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July 31, 2026

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS ON
THE DRAFT ENVIRONMENTAL IMPACT REPORT

PROJECT NAME : Reserved Channel Master Plan Development
PROJECT MUNICIPALITY : Boston
PROJECT WATERSHED : Boston Harbor
EEA NUMBER : 16802
PROJECT PROPONENT : Oxford Properties Group and Pappas Enterprises
DATE NOTICED IN MONITOR : November 26, 2025

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G.L. c. 30, ss. 61-62L) and Section 11.08 of the MEPA regulations (301 CMR 11.00), I have reviewed the Draft Environmental Impact Report (DEIR) and hereby determine that it **adequately and properly complies** with MEPA and its implementing regulations. The Proponent may prepare and submit for review a Final Environmental Impact Report (FEIR). As explained in the Certificate on the Environmental Notification Form (ENF), a Special Review Procedure (SRP) was established on April 1, 2024 to allow for deferred review of future phases. Under the SRP, the DEIR and FEIR are intended to focus on Phase 1 of the project and conceptual review of the full build (Master Plan) development program.

Project Description

The DEIR described an updated master development program, which has changed from that proposed in the ENF. As updated, the project now consists of the phased development (the “Master Plan Project”) of a 41.66-acre site with a total buildout of approximately 5,998,000 square feet (sf) of mixed uses on 11 development blocks.¹ The project is anticipated to be constructed over a 30-year period. The development blocks will range in size from 0.6 acres to 3.8 acres, with most of the blocks anticipated to be approximately 2.0 to 3.0 acres in size. As

¹ In the ENF, 12 development blocks were proposed, including Block L, a small parcel owned by the Proponent adjacent to Summer Street where a 3,500-sf building was proposed. Neither Block L nor any planned development of this parcel are mentioned or shown in the DEIR.

detailed below, the full buildout of the site will include approximately 4,079,000 sf of commercial office and research and development/laboratory (R&D) uses; 205,000 sf of hotel space (approximately 224 rooms) with facilities of public accommodation anticipated to include a public marina; 1,496,000 sf of residential uses (1,578 units); and approximately 218,000 sf of retail and/or amenities space. Development of each block as proposed in the Master Plan will be as follows:

Block A: Three buildings with approximately 407,000 sf of residential space (400 units) and a total of approximately 13,000 sf of retail and/or amenity space.

Block B: Three buildings with approximately 501,000 sf of residential space (535 units) and a total of approximately 30,000 sf of retail and/or amenity space.

Block C: Two buildings with approximately 567,000 sf of commercial R&D uses and approximately a combined total of 41,000 sf of retail and/or amenity space.

Block D: Four buildings, including two buildings with approximately 541,000 sf of commercial R&D uses and two buildings with approximately 190,000 sf of residential use (207 units). The four buildings will have a combined total of approximately 30,000 sf of retail and/or amenity space.

Block E: Three buildings, including two buildings with approximately 944,000 sf of commercial R&D uses and one building with approximately 212,000 sf of residential use (232 units). The three buildings will have a combined total of approximately 30,000 sf of retail and/or amenity space.

Block F: The entire parcel (1.67 acres) will be part of the Central Open Space (along with a portion of the adjacent Block G as described below). A park is proposed on this block; No buildings will be constructed on this block.

Block G: Two buildings, including one with approximately 325,000 sf of commercial R&D space and 5,000 sf of retail and/or amenity space, and a small building with 5,000 sf of amenity space. Approximately 1.04 acres of the Central Open Space will be located on this parcel.

Block H: Three buildings, including two buildings with approximately 749,000 sf of commercial R&D uses and one building with approximately 186,000 sf of residential use (203 units). The three buildings will have a combined total of approximately 19,000 sf of retail and/or amenity space.

Block I: Two buildings with approximately 746,000 sf of commercial R&D uses and approximately 25,000 sf of retail and/or amenity space.

Block J: One building with approximately 207,000 sf of commercial R&D uses and approximately 10,000 sf of retail and/or amenity space.

Block K: One building with 205,000 sf of hotel space with approximately 224 rooms and 10,000 sf of retail and amenity space. A public marina is also proposed on Block K.

