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Boston Planning and Development Agency
One City Hall Plaza
Boston, Massachusetts 02201

Via email: Richard.McGuinness@boston.gov

RE: 100 Acres Open Space Concept Plan

February 8, 2021

Dear Mr. McGuinness,

We are pleased to offer comments on the 100 Acres Open Space Concept Plan. The creation of Fort Point parks is long desired and long awaited for by the neighborhood since its conception during the development of the 100 Acres Master Plan and subsequently codified in PDA 69, a process informed by residents, property owners and City and State stakeholders. With the increasing vulnerability of sea level rise and climate change, the parks increase in significance to serve a dual role of recreation and resilience. The current pandemic puts greater emphasis on public health considerations and thereby, more demand for outdoor spaces by all Boston residents, neighborhood employees and visitors.

Park Sizes and Phasing

The waterfront park (Fort Point Park) and Necco Park are being designed simultaneously with the development of 244 – 284 A Street, which is primarily responsible for the creation of parks within their 6.5 acre property.

Our analysis indicates that the waterfront park has been reduced by 24% from the PDA and that the migration of buildings G4 and G5 from the pumphouse are squeezing the park casting additional shadows, making it less appealing to park users. If one of the stated guiding principles/objectives is to provide all Boston residents, especially inland communities devoid of a waterfront, a worthy park experience, isn't it necessary to give them a waterfront park the size zoning currently requires, not one smaller squeezed between two 180' buildings? The unique role of the waterfront park to enhance watersheet activation on the Channel is another reason why this park's size should be maintained. In conclusion, we support building G4 be "in the same footprint as outlined in PDA No. 69 and the Municipal Harbor Plan, and that the minimum width and size of Open Space Parcel FT1 remains the same, if not greater than, currently required." (source: 244-284 A St Scoping Determination Feb 5, 2021)

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If Binford Street is to be terminated at Necco Street, then the 100 Acres Open Space Concept Plan should include these parcels to make sure they meet open space objectives and serve the public good.

The neighborhood appreciates the focus on increasing open space outlined in the Plan, the shift though of larger parks and neighborhood amenities are set inland, not along the channel. Over 3+ acres of expanded park network occur on the USPS parcels, which are devoid of plans to be developed in the foreseeable future, and without USPS written approval or a guarantee to incorporate greater park space in any future sales of their property. The neighborhood park amenities include active recreation (Active Park), community gardens and dog park are located here. With the pandemic, even more dogs grace our neighborhood overrunning current capacity and necessitating the accommodation of dogs in the upcoming 244-284 park development. If not included in concept design, it will occur unplanned.

More importantly, community input on massing trade-offs for enhanced open space has not been publicly vetted. Shifting massing/building heights along Medallion Avenue from 100' to 150' (source: 100 Acres Opens Space Concept Plan Draft Comments by Steve Hollinger 02/02/2021) has serious implications on the critical light necessary for community gardens and for adjacent residents and artists in 15 Channel Center St, Boston's largest artist live/work rental building with a building height of approximately 75'.

Role of Community & Neighborhood

Community needs and features must be incorporated into the waterfront park and Necco Park. Visitors cannot be asked to create community for a neighborhood, it needs to come from those who live in close proximity every day. By isolating neighborhood amenities across A Street adjacent to the Haul Rd, an unintended us versus them dynamic is created.

The Community's top choice, Urban Wilderness, is not incorporated throughout the network of parks, and especially is missing from the waterfront park. There is an opportunity for harbor marine life and seabirds to be encouraged. A successful neighborhood park can be a great waterfront destination park. There are examples of successful waterfront parks that serve their neighborhoods and serve as a citywide destination, it does not need to be mutually exclusive. Two examples are the Christopher Columbus Park in the North End and Piers Park in East Boston.

We support the inclusion of Fort Point and South Boston Waterfront residents along with our neighbors from Chinatown, South End, Roxbury and Dorchester in the Community Advisory Committee or Inclusive Access Advisory Group (We believe this Committee or Group to be the same entity, but request confirmation.). Membership should also include experts on equity inclusion, park programming and climate resilience and adaptation or that expertise should be provided. We recommend if not already identified that this group review periodically climate resiliency measures and protections.

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Ground Floor Uses

The concept plan includes thoughtful goals and objectives for ground floor uses that support a range of watersheet and waterfront park facilities from storing boats and equipment to learning spaces to affordable food services to a number of restrooms and changing facilities that will comfortably support a family's full day spent in Fort Point. Recommendations call for a large scale exhibition or museum space, highlighting nature learning and climate resilience. The former GE Headquarters had a museum planned, why not adapt that space into a nature & climate resilience museum given its useful location next to the water? The location also flows nicely connecting to the Boston Children's Museum also located along the Fort Point Channel Harborwalk.

It was with surprise and disappointment that the report replaces the neighborhood branch of the Boston Public Library with a community learning space with a collection of books. A civic facility such as BPL branch would attract a wide range of people and ultimately enhance the parks as being welcoming for all. The branch library is a priority of the neighborhood and was introduced and discussed at a public meeting by the developer of 244 - 284 A Street.

Visitor enjoyment and park usage would be enhanced by bike racks, stroller parking, storage lockers, tables and refrigeration in addition to free water. An information center would provide resources and a place for kids to go to if they are lost.

Public Safety

Additional visitors are expected along this stretch of the Fort Point Channel. To ensure adequate public safety the inclusion of life rings, exit ladders, grab chains and safety instructions in multiple languages along the Harborwalk is needed. Park lighting and hours of operation needs to be defined while balancing the need to minimize light pollution from adjacent buildings. With the plan now for an Active Park abutting the Haul Road (a heavily intense truck route), an adequate year round noise buffer and fencing needs to be included to provide a pleasant park experience and to eliminate the chance of court balls bouncing onto the road.

