appreciate the Proponent's research into the Project's potential effects on Environmental Justice communities and the DEIR's compiled record of outreach attempts and meetings held with local organizations and representatives. While this approach demonstrates efforts by the proponent to reach Environmental Justice communities, we feel that more outreach and engagement are required particularly to those who live closest to the site and will be impacted by the construction and future development. As stated previously, every neighborhood in Chelsea is classified as an Environmental Justice community; therefore the Proponent must demonstrate it has implemented expanded outreach to ensure these populations have been meaningfully engaged. The onus is on the Proponent to reach, inform, and engage community members in this redevelopment proposal and process, in addition to the community-based organizations and community leaders the Proponent met with. At no point did the Proponents ask for assistance meeting with and engaging Environmental Justice populations; and/or request a meeting of GreenRoots' membership on the subject of the project. While a site visit was held, it occurred during the workday at a time when most community members are not available. A virtual meeting was offered later that evening, but it is unclear how and to whom it was notified. We implore the Proponent to hold community meetings in the evening or on a weekend, with interpretation, food, and childcare so that busy working families can attend. Outreach should include adjacent neighborhoods such as Bellingham St., Cottage St., Watts St., etc., all of which fall within a half mile radius of the project. Moreover, the information on the project, including presentations, should be shared in at least Spanish.

In comparison, the Proponents of 295 Eastern Ave. hosted community meetings, on-site walks and question and answer sessions as well as design sessions with community members and offered interpretation. They also sought community engagement in designing public access and interpretive signage.

InterPark's long history of partnership and engagement with Chelsea and Chelsea-based organizations demonstrates its commitment to the community. Given that commitment, we know InterPark can improve upon their outreach and engagement strategies before the FEIR is released.

The Proponent concedes that the Project's biggest potential long-term impact to Environmental Justice populations in the area is increased vehicular traffic (36% increase in daily vehicles) and the resulting associated mobile source pollution emissions. Chelsea already is disproportionately impacted by poor air quality. Additional data is needed to fully understand the impacts of these new and additional emissions. Furthermore, we believe that the increase in emissions warrant the Proponent carrying out a cumulative impact analysis of this project in relation to the compounded effects of significant air pollution already burdening Environmental Justice populations in Chelsea and nearby East Boston and Revere, also Environmental Justice

populations.

Finally, once that research has been conducted and shared publicly and meaningfully with Environmental Justice populations in Chelsea (and possibly East Boston and Revere), the Proponent must outline remedial measures it will implement, both during construction and once fully operational, to offset the impacts of the additional emissions caused by this project.

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 are intended to provide critical support for Massachusetts' maritime economy and cultural history. At the same time, Inner Harbor DPAs 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.

The 111 Eastern Ave Garage project illustrates how some of Boston's Inner Harbor DPAs do not function as intended for water-dependent industrial use, sometimes over several decades.

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. (Sections 6.3, 6.7, 6.8.6)

Continued management of DPAs in this fashion compromises the system designed to protect water-dependent industrial use for the region. It also prevents projects that might provide more benefits for their neighboring communities - through local jobs, climate resilience investments, municipal tax support, equitable public access, and more. The Commonwealth must lead a process to revitalize DPA regulations to reflect the modern maritime industrial character of Massachusetts. Our organizations are ready and committed to participate in such a process. The environmental bond bill pending in legislative conference committee includes creation of a port commission for that purpose. We look forward to working with that commission in the near future.

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](#)).

Upon reviewing the DEIR, we appreciate the Proponent responding to our previous recommendation to improve conditions for public access with the commitment to "an approximately 10-foot-wide vegetated strip...which could support future implementation of a public access walkway" (111 Eastern Avenue Garage DEIR, 2026). However, this project must do more to expand access to the Chelsea Creek. This project site has the potential to link current and future waterfront access sites for the Chelsea community. Given the redevelopment of other projects along the Chelsea Creek and where investments have been and will continue to be made,

such as 295 Eastern Ave., the future Lewis Latimer Park, 257 Marginal Street, PORT park and the Forbes Site, this project should add to the network of waterfront access improvements, meaningfully responding to the City of Chelsea's Municipal Harbor Plan and DPA Master Plan by increasing public access to Chelsea Creek. Public waterfront access features could easily be removed or adapted if a suitable marine industrial tenant is identified and if deemed appropriate by MassDEP Waterways. Should the Proponent be allowed to develop without creating perimeter access to the Chelsea Creek, as requested by GreenRoots and partners, the state will be setting precedent that flies in the face of the Environmental Justice legislation enacted in 2021.

Below, are recommendations, that if fulfilled by the project Proponent, would meet the community's goal of increasing waterfront access along the site while connecting to the aforementioned waterfront investments along the Chelsea Creek:

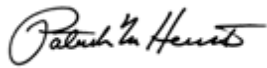
- The proposed 10 foot wide vegetated strip should be replaced with a 12 foot wide paved public walkway with vegetated borders along the entire project waterfront. Some regrading or redesign of the proposed curbing, planted island, and dumpster enclosure in the northeast corner of the Project Site may be required to provide an accessible path of the recommended width. The DEIR Grading & Drainage Plan shows that the perimeter landscaping strip, just south of the proposed dumpster enclosure, would have inaccessible slopes incompatible with a waterfront walkway.
- To provide accessible access and egress for waterfront walkway users and emergency responders, at least four sections of guardrail proposed along the waterfront should be removed, and, if needed for safety, replaced with bollards spaced wide enough for ADA accessibility. At each such location, an accessible ramp from the parking lot grade to the waterfront walkway should be provided. One should be at each end of the waterfront walkway, and the other two should be roughly evenly spaced between each end.
- To provide a safe, comfortable, well-lit environment for waterfront walkway users, additional lighting should be provided for areas of the waterfront walkway that are insufficiently served by the lighting proposed in the FEIR Layout and Materials Plan. In particular, the southeast corner of the Project Site looks to be underserved. The FEIR should include a separate Lighting Plan showing updated light pole locations and the areas served to demonstrate that the waterfront walkway is sufficiently lit.
- The project Proponent should revisit the permitted project at 295 Eastern Ave., currently in final stages of construction, as an example of what public access can and should look like and how meaningful community engagement of Environmental Justice communities translates into a project that is mutually beneficial.

In conclusion, we appreciate some of the changes the Proponent made to the earlier ENF proposal; however, we strongly believe this project still falls short on mitigating additional environmental and public health impacts to an already overburdened Environmental Justice community that has long dealt with the burdens of regional industrial activities. We are grateful for the opportunity to comment on this DEIR and look forward to seeing the State implement the Environmental Justice and climate resilience tools it has been enabled with to move this project to one that demonstrates far fewer burdens on the Chelsea and East Boston communities and Chelsea Creek waterfront. We look forward to participating in the upcoming regulatory processes.

Sincerely,



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