The Master Plan Project (including Phase 1) includes a total of approximately 11.5 acres of open spaces, plazas, pedestrian connections, and other upland and waterfront spaces. The eight blocks comprising the main body of the site (Blocks A, B, C, D, E, F, G, and H) will be separated by a new street grid consisting of the northerly extension of F Street (which currently terminates at West First Street) through the site, and four new east-west streets (Anchor Street and Roads 1, 2, and 3) that will connect Pappas Way and E Street and intersect F Street Extension. Two new roads (Roads 4 and 5) will provide access to buildings proposed on Blocks I and J in the northern part of the site. According to the DEIR, a total of 4,079 parking spaces will be primarily provided in below-ground parking structures on each block, except for Block K where surface parking spaces will be constructed.

The Master Plan project will be constructed in three phases. Phase 1, which was previously described at a conceptual level in the ENF and is detailed in greater detail in this DEIR, consists of development of Blocks A, B, and C. Phases 2 and 3 were described for the first time in the DEIR. Phase 2 includes development of Blocks D, I, J, and K as described above; construction of a park on Block F; open space improvements along the Reserved Channel waterfront; and construction of Roads 4 and 5 and the eastern sections of Anchor Street and Roads 2 and 3. Phase 3 will include development of Blocks E, G, and H, as described above; construction of the western sections of Anchor Street and Roads 2 and 3 and extension of F Street from its interim terminus at Road 1 (constructed in Phase 1) to Anchor Street; construction of a segment of Fargo Street adjacent to the north side of Block J; decommissioning of the segment of Pappas Way between Summer Street and the proposed section of Fargo Street; and decommissioning of the southern end of Pappas Way between proposed Road 1 and East First Street and construction of open space in its place. According to the DEIR, Pappas Way will be relocated away from Reserved Channel by up to 50 feet south of Anchor Street; however, this relocation is not clearly depicted on plans or described in detail in the DEIR and should be fully described in the FEIR.

Phase 1 is expected to be constructed in the near term on a 12.86-acre portion of the 41.66-acre Master Plan Project site consisting of Blocks A, B, and C. Under proposed conditions, Phase 1 will include 5.74 acres of building footprints, 2.76 acres of open space including an approximately one-acre waterfront park, and 4.15 acres of road rights-of-way (ROW); the remaining 0.21 acres will continue to consist of watersheet. Phase 1 will include construction of eight buildings with a combined gross square footage of 1,559,000 sf, including 908,000 sf of residential space (935 units), 567,000 sf of commercial R&D space, and 84,000 sf of retail and/or amenity space. Blocks A and B are adjacent to each other and are located at the southwestern end of the site along West First Street. Block C is located along Pappas Way northeast of Blocks A and B, from which it is separated by Blocks D, E, F, and G. According to the DEIR, the eight buildings proposed in Phase 1 include:

Buildings A1 and A2: Two residential buildings with a shared podium that will include parking and retail/amenity space. Building A1 will be a six-story (77 ft high) building with 66 residential units located adjacent to West First Street. Building A2 will be a 16-

story (183 ft high) building with 221 units and will be located north of Building A1 (further away from West First Street).

Building A3: An 11-story (107 ft high) building with 113 residential units and ground floor retail and/or amenity space.

Buildings B1 and B2: Two residential buildings with a shared podium that will include parking and retail/amenity space. Building B1 will be a six-story (72 ft high) building with 77 residential units located adjacent to West First Street. Building A2 will be a 16-story (183 ft high) building with 291 units and will be located north of Building A1 (further away from West First Street).

Building B3: A building with 167 residential units and ground floor retail space that will be 7 stories tall along West First Street and increase in height to 15 stories (maximum height of 145 ft) further away from West First Street.

Building C1: A five-story (64 ft high) building directly abutting Pappas Way with 36,000 sf of retail/amenity space on the ground floor and 121,000 sf of commercial R&D space on the upper floors

Building C2: A 10-story (153 ft high) building located north of Building C1 with 446,000 sf of commercial R&D uses and 5,000 sf of ancillary retail uses.

A total of 1,095 parking spaces will be constructed in Phase 1. Below-grade parking will be provided on each block to support proposed uses on that block. Roadways to be constructed in Phase 1 include Road 1 (excluding its northern sidewalk), which will run along the northeast side of Blocks A and B between Pappas Way and E Street; an extension of F Street from West First Street to Road 1 which will separate Blocks A and B; and three temporary roadways to be constructed on the southern, western, and northern edges of Block C.

Phase 1 will include 2.76 acres of open space, including one acre of waterfront open space, the First Street Open Space south of Building A3, and landscaped corridors between Building A3 and Buildings A1 and A2, between Building B3 and Buildings B1 and B2, and between Buildings C1 and C2.

Special Review Procedure

An SRP was established to govern MEPA review of the phased buildout of the site. As set forth in the SRP, the Proponent has agreed to undertake the standard MEPA review process for the Master Plan Project, including the filing of an ENF, DEIR, and FEIR. Within these filings, proposed activities in Phase 1 will also be reviewed in more detail to allow for the Phase 1 project to complete MEPA review and proceed to state permitting.

Review of the Master Plan Project under the SRP is expected to include a conceptual description of the Master Plan Project, analysis of alternatives for the full buildout of the site, and a review of the impacts and potential mitigation measures, while information for Phase 1 is

expected to be more detailed and include analysis of alternatives for Phase 1 and all applicable environmental impacts and mitigation. Issuance of the Secretary's Certificate on the final filing will conclude MEPA review of the Phase 1 project, and shall mean that Agency Actions may be taken as related to Phase 1.

Under the SRP, the Proponent is required to submit Project Commencement Notices (PCNs) for future phases of the Master Plan Project as plans are developed. The PCNs will also review the consistency of the development proposed in each phase to the Master Plan Project, and provide more detailed descriptions of future phases and their impacts and mitigation.

The SRP established a Citizens Advisory Committee (CAC) to serve as a conduit for public input and review of the Phase 1 Project and the Master Plan Project. The CAC was initially formed as the advisory body for the City's Article 80 process, and to serve in lieu of the agency's customary Impact Advisory Group ("IAG"). In an effort to establish a CAC that is diverse in affiliation and experience and fairly represents a range of viewpoints and priorities, additional CAC nominations were solicited together with publication of the draft MEPA SRP, and the MEPA Office and City undertook efforts to reach out to community leaders from EJ populations within 1 mile of the site. Based on these efforts, three additional members were added to the CAC prior to formally designating the CAC through the SRP. Since the filing of the ENF, the membership has been modified to fill vacancies on the CAC, and the Proponent facilitated additional CAC meetings to provide updates on project development in May 2025. Consistent with the SRP and a Public Involvement Plan (PIP) established for the project, the project team organized a public meeting in advance of the DEIR filing as well as a follow-up meeting during the DEIR review period to solicit additional public input. The CAC is intended to serve as a common body for both the City's Article 80 process and the MEPA review process under the SRP. The SRP requires the Proponent to provide administrative support for the CAC, and the MEPA Office is required to be copied on invitations to all CAC meetings. Further information on activities of the CAC conducted since the ENF filing is described below.

Changes Since the ENF

The DEIR identified the changes to the Master Plan Project and Phase 1 since the filing of the ENF. The change in the Master Plan development program is shown in Table 1. The overall gross square footage of the Master Plan development program as proposed in the DEIR has increased slightly, with more residential space and less office/R&D and retail/amenity space.

Table 1. Master Plan development program proposed in the DEIR compared to development program proposed in the ENF.

Use	ENF	DEIR	Change
Residential (sf)	788,000	1,496,000	+708,000
Residential units	847	1,578	+731
Retail/Amenity (sf)	227,500	218,000	-9,500
Office/R&D (sf)	4,768,500	4,079,000	-689,000
Hotel (sf)	205,000	205,000	0
Total building square footage (sf)	5,989,000	5,998,000	+10,000

Most of the changes in the Master Plan development program are due to the revised Phase 1 development program. Table 2 provides a comparison of the Phase 1 development as presented in the ENF and DEIR. The Phase 1 development program described in the DEIR has much more residential space and much less office/R&D space than proposed in the ENF.

Table 2. DEIR Phase 1 development program compared to Phase 1 development program proposed in the ENF

Use	ENF	DEIR	Change
Residential (sf)	200,500	908,000	+707,500
Residential units	205	935	+730
Retail/Amenity (sf)	90,000	84,000	-6,000
Office/R&D (sf)	1,448,500	567,000	-881,500
Total building square footage (sf)	1,739,000	1,559,000	-180,000

In addition, the DEIR identified the following changes in the design of Phase 1 and the Master Plan Project:

- The southern and northern ends of Pappas Way will be closed to traffic in Phase 3, at which time the southern end Pappas Way (adjacent to Block A) will be converted to open space
- The section of Pappas Way south of proposed Anchor Street will be relocated away from Reserved Channel by up to 50 feet in a future phase
- A section of Fargo Street will be constructed at the northern end of Block J in Phase 3
- The location and sizes of proposed open space have been revised, but the total area of open space remains at 11.5 acres as proposed in the ENF
- Building A3, which was proposed as a small, one-story civic pavilion in the ENF, has been redesigned as an 11-story residential building with 113 units and ground-floor retail space
- Open space on Block A has been reduced in size
- Buildings A1, B1, and B3 Blocks A and B have been shifted further to the north away from West First Street by an additional 12 ft and Buildings A2, A3, and B2 have been moved 63 ft further away from West First Street to address concerns about building heights along West First Street
- A small open space will be provided on Block B at the corner of East Street and Road 1

As discussed below, Massport is evaluating the potential extension of F Street from its proposed northern terminus in Phase 3 to Summer Street; however, this is not proposed as a component of the Master Plan Project in the DEIR. As noted below, the timing and design of a potential off-site extension of F Street are not yet known and will be determined as a result of ongoing planning and design studies by Massport.

Project Site

The 41.66-acre Master Plan Project site, of which 12.86 acres comprise the Phase 1 site,

is bordered by Reserved Channel to the east, Summer Street to the north, E Street to the west, and West First Street to the south. A residential neighborhood is located south of West First Street. According to the Proponent, 38.47 acres of the Master Plan Project site (including Phase 1) are covered by impervious area, 1.37 acres are pervious, and 1.82 acres are within the waters of Reserved Channel. Commercial uses and the Boston Convention Center are located to the west and the Raymond L. Flynn Marine Park (RLFMP) (EEA# 8161) is located north of Summer Street. Pappas Way runs along the west side of Reserved Channel between Summer Street and the intersection of West First Street and East First Street. Approximately 38.23 acres of the Master Plan Project site are owned by Massport and will be ground leased to the Proponent, and the remaining 3.43 acres are owned in fee by the Proponent. Under existing conditions, the Master Plan Project site includes nine buildings with commercial and industrial uses, including office space and warehousing, with a combined square footage of 791,000 sf.

The Phase 1 site consists of two discrete areas within the Master Plan Project site. Contiguous Blocks A and B, which are owned in part by Massport and in part by the Proponent, occupy an area of approximately 5.65 acres of land at the southern end of the Master Plan Project site along West First Street between Pappas Way and E Street. Blocks A and B are covered entirely with impervious surfaces, including paved parking and laydown areas, and a 9,900-sf building used by a private bus company for bus storage and maintenance and ancillary office space. The 5.21-acre Block C is the second area to be developed in Phase 1. It is located along the eastern edge of the middle portion of the Master Plan Project site and is entirely owned by Massport. Block C extends across Pappas Way and includes an area of the Reserved Channel shoreline and watersheet. The majority of Block C is covered in impervious surfaces, including paved parking areas and a 62,800-sf warehouse building used by the United Parcel Service. A small publicly-accessible green space and a shared use waterfront path are located along water's edge on the Block C shoreline. According to the Proponent, 12.01 acres of the Phase 1 site are covered by impervious area, 0.64 acres are pervious, and 0.21 acres are within the waters of Reserved Channel.

The entire land area for the Master Plan Project site (approximately 39.84 acres, which excludes watersheet) lies on filled tidelands associated with Boston Harbor. As detailed below, only the approximately 13.71-acre area closest to Reserved Channel, including 2.48 acres within Block C (Phase 1), is subject to licensing under M.G.L. Chapter 91 (c. 91); the remaining land area of approximately 26.13 acres is landlocked filled tidelands. As shown on the Federal Emergency Management Agency's National Flood Hazard Layer, approximately 274,400 sf (6.3 acres) of the Master Plan Project site, including 2,464 sf (0.06 acres) of the Phase 1 site, is located within the 100-year floodplain (Zone AE) with a Base Flood Elevation of 12 ft NAVD88. The 100-year floodplain at the site is regulated under the Wetlands Regulations (310 CMR 10.00) as Land Subject to Coastal Storm Flowage (LSCSF).

The Master Plan Project site is not located within an EJ population; however, it is located within one mile of 21 EJ populations in Boston designated as Minority; Minority and Income; and Minority, Income, and English Isolation. The site is located within five miles of 555 additional EJ populations designated as Minority; Income; Minority and Income; Minority and English Isolation; and Minority, Income, and English Isolation. According to the DEIR, the

Designated Geographic Area (DGA) for the Master Plan Project and Phase 1 is one mile.²

Environmental Impacts and Mitigation

According to the ENF, the cumulative environmental impacts associated with the Master Plan Project (including Phase 1) include nonwater-dependent use of approximately 13.71 acres of filled tidelands; alteration of 447 linear feet (lf) of Coastal Bank and 274,400 sf (6.3 acres) of LSCSF; generation of 66,074 average daily trips (adt), an increase of 62,859 adt compared to existing uses; a total of 4,079 parking spaces (including 822 existing surface spaces that will be relocated into parking structures); use of 802,417 820,842 gallons per day (gpd) of water,³ an increase of 795,093gpd compared to 25,749 gpd under existing conditions; and generation of 729,470 gpd of wastewater, an increase of 706,062 gpd compared to 23,408 gpd of wastewater generation under existing conditions.⁴

The environmental impacts of Phase 1 alone include nonwater-dependent use of 2.4 acres of filled tidelands; alteration of 447 lf of Coastal Bank and 2,464 sf of LSCSF; generation of 13,910 unadjusted adt (revised since the ENF based on the updated development program); of 463 New parking spaces (for a total of 1,095 spaces); use of 189,102 gpd of water, an increase of 183,104 gpd compared to existing conditions; and generation of 171,911 gpd of wastewater, an increase of 166,459 gpd compared to existing conditions. As noted in the Scope below, the FEIR should provide updated information on the impacts of the Master Plan Project and Phase 1.

Measures to avoid, minimize, and mitigate environmental impacts include a reduction of 6.12 acres of impervious area on the Master Plan Project site from existing conditions, including a reduction of 1.03 acres in Phase 1; 11.5 acres of public open space, including 2.42 acres in Phase 1; implementation of multimodal transportation improvements, including new roads, sidewalks, and bicycle accommodations; high-efficiency buildings in Phase 1 that will meet the Specialized Energy Code; and construction of a stormwater management system for Phase 1 consistent with the Massachusetts Stormwater Management Standards (SMS). As discussed below, additional measures to mitigate for potential flooding impacts from on-site grading and resiliency measures in Phase 1 should be further explored in the FEIR.

Jurisdiction and Permitting

The Master Plan Project is undergoing MEPA review and is subject to a mandatory EIR because it requires Agency Actions and exceeds the thresholds at 301 CMR 11.03(3)(a)(5) (Provided that a Chapter 91 License is required, New nonwater-dependent use or Expansion of

² The ENF indicated that the Master Plan Project would generate more than 150 daily diesel truck trips, thereby extending the DGA to five miles around the site. The DEIR clarified that the Master Plan Project will generate a total of 244 daily truck trips; however, only 18 of these trips are New because existing uses at the site generate 226 truck trips per day.

³ The estimate of 820,842 gpd of water consumption provided in Chapter 8 of the DEIR is not consistent with the value of 802,417 gpd of water consumption listed in Table 2-1. The FEIR should clarify the proposed water use of the Master Plan Project and Phase 1.

⁴ Chapter 8 of the DEIR provides an estimate of 722,812 gpd of New wastewater generation, which is not consistent with the value of 706,062 gpd of New wastewater generation derived from Table 2-1. The FEIR should clarify the proposed wastewater generation of the Master Plan Project.

an existing nonwater-dependent use structure, provided the use or structure occupies one or more acres of waterways or tidelands); 301 CMR 11.03(6)(a)(6) (generation of 3,000 or more adt on roadways providing access to a single location); and 301 CMR 11.03(6)(a)(7) (construction of 1,000 or more New parking spaces at a single location). The Master Plan Project is required to prepare an EIR due to exceedance of EIR thresholds and pursuant to 301 CMR 11.06(7)(b) because it is located within a DGA (one mile) around one or more EJ Populations. Phase 1 will also meet or exceed the above thresholds.

The Master Plan Project also exceeds ENF review thresholds at 301 CMR 11.03(3)(b)(5) (New or existing unlicensed nonwater-dependent use of waterways or tidelands); 301 CMR 11.03(6)(b)(1)(a) (construction of a New roadway one-quarter or more miles in length; 301 CMR 11.03(6)(b)(14) (generation of 2,000 or more New adt on roadways providing access to a single location); 301 CMR 11.03(6)(b)(14) (generation of 1,000 or more New adt on roadways providing access to a single location and construction of 150 or more New parking spaces at a single location; and, 301 CMR 11.03(6)(b)(15) (construction of 300 or more New parking spaces at a single location). Phase 1 will also meet or exceed the above thresholds.

The Master Plan Project and Phase 1 will require one or more c. 91 Licenses from MassDEP and one or more Sewer Use Discharge Permits from the Massachusetts Water Resources Authority (MWRA), and are subject to the 2010 MEPA GHG Policy and Protocol (GHG Policy). The Master Plan Project and the Phase 1 also require Public Benefits Determinations (PBD) from the EEA Secretary under M.G.L. c. 91, § 18B. Future phases may meet or exceed additional review thresholds and/or require additional Agency Actions.

In addition, the Master Plan Project and Phase 1 require approvals from the Boston Water and Sewer Commission (BWSC) and one or more Orders of Conditions from the Boston Conservation Commission (or in the case of an appeal, a Superseding Order of Conditions from MassDEP). According to the DEIR, the Proponent is voluntarily undertaking reviews of the project by the Boston Planning and Development Agency, Boston Civic Design Commission, and Boston Transportation Department. The Master Plan Project and Phase 1 require a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the U.S. Environmental Protection Agency (EPA), and may require approval by the U.S. Army Corps of Engineers (ACOE) pursuant to the General Permits for Massachusetts. There may be additional permitting requirements for future phases, which will be described in future filings.

The project involves Land Transfers, in the form of one or more ground leases, from Massport to the Proponent. The Land Transfers involve a majority of the project site, and will facilitate development of a common and integrated development plan across the entire site. Therefore, MEPA jurisdiction is broad and extends to those aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment as defined in the MEPA regulations.

Review of the DEIR

The DEIR was generally responsive to the Scope included in the ENF Certificate. It identified changes to the project and provided updated plans and description of Phase 1 and the Master Plan Project, a supplemental alternatives analysis, a full transportation analysis of Phase

1, a coastal hydrodynamic modeling analysis to assess flood patterns under proposed conditions, and an analysis of energy efficiency measures that will be incorporated into the design of the Phase 1 buildings. The DEIR provided draft Section 61 Findings for Phase 1 and future phases, and responses to comments received on the ENF.

I note that the DEIR did not provide a table with updated impact calculations for Phase 1 or the Master Plan Project, as was required in the Scope included in the ENF Certificate; this should be provided in the FEIR in accordance with the Scope below. In addition, many of the responses to comments consisted of directing reviewers to an entire chapter or an appendix to address a comment without providing a direct response. This is not an acceptable response to a comment letter. The FEIR should include direct responses to comments received on the DEIR that are substantive and responsive to comments within MEPA jurisdiction, as detailed in the Scope below.

Alternatives Analysis

The DEIR included a supplemental analysis of Master Plan and Phase 1 design alternatives, as further described below.

Master Plan Alternatives

In the ENF, the Proponent reviewed No Build Alternative, which would maintain existing uses and conditions at the site, and a Reduced Build Alternative which would include a total of 3,400,000 sf of mixed-use development in 30 buildings. As summarized in the ENF Certificate, the No Build Alternative was rejected because it does not meet project goals or provide the environmental benefits associated with the Preferred Alternative, and the Reduced Build Alternative was not selected because it would provide much less open space and reduce the ability to incorporate climate resiliency design measures into the project than the Preferred Alternative. As required by the Scope included in the ENF Certificate, the DEIR evaluated a Second Reduced Build Alternative, a Reduced Height Alternative, a Raised Elevation Alternative, a Future Traffic Operations Alternative, and a Climate Resiliency Alternative.

The Second Reduced Build Alternative would include construction of approximately 3,483,000 sf of mixed uses in 22 buildings (including reuse of one existing building). According to the DEIR, this alternative would provide an additional 10,400 sf of open space compared to the Preferred Alternative; however, to reduce development costs, the site would not be elevated to provide climate resiliency. The Second Reduced Build Alternative would include a total of 32.52 acres of impervious area, generate 40,776 adt, use 682,570 gpd of water, and generate 620,518 gpd of wastewater. According to the DEIR, this alternative is infeasible because it would leave the site susceptible to coastal storm surge, and would add cost to the project because each building would have to be designed with its own resiliency measures. In addition, the reduced development program would make the project financially infeasible due to the loss of revenue associated with a smaller development program.

To address concerns by residents neighboring the site about the heights of buildings proposed in the ENF, the Proponent was required to evaluate a Reduced Height Alternative. The

Reduced Height Alternative would include 4,436,500 sf of mixed-use development (which is 380,000 sf less than proposed in the Preferred Alternative). The heights of buildings along West First Street (Blocks A and B) would be lowered to approximately 60 ft, but heights of buildings further away from West First Street would be higher to provide the same level development as proposed in the Preferred Alternative. Development would be reduced by approximately 560,000 sf in Phase 1, and 361,000 in the Master Plan Project. According to the DEIR, the Reduced Height Alternative would include 30.35 acres of impervious area, generate 45,610 adt, use 607,374 gpd of water, and generate 552,158 gpd of wastewater. According to the DEIR, the Reduced Height Alternative would reduce the number of residential units in Phase 1 and would not be economically feasible due to the smaller development program compared to the Preferred Alternative; for these reasons, it was rejected. However, as described above, changes to the project design since the ENF include establishing greater setbacks from West First Street for buildings on Blocks A and B; these changes are anticipated to address concerns about building heights along West First Street.

The Scope included in the ENF Certificate required an evaluation of strategies to improve resiliency of the site, such as raising the proposed elevation of the site, converting Pappas Way to open space or relocating it further away from Reserved Channel to allow for better flood protection along the water's edge, and on-site resiliency design that would connect to regional resiliency efforts. In the ENF, the site was proposed to be elevated to 15.8 ft NAVD 88, which is below the projected weighted average wave action elevation associated with a 2070 500-year storm event of 16.8 ft NAVD 88, as reported in the MA Resilience Design Tool. The DEIR evaluated a Raised Elevation Alternative which would elevate the site from 15.8 ft NAVD 88 as proposed in the ENF, to 16.8 ft NAVD 88. According to Section 2.3.3 of the DEIR, elevating the ground level to 16.8 ft NAVD 88 would require that additional space around the margins of the site be used for slope transitions between adjacent sites, rather than for the proposed open space or development program. In addition, the cost of the additional fill would make the project economically infeasible. The discussion of climate resiliency alternatives in Section 2.3.5 of the DEIR states that most of the Master Plan Project site will be raised to an elevation of 15.8 ft NAVD 88, which corresponds to guidance provided by the City. As detailed below, however, Chapter 10 of the DEIR describes most of the site as being proposed to be raised to elevation 16.8 ft NAVD 88, which is consistent with the description of conditions as modeled in the flood analysis provided in the DEIR. This discrepancy should be clarified in the FEIR with further consideration of climate resiliency and alignment with long-term planning scenarios.

The Scope included in the ENF Certificate required an analysis of how alternative street grid configurations could affect the broader transportation network. The DEIR reviewed two alternatives for Pappas Way: complete and partial decommissioning/closures of Pappas Way. A closure of Pappas Way to traffic would provide space for expansion of the waterfront open space for recreational use and climate resiliency. However, according to the DEIR, a complete closure of Pappas Way would significantly complicate access to the buildings on the east side of the Master Plan Project site for service and emergency access, in particular Buildings C1, D1, D2, I1, I2, and J1. Without the use of Pappas Way, a new roadway would be needed, which would reduce the area open space and impact the configuration of open space, including Central Open Space. As an alternative to complete closure, the DEIR studied, and adopted in a revised Preferred Alternative, the option of partial closure of Pappas Way in Phase 3. Specifically, the

southern end of Pappas Way at East First Street will be discontinued and converted to open space, and the northern end will be discontinued where it meets Summer Street under existing conditions. According to the DEIR, closing the ends of Pappas Way will redirect traffic toward F Street, which will reduce traffic volumes adjacent to the waterfront open space while still providing access to the eastern end of the Master Plan Project site for emergency and service vehicles and maintain a route between the residential area south of the site and Summer Street. As noted below, the traffic implications of the partial closure of Pappas Way will continue to be evaluated through development of the Master Plan Project.

Phase 1 Alternatives

The Scope also required analysis of an alternative which would include more residential space in Phase 1; as described above, the Preferred Alternative has been revised since the ENF with an increase of 708,000 sf of residential space (an increase of 731 units) and a reduction in office/R&D space of 689,000 sf. Given the high trip generation of the Master Plan Project, future PCNs should evaluate alternatives with more residential uses and less commercial space to minimize transportation impacts.

Environmental Justice / Public Health

As noted, the Master Plan site is located within one mile of (but not directly within) 21 EJ populations designated as Minority; Minority and Income; and Minority, Income, and English Isolation. Within the census tracts containing the above EJ populations within 1 mile of the Master Plan Project and Phase 1 sites, Chinese, Spanish/Spanish Creole, and Vietnamese are identified by the EEA EJ Mapping Tool as languages spoken by 5% or more of residents who also identify as not speaking English very well.

The ENF indicated that the Master Plan Project will generate over 150 daily diesel truck trips. As a result, the Scope included in the ENF Certificate required the Proponent to identify public engagement strategies and evaluate the impacts of project-generated vehicle emissions within a 5-mile DGA. According to the DEIR, the Master Plan Project will generate a total of 244 daily truck trips; however, only 18 of these trips are New because existing warehouse uses at the Master Plan Project site generate 226 truck trips per day. Therefore, the DGA for both the Master Plan Project and Phase 1 was modified to one mile.

Public Engagement

In accordance with the SRP, the Proponent prepared a Public Involvement Plan (PIP) which provides a framework for the Proponent's public engagement, including to EJ populations, during MEPA review of the Master Plan Project and Phase 1. According to the DEIR, the PIP has not been revised since it was included in the ENF. Key components of the PIP include a communications strategy for notifying the public about MEPA filings, public meetings, and updated project information; commitments to hold public meetings prior to each Master Plan Project filing and subsequent submissions under the SRP (i.e., prior to filing PCNs for future phases) (with language interpreters upon request); ongoing communication with stakeholders through individual meetings and distribution of project information; and consultation with the CAC.

The DEIR described public involvement activities conducted after the ENF certificate was issued. Three CAC meetings open to the public were held in May 2025 which addressed specific aspects of the project; however, the DEIR did not summarize these meetings or the input that was received, which should be provided in the FEIR as detailed below. A CAC meeting, which was open to the public, was held virtually on the evening of October 8, 2025 to present revisions to the Master Plan Project and Phase 1 development programs and designs and responses to comments received on the ENF. Key project revisions in response to comments received on the ENF included a greater building setback from West First Street to address concerns about heights of the proposed buildings and the decommissioning of the southern end of Pappas Way in Phase 3 and construction of open space in its place. In addition, the Proponent held a meeting of the CAC, which was open to the public, during the DEIR comment period (on the evening of July 7, 2026) to provide an overview of the contents of the DEIR and provide an update on the review of the Master Plan Project and Phase 1. Both of these meetings were publicized through the distribution of flyers at several locations in South Boston and Chinatown; physical mailings to abutters; public notices placed in a local newspaper; direct emails to CAC members, the EJ Distribution List, and all ENF commenters; and a notice posted on the [project website](#).⁵ All notifications and presentation materials were available in English, Spanish, Chinese, and Vietnamese. According to the DEIR, a similar approach to public engagement will be undertaken in the future. The FEIR should continue to follow the expectations and strategies committed to in the project PIP and, as appropriate, update the PIP based on community input received. In addition, the FEIR should describe continued efforts to meaningfully engage in small group discussions to take feedback and suggestions from affected stakeholders as final design and mitigation commitments are made as part of the MEPA process.

Baseline Conditions Assessment

The DEIR contained a baseline assessment of any existing unfair or inequitable Environmental Burden and related public health consequences impacting EJ Populations in accordance with 301 CMR 11.07(6)(n)1. and the MEPA Interim Protocol for Analysis of EJ Impacts. According to the DEIR, the data surveyed show some indication of an existing “unfair or inequitable” burden impacting the identified EJ Populations based on an evaluation of the factors below. The City of Boston meets the vulnerable health EJ criteria for childhood blood lead levels, low birth weight, and childhood asthma, as reported in the DPH EJ Tool.⁶ In addition, ten census tracts within the DGA meet the criteria for low birth weight and one census tract meets the criteria for childhood blood levels.

According to the DEIR, the following sources of potential pollution exist within the one-mile DGA, based on the mapping layers available in the DPH EJ Tool:

- Major air and waste facilities: 24

⁵ www.rcdboston.com

⁶ See <https://matracking.ehs.state.ma.us/Environmental-Data/ej-vulnerable-health/environmental-justice.html>. Four vulnerable health EJ criteria are tracked at the municipal level in the DPH EJ Viewer (heart attack hospitalization, childhood asthma, childhood blