



Are you on board?

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February 5, 2021

Via email: Richard.McGuinness@boston.gov

Richard McGuinness, Deputy Director for Climate Change & Environmental Planning
Boston Planning and Development Agency
One City Hall Square
Boston, MA 02201

Re: 100 Acres Open Space Plan

Dear Mr. McGuinness,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the 100 Acres Open Space plan currently under review by the Boston Planning and Development Agency (BPDA). As you know, Boston Harbor Now has closely followed the development of this plan, and recently hosted the BPDA at our November 2020 Harbor Use Public forum to discuss the plan as part of the public outreach and engagement effort.

Boston Harbor Now is a non-profit organization focused on maximizing the benefits of Boston Harbor for everyone through quality programming, policy, planning, and design. We are committed to a vision of a future Boston Harbor waterfront that is prepared for and resilient to climate change. We work collaboratively with public, nonprofit, and private sector partners to realize this vision. We commend the Boston Planning and Development Agency for its efforts to create a plan that activates the Fort Point neighborhood's Harborwalk and connected open spaces in a way that responds to the threat of coastal flooding identified in the *Coastal Resilience Solutions for South Boston* report. The agency's responsiveness to the extensive public outreach and engagement that the project team has undertaken is evident in the recommendations of the draft plan.

Resilience

As noted earlier, the plan does a good job of preparing for the effects of climate change anticipated in the *Coastal Resilience Solutions for South Boston* report. The berm that is being designed along the water's edge will provide protection to the neighborhood and seems to be well-aligned and integrated with the design of the adjacent property. In order to verify this, and

to provide comments on the berm as it goes through its eventual permitting, it would be helpful to see how each of the development projects tie into the berm's design and elevations. As we have noted throughout the process, it will be important that this berm be designed in such a way that it is more than just a resilience strategy. It should be integrated into the public realm with thoughtful design and programming that ensures its seamless coordination with the rest of the anticipated open space and the development projects that are currently moving through permitting. We look forward to seeing the evolution of this berm as a critical element of the public realm once it is completed.

In addition to the elevation and design of the berm, ensuring the availability of the Harborwalk as the impacts of climate change are felt is a critical piece of this plan. We are encouraged that the elevation of the Harborwalk will be slightly raised in large parts of the Fort Point channel area to adapt to sea level rise projections. We also support the idea of creating a pathway connection at higher elevations to further ensure that people can continue to walk close to the water even after some sea level rise becomes a reality in the area. Finally, a pathway system along the buildings, in addition to the Harborwalk, would create a sense of openness to public use and further combat the feel of a private campus.

Open Space/Facilities of Public Accommodation

The plan emphasizes the importance of extending the public realm and removing the sense of privatization by providing community uses indoors that relate to the outdoor open space. This is a laudable goal, and one that we support fully. Designing spaces with equity in mind must also be a priority of the plan. In order to more fully achieve the goal of welcoming the whole public into the space, and to continue to connect the outdoor space to the interior space, we recommend that the "proprietary seating" areas that line buildings G4 and 15 Necco Street be converted to public seating. These areas, which measure between twelve and twenty feet in width in the plan, line the new open space near the water feature and should be fully integrated with that space and open to the general public, not just occupants of the buildings. This change would support the goal of not privatizing the exterior space as elucidated at the Harbor Use Public forum on this topic. It would also serve to return to public use some of the exterior open space that seems to have been lost in the shifting of the developments adjacent to the park. With respect to the size and orientation of G4, care must also be taken to ensure that the building does not cast a significant shadow on the FT-1 park, making it less appealing for park users and more difficult to keep plants and grass flourishing.

Further, the entire open space network is anticipated to provide a connection from the South Bay Harbor Trail to the Seaport. In order to support and encourage users of the open space and the buildings who arrive by bicycle, we recommend providing bike racks and other facilities that will allow cyclists to come and spend the day. This may include locker rooms and showers in the interior spaces that support the parks.

Operation and maintenance

The plan anticipates that the open spaces will be operated and maintained either by a non-profit organization or the City Parks Department. The A Street Park provides a model for public ownership that meets neighborhood needs. We support this model for future park ownership

and care. Whichever model is ultimately chosen, it will be critical that there is enough funding available to operate and maintain the water feature and all of the fields that are anticipated by the plan. The Rings Fountain on the Greenway has proven to be one of the most popular, and most expensive to maintain and operate, features of that space. Creating a truly great destination of similar success at 100 Acres will require that an appropriate level of funding for operation, maintenance, and capital improvements will be available over the long term.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron Toffler', with a stylized flourish at the end.

Aaron Toffler
Director of Policy
Boston Harbor Now



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February 5, 2021

Via email: Richard.mcguinness@boston.gov

Richard McGuinness
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One City Hall Plaza
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Re: **Comments on Fort Point 100 Acres Open Space Plan**

Dear Mr. McGuinness:

Conservation Law Foundation (CLF) provides these comments on the draft Fort Point 100 Acres Open Space Plan. We are grateful to have engaged early in this process and to see many of our initial questions and concerns reflected in the draft plan. We strongly support this effort as a way of developing and codifying the community's priorities for open space development, rather than leaving it to individual property owners to design ad hoc. However, we have outstanding questions about long-term park maintenance and operation, ownership and regulatory compliance, and privatization. Our primary concern is this plan may not be enforceable long-term. We strongly encourage Boston Planning and Development Agency (BPDA) to explore ways to codify the plan's goals and objectives to ensure implementation.

I. The draft plan should prioritize multi-modal travel to and from the open space network and improve the pedestrian experience on shared roads.

The current draft outlines bicycle and pedestrian circulation but lacks critical details about shared streets and amenities to support multi-modal travel. A safe and seamless pedestrian experience will be critical for making this network of open spaces feel cohesive. CLF's chief concern is that primary and secondary roads bisect each of the four open spaces. The plan states that the open space design will include a "continuous promenade through the park and pedestrian walkway along Wormwood Street and Wormwood Street extension," which will provide "a unifying element through the network of new parks." But it is not clear that pedestrians will have a unique experience in attempting to cross busy roads with vehicular traffic like A Street and Necco Street. Given the proposed developments adjacent to these roads, and the expected increase in vehicle trips, making sure that vehicles and pedestrians can safely co-exist is even more important. There should be

additional measures in place to facilitate pedestrian crossing over A Street and Necco Street, beyond a mere crosswalk, so users can more safely and seamlessly access the open space network. We also oppose the widening of Necco Street. Increasing the gap between the proposed open space network is counter to the goals of making this a linear series of signature park spaces and would prioritize vehicular access over pedestrians and park users.

The draft plan mentions that a stretch of Necco Court between Fort Point Ave and Wormwood Street could be closed to vehicles during events and function as a pedestrian plaza. We encourage the BPDA to consider additional locations that could incorporate an open streets concept and to consider whether this could be done on a semi-frequent or permanent basis. Again, this is important for making the network feel like a safe, cohesive series of linear park spaces.

Although the plan proclaims an interest in facilitating bicycle and shuttle travel to the site, the current design offers few details about supporting these modes of transportation. For instance, the plan does not incorporate bicycle parking or storage as an amenity for the open spaces. It also does not provide recommendations for shuttle traffic flow or pick up/drop off locations for passengers. There are limited details in the plan about shared streets and how cyclists, pedestrians, and vehicles will safely co-exist across the planning area. Similarly, it is unclear whether the South Bay Harbor Trail connection on the site will be designed with climate resilience in mind. Unless this connection is elevated or otherwise insulated from flood risk, it will likely be unusable in the future.

II. The draft plan should identify opportunities for landside infrastructure to support water recreation and watershed activation.

The plan briefly notes there is an opportunity to support watershed activation through landside infrastructure including boat storage, changing rooms, easy access for walking canoes, kayaks, and other boats; however, this does not appear to be incorporated into the design of the open space network. Watershed activation has long been a goal for this area of Fort Point Channel, dating back to the original 100 Acres Plan in the early 2000s. There is a unique opportunity to make this part of Boston's waterfront vibrant with diverse water recreation opportunities. There are several landside infrastructure projects that the community has been promised over the years, including an expanded kayak center near the 15 Necco Court development. Unfortunately, no promises have come to fruition. The open space plan should consider opportunities for building out these and other amenities that would support water recreation and activation.

III. The draft plan should provide more detail on the stormwater management strategy for the open space network and the implications of phasing on the effectiveness of the strategy.

CLF is supportive of the climate resilience features proposed for the open space network. The berm project will be a critical defense to current flood risks from Fort Point Channel. However, another short-term challenge for this area is stormwater flooding. The majority of stormwater management features, including a large area of subsurface

stormwater storage, appear to be located on parcels FT-3 and FT-4, which are not expected to be developed until later phases. Because it is unclear when or if these later phases of open space development will occur, it is problematic there are no alternative measures planned for earlier phases of development. The plan should discuss alternatives to the stormwater management approach and include sufficient redundancy so that if later phases of open space development do not occur or take an additional five to ten years, the short-term risks of stormwater flooding are appropriately managed.

IV. The BPDA should take additional steps to codify the goals and objectives in the draft plan to ensure that they are enforceable and implemented over the long-term.

Enforceability and implementation are the most important considerations for this open space plan. The long-term build out, operation, maintenance, and programming of both the open space network and the adjacent Facilities of Public Accommodation (“FPA”) will be complex. There are two separate enforceability issues to consider: (1) ensuring that the open space network is developed, and (2) ensuring that the long-term management and programming of open spaces are consistent with the plan’s objectives and protect public spaces from privatization. Because open space development will happen in phases, the BPDA should consider ways to reconcile this plan with the projects already going through city and state permitting. The BPDA should separately consider how future development will be held accountable to the goals and objectives of the plan.

Long-term operation and maintenance

The draft plan notes two separate strategies for long-term FPA and open space management. First, it suggests establishing a Community Advisory Committee (“CAC”) to help with tenancing and programming of public ground floor uses. Second, it suggests making a nonprofit entity responsible for managing the open space network, though it will presumably remain in private ownership. It is unclear how or if these two entities will collaborate on programming for the 100 Acres planning area. The CAC should have some role in park programming as well as FPAs. Park operation and programming should not be left to a single nonprofit entity without community involvement and oversight. It is also unclear what authority the CAC will have over tenancing and programming of private buildings, especially once the city and state permitting for those projects has concluded. The BPDA should memorialize any formal authority the CAC will have over these processes in a Memorandum of Agreement with individual private property owners to ensure that the CAC will have a meaningful role long-term. Further, we urge the BPDA to establish a transparent application and selection process for CAC members to ensure representation from a diverse cross-section of residents. The selection process for CAC members should prioritize residents over organizations. There should also be term limits for members so there is a periodic turnover of representatives. This will help to ensure broad participation and diverse opinions.

Despite offering several ideas for how the open space might be managed long-term, including the possibility of transferring ownership to a public or nonprofit entity or obtaining an easement or access rights, the plan does not describe the current ownership structure and the related complexities of managing the final open space network. This is critical for

understanding the long-term implications for regulatory compliance and enforcement. Given the complexities around ownership, operation, maintenance and programming, we are concerned about the feasibility of enforcement. The draft plan proposes giving a nonprofit entity control over the maintenance and operations of the open space network; however, the individual property owners and Chapter 91 licensees will ultimately be responsible for complying with city and state regulations for activation and maintenance. For instance, Chapter 91 licenses often have restrictions that require open spaces to be available to the public 24/7 free of charge. This forecloses using Chapter 91 open spaces for private, paid events without prior authorization from DEP (requests for which would presumably need to come from individual license holders). Will the nonprofit entity in charge of maintenance also be responsible for programming? How will they navigate the complexities of individual license conditions for programming amenities like the amphitheater or waterfront plaza/stage? Who will be responsible if there is a violation of a Chapter 91 license condition? These questions illustrate the complexities of managing multiple state-licensed sites as a single open space network. It also highlights the advantages of transferring ownership of the open space network, rather than mere maintenance responsibilities, to a public or nonprofit entity who could then become the Chapter 91 licensee for regulatory purposes. We encourage BPDA staff to meet with MassDEP Waterways staff to discuss some of the aforementioned complexities around regulatory compliance.

We recognize that not all the open spaces fall under Chapter 91 jurisdiction. However, we have similar questions about compliance at the city-level. Presumably, BPDA will want to put restrictions in place, like the conditions in a Chapter 91 license, that ensure these spaces are open and available to the public long-term and they are not incrementally privatized. To our knowledge, the BPDA does not currently have a legal enforcement mechanism for ensuring that property owners comply with these restrictions after build-out. We strongly encourage BPDA to consider executing a Memorandum of Agreement, a Conservation Restriction, or some other specific, detailed, and legally enforceable document with property owners to memorialize these commitments to long-term open space management.

Short-term and long-term build-out of open spaces

The BPDA should take stronger steps to codify the plan through local zoning so it ensures that later phases of open space development, namely the development of Wormwood Street Park, Medallion Street Park, and the Active Park, are achieved. The plan notes this open space concept has evolved from a proposed 5.10 acres in 2006 to the current 9.30 acres; however, the majority of that increase is on parcels FT-3 and FT-4. These parcels are under USPS control and are slated for development in later phases. It is uncertain when or if there will be a change in site ownership or a redevelopment proposal for these parcels. Although modest gains were made in the “phase one” area of the open space network (less than an acre increase), the vast majority of the proposed open space relies on future development activity. This makes it all the more important that the commitment to build out future phases of the open space network are codified.

Conservation Law Foundation

The plan states that the document is intended to establish concept design, use, and program for the open space required in the Fort Point 100 Acres Master Plan and corresponding zoning, Planned Development Area #69 ("PDA #69"). The plan states it will be incorporated by reference into PDA #69, the zoning for the Fort Point District 100 Acres District, through an amendment recognizing it as a guiding document for the design, use, and program of the new parks. It also states that PDA #69 requires private landowners contribute the necessary rights-of-way and construct streets and open spaces in phases as they develop on parcels and will be responsible for long-term care and maintenance. We encourage the BPDA to codify specific open space requirements in PDA #69 beyond mere design and use guidance. The draft plan sets forth a specific acreage of open space to be developed on each parcel. Those ratios should be reflected in the PDA amendment. The BPDA should also consider a Municipal Harbor Plan Amendment to reflect the changes to this area, including community priorities for waterfront activation and FPA spaces.

Meanwhile, the development of parcels adjacent to FT-1 and Ft-2 are actively undergoing city and state permitting; yet it is unclear the extent to which those proponents have agreed to incorporate this proposed design into their plans. Several residents have raised concerns at public meetings that the open space network presented in this plan is inconsistent with what project proponents have presented to the community for 244-284 A Street and 5-15 Necco Court. We echo those concerns. The BPDA should take steps to reconcile this plan with what is actively being permitted at those locations and be transparent with the community about any inconsistencies.

Thank you for your consideration of these comments.

Sincerely,



Deanna Moran
Director, Environmental Planning
Conservation Law Foundation



February 5, 2021

Rich McGuiness, Deputy Director for Climate Change and Environmental Planning
Boston Planning and Development Agency
1 City Hall Square
Boston, MA 02201

Dear Rich, Core Project Team Members, and Steering Committee Members,

Thank you for sharing the draft of the Fort Point 100 Acres Open Space Concept Plan (“Plan”) and allowing us the opportunity to provide comments.

TACC’s Relevant Work

In December 2017 with support from the Barr Foundation’s Boston Waterfront Partners (BWP) Initiative, TACC, together with our partners Kelley Chunn & Associates and Denterlein, launched *Waterways: Connecting Residents of Roxbury and Dorchester to Boston’s Waterfront*. This project is based on the belief that for the waterfront to be fully realized and maintained as a resource for this and future generations, community- and resident-level perspectives from a broad range of neighborhoods must be consciously elevated and supported.