Site Features Sizing Guidelines

While we are appreciative of the proposed park features, we are concerned that the open spaces are not large enough to accommodate the ambitious programming goals. This capacity issue is of particular concern at what is anticipated to be a very popular waterfront park (Fort Point Park). The features seem to be squeezed in an increasingly small space. Furthermore, the 12'-20' wide frontage zone along each building for proprietary seating should be reduced and tables and seating made available free of patronage to the public. In other words, the public should have access to waterfront tables and seats. Overall, park concepts should contemplate how features function year around to create an inviting experience. In addition, it would be helpful to get comparable sized parks with similar features to understand the true feasibility of all park parcels.

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Resilience & Environment:

The amount of hardscape at the Waterfront Park is troubling, especially given its proximity to the Channel. We would like to understand how it is resilient and adaptive to future sea level rise.

Although there is an upland alternative Harborwalk pathway, the elevation of the Harborwalk is critical for access to the Fort Point Pier (public dock) and the watershed to enjoy water related activities such as kayaking. The Harborwalk needs to be appropriately raised to accommodate future sea level rise.

It is unclear if the proposed tree canopy is enough to offset heat island effects in our neighborhood and how much it will add to South Boston's tree canopy goals. On the waterfront and Necco Parks the existing 72 large on-site trees need to be preserved.

An independent analysis should be conducted to determine the better methodology of a clay core system or a sheet pile system for the Berm along the Channel.

Stormwater management and storage capacity is unknown and therefore difficult to evaluate whether landscape concepts will increase capacity and how much protection it will offer the inner neighborhood. We look forward to seeing the analysis.

Why aren't the Necco Park and Fort Point Park being used for stormwater management? If stormwater is not captured until it crosses A Street, what does it mean for protection of the inner neighborhood? More importantly, how will the neighborhood be protected if stormwater management is not incorporated until some undefined time when/if the USPS property is developed?

The open space on Necco Ct at the Harborwalk is a flood pathway and needs to have a plan for an appropriate flood protection. It is also identified for emergency access.

View Corridors

It would be helpful to have a model and virtual experience of the elevations from Necco to the water's edge to understand what can be seen of the water at Fort Point Park and Necco Park.

Mobility & Connections

The proposed open space is located within a vibrant neighborhood with over 4,500 housing units less than 1/2 a mile from the parks. We expect that the residents of our community will look to take full advantage of this wonderful space once built. We also believe that with the exciting programming planned it will be a destination for visitors from other parts of the City.

In other parts of our neighborhood, we have seen our open space ringed with private streets and roads with controls in place that limit on street parking. With that experience fresh in our minds we would like to see the roads abutting the parks become City owned and managed. Metered parking will be needed but it must be balanced with the current resident permit parking that is in place in this part of our neighborhood.

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We also recognize that transit may be a viable option for some visitors. The parks are within a 1/2 mile from the Broadway Station Red Line MBTA stop and South Station. They are also within 1/4 mile of the MBTA #7 bus and the MBTA #11 bus has a stop adjacent to Necco Street park. We would like to see these three bus stops receive upgrades with shelters and seating.

Whilst the immediate park abutting sidewalks, intersections and streets will see improvements, the primary feeder streets and sidewalks to access the new open space within the neighborhood all require remediation to support safe pedestrian and cycle trips. This includes access from two of the three bus stops and both South Station and Broadway Station.

Sidewalks and pedestrian intersections along Melcher Street, Summer Street and A Street are not ADA compliant. Sidewalk widths in a number of locations are less than 3 feet and some curbs and sidewalks require re-surfacing or replacement. Intersections requiring upgrades to support additional pedestrian trips include A Street @ Richards Street, A Street @ Melcher Street, A Street @ Binford Street and Summer Street @ Melcher Street. Separated cycle tracks are needed along A Street and Melcher Street to provide a safe and stress free connection for our bicycling neighbors. Whilst visitors from other parts of the City may arrive via the South Bay Harbor multi use Trail, we expect that residents of South Boston will arrive using these feeder streets.

Draft recommendations also need to incorporate two planned pedestrian & bike bridges connecting to the new green space, one from the current USPS Annex across the Channel and the other from the BCEC across the Haul Rd.

Fort Point Parks Ownership

Our community strongly supports the adoption of the successful public/ private model that created and maintains the A Street Park, which is also within PDA 69. A St Park was constructed by a private developer and is maintained with contributions from PDA signatory property owners and more importantly owned and protected by the City of Boston's Parks & Recreation Department. This model is a departure from the separate private ownership of the parks in the Seaport, which have been perceived by the public as being inaccessible and unwelcoming.

The parks need to be owned publicly, to be clearly public and welcoming to all. If Harborwalk access is redirected to parks during flood events, then public access and ownership must be public.

Enforcement & Process

As mentioned in the 100 Acres Open Space Concept Plan draft, the parks and open spaces will be created in phases based upon the development of the identified properties. It is our recommendation that PDA 69 be amended to codify open space dimensions on all zones or phases identified in the 100 Acres Open Space Concept Plan through a public community

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process regarding density and massing trade-offs for the 244-284 A St and USPS parcels and the remaining Gillette parcels.

The open space located on the waterfront park, Necco Park and other open spaces located on A Street to the Channel are also subject to the Massachusetts Public Waterfront Act and numerous Chapter 91 licenses and Facilities of Public Accommodation. These properties under State jurisdiction and City planning need to be clarified, especially in terms of enforcement and adaption of a Community Advisory Committee or Inclusive Access Advisory Group.

Thank you for your consideration of our neighborhoods comments.

Sincerely,

Tom Ready

Sara McCammond

Joe Rogers

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