



*building a better neighborhood together in Fort Point & the South Boston Waterfront*

The Honorable Rebecca Tepper  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114  
via email to [Nicholas.Perry@mass.gov](mailto:Nicholas.Perry@mass.gov)

Dear Secretary Tapper,  
We are writing to comment on Parcel 3 Owner, LLC (“the Proponent’s”), Draft Environmental Impact Report (“DEIR”) for Environmental Notification Form EEA# 16746 (“ENF”) for 232 A Street in South Boston.

We would like to acknowledge the Proponent’s undertaking of a project that is being built as of right and allowed in both the South Boston Municipal Harbor Plan (“SBMHP”) and PDA No. 69, the overriding City of Boston zoning that covers the site. We are grateful for the additional benefits the project is providing to the neighborhood above what is required including additional park space, a wider Harborwalk and enhanced site elevation. We also support the commitment to dedicate the waterfront park for public use to the City of Boston Parks Department with its initial construction funded by the Proponent and maintenance funded by the 100 Acres Owners Association in accordance with the MOA for PDA No. 69.

With regard to the ground floor, CH91 Facilities of Public Accommodation (“FPA”) and Tidelands the parcel has a complicated history. As noted in the DEIR, the site has a mixture of Commonwealth, Private and Filled Tidelands and needs to accommodate a right of way to MassDOT for emergency access to the I-90 tunnel.

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These tideland classifications combined with the obligations of CH91, the 65 year license term being requested, the reduction of watersheet activation investments through the surprising removal of the dock space and the requirement that the Secretary of EEA make a “public benefits determination”; we believe supports the use of the CH91 Special Public Destination Facility (“SPDF”) provision. This SPDF designation for civic and cultural uses that would protect public access and services to the Proponent’s highlighted 17,341k SF of required and voluntary FPA spaces for the extended CH91 term, regardless of what type of Tideland it resides on. It should be noted that there is zero civic space in the entire South Boston Waterfront, which is comprised of the Fort Point neighborhood and the newer Seaport neighborhood. Without this designation the only obligation the Proponent has will be to the 6,012k SF of CH91 required FPAs, the 11,329k SF of “voluntary” FPAs could simply be changed to any other use by the parcel owner or their successor at any time during the CH91 license term. We also recognize the need to declare type, size and location of remaining FPA uses onsite and further specifications such as rental subsidies, build out allowances and other necessary support to create successful FPA.

There is a lack of a clarity and a lack of a comprehensive approach to what 244-284 A Street proposed for Binford Street flood mitigation, what 232 A Street is proposing and what the City is contemplating for a final solution. The Fort Point Channel Resilient Infrastructure/berm is still in an engineering design phase and these resilient solutions are critical to the protection of the inner neighborhood. It is difficult to understand moving waterfront development projects sited in flood zones forward when taking into consideration the latest storms, climate data and modeling. This project and the neighborhood would be stronger with a more concrete, comprehensive plan vetted by experts and explained to the neighborhood.

In addition, the future climate adaptation for the public realm and facilities of public accommodation are at risk, especially the ground floor as it approaches the A St elevation and the long term use of those public spaces. We would like to see public climate adaptation planning evolve over the course of the Chapter 91 license should it be granted for the requested 65 years.

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Binford Park, an existing park part of the 232 A Street parcel, is located at the edge of the Fort Point Channel and abuts the Harborwalk and the South Bay Harbor Trail. This park is unique because it is the neighborhood's most waterfront park closest to the Channel's edge. As with the open green spaces at 244 - 284 A Street, we would request that the Park's department be involved in the 232 A Street park design. We also request clarity in understanding why the parks ownership reference only an easement to the City of Boston and not the expected land transfer, an important public benefit.

In evaluating the comprehensive assessment of the project-related transportation impacts within the study area (they were not included in the ENF), we have a few areas of disagreement with the assumptions and recommendations. We believe the study area should be extended South from the site to include the intersections of A Street at West 2nd Street and A Street at West Broadway Street. The apparent operating assumption that vehicular traffic originating and destined from the site to I-90 and I-93 utilize the highway ramps on Congress Street is flawed. Our lived experience is that a large majority of these trips in fact use the highway ramps accessed by the Broadway Street bridge or continue South on A Street using through streets in South Boston to access points South. These intersections need to be evaluated to truly understand the transportation impacts associated with this project.

We also believe, once again based on the experience of living in our neighborhood, that improvements are needed for the intersection of Binford Street and A Street. Binford Street is the only public road that provides access from A Street to the Fort Point Channel. Today it is a complex, highly used multi-mode intersection without the planned park improvements and additional +3,000 daily trips the project will generate. We expect conflicts to increase and believe mitigation is required at this intersection.

At exactly 0.5 miles from the MBTA South Station and MBTA Broadway Station, the project site barely qualifies as a Transit Oriented Development location and is clearly not "adjacent to a transit hub" (as denoted in the ENF). With the elimination by the MBTA of the 11 bus, we believe the use of a 53% mode share for transit is far too optimistic for the aforementioned 3,000 new daily trips without some type of additional last mile option.

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The City of Boston approved its South Boston Seaport Strategic Transit Plan on December 14, 2023 that has a number of recommendations to improve last mile access to properties along A Street, those recommendations need to be incorporated into the project.

Lastly, the site borders the Fort Point Channel and is subject to unobstructed summer winds from the South. In the ENF the Proponent indicated that a detailed quantitative analysis would be performed for the Project to proactively incorporate wind mitigation techniques into the design of the building. We would like to see the results of that work and shadow impacts on the neighborhood and open space.

Thank you for your thoughtful consideration.

Tom Ready  
FPNA

cc.  
Nick Collins, Senator First Suffolk  
David Biele, Representative Fourth Suffolk  
Daniel Padien Waterways Program Chief  
Jessica Hughes, Managing Director, Tishman Speyer

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