- **Project Rationale:** Boston’s waterfront is the city’s largest green space and a critical public asset for all of Boston’s residents. Following a multi-billion-dollar public investment in harbor clean-up, a network of civic and nonprofit organizations has made strides in increasing public access to the open spaces, cultural institutions, and economic resources of the waterfront. However, knowledge and access gaps still exist in neighborhoods that are not proximate to Boston Harbor, such as Roxbury, including in key policy discussions related to Harbor resiliency, transportation, and development that will have ramifications for the region.
- **Project Goal:** In the short term, TACC is documenting resident-identified barriers to access and utilization and is catalyzing sustained engagement so that more Roxbury and Dorchester residents are invested in and are connected to the waterfront for recreation, culture, and employment. Ultimately, the aim is to give voice to a broader group of residents from Roxbury and Dorchester to impact programs, policies, and accessibility so that as the waterfront continues to evolve, it does so more equitably with the needs and interests of the Roxbury and Dorchester communities actively considered and implemented.
- **Documenting Resident-Identified Barriers and Resident-Identified Solutions:** *Waterways* conducted seven focus groups (four with subsidized/public housing residents, two with neighborhood and downtown stakeholders, one with large waterfront employers) to identify current perceptions of, experiences on, interests in, and barriers to accessing Boston’s waterfront. In addition, *Waterways* engaged residents through a series of seven waterfront activities (Spectacle Island, harbor cruises, bike trip to Moakley

Park/Castle Island, etc.) and collected data/feedback through pre- and post-surveys. Through two data walks, we shared the data with the community, discussing its meaning and potential solutions.

Currently, TACC is collaborating with the BWP on a racial equity assessment of waterfront programming, using the resident-identified barriers, as well as demographic data to create a toolkit that includes: 1) shared, standardized procedures for program planning (to better ensure barriers are addressed); and 2) shared evaluation processes to collect performance measures to fill gaps in performance data that are essential to inform ongoing quality improvements and a sustained focus on access and utilization of waterfront programming by BIPOC Boston residents. TACC is also drafting a racial equity assessment of waterfront employment to better understand the “access gap” for waterfront jobs.

Racial Equity and Economic Equity

As noted in the Plan (page 24, Creating and Inclusive Destination, Context), the demographic data for the Fort Point census track demonstrates that Fort Point is whiter and wealthier than Boston as a whole; this demographic data is true along almost all of downtown Boston’s waterfront census tracks. Focusing on BIPOC inclusion is important to “expanding access and creating a more welcoming waterfront” and will contribute to spatial justice. The Plan should more intentionally address racial equity and economic equity, using those terms in the Plan as well as articulating how equity is deeply embedded in the Plan and the ways in which the Plan will hold up these values.

Fort Point is a critical area for increasing equity in the City of Boston due to its mix of uses (recreational, cultural, and employment) as well as its relative ease of access (Silver Line, South Station). By 2025, it is projected that the South Boston Waterfront will gain another 26,000 jobs. In general, the Plan focuses on recreational uses considering, for example, mobility strategies (page 72) to access recreational uses and aligned modes (South Bay Harbor Trail, Harborwalk) and not on employment and public transportation (Silver Line, South Station).

TACC is encouraged to note Plan strategies for supporting economic opportunities for businesses and artists from Roxbury and other inland neighborhoods (page 94, Promoting Wealth Building) and acknowledgement of the role of systemic racism. The authors should consider, how this section’s language and stated goals might be embedded in and help to shape equity goals for the overall Plan.

TACC recognizes that in order to maximize the impact the Plan will have on economic equity in the City of Boston, more specific and innovative strategies are required for open space and ground floor uses. The scale of the future development in Fort Point demonstrates that this Plan is an opportunity to address equity with intentional strategies that cannot be passed over; the phasing of the Plan over time creates opportunities to do so.

TACC acknowledges the important ways in which the Plan realizes the Resilient Boston Harbor Vision, seizing opportunities to create new, welcoming, and accessible open space while

responding to climate change infrastructure needs. Increased access and utilization of open space and recreational amenities that meet the expressed needs and interests of Roxbury and Dorchester residents is an important first step and should, over time, help to build greater familiarity with the area. Amenities that might contribute to employment access such as a comfortable third space to relax before a job interview should be included.

TACC supports ground floor uses such as a “Port Center” that would be: 1) a community space that includes rotating and interactive displays of all of Boston’s waterfront history—including Indigenous Peoples, African Americans, and immigrants; and 2) a modern-day gateway to water-dependent and waterfront-proximate job opportunities that helps to mitigate barriers to accessing jobs for those that have historically been excluded from these job sectors and from jobs in this geographic area.

Community and Neighborhood/Defining Terms and Ongoing Engagement

For the waterfront to be fully realized and maintained as a resource for this and future generations, community- and resident-level perspectives from a broad range of neighborhoods must be consciously elevated and supported. TACC thanks the project team for meeting with and listening to residents of Roxbury and Dorchester; residents’ feedback and many of their ideas are reflected in the Plan; focus group participants we checked in with about the Plan agreed.

Ensuring the common understanding of terms is important. In the Plan, terms, particularly those linked to equity or demographics (neighborhood, community) should be defined and used consistently. Overall, TACC likes the use of “resilience” highlights and “community” highlights. However, it is worth noting that for some readers, the term resilience is not always exclusively used for climate change and can apply to race. The use of the terms diversity and inclusion should also be used consistently and clearly. Additionally, the authors must clarify that diversity should not assume equity.

TACC’s own path to involvement in the Plan, might hold some lessons for strategies to be included to further understand the ways in which the open space design, ground floor uses, and management and operations can best support a park system that is welcoming and inclusive, as well as an area of the City of Boston that contributes to economic equity.

- **Activation Grants:** With funding from the Watersheet Activation Grant Program, TACC collaborated with Piers Park Sailing Center, Boston Children’s Museum, Institute of Contemporary Art, Friends of the Harborwalk, and Save the Harbor/Save the Bay to host *Un Dia de Kayak*, a fun, free day of kayaking and related on-land activities conducted in English and Spanish on Fort Point Channel. TACC recommends that the Plan also include more substantial activation grants.
- **Demographic Data and Performance Data:** TACC used *Un Dia de Kayak* to collect demographic and performance data as well as qualitative data. Participants shared information about the amenities needed to make their families’ trip to Fort Point more comfortable (shade near the kayaking dock, closer/clearer access to public bathrooms, drinking water, play area for children, etc.); TACC shared information about Chapter 91,

signage, etc. Activation grants be used to collect data that could strengthen the Plan and implementation.

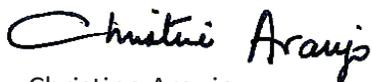
- Ongoing Engagement: Activation grants can make planning easier, iterative, and more interactive. The fact that Roxbury and Dorchester residents had a recent experience on the waterfront made contacting them for a focus group easier; at the focus groups, participants were able to share their thoughts based on a recent experience in Fort Point. With a thoughtfully designed activation grant program, more input from residents from inland neighborhoods could be included in the Plan and demographic data and performance data collected. This seems particularly relevant since the Plan will be phased over time and will likely need to be refreshed.

Other

- Photographs: TACC recommends the use of additional photographs of BIPOC Boston residents in action be included in the Plan. TACC has some beautiful photographs from *Un Dia de Kayak* and other activities that reflect a sense of joy. Since we have photo releases, we would be happy to share them with you for use in the Plan. We will send you a link to the file.
- Add access to fresh water as an amenity needed for watershed activation in Zone 1 (Page 87) as well as Zone 1 amenities the organizers of group watershed and open space activities might need such as: refrigeration, table, temporary signage, etc.
- Reference should be made to The American City Coalition (not Cities) throughout the Plan.
- TACC has additional comments on specific details of the Plan that will assist in clarifying the input from Roxbury and Dorchester residents. Please reach out to Charlotte Rice at charlotte_rice@tamcc.org if you would like this input.

Thank you again for allowing us to provide this comment letter. We look forward to reading the final version of the Plan and to staying engaged in the project in the coming years.

Warm Regards,



Christine Araujo
Executive Director



Richard McGuinness
Deputy Director for Climate Change and Environmental Planning
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 PDA69, 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 watershed 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)

FPNA is dedicated to enhancing and preserving the quality of life in our community, to broadening citizen awareness and participation within our growing neighborhood, and to building a socially interactive civic life.

FortPointNeighborhood.org FortPointBoston.com @FPNA_Boston P.O. Box 52122 Boston, MA 02205

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 Open 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.

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

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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

FPNA is dedicated to enhancing and preserving the quality of life in our community, to broadening citizen awareness and participation within our growing neighborhood, and to building a socially interactive civic life.

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BOSTON

Martin J. Walsh, Mayor

February 5, 2021

Joe Christo
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201

RE: *DRAFT Fort Point 100 Acres Open Space Concept Plan*

Dear Mr. Christo;

The Boston Parks and Recreation Department (BPRD) has reviewed the *DRAFT Fort Point 100 Acres Open Space Concept Plan*; the plans for 5 and 15 Necco Street approved by the BPDA in 2020; and the plans for 244-284 A Street which is currently under Article 80 review.

The *Fort Point 100 Acres Open Space Concept Plan* refines the framework of open space that was negotiated as impact mitigation for the increased footprints, height and massing allowed on private development parcels in the *Master Plan for Planned Development Area No. 69, South Boston/The 100 Acres, Boston, January 10, 2007* (PDA 69) and five subsequent amendments.

The draft plan defines the network of parks that will serve a rapidly growing neighborhood and beyond. It is an effort to incorporate the vision of the community, and accommodate the open space needs of the neighborhood. The illustrative plan envisions aspirational land use, thematic design, and animated programming. It creates connections to a compact waterfront with city views. It envisions climate resiliency through open space infrastructure. It includes a discussion on inclusivity that is a positive step toward ensuring open spaces which are welcoming to all.

BPRD is aware of some community concerns regarding the vision, conceptual designs and programming presented in the draft plan. BPRD encourages the BPDA to continue to refine the draft plan to incorporate the concerns of residents and stakeholders into the final document.

This letter focuses on issues that should be addressed in the next amendment to PDA 69: changes in acreage and configuration; use of property owned by the U.S. Postal Service; permanent protection, public ownership and private management; active recreational uses; and shadows.

Changes in Acreage and Configuration

The original master plan for PDA 69 (2007) and the Fifth Amendment (2020) included 6.93 acres of open space. However, the footprints at 5 and 15 Necco Street and 244-284 A Street have recently changed, which has impacted the size and configuration of the open space along Waterfront Park (HW1-HW5) and Fort Point Channel Park (FT1).



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Local stakeholders have expressed concern that the total acreage of these parcels appears to have been reduced from 3.77 acres in 2007 to 2.87 acres in 2020 or about 25%. The width of the park at FT1 has been reduced to 80' with 20' boundaries on each side along private buildings.

The BPDA undertook an open space planning process for PDA 69 concurrent with the Article 80 reviews of 5 and 15 Necco Street and 244-284 A Street (each with its own PDA). The plan will result in a sixth amendment to PDA 69. The plan includes a comparison (page 35) of the open space over time - with 5.10 acres of open space in the 2006 PDA master plan; and 9.30 acres of open space in the proposed 2020 framework. The 2006 plan does not match the PDA plan.

The significant increase in open space between the 2006 plan and the 2020 plan warrants further analysis. A visual comparison of the plans and tables makes it difficult to understand how the open space is now being measured. It seems that perhaps the open space may now include public realm elements e.g. sidewalks and streets. The parcel at FT-4 includes a development site. The acreage of the proposed open space should be confirmed.

U.S. Postal Service Property

The *Open Space Concept Plan* has shifted acreage away from parcels HW1-HW5 and FT1 at 5 and 15 Necco Street and 244-284 A Street; consolidated building footprints; and relocated acreage from smaller parks to three acres of property owned by the U.S. Postal Service (PID: 0602747010, 0602756020, and 0602760000). The parcels owned by USPS are shown with significant open space designed to accommodate a variety of active uses and programs.

It is unclear to what degree the USPS participated in the current open space planning; whether it provided written agreement to the change of the plan; if it has committed to provide acreage for open space; or how this open space will be guaranteed should the USPS sell the property. This commitment should be obtained before the plan is finalized, or PDA 69 is further amended.

Permanent Protection /Public Ownership and Private Management

The draft plan discusses at length how to design, program and manage the open space so that it feels inclusive to all. *The best way to make the open space feel inclusive would be to transfer the ownership to a public entity such as BPRD or the Conservation Commission, or enact a publicly accessible conservation restriction approved by the Massachusetts Executive Office of Energy and Environmental Affairs (EOEEA).*

The plan proposes the easement that the BPDA holds for the Harborwalk as another form of public control. However, an easement for public access is not the same level of permanent open space protection as fee simple ownership or a conservation restriction approved by the EOEEA.



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The plan notes that there may be opportunity to make the open space publicly owned through transfer to BPRD (this is left open to future negotiations). *Open space that is required, negotiated or proposed as impact mitigation for increased zoning in a PDA, or as a public benefit under Chapter 91 or other requirements, should be transferred to public ownership or otherwise protected in perpetuity. This should be considered in the amendment to PDA 69.*

Publicly owned open space may be managed privately. A relevant example is the A Street Park which was created as a public benefit in exchange for development rights in PDA 69. The ownership was transferred to BPRD thereby ensuring permanent protection of the park. A long term agreement was created for the proponents to maintain and improve the park.

The open space framework should be permanently protected in the near term, so that it cannot be changed with the PDA for each new development or with every amendment to PDA 69.

The plan notes that subsurface rights/vertical limitations below open spaces may occur due to utilities easements, parking garages or private facilities. *Multiple examples exist in Boston of parks built over subsurface uses such as tunnels, parking garages and medical facilities. This should not be a hindrance to the permanent protection of surface level open space.*

Active Recreational Space

The plan notes that an analysis of needs, review of previous planning documents, and community and stakeholder feedback indicated that there is a key need for the expansion of active recreation. This reflects the *Boston Open Space Plan 2015-2021* which notes that “additional active recreation space is necessary to meet the current and future needs of this growing district.” *Active recreational space should be integrated throughout the open space framework.*

The conceptual designs of the Waterfront Park and Fort Point Channel Park are passive and may feel corporate and privatized. Active recreational uses are not proposed along the waterfront parcels – these uses have been allocated to parcels away from the water, on USPS property that is not under the control of the BPDA or the current developers at Necco and A Streets. The FT-4 parcel furthest to the east has a high concentration of active uses. It is currently a buildable lot.

Shadows

PDA 69 allows commercial scale building footprints and heights that range from 100-180 feet. The buildings are immediately adjacent to the full length of the open space framework, aligned to the north and south of the parks. The shadow impacts of proposed building height and massing should be evaluated from dawn to dusk on open space. The creation of open space in exchange for increased zoning should be evaluated in terms of the desirability to be in the space year round, and the ability to include a landscape design that is more than an impervious plaza.



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BOSTON

Martin J. Walsh, Mayor

Sincerely,

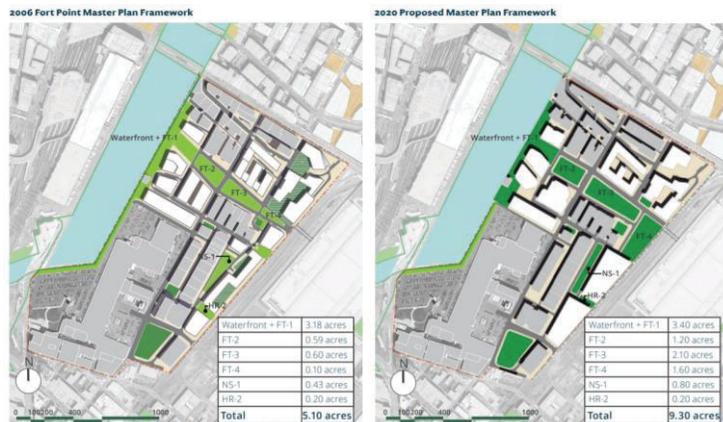
Carrie M. Dixon

Carrie Marsh Dixon, Executive Secretary
Boston Parks and Recreation Commission

cc: Christopher Cook, Chief, Cabinet of Energy, Environment and Open Space
Ryan Woods, Commissioner, Boston Parks and Recreation Department
Liza Meyer, Chief Landscape Architect, Boston Parks and Recreation Department
Michael Cannizzo, Deputy Urban Designer, Boston Planning and Development Agency
Rich McGuinness, Deputy Director for Climate Change and Environmental Planning, BPDA
Jill Zick, Landscape Architect, Boston Planning and Development Agency
Aisling Kerr, Project Manager, Boston Planning and Development Agency



SOURCE: Master Plan for PDA 69 South Boston/ The 100 Acres, January 10, 2007; and the Fifth Amendment to PDA 69



SOURCE: The Fort Point 100 Acres Open Space Concept Plan showing a 2006 open space plan and a proposed 2020 plan



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RELATED BEAL

177 Milk Street
Boston, MA 02109
617-451-2100

By Electronic Mail

February 5, 2021

Richard E. McGuinness
Deputy Director for Climate Change and Environmental Planning
Boston Redevelopment Authority
d/b/a Boston Planning & Development Agency
One City Hall Square, 9th Floor
Boston, MA 02201

Re: Comments on Draft Fort Point 100 Acres Open Space Concept Plan (the
“Concept Plan”)

Dear Deputy Director McGuinness:

As the owner and developer of 244-284 A Street, we appreciate the opportunity to review and offer comments on the draft Concept Plan. It reflects considerable effort and input by Sasaki, the BPDA, property owners, neighbors and other stakeholders to aide in the creation of a vision for vibrant, accessible, resilient and connected open spaces in what is now predominately bituminous surface parking. We hope to continue to work with the BPDA and other stakeholders to plan and implement open spaces on and adjacent to our project site which is reflective of the goals and guiding principles articulated in the Concept Plan, while being responsive to the site-specific qualities, constraints and opportunities which can be best evaluated in the course of project review and implementation.

While we are generally supportive the Concept Plan, we wanted to share some specific thoughts for your consideration as the draft Concept Plan is refined:

- The site plans and grading plans will need further definition and detail as applied to the land area within the 100 Acres. In particular, it will be important to first confirm the areas and improvements as shown on the current approved PDA Master Plan (including those proposed amendments thereto) and then confirm that the areas and improvements as shown on the Concept Plan correlate to the PDA Master Plan.
- The existing conditions, including buildings, land area and existing topography will form the framework for site grading, resiliency measures and structures. More specific data and study will be required to insure that the site grading, resiliency

measures and open space depicted in the Concept Plan is capable of implementation in concert with the development of our project.

- The Concept Plan should be viewed in light of the requirements of Chapter 91 and the requirements of the Municipal Harbor Plan Amendment for this area, in particular with respect to how “open space” is defined to insure that compliance with both is achievable.
- The Concept Plan includes a variety of site specific amenities and elements, both within exterior open space and within buildings. These concepts while helpful should be seen as suggestive and not prescriptive in order to enable consideration and accommodation of site-specific constraints (such as below-grade tunnel, pump station, outfall) and to allow the BPDA and other state and city regulatory agencies, property owners, neighbors and other stakeholders the appropriate opportunity for input and evaluation. This empirical synergy will be key in determining how to best optimize these external and internal publicly accessible spaces in the course of the project’s evolution and implementation.
- The proposed pedestrian, bicycle and vehicular circulation depicted within the Concept Plan must be capable of being revised and updated as appropriate to respond to the more detailed circulation plans which will be developed and approved during the course of a project’s review, in the same manner as such updates and amendments are undertaken to the PDA Master Plan.
- While Related Beal has long been a proponent of optimizing water sheet activation, it is important that the Concept Plan be evaluated revised to reflect the fact that existing infrastructure and public safety concerns may preclude the implementation of docks and watersheet access.

We have other, more specific, comments which we can share as helpful, but thought it best to summarize as noted above. We are confident that, working together and collaboratively through the review process, our project will be able to implement long-awaited, exceptional open spaces which meet and exceed those described in the Concept Plan.

Very truly yours,

244 – 284 A Street
Channelside Acquisitions, LLC
c/o Related Beal

cc: Joe Christo, BPDA
Chris Busch, BPDA

Richard McGuinness
Boston Planning and Development Agency
One City Hall Plaza
Boston, MA 02201

February 5, 2021

Re: Comments on Fort Point 100 Acres Open Space Concept Plan

Dear Mr. McGuinness,

Thank you for the opportunity to submit comments on the draft Fort Point 100 Acres Open Space Concept Plan. This Plan provides important concept design, program and uses for the open space system included in the original 2006 Fort Point 100 Acres Plan, codified into law by PDA 69.

The 100 Acres Plan was developed by BPDA (BRA), property owners and community in 2006 to address the development opportunity of nearly one hundred acres of parking lots with outdated zoning within a neighborhood of historic warehouses and commercial buildings being repurposed for residences and offices. With the goal of planning for a neighborhood of mixed commercial and residential uses, a network of parks and green spaces was an important part of the original plan. This open space network is intended to provide a system of green parks of sufficient scale and quality to provide the developing Fort Point neighborhood with authentic urban parks as other Boston neighborhoods enjoy. Importantly, the open space network included waterfront parks along and adjacent to Fort Point Channel in addition to inland green spaces.

The first park developed under the 100 Acres Plan is the A Street Park, built and opened in 2014, and accepted into the Boston Park System in 2017. This is Fort Point's first permanent park and provides the neighborhood with a rich landscape of lawn, trees, shrubs with children's play area, small community gardens, half court basketball court, dog park and lots of benches and seating options. Its creation was accompanied by development of the large State Street office building and 900 car parking garage. A Street Park is owned by the Boston Parks Department, operates under its citywide park regulations and is maintained by agreement by private property owners.

A Street Park is truly public, very successful and well used by residents of Fort Point, and other South Boston neighborhoods, and office workers alike. A St Park provides a tested model for the development of the Fort Point 100 Acres open space system.

Project Goals And Guiding Principles of Design and Implementation

The plan provides thoughtful Project Goals and Guiding Principles of Design and Implementation by acknowledging the important open space year round park needs of the existing and growing neighborhood of residents and workers, while appropriately focusing attention on the Fort Point Channel waterfront as not only a community resource but one that is part of the open space system of Boston Harbor parks and Harborwalk. Fort Point's waterfront, long overlooked as part of the harbor wide system, can be an important addition. With the South Bay Harbor Trail, it is also a new pedestrian and bicycling gateway for inland neighborhoods to access the Inner Harbor.

Over the last 15 years, Children's Wharf Park, Atlantic Wharf Park, and the accessible for all children Martin's Park have combined to make a new system of parks on Fort Point Channel. It is important the Fort Point park system of this Concept Plan join these existing Channel parks

in making Fort Point Channel a citywide destination that is welcoming, comfortable and interesting for all.

In 2021, Boston has the advantage of learning from the waterfront parks and open spaces developed in the adjacent Seaport neighborhood over the last 15 years. Important lessons there should inform how the Fort Point Channel waterfront is programmed, designed, activated and welcoming to all. Lessons can also be learned from some of Boston's most successful parks - Waterfront Park in the North End and Piers Park in East Boston.

Open Space Concept Plan

The Open Space Concept Plan shows six park parcels extending from the Fort Point Channel easterly to the South Boston Haul Road and southerly to A St Park. Five of the parks are included in the Plan, the sixth is the existing A Street Park of 1.6 acres. This alignment of the open space is as included in the 2006 100 Acres Plan, **but with critical alterations.**

As had been observed in the BPDA public planning process by members of the public, in person at the open houses, and virtually in meetings, the very important waterfront parks have been reduced in size. Most important of these reductions is the waterfront park between building G4 and 15 Necco Street. G4 and 15 Necco are allowed in the 100 Acres Plan as large 180 ft tall buildings, now with proposed uses of life science and residential. The reduction of the waterfront park, between these buildings in this waterfront location, and as the link to the inland Fort Point parks, is a very critical change and threatens the potential of creating a destination waterfront park in Fort Point.

In addition, this reduced parcel is presented in concept as seriously over programmed, resulting in a park that is half hardscape. It does not have the sufficient amount of space for the numbers for park users that are envisioned to come from inland neighborhoods to enjoy the Fort Point Channel waterfront and parks. The features that make a destination park - amphitheater, stage, water features, public art - are located in a space that is too small for any of these features to be successful.

I urge consideration of restoration of the waterfront Fort Point Channel park as proposed in the original 100 Acres Plan. I also suggest rethinking the adjacent Necco Park as an extension of Fort Point Channel Park by including some of the features in it, such as the water feature. Not all water features need to be on the waterfront - Frog Pond on Boston Common, Rings Fountain on the Greenway.

In addition, the Open Space Concept Plan locates the only park parcel with active recreation next to the busy and heavily used South Boston truck route, raising issues of air quality. The community gardens, one of the neighborhood's most requested features, are west of now four 150' buildings and subject to serious daytime shadows. Both these uses on these parcels should be studied more and possibly reconsidered.

Activity and Program Zones

During BPDA's public process, community members, the larger neighborhood, and advocates were asked to choose their top themes as proposed by the consultant Sasaki. With responses from Open Houses and from online surveys, the top choices were Urban Wilderness, Community Living Room and Flexible/Art Gallery. Surprisingly, in the Concept Plan, the priority activity is seasonal activities. Nature/ecology, aka "urban wilderness", has a lesser priority, after active recreation.

Through community effort, Fort Point is now a Boston Historic District. The community is committed to preserving its history. The community was also very clear and articulate in having the new parks be a natural and green compliment to the historic industrial fabric. Trees, lawn and flowers were requested as places to relax and play and attract wildlife in richly planted pollinator landscapes. Green parks provide needed cooling, wind block and help to create an ecosystem.

The conceptual Activity and Program Zones should be reconsidered to propose a more natural and environmentally rich system, especially at the extensive hardscape of the waterfront parks. Here is an important opportunity to present waterfront landscapes as year round parks, not just when water based programs are active.

Events and Public Art

Events and public art installations are strong factors in creating destination parks, It is important that all events be offered free of charge as in all other Boston parks. The program of the park in its design should provide supportive infrastructure for a variety of events and installations. At the same time, it is important that the parks are a destination even if there are not special events. This applies especially to the colder months. The parks must be welcoming and interesting year round, so that nearby residents and those further away who want to spend time at the water's edge are encouraged to enjoy the Channel when special events are not taking place.

Phasing

The entire draft 100 Acres Open Space Concept Plan is within the ownership of two large property owners - Related Beal and United States Post Service (USPS). This Concept Plan is being developed at a time when Related Beal, owner of 6.5 acres and all the waterfront parcels, has been moving ahead through permitting for development of its site concurrently with the development of the Concept Open Space Plan. USPS currently operates US mail operations on all of its property with no indication that this intensive use will cease.

As a result, there is serious concern about when, if ever, USPS will develop its property. And yet, all the active recreation, the dog park and community gardens that the community requested are located on its property. What binding legal commitment can be made to insure that these USPS parcels will be developed as the Concept Plan indicates?

Related Beal has been an active participant in public meetings regarding the Concept Plan development. The waterfront parks which are now being reduced and overly programmed are part of their holdings.

As stated above, the scale of the waterfront parks as the flagship attraction for a destination park must be reconsidered. As a BCDC commissioner recently said "It's the place everyone wants to be".

Ownership

A Street Park, the first park developed in PDA 69 100 Acres Plan, is a successfully proven model for the ownership for all Fort Point parks. This model with Boston Parks ownership, protects the parks under state law Article 97. It joins Fort Point parks with all other Boston parks as truly public, operating with the same rules and regulations as parks across the city. As included in PDA 69, the maintenance of Fort Point parks is provided by developers, as it has

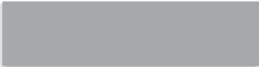
been so successfully done at A street Park. The A Street model should be endorsed in the Concept Plan.

Ground Floor Uses

The ground floor uses of all buildings built between the Fort Point Channel and A Street are subject to MGL chapter 91, since the land was created by filling tidelands and require facilities of public accommodation (FPAs). No residences or private offices are allowed on the ground floor. Food service, other retail, educational, community and cultural uses are allowed. It is very important that these uses support and serve the Channel water based activities, the parks and their users, and the neighborhood. The draft Concept Plan provides some guidance on this which has not yet been fully presented in a public forum. The opportunities for this amount of FPA space should include a follow up public process that includes interested people from across the city.

I appreciate the work of BPDA staff and their consultants Sasaki in guiding this draft concept plan through the difficult months of Covid related restrictions. I look forward to the continued development of the draft Fort Point 100 Acres Open Space Concept Plan as it responds to public comments.

Sincerely,
Valerie Burns



Date: February 2, 2021
To: BPDA
From: Steve Hollinger

Subject: Comments regarding the Fort Point Open Space Concept Plan draft of December 2020 (hereinafter referred to as the “Draft BPDA Open Space Plan”).

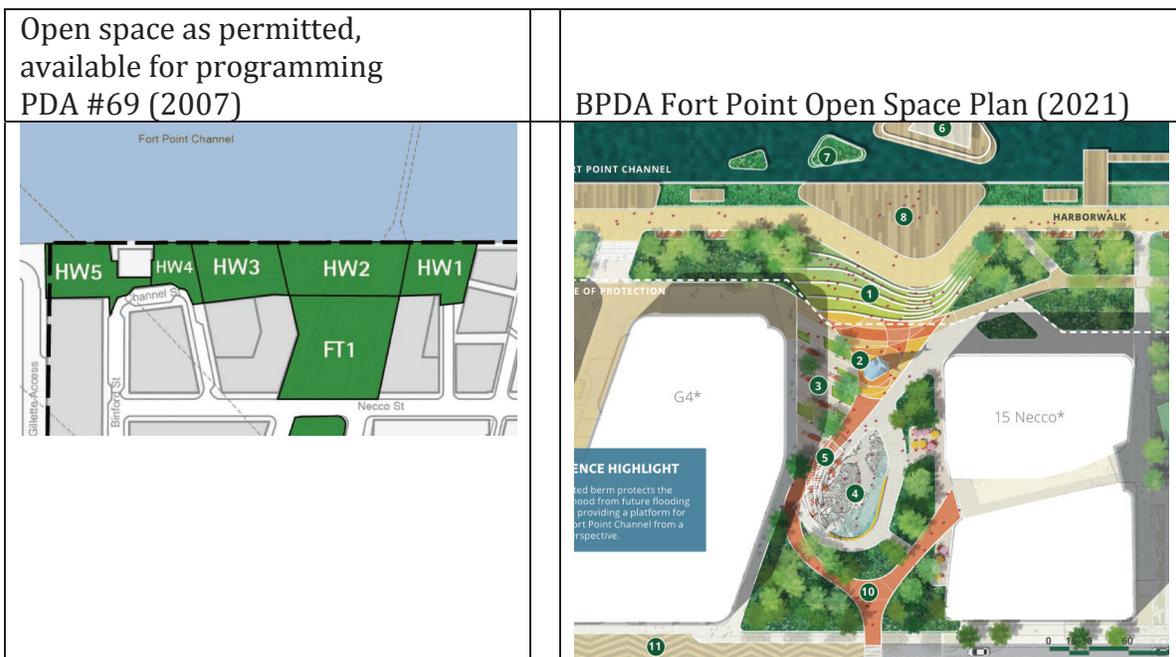
Introduction

Failing to recognize objectives of the Seaport Public Realm Plan (100+ public meetings) and the 100 Acres Plan process (60 public meetings), the Draft BPDA Open Space Plan marginalizes the fourth of six signature waterfront parks that had been formerly planned and fully permitted in Boston’s Seaport District.

This (re)planning initiative represented a unique opportunity for Bostonians and visitors to celebrate the Fort Point Channel and to achieve stated objectives of Climate Ready Boston regarding long-term management of floodwater.

For the past 5 years, as recent as January 2021, BPDA has denied knowledge of encroachment on area FT1 (shown below) and adjoining waterfront open spaces by abutting buildings at 15 Necco Street (formerly General Electric project) and 244-284 A Street, now in permitting.

As further detailed in this document, BPDA denials and misstatements of fact have characterized the permitting environment we find ourselves operating in.



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9	4	Regarding: Failure to acknowledge reductions in size of park area FT1, the Fort Point Channel-adjacent park area offering the most valuable public benefit potential within Fort Point Park
12	5	Regarding: Failure to integrate park reductions being presented by Related Beal during permitting of 244-284 A Street, dating back to September 2020
14	6	Regarding: Swath of park space presented by BPDA, outside boundary of 244-284 A Street, for which no zoning or agreement exists
18	7	Regarding USPS Property
21	8	Regarding the Shifting Footprint of 15 Necco St
23	9	Regarding Contrived Acreage Calculations
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1. Context

BRA/BPDA Track Record Waterfront Parks in Seaport PDAs

As originally permitted in respective PDA	After BPDA re-permitting
<p>Seaport Common (Lot F), PDA #78 (2010) Size: 1.3 acres</p>  <p>    </p> <p>Figure 2.3-21 Public Realm Seaport Square Sections & Perspective prepared by: Reed Hilderbrand/KPF</p>	<p>Seaport Common (Lot F), 2021 (2nd mixed-use commercial building remains to be built in area at right)</p> 
<p>Seaport Hill Park, PDA #78 (2010) Size: 1.3 acres</p>  <p>    </p> <p>Figure 2.3-24 Public Realm Seaport Hill Sections & Perspective prepared by: ADD Inc/Reed Hilderbrand</p>	<p>Seaport Hill Park, 2021</p> 
<p>Fan Pier Park, PDA #54 (2001) Designer: Michael Von Valkenburgh</p> 	<p>Fan Pier Park, 2021</p> 

2. History of Fort Point Planning

History is important today because the 100 Acres Plan drafting process itself represented a compromise with landowners including Gillette.

Fort Point open space planning predated the drafting of the Seaport Public Realm Plan (1998-1999, 100+ public meetings) by the Boston Redevelopment Authority, led by BRA-hired waterfront planners at Cooper Robertson.

Fort Point Park itself was conceived and refined in late 1997 and early 1998, in planning workshops hosted by our community organization, Seaport Alliance for a Neighborhood Design (SAND), a group that included members of the BSA Seaport Focus Team. A number of former SAND members, including BSA Seaport Focus Team members, still remain engaged in community work citywide.

SAND website: <http://www.seaportalliance.org>

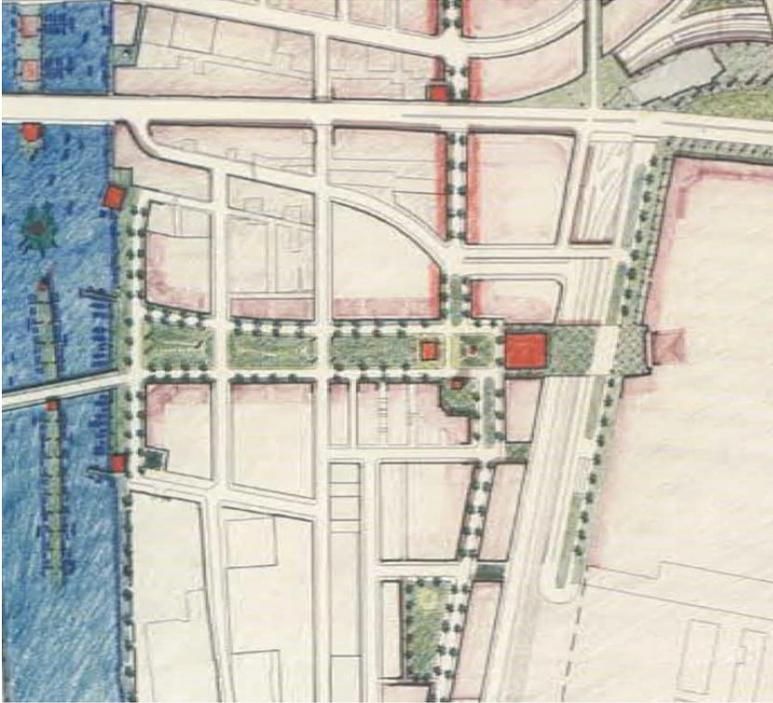
Fort Point Greenspace Planning Timeline:

<http://www.seaportalliance.org/SAND/Archive/050615green/050615green.html>

SAND member Gustavo Soto Rosa first proposed a swath of green space running from the planned convention center to the Fort Point Channel. SAND and BSA Seaport Focus Team members incorporated that initial idea into a model and carried the concept forward into the drafting of the BRA Seaport Public Realm Plan led by Cooper Robertson.



Below: Fort Point Park, BRA Seaport Public Realm Plan (1999)



SAND's early conception of Fort Point Park was a defining moment for our fledgling group, leading members to a decade of collaborative Fort Point and Seaport planning (1997-2008).

BPDA has failed to acknowledge the BRA Seaport Public Realm Plan (1999) in the Draft BPDA Open Space Plan.

Below: View of Fort Point Park, BRA Seaport Public Realm Plan (1999)



3. Regarding: Misrepresentations of 100 Acres Plan in the Draft BPDA Open Space Plan and Public Process

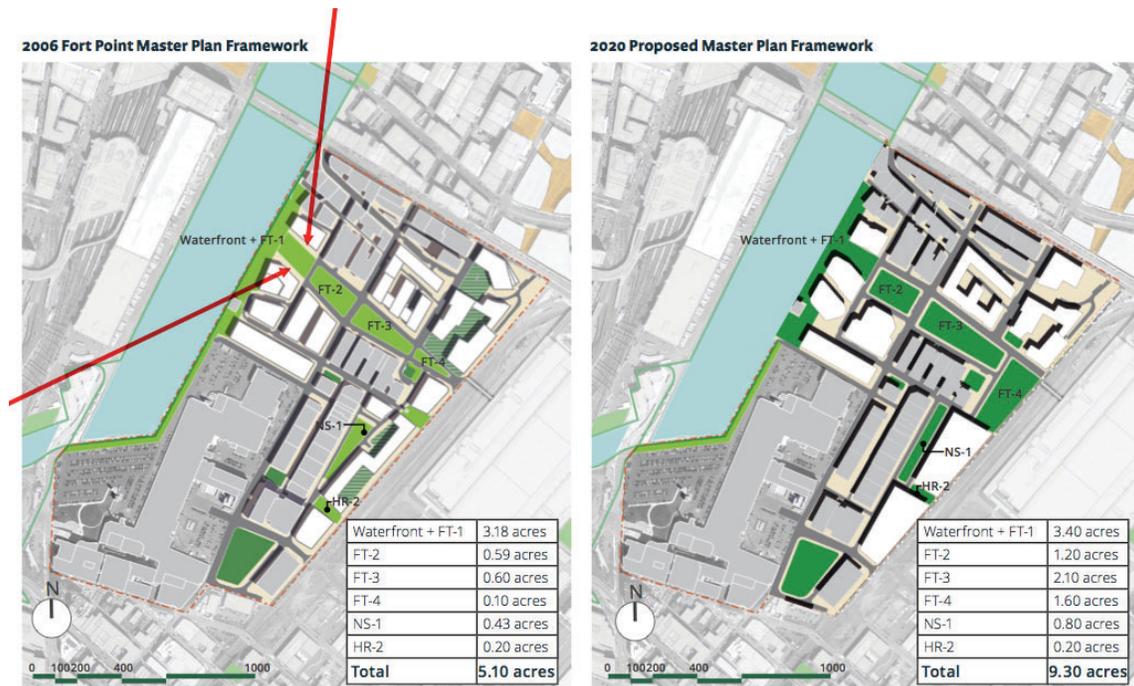
Both BPDA and the proponent of 244-284 A Street have routinely misrepresented the 100 Acres Plan, both in documents (including the Draft BPDA Open Space Plan) and public presentations.

These misrepresentations have most often occurred in public comparisons between Fort Point Park as intended in the 100 Acres Plan and the park concept today.

The graphic below is sourced from Page 35 of the Draft BPDA Open Space Plan.

The graphic shown at below left was not sourced from either the 100 Acres Plan (2006) or PDA #69 (2007) as suggested in the title.

The graphic at left has been edited by BPDA to add two wide swaths of hardscape fronting each building (red arrows are mine). For a fair comparison between plans, the addition of these swaths should have been applied to both plans or neither plan.



Shown below is an accurate comparison between Fort Point Park as zoned in the 100 Acres Plan and the same waterfront area proposed by the Draft BPDA Open Space Plan.

At left, the graphic was **directly** sourced from the 100 Acres Plan.

Looking at this comparison, the significant loss of park space at area FT1 becomes apparent.



The editing being applied to 100 Acres Plan graphics published in the Draft BPDA Open Space Plan and in public meetings has been misleading.

While an accurate view of the 100 Acres Plan is included on Page 37 of the Draft BPDA Open Space Plan, to the best of my knowledge, BPDA has *never* presented a clear, side by side comparison between the 100 Acres Plan (2006) and the current Plan.

Why was the 100 Acres Plan presented on Page 35 of the Draft BPDA Open Space Plan edited to create the illusion of reduced park space?

Public Misrepresentations (continued)

In fact, misrepresentations of the 100 Acres Plan as originally permitted have been routinely deployed throughout the public process.

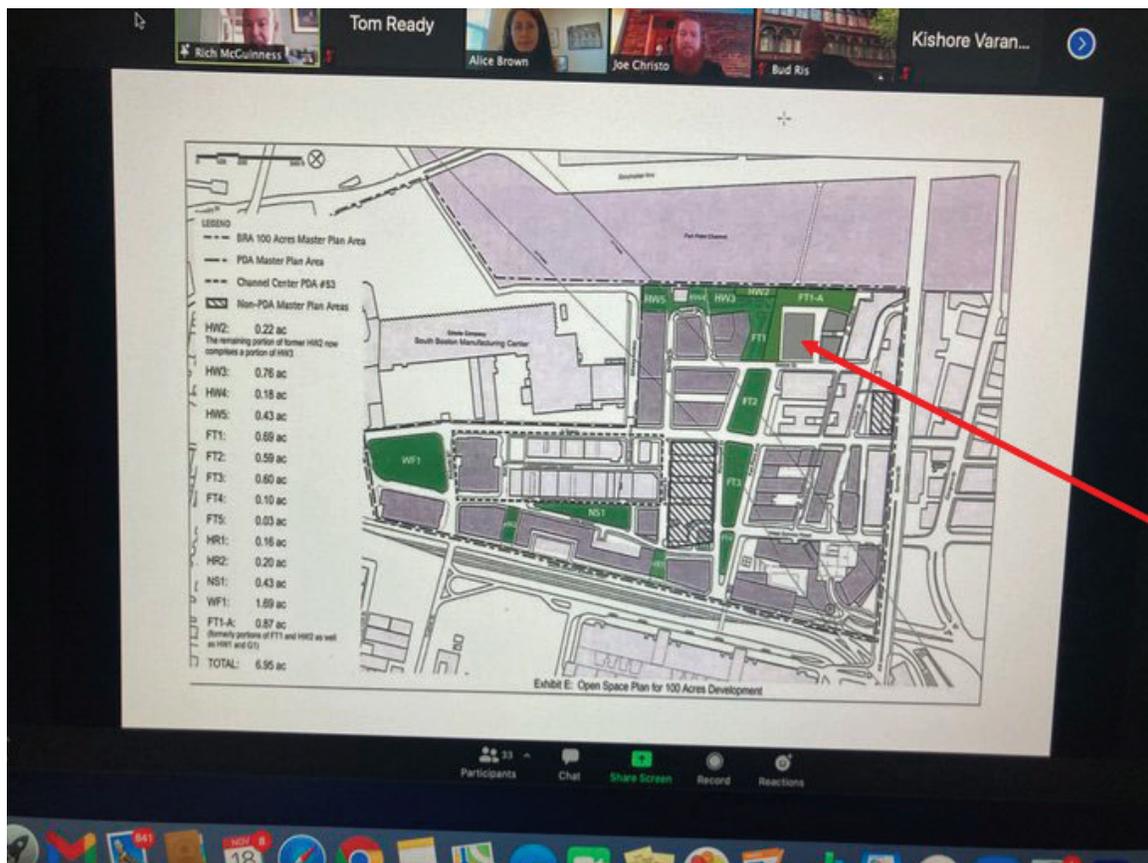
Shown below is a screencap from a Harbor Use Forum held by Boston Harbor Now on 11/18/2020, in which BPDA presented the Draft BPDA Open Space Plan (10/16/2020 draft).

The graphic below is titled “Open Space Plan of 100 Acres Plan Development.”

The graphic includes recent permitting for GE/National Development, as shown at the arrow.

Did BPDA inform Harbor Use Forum attendees that this graphic represented the 100 Acres Plan after multiple PDA amendments for General Electric (later National Development) that incrementally diminished the size of area FT1?

In fact, I’ve been present at numerous zoom meetings where the representation of Fort Point Park below was misrepresented as the original 100 Acres Plan and/or PDA #69 (2007), not clearly identified as representative of recent permitting.



4. Regarding: Failure to acknowledge reductions in size of park area FT1, the Fort Point Channel-adjacent park area offering the most valuable public benefit potential within Fort Point Park

Both BPDA and the developer of 244-284 A Street have repeatedly denied or disavowed awareness of shifts in building footprints that have diminished the dimensions of area FT1, the only significant park area along the Fort Point Channel.

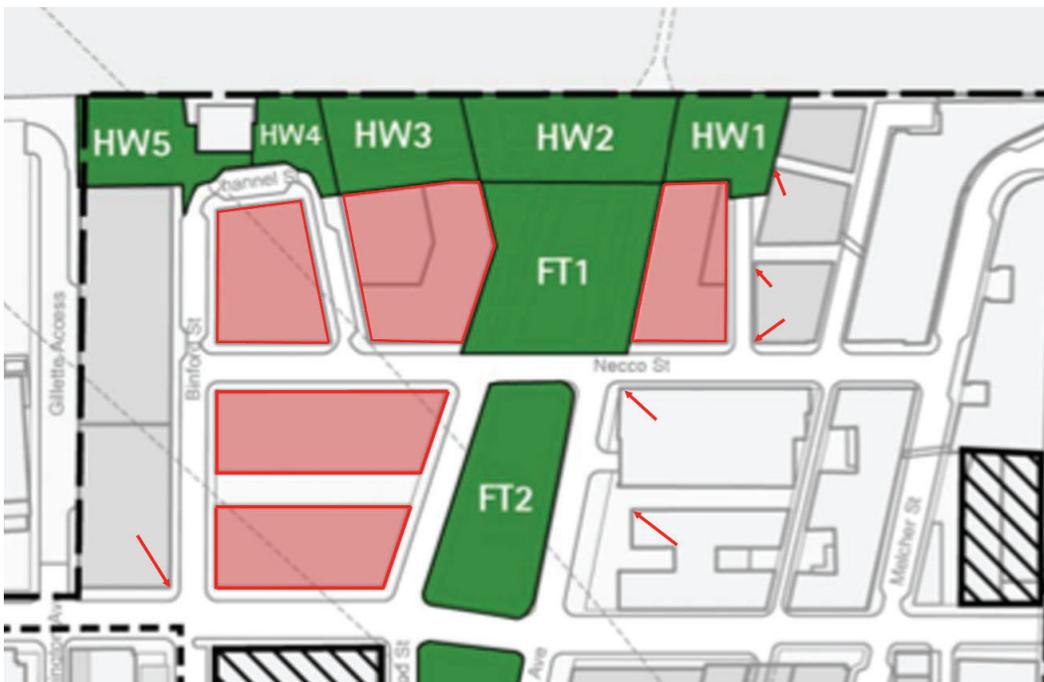
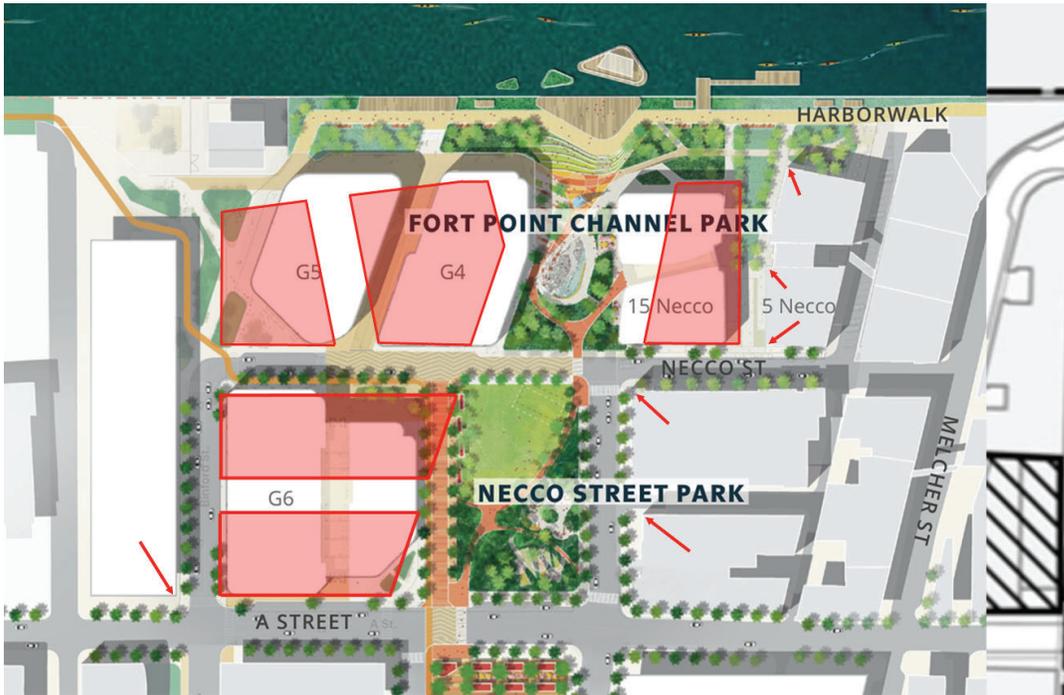
At BPDA Office Hours in January 2021, BPDA disavowed knowledge of an encroachment on FT1 by Building G4 in the 244-284 A Street project (represented in the Draft BPDA Open Space Plan).

At a BCDC meeting on 1/26/2021, the developer denied that building G4 encroached on area FT1. This denial has been repeated since the initial filing in July 2020.

See next page for a further discussion of this issue.

Shown below is an accurate alignment of the buildings as permitting in the 100 Acres Plan and PDA #69, overlaid on the Draft BPDA Open Space Plan. Red arrows represent example alignments (see next page). Note the encroachment on park area FT1 by building G4, currently in permitting at BPDA.

The encroachment by Building G4 on area FT1 has been repeatedly denied in public meetings.



At BPDA Office Hours in January 2021, BPDA disavowed knowledge of an encroachment on area FT1 by Building G4 of the 244-284 A Street project filings, an encroachment that also exists in the Draft BPDA Open Space Plan.

Since early public meetings following the initial filing in July 2020, the developer of 244-284 A Street has continued to deny that G4 encroaches upon area FT1.

Most recently, the 244-284 A Street project was presented to BCDC on 1/26/21. At this BCDC meeting, the developer denied that building G4 encroached on area FT1. This denial by the developer has been repeated in numerous public meetings.



5. Regarding: Failure to integrate park reductions being presented by Related Beal during permitting of 244-284 A Street, dating back to September 2020

The BPDA Plan fails to include a number of successive, incremental reductions in park size being presented by Related Beal in meetings dating back to September 2020.

The park as presented in the Draft BPDA Open Space Plan appears to approximate 244-284 A Street's original Project Notification Form of 7/27/2020 and Related Beal's early presentations in August 2020.

Since September 2020, and as recent as 1/26/21 at BCDC, Related Beal has continued to reconfigure the footprint of Building G6, pressing deeper north into formerly presented park area.

As shown on the following page, a significant disparity now exists between the Draft BPDA Open Space Plan and the project currently in permitting.

Note the alignment of Building G6 with the north edge of Wormwood Street in the Draft BPDA Open Space Plan. Note the narrowing of park space that has occurred as a result of incremental changes by Related Beal in the 244-284 A Street Plan.

- **Why hasn't BPDA updated the Draft BPDA Open Space Plan to reflect Beal presentations dating back to September 2020?**
- **Will Related Beal be required to reverse course to meet what BPDA is presenting to the public?**

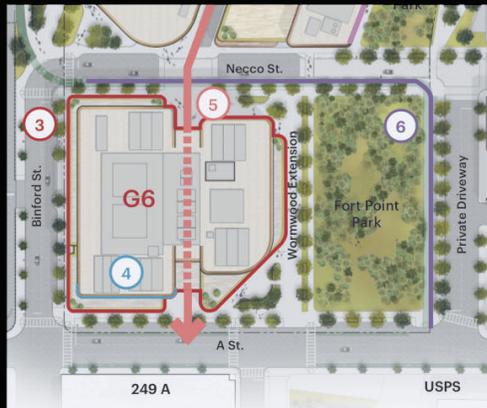
Below: Example failure to integrate nearly 6 months of 244-284 A Street project modifications to Fort Point Park (in permitting) with BPDA Fort Point Open Space Draft

BPDA PLAN / DECEMBER 2020



NORTH EDGE OF
WORMWOOD STREET
(EXISTING)

244-284 A STREET / BCDC 1/26/2021



NORTH EDGE OF
WORMWOOD STREET
(EXISTING)

6. Regarding: Swath of park space presented by BPDA, outside boundary of 244-284 A Street, for which no zoning or agreement exists

BPDA has continually failed to adequately identify property bounds along a swath of park space being presented in the Draft BPDA Open Space Plan, often conflating land owned by a project in permitting (244-284 A Street) with a swath of land that is not subject to the imposition of new costs for construction or maintenance of a park.

This misrepresentation matters because no zoning or other agreement exists with BPDA that binds the landowner to construction and maintenance of the area being presented as part of the Draft BPDA Open Space Plan.

Furthermore, any future PDA amendment would not control that swath unless the landowner explicitly agreed to the obligation.

Shown below is the property line. The graphic is sourced from a presentation of 244-284 A Street on 11/5/2020.



Shown below is a view of the Related Beal property line (overlaid in red) as it passes through the park presented by BPDA in the Draft BPDA Open Space Plan.

A swath of green space is presented along the north edge (right side in graphic) of the park for which no zoning under the 100 Acres Plan, and no agreement outside of current zoning, exists with BPDA for costs of construction and maintenance of the swath.

When this issue was raised during BPDA Office Hours regarding the Draft BPDA Open Space Plan in January 2021, BPDA disavowed any awareness of this swath being outside the bounds of ownership of the developer of 244-284 A Street.

As I stated in response to a question by BPDA, my concern regards the fact that the park will be narrower than presented as a result of a failure to coordinate responsibility for costs of this swath.

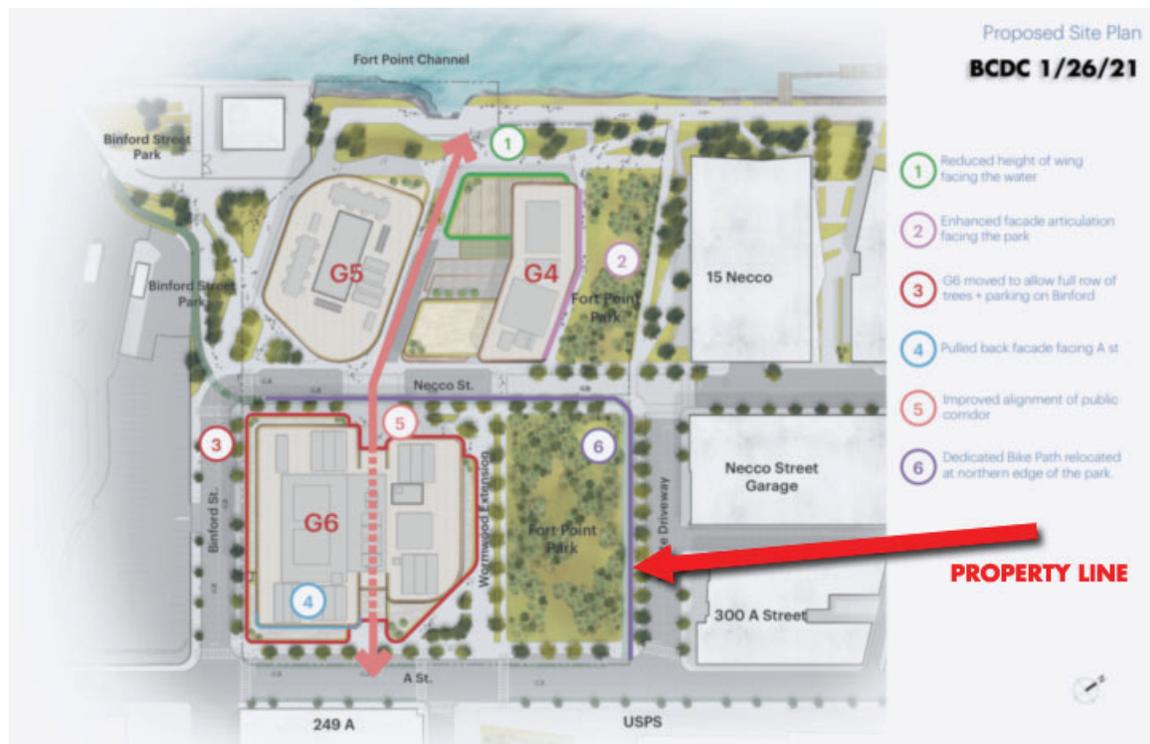


Only days after I outlined my concerns to BPDA regarding the swath being presented by BPDA as park space, at a BCDC meeting of 1/26/21, the concerns were realized.

At a BCDC meeting on 1/26/21, Related Beal, the developer of 244-284 A Street presented the latest draft of the plan currently in permitting.

As shown below, Related Beal has not only reduced park area to exist within their own property bounds, the are presenting the latest iteration of the South Bay Harbor Trail, now planned to run along the property boundary.

The graphic shown below illustrates one of a series of incremental reductions in park space that are not being presented by BPDA in the Draft BPDA Open Space Plan.



Shown below is a closeup view of the park presented by the developer of 244-284 A Street to Boston Civic Design Commission on 1/26/2021.

The developer no longer places a dependency on the abutting landowner along the north edge (right side of park shown) for green space.

The swath abutting the Related Beal property is being presented by Related Beal in its existing condition, a wide sidewalk and trees with a small sliver of grass.

But BPDA is presenting a larger park that relies on the abutting property owner. And from its initial filing of the 244-284 A Street PNF through 1/26/21, Related Beal also presented green space on this swath, relying on the abutting property owner.

Is the public being misled in terms of the final dimensions of this park area?



7. Regarding USPS Property

In October 2020, BPDA first revealed that USPS property within the bounds of the 100 Acres Plan were being reconfigured. This reconfiguration followed a year of community workshops and open houses with Sasaki that assumed no reconfiguration of USPS property.

It was inappropriate for BPDA engage in a reconfiguration of parks and building massing on USPS property — land not subject to BPDA authority — while projects west of A Street were (and remain) in permitting, with strict schedules, filing deadlines and market pressures.

BPDA either should have initiated a redesign of USPS property within 100 Acres Plan bounds in the 13 years prior to the permitting of 244-284 A Street, or the agency should have focused the 2021 Open Space planning effort exclusively on 244-284 A Street.

BPDA has instead conflated discussions that regard the conceptual planning of USPS property with actual permitting of the most significant waterfront areas of Fort Point Park.

BPDA's public process, presenting a massive expansion of park space on USPS property, has diverted attention away from parcels near the Fort Point Channel.

In my view, this was an intentional diversion from issues regarding 244-284 A Street, most notably the encroachment of buildings G4 and G5 on waterfront park spaces permitted in the 100 Acres Plan.

Notes regarding dimensional changes on USPS Property

For the entirety of public process through October 2020, including workshops and open houses, no change had been proposed to the park dimensions on USPS property, or to the massing of buildable lots on USPS property within the bounds of the 100 Acres Plan.

In October 2020, months after the community workshops, significant changes were made to dimensions of park area and shifts in massing on USPS property.

My earliest introduction to dimensional changes to plans for USPS property was in October 2020, having seen a slide from a Plan draft dated 10/16/20. (The 10/16/20 draft was not made available by BPDA at the Document Center until early November).

None of the work on USPS property regarding dimensional changes was the result of the community workshop process with Sasaki.

Notes regarding shifts in Massing with no change in GFA on USPS Property

While no change in total gross floor area (GFA) is proposed by the Draft BPDA Open Space Plan on USPS property, significant shifts in massing would accompany the Draft BPDA Open Space Plan.

These shifts have been privately discussed with USPS, as I learned via my Public Records Request filed at BPDA on 1/11/21, response received on 2/2/21.

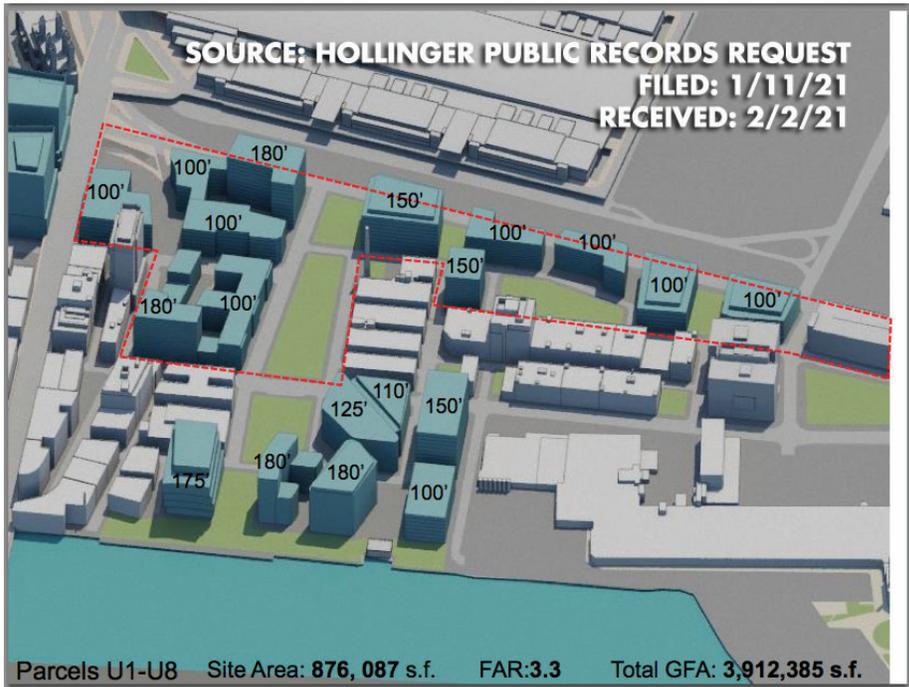
USPS is not subject to BPDA zoning control, but BPDA has stated that future landowner(s), if subject to being regulated under City of Boston zoning, would be responsible for elements of the Draft BPDA Open Space Plan that are codified into zoning (presumably PDA #69).

In other words, the Draft BPDA Open Space Plan is expected to replace existing 100 Acres Plan massing.

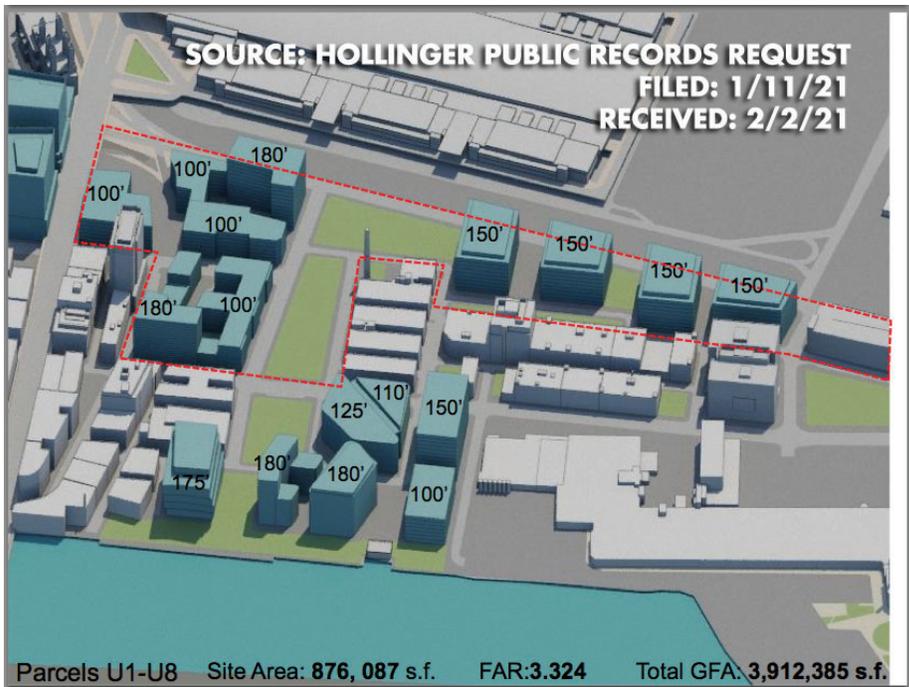
Fort Point residents — most particularly direct abutters at 15, 25 and 35 Channel Center — have had no opportunity to view or discuss the shifts in massing proposed by BPDA in the Draft BPDA Open Space Plan and to evaluate the tradeoffs by comparison with the 100 Acres Plan (drafted through 60 public meetings).

Why weren't illustrations on the following page made available to residents for a public discussion of tradeoffs regarding massing changes on USPS property, especially considering there was no proposed change in gross floor area (GFA)?

From private BPDA communication to USPS (date TBD):
USPS Property (bounded in red): 100 Acres Plan / PDA #69 (2007)
Foreground massing = 244-284 A Street as proposed



From private BPDA communication to USPS (date TBD):
USPS Property (bounded in red):
Massing proposed with BPDA Open Space Plan
Foreground massing = 244-284 A Street as proposed



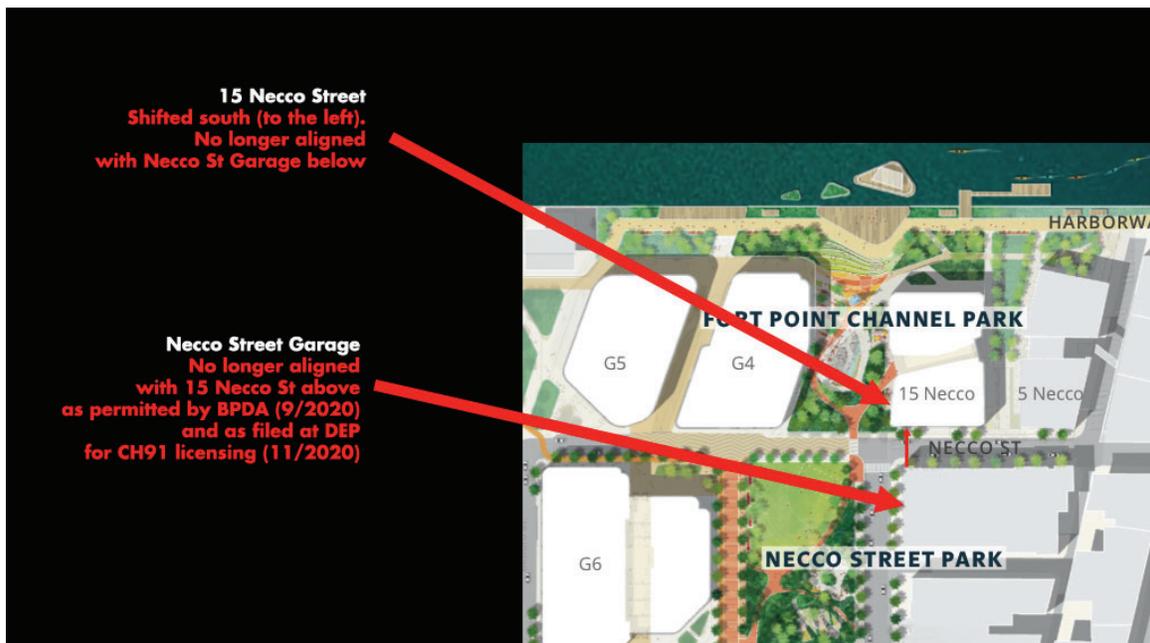
8. Regarding: Shifting footprint of 15 Necco Street

The Draft BPDA Open Space Plan of December 2020 (and earlier draft of 10/16/2020) has shifted the footprint of 15 Necco Street deeper into area FT1 of the 100 Acres Plan than had been permitted by BPDA in September 2020.

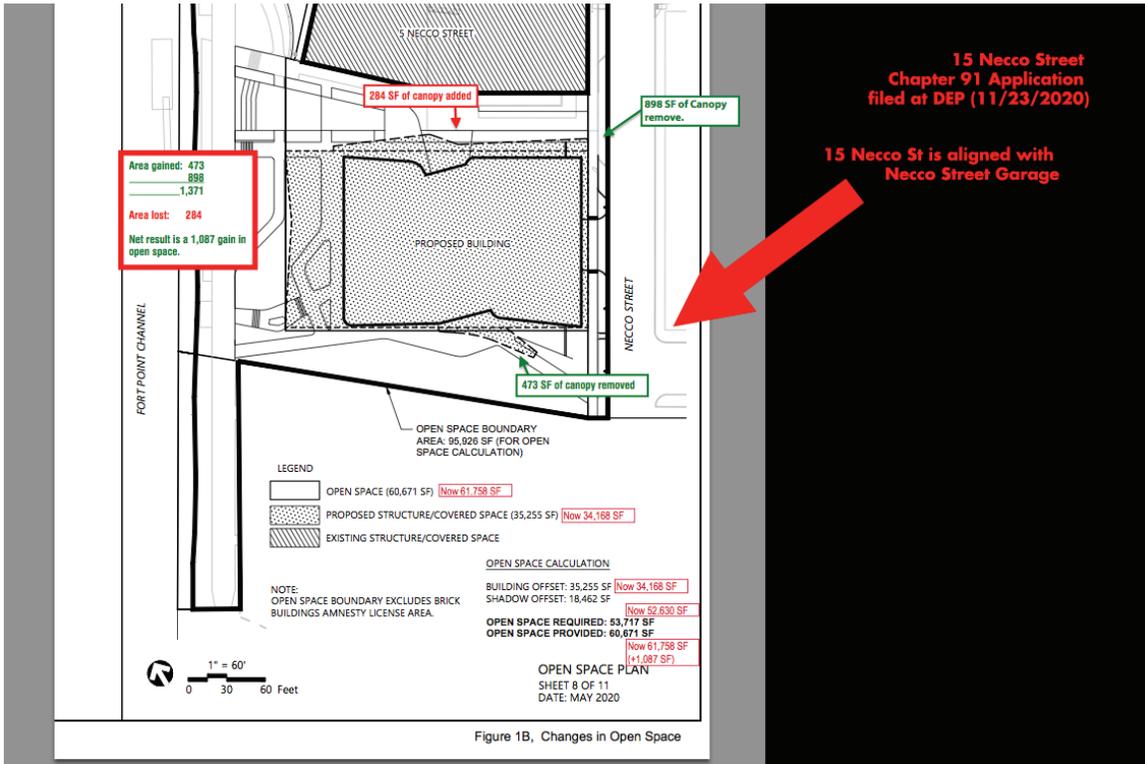
Why is area FT1 further diminished by a southward shift of the 15 Necco Street footprint, adding open space to an interior courtyard predominately to serve 5 and 15 Necco Street tenants?

In January 2021 office hours, BPDA disavowed any awareness of this shift.

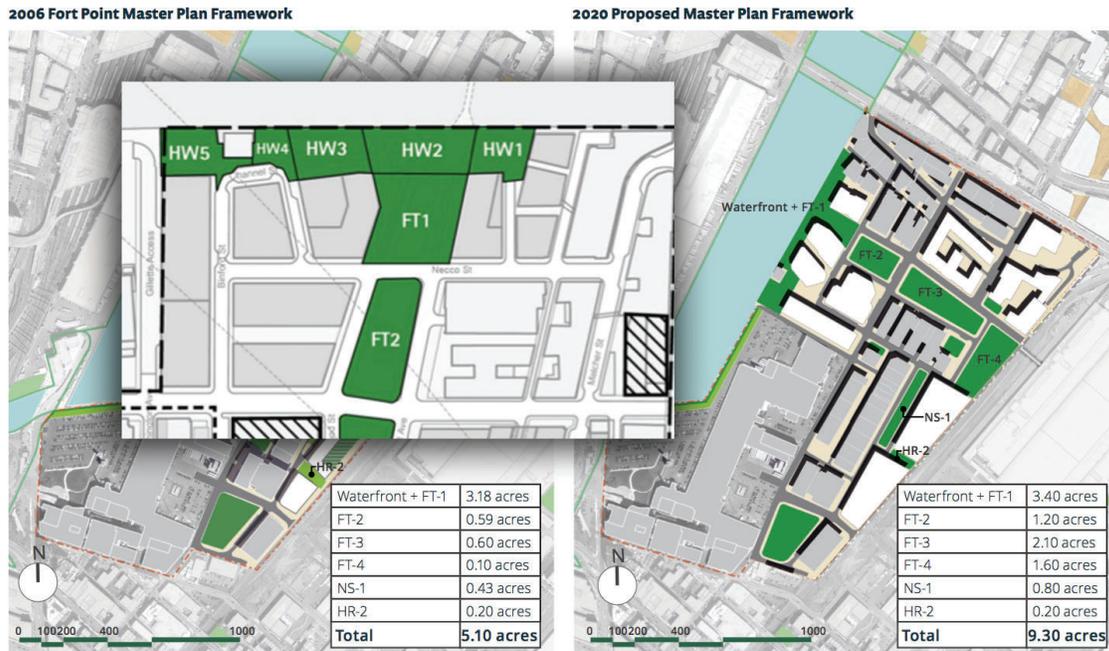
See following page for alignment as permitted by BPDA in 9/2020 and as filed at DEP in 11/2020.



Below: 15 Necco Street alignment as filed at DEP in Chapter 91 application (11/23/20)



9. Regarding Contrived Acreage Calculations



When the Draft BPDA Open Space Plan is compared with the 100 Acres Plan (2006) and zoning (PDA #69, 2007), repeated analyses fail to approximate acres presented in BPDA's tables.

BPDA claims area FT1 and Waterfront park area is 8% larger in the new plan.

BPDA claims FT2 is twice the acreage in the new plan.

Calculations in Photoshop using a histogram tool to measure pixel counts within each park area easily disprove BPDA's assertions.

I'm not going to make the case parcel by parcel. Arguing against BPDA math, when BPDA is not transparent in how calculations are performed, is a fool's errand.

But more importantly:

Shifts of square footage from premium areas such as FT1 to areas such as behind the Gillette pump house diminish public benefit without changing square footage. A claimed gain in total acreage fails to consider the loss of premium park space in favor of open space predominately serving private projects.

10. Regarding Climate Ready Boston

This document will not address BPDA's marginal track record with respect to planning for projected climate impacts on the Fort Point district.

Climate Ready Boston plans (graphics below) have amounted to a neon green sales pitch garnering worldwide acclaim, with little follow-through on the ground beyond elevating individual project sites, each site expected to push seawater away, and to shed stormwater offsite in 50 years, unable to drain with sea level rise.

Climate Ready Boston's conceptual plans could not have assessed groundwater or drainage at every site. But for two decades, BPDA failed to kick off district-level planning for management of projected volumes of floodwater (sea level rise, storm surge, precipitation) at grade in any Boston neighborhood, on the faulty assumption that responsible planning equates to building seawalls, berms, elevated project sites, and relying on pumps (with no study of costs or logistics), while foisting any additional water retention planning on Boston Water & Sewer.



For years, my own requests to BPDA regarding district-level planning and data regarding volumetric calculations of floodwater have been directed to Boston Water and Sewer.

From 2018 NAB Task Force Meeting:



- A near-term project or incremental solution are not possible with this option.
- It can be designed to address 40 inches of sea level rise now, but it is unlikely to be adaptable to higher flood levels later without significant additional investment.
- Increased closure frequency with sea level rise could limit effectiveness, introduce opportunity for failure, and have environmental impacts.
- It would have impacts on water quality and navigation.

He also noted the green infrastructure built along the perimeter of the channel enhances access to the area and increases property values.

BPDA

Steve Hollinger asked what plans are in place for managing stormwater. [REDACTED] said that is something that will be looked at in more detail as part of a yearlong analysis of inland flood dynamics, along with groundwater management.

Vice Chair [REDACTED] asked what solutions are being recommended for the areas on either side of the Northern Avenue Bridge (NAB). [REDACTED] said the plans are only conceptual designs right now and that the area's vulnerability is in the 2040 midterm solutions range. He said the bridge would need to be elevated and the landings would

2

Twitter thread regarding BPDA's project-by-project approach to addressing climate impacts: <https://twitter.com/FortPointer/status/1356626865348313089>



11. Regarding Harborwalk / South Bay Harbor Trail

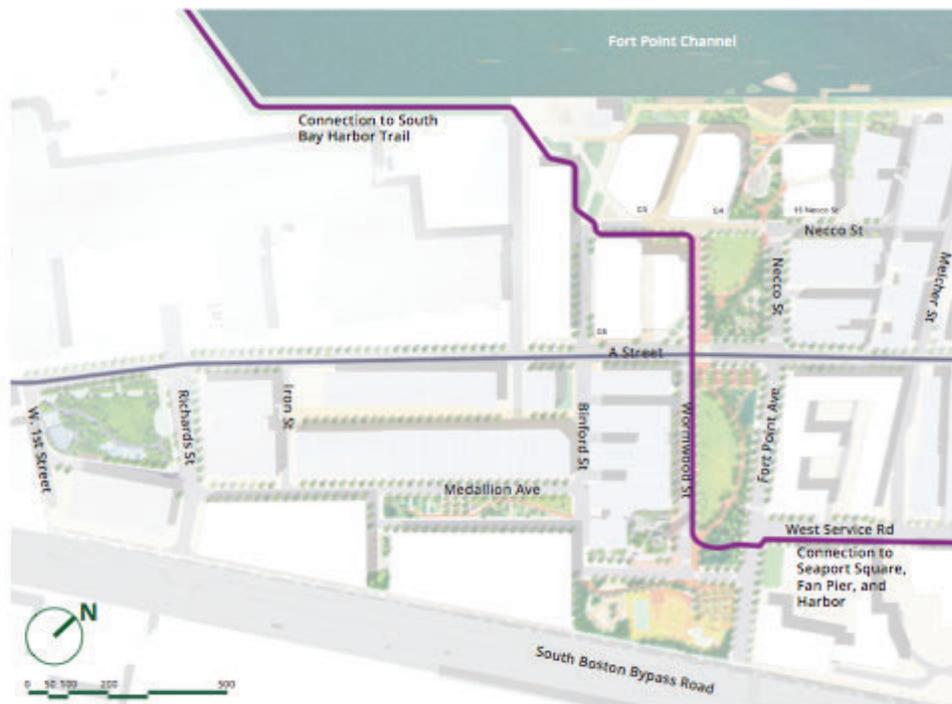
This document will not address issues with Harborwalk and South Bay Harbor Trail, primarily because BPDA has not planned either project to survive anticipated sea level rise.

At planned elevations, both the Harborwalk and South Bay Harbor Trail will be submerged within 50 years.

BPDA's only opportunities to responsibly fund the elevation of these waterside projects in Fort Point was foreclosed upon with the permitting of 15 Necco Street and (today) the permitting of 244-284 A Street.

As a result of this planning failure, a future cyclist following the South Bay Harbor Trail will likely be expected to ride alongside traffic on A Street.

Source: BPDA Fort Point Open Space Draft, path shown not final



12. Widening of Necco Street

I strenuously object to the continued widening of Necco Street Extension. Necco Street Extension a new street in a flood zone, within walking distance of two MBTA stations.

To minimize addition of surfaces impervious to drainage of floodwater/stormwater, Necco Street Extension should have been either eliminated (with all loading of buildings on Binford Street), or reduced in width to a maximum of two travel lanes. Cyclists should have been expected to ride in traffic on Necco Street, or use protected bike lanes on A Street.

The widening of Necco Street has resulted in the loss of square footage in Fort Point Park (as detailed in above section regarding encroachment by Building G6).

The widening of Necco Street has also increased the existing gap between Fort Point Park areas that had been envisioned as part of a linear series of signature park spaces.

Source: BPDA Public Records Request 1/11/21, response received 2/2/21

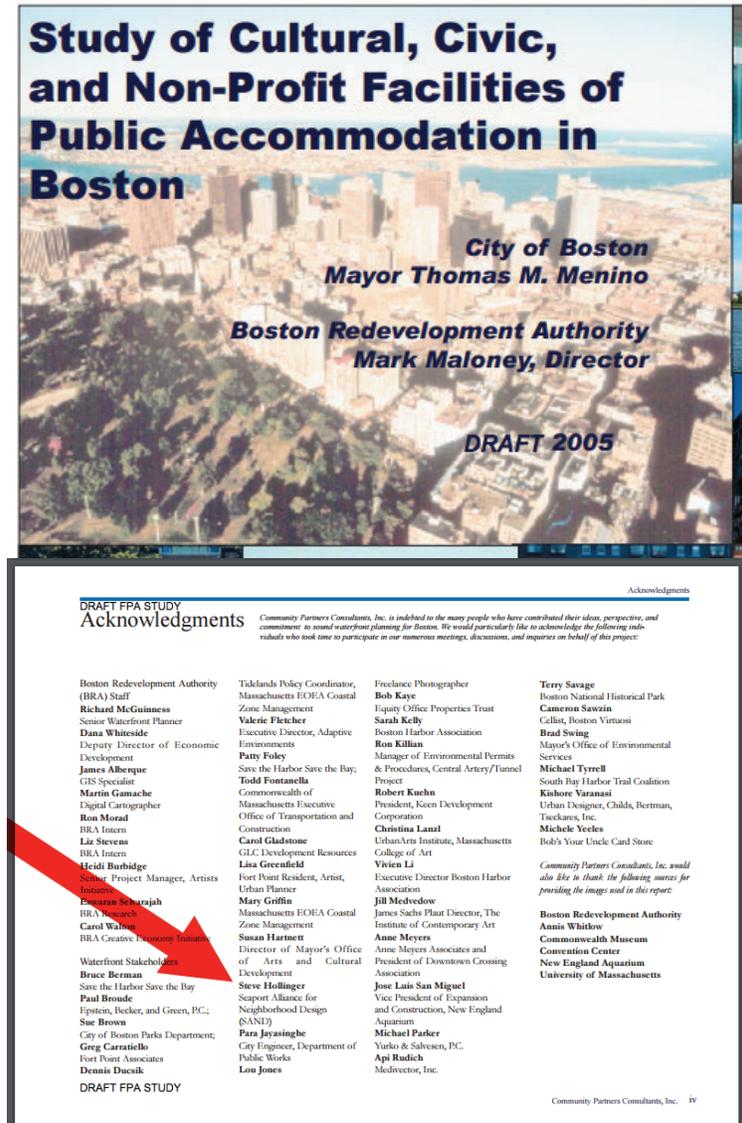


13. Regarding Ground Floor FPAs

This section will not fully address my views regarding Ground Floor Facilities of Public Accommodation (FPAs). We've been planning civic and cultural FPAs for over 20 years. (See below 2005 study, a 79-page document).

In 2020, BPDA spent approximately \$25,000, drawn from a Chapter 91 account, to hire a consultant to once again study ground floor FPAs as part of the BPDA Fort Point Open Space planning process. Results of BPDA's study are on pages 86-89.

BPDA's track record Seaport-wide speaks for itself. When an opportunity arose in Fort Point last year, a unique chance to prioritize public competition, equity and diversity, BPDA once again elected to negotiate a million dollar deal with local insiders, without a single public disclosure for five months during the public permitting process. BPDA is now working on a public "room with furniture."



14. Personal Opinions

This section provides some personal opinions, in contrast to (largely) objective facts provided in earlier sections.

With the exception of the park area below, putting aside objections to BPDA's reconfiguration of Fort Point Park dimensions, I'm generally supportive of Sasaki's work programming Fort Point Park within the given boundaries.

I especially like the programming of the Necco Street park area (not shown below).

But as the only waterfront area to accommodate the public, the "Fort Point Channel park area" below should have been programmed to maximize capacity for public events.

A planned interactive fountain and sculpture on this site are an unnecessary distraction from the natural beauty of the Fort Point Channel. These amenities, limiting capacity for larger events, seem to be programmed to serve the abutting luxury condo now in permitting at 244-284 A Street. The plaza and amenities are not responsive to public workshops at this location. Furthermore, a fountain is seasonal, useless in winter, better suited to a large park rather than a small, highly valuable waterfront park.

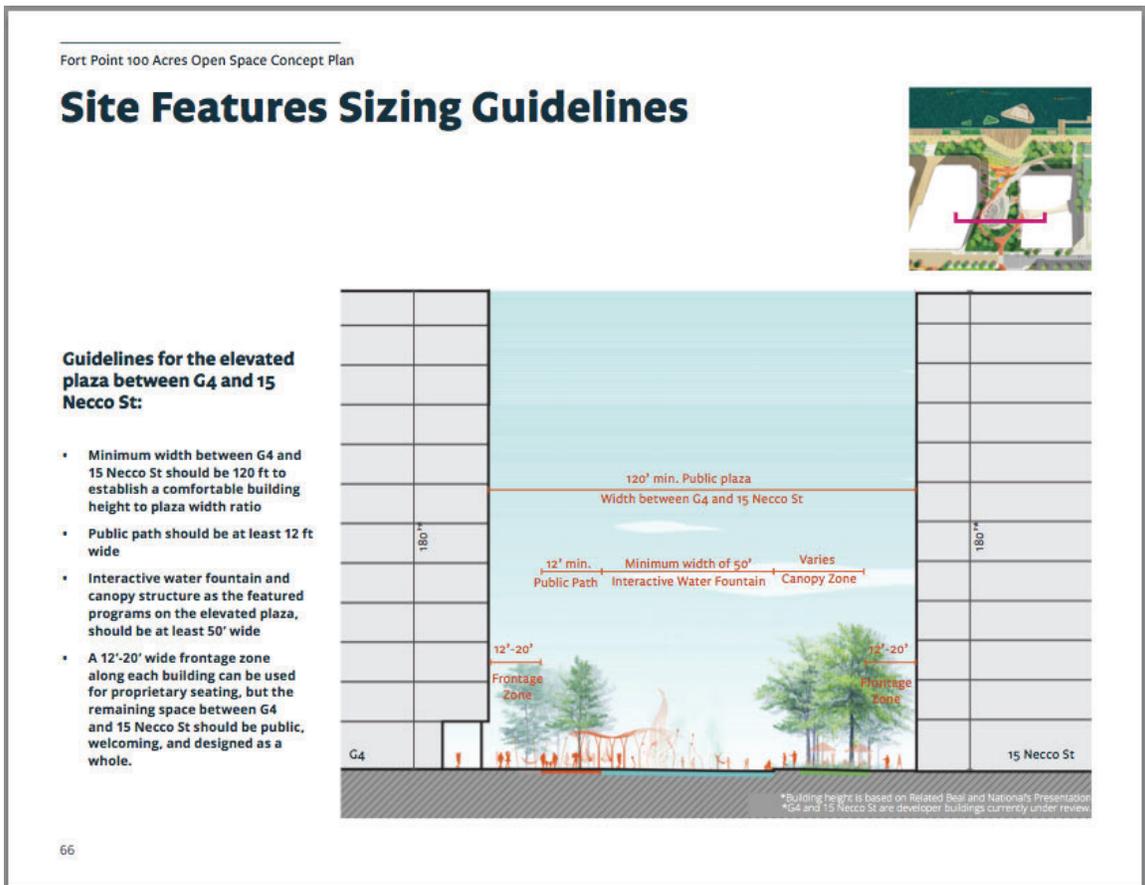


Given the diminutive size of this waterfront park area, I also object to BPDA's proposed 12'-20' "proprietary" frontage areas on either side.

NOTE: These frontage areas are not shown in BPDA's rendering of the park above.

Frontage for restaurant patio seating should be minimized in this already-narrow 120-foot gap between buildings.

The resulting public space for events (including the fountain and sculpture) is a meager 50 feet wide.



15. Conclusion

When I look at what's left of 20+ years of planning across the Seaport District, reflecting on the potential that existed (much of which was formerly permitted in original PDAs), it's honestly impossible to comprehend what BPDA's vision is of Boston is.

Every civic, cultural and park space obligation in 02210 (with the exception of A Street Park) has been either marginalized or jettisoned in years after initial permitting.

BPDA Fort Point Open Space Plan, Summarized

"Our highest bar for a signature waterfront is a 12' wide path at water's edge, expected to be submerged by 2070."

Signed,

Steve Hollinger
Resident and Business Owner





Joe Christo <joe.christo@boston.gov>

BPDA Fort Point Open Space Fort Point Plan Draft

Christine Vaillancourt [REDACTED]

Fri, Feb 5, 2021 at 1:37 PM

To: "joe.christo@boston.gov" <joe.christo@boston.gov>

Cc: arreen.l.andrew@boston.gov

To Whom It May Concern:

My big objection is G4 building. Here is my January 12 letter I sent with some corrections.

Best,
Christine Vaillancourt

Arreen,

Thank you for opportunity to submit comments.

When I look at the map of public green space in Boston, including Fort Point and Seaport, in recent presentation, it is shocking that the 100 Acres has incredibly less green space than downtown Boston. In fact, the Boston Commons is larger than entire 100 Acres Plan, buildings, roads and all.

I doubt the part of the park on the Post Office property will happen soon if at all as it is owned by the Post Office.

Soon it will become a permanent mistake in not saving more public green space while we have the opportunity. At least, building G4 must not block the public's distant view to the Channel. We must resist the temptation of valuable property on the water being reserved for buildings for monetary reasons over public interest which will be impossible to revert.

I hope Building G4 will be trimmed or re-shaped for more distant wider view to water from the park as in 2016 100 Acres Plan attached. (see attachment 2 with my line). It has changed from earlier drawings.

Would be great if the developers and city will re-instate the pedestrian bridge shown in the 2016 Plan (last attachment).

Seaport District and Fort Point Historic District is a destination to live, work—people also need open space/parks to play and relax. The pandemic has increased park use that is a savior during these hard times—makes us realize how important open space is. Parks bring people together promoting mental health.

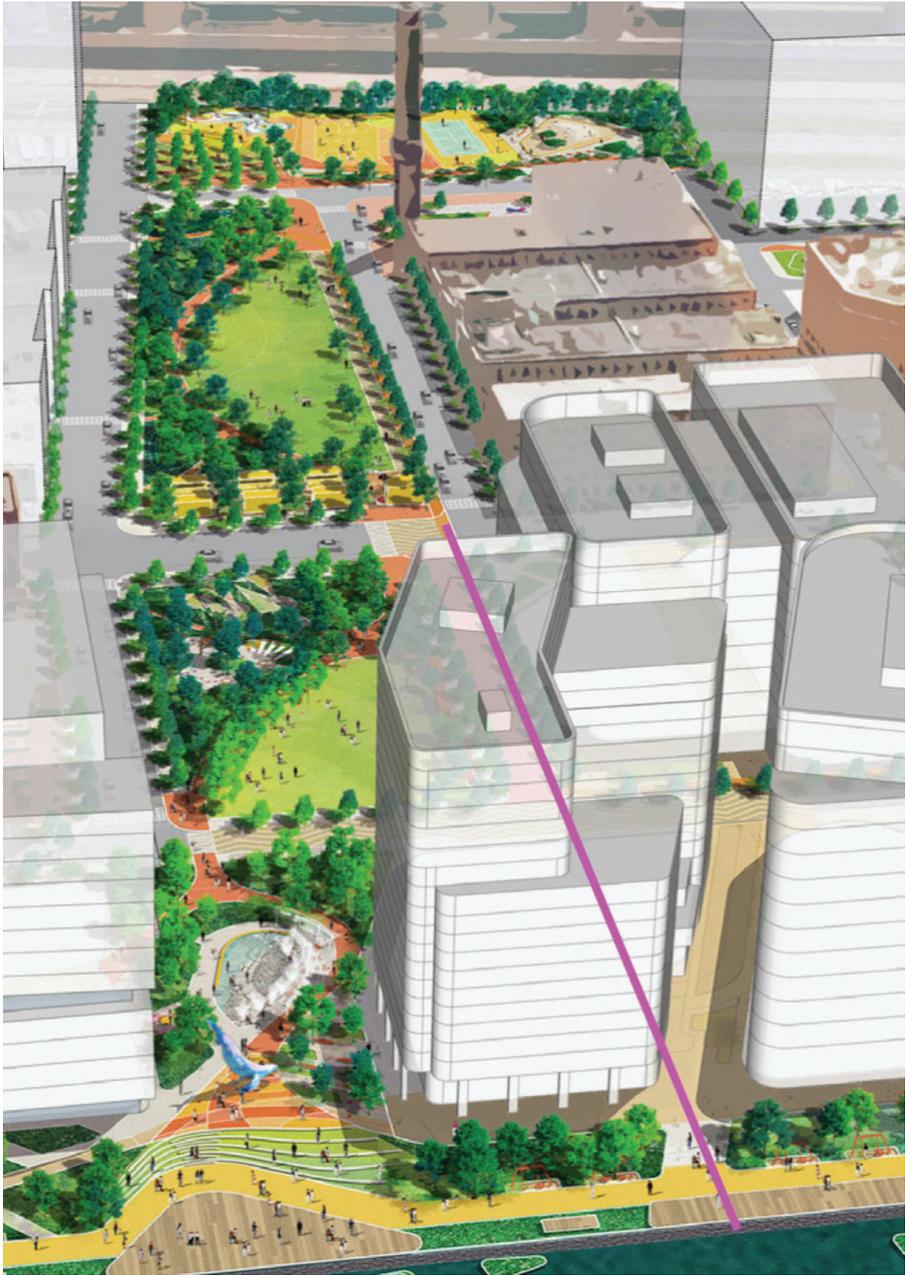
In addition, although probably not the issue at the moment, the building heights in the post office parking lot look oppressively high in such a historic district.

Best,

Christine Vaillancourt, Fort Point Resident since 1992, FPNA and FPAC member

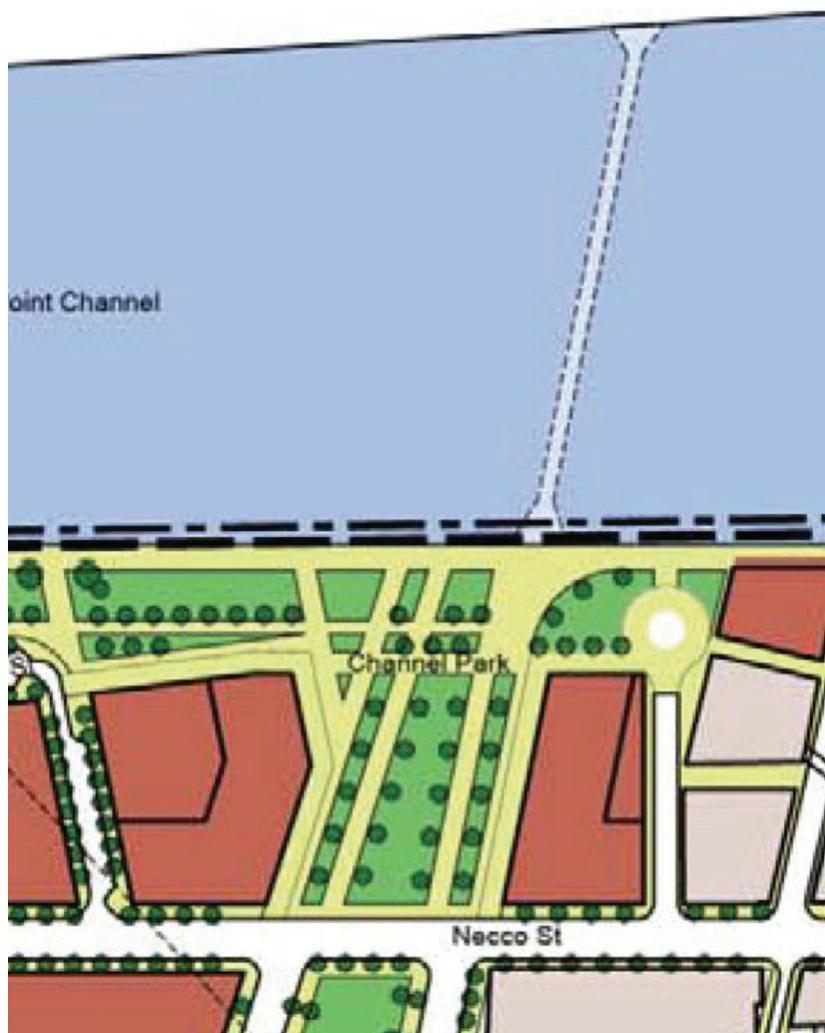














Joe Christo <joe.christo@boston.gov>

Fort Point 100 Acres Open Space Comments

Tammy New Yahoo <[REDACTED]>
To: joe.christo@boston.gov

Tue, Jan 26, 2021 at 7:27 PM

Hello Joe,

I am writing to express serious concerns about the proposed Related Beals buildings (density and height), however I understand comments today are to be specific to the open space.

To that end, I moved here 17 years ago to Fort Point Place SPECIFICALLY after reading every page of the 100 Acres Master Plan. The commitments made in that agreement gave me assurances that this would become a neighborhood I could grow into and enjoy for many, many years.

What is being proposed now do NOT meet the promises made and that is very concerning. First, these plans are deceiving because they are showing many parks on USPS land which are NOT approved and therefore should not be presented as something that is "in process". The land isn't even for sale, and as I have seen first hand over the years is that the pretty pictures they dazzle the community with, end up changing dramatically over time and we always get delivered much less than what was presented.

So taking the USPS parks out of the equation (since they are fantasy right now and not real) then we are left with much less open space than was committed to in the 100 Acre plan. Also, the prime land along the water has been squished!! That is where people will want to be. Much more than the park in between two giant buildings creating cold shadows, and wind tunnels. It is extremely unfortunate and upsetting that the public park is getting shifted mainly to less desirable areas and away from the water.

I desperately ask that the 100 Acre plan agreements be upheld - and whatever or who ever can do so - to ensure that Related Beal and other developers MUST commit to the design aspects that were negotiated in good faith almost 20 years ago.

Thanks you.

From Tammy Diorio





Joe Christo <joe.christo@boston.gov>

Fwd: There's a new message in your inbox

Emily Wieja <emily.wieja@boston.gov>
To: Joe Christo <joe.christo@boston.gov>

Tue, Jan 5, 2021 at 2:32 PM

FYI Joe- this was a reply to the Fort Point 100 Acres Open Space Concept Plan email.

Thanks,

**boston planning &
development agency****Emily Wieja***Web Content Manager*

617.918.4443

Boston Planning & Development Agency (BPDA)

One City Hall Square | Boston, MA 02201

bostonplans.org

----- Forwarded message -----

From: **Mailchimp Account Services** <accountservices@mailchimp.com>

Date: Tue, Jan 5, 2021 at 2:07 PM

Subject: There's a new message in your inbox

To: <emily.wieja@boston.gov>

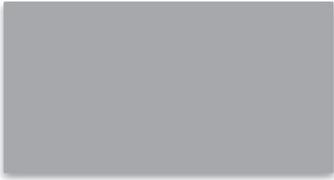
**mailchimp**

You have a new message from a contact in your audience, "Neighborhoods".

[REDACTED] wrote:

This is a good start. But if there are not more family sized housing in this area, you won't have the kids you have so hopefully illustrated. Families need more bedrooms. We raised our children in the city but high housing costs, 1 bedroom and studio arts being built, no schools in Fort Point or Back Bay or Beacon Hill or West End mean that families leave. That is a sad situation and the BPDA can help do something about it.

Karen Cord Taylor
[REDACTED]



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Joe Christo <joe.christo@boston.gov>

Hollinger Comments on BPDA Fort Point Open Space Concept Plan (Dec 2020 Draft)

Steve Hollinger · [REDACTED] Fri, Feb 5, 2021 at 12:14 PM

To: Richard McGuinness <Richard.McGuinness.bra@cityofboston.gov>, Joe.Christo@boston.gov, Chris Busch <chris.busch@boston.gov>

Cc: "Collins, Nick - Rep (HOU)" <Nick.Collins@mahouse.gov>, "Padien, Daniel (DEP)" <daniel.padien@state.ma.us>, Councilor Ed Flynn <ED.FLYNN@boston.gov>, Councilor Michelle Wu <michelle.wu@boston.gov>, Peter Shelley <pshelley@clf.org>, "atoffler@bostonharbornow.org" <atoffler@bostonharbornow.org>, Sara McCammond <smccammond133@gmail.com>, Tom Ready <ready.thomasj@gmail.com>, Deanna Moran <dmoran@clf.org>, Tim Logan <timothy.logan@globe.com>, Jim Canales <jcanales@barrfoundation.org>, Nick Black <nblack@thetrustees.org>, RYAN.WOODS@boston.gov, "Biele, David - Rep. (HOU)" <David.Biele@mahouse.gov>, CHRISTOPHER.COOK@boston.gov, "You, Susan (DEP)" <susan.you@state.ma.us>, "Hopps, Christine (DEP)" <christine.hopps@state.ma.us>, "Moran, Barbara" <bmoran@bu.edu>

Update: I received a number of rejected e-mails due to large document size (21mb PDF).

A copy of my comment letter to BPDA can be downloaded here:

http://www.fortpointer.com/Archive/20210205_hollinger_FP_Open_Space.pdf

If you have any problems downloading, let me know and I'll arrange distribution via another method.

My apologies for duplicate e-mails.

Steve

Good morning Rich, Joe, Chris et al.,

Please accept my comment letter regarding the BPDA Fort Point Open Space Concept Plan draft of December 2020 for today's comment deadline.

Pages 1-30 of my comment letter largely regard fact-based concerns and continued misrepresentations that have short-circuited a public dialog, particularly as it relates to the accurate dimensions and planning of areas of Fort Point Park along and near the Fort Point Channel.

Page 31 provides some personal opinions. I am generally satisfied with Sasaki's work, programming within the boundaries provided to them by BPDA, with the exception of the parcel of Fort Point Park nearest the Channel.

To be very clear, the conceptual planning of USPS property has served as a diversion during actual permitting of Fort Point Channel tracts for Related Beal. The Plan not only marginalizes the 100 Acres Plan as it is currently permitted in PDA #69 with respect to Related Beal property, it fails to responsibly capitalize on a unique opportunity to improve upon the 100 Acres Plan along and in areas nearest to the Fort Point Channel.

Information received from BPDA on 2/2 in response to my Public Records Request regarding BPDA communications with USPS has been illuminating. The Fort Point community has not had an open, honest dialog with what BPDA has proposed to USPS, particularly in terms of reconfiguring building massing with no change in gross floor area (GFA).

Lastly, while I have included a section regarding Climate Ready Boston, I've intentionally avoided an in-depth discussion regarding climate impacts. BPDA has not initiated any district-scale planning at grade for floodwater in any Boston neighborhood, nor has BPDA implemented a value capture mechanism from new development as a means to help fund mitigation solutions. My "experts" remain concerned.

While I don't expect my comment letter to make a difference, it may serve as a guide for historians and that alone will justify the time put into it. Perhaps planners in other cities with high-potential waterfronts can learn from Boston's mistakes.

All the best,

Steve Hollinger



Joe Christo <joe.christo@boston.gov>

Planning Comment Submission: Fort Point District Planning (100 Acres)

kentico@cityofboston.gov <kentico@cityofboston.gov>

Wed, Feb 3, 2021 at 2:41 PM

To: joe.christo@boston.gov, Richard.McGuinness@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 415

Form inserted: 2/3/2021 2:41:03 PM

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Document Name: Fort Point District Planning (100 Acres)

Document Name Path: /Planning/Planning Initiatives/Fort Point District Planning (100 Acres)

Origin Page Url: /planning/planning-initiatives/fort-point-district-planning-(100-acres)

First Name: Jason

Last Name: Muth

Organization: Sturdy Girl Properties LLC / NextHome Titletown Real Estate



Zip: 02127

Comments: Hi - I am the owner of the commercial condo unit at [100 A Street Unit 100](#), which is a new building diagonal from Artists for Humanity at the intersection of Southie proper and Fort Point, right down the street from this project area. I have also lived in South Boston for 18 years (now with my husband and 2 year-old daughter), and my husband operates his real estate brokerage and law firm from our commercial condo at [100 A Street](#). I just wanted to express my wholehearted support for this project. I just learned about it and reviewed the proposal. What an amazing addition to the neighborhood. We are seeing such positive transformation along A Street, and this project would greatly enhance the outdoor public spaces. Please let me know how we can help make this project happen! Thanks, Jason Muth



Joe Christo <joe.christo@boston.gov>

Planning Comment Submission: Fort Point District Planning (100 Acres)

kentico@cityofboston.gov <kentico@cityofboston.gov>

Fri, Feb 5, 2021 at 7:14 PM

To: joe.christo@boston.gov, Richard.McGuinness@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 420

Form inserted: 2/5/2021 7:13:59 PM

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Origin Page Url: /planning/planning-initiatives/fort-point-district-planning-(100-acres)

First Name: Naomi

Last Name: Mayeux

Organization: National Development



Zip: 02462

Comments: Comment Letter to Support of BPDA's Draft 100 Acres Open Space Concept Plan On behalf of Ownership of 15 Necco, we are writing in support of the concept plan draft for the Fort Point 100 Acres Open Space. We are excited for the opportunity to collaborate with the City of Boston and our neighbor Related Beal on developing this Park and this part of the Fort Point Channel. We were pleased to see the draft and are supportive of the direction in which the design is moving. The draft concept plan provides a terrific framework through which we can progress design to achieve the wonderful elements and amenities considering infrastructure, resiliency, and functionality. We will continue to support the BPDA in the collaborative effort with the neighborhood and stakeholders to create this plan for an engaging waterfront destination with a resilient future. We are confident that 15 Necco will fulfill several elements of the concept design with inviting accessible public space integrated seamlessly into the adjacent Property Owner's site, diverse programming, celebrations of the arts community, and connected resiliency measures. 15 Necco's interior ground floor spaces will provide a complementary extension from the outdoors of the Park with the Touchdown Space and Work Lounge. We look forward to the continued conversations with the neighborhood and the City, and developing design further to be able to physically bring this Park to life. Sincerely, Sherry Clancy, Naomi Mayeux, and Ed Marsteiner National Development Representing Ownership of 15 Necco



Joe Christo <joe.christo@boston.gov>

Planning Comment Submission: Fort Point District Planning (100 Acres)

kentico@cityofboston.gov <kentico@cityofboston.gov>

Fri, Feb 5, 2021 at 3:19 PM

To: joe.christo@boston.gov, Richard.McGuinness@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 418

Form inserted: 2/5/2021 3:19:02 PM

Form updated: 2/5/2021 3:19:02 PM

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Document Name Path: /Planning/Planning Initiatives/Fort Point District Planning (100 Acres)

Origin Page Url: /planning/planning-initiatives/fort-point-district-planning-(100-acres)

First Name: Chris

Last Name: Mancini

Organization: Save the Harbor/Save the Bay



Zip: 02210

Comments: I am writing to you today as Save the Harbor/Save the Bay's Executive Director with comments on the BPDA's Fort Point 100 Acres Open Space Concept Plan. We'd like to commend the BPDA for managing the extensive and inclusive community process both before and continuing through the COVID-19 pandemic. It is evident from the results that the BPDA has listened closely and incorporated feedback from throughout the process. We would like to note in particular the plan's commitment to diversity and inclusion through design and operations at multiple stages of the process so far and into the future. It is more important than ever that plans focused on development around Fort Point Channel and the Seaport include targeted action items to make the area accessible to all of Boston, not only those who are fortunate to live or work in the Fort Point Channel and Seaport Neighborhoods. The plan's repeated acknowledgement of the 100 Acres Open Space and the Fort Point Channel as a city-wide and regional destination, particularly for nearby communities that lack direct waterfront access is explicit about this inequity and the opportunity we have for positive change. We would also like to commend the inclusion of the Community Advisory Committee, whose membership will include BIPOC representation from beyond Fort Point, including Chinatown, Roxbury, and Dorchester as part of the operations strategy. We are very pleased to see the thoughtful integration of the South Bay Harbor Trail into this plan. As you know, Save the Harbor/Save the Bay was asked by the City of Boston to "quarterback" the effort to bring the South Bay Harbor Trail from the back of an envelope to final design and implementation. We have raised and invested more than one million dollars with invaluable contributions from David Giangrande of DCI and the late Bill Pressley of Pressley Associates to design the trail and develop signage and wayfinding that will connect the Channel and the Seaport to Chinatown, the South End and Roxbury at Ruggles Station. When it is completed it will provide a critical and safe connection to inland and upland communities of color,

reducing both vehicular traffic and carbon emissions. As you know, and as we wrote in our comments for the proposed project at 244 - 284 A Street, when the City of Boston asked Save the Harbor/Save the Bay and The Boston Children's Museum to lead and help fund an innovative and collaborative process that resulted in the award winning Fort Point Channel Watersheet Activation Plan, our overarching goal was to make the Fort Point Channel "The Next Great Place" in Boston, a truly welcoming and inviting place for all Bostonians, regional residents and visitors alike. Today, as we all look for ways to address racial injustice, which is a priority for Save the Harbor/Save the Bay, for the City of Boston, for the Commonwealth of Massachusetts, the project proponent, and for the Channel's property owners, businesses and residents as well, it is particularly important to keep that goal in mind. Toward that end, Save the Harbor intends to host a Watersheet Activation Roundtable to talk through the plan itself as a reminder for its purpose and goals, share thoughts on it, as well as opportunities for building on its foundation for inclusive and diverse public spaces and programs – David Spillane, who wrote the plan, and Waterways Chief Daniel Padien have agreed to take part and we hope BPDA will join us as well. The success of a public open space depends on both physical and programmatic connections to make it open, inviting and inclusive. Opportunities at every price point, particularly free events and programs, and the ability to touch the water will bring the most value to the public. Removing physical barriers is important, but eliminating perceived and "emotional" barriers in public spaces is essential to creating real and meaningful access for many who have been excluded in the past, such as low income families, BIPOC community members and people with disabilities. These are ambitious goals. At Save the Harbor we look forward to working together and turning these shared goals into a clear plan and strategic actions. I believe that the 100 Acres Open Space will serve as a model of resiliency and inclusion for future development and open space throughout the city. Sincerely, Chris Mancini Executive Director Save the Harbor/Save the Bay



Joe Christo <joe.christo@boston.gov>

Planning Comment Submission: Fort Point District Planning (100 Acres)

kentico@cityofboston.gov <kentico@cityofboston.gov>

Wed, Feb 3, 2021 at 10:05 PM

To: joe.christo@boston.gov, Richard.McGuinness@boston.gov, BRAWebContent@boston.gov

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Form inserted: 2/3/2021 10:05:06 PM

Form updated: 2/3/2021 10:05:06 PM

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Origin Page Url: /planning/planning-initiatives/fort-point-district-planning-(100-acres)

First Name: Dayna

Last Name: Isley

Organization:



Zip: 02127

Comments: This development must prioritize: *Green space for recreational use *Green space for climate change mitigation (in addition to/separate from recreational green space) *Accessibility for all *Biking, walking, and public transit priority What is the plan to accommodate these critical needs?



Joe Christo <joe.christo@boston.gov>

Planning Comment Submission: Fort Point District Planning (100 Acres)

kentico@cityofboston.gov <kentico@cityofboston.gov>

Sat, Feb 13, 2021 at 11:07 AM

To: joe.christo@boston.gov, Richard.McGuinness@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 430

Form inserted: 2/13/2021 11:06:32 AM

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Document Name: Fort Point District Planning (100 Acres)

Document Name Path: /Planning/Planning Initiatives/Fort Point District Planning (100 Acres)

Origin Page Url: /planning/planning-initiatives/fort-point-district-planning-(100-acres)

First Name: Ryuji

Last Name: Suzuki

Organization:



Zip: 02210

Comments: The Channel Center neighborhood is surprised with this draft plan that involves a drastic re-scope of USPS parcels U4, U5, and U6, which we suspect will be used to justify easing the height restriction of U6 to 150 feet, a drastic change from 100' in PDA 69. The trade-offs of the impacts arising from the new "active park" in U4, particularly the negative impact of the massing transfer, were never mentioned or described in the prior public meetings or drafts. The community meetings only talked about the open space plan in very generic terms with the PDA 69 map. This draft plan appears to be a subterfuge to set up an eventual justification of the massing shift. Your documents do not mention this massing shift from U4/U5 to U6, but it was recently revealed through Hollinger's public record request that the BPDA and USPS were discussing this "re-scope" (citing David Rouse of USPS) for most of 2020. I request that BPDA immediately discuss this massing shift publicly and directly and not change any document (including PDA 69 amendment) regarding any aspect of the USPS parcels without thorough public processes.



Joe Christo <joe.christo@boston.gov>

Planning Comment Submission: Fort Point District Planning (100 Acres)

kentico@cityofboston.gov <kentico@cityofboston.gov>

Thu, Feb 18, 2021 at 7:51 PM

To: joe.christo@boston.gov, Richard.McGuinness@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 436

Form inserted: 2/18/2021 7:50:44 PM

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Document Name Path: /Planning/Planning Initiatives/Fort Point District Planning (100 Acres)

Origin Page Url: /planning/planning-initiatives/fort-point-district-planning-(100-acres)

First Name: Cam

Last Name: Tulley

Organization: resident



Zip: 02210

Comments: BASKETBALL COURTS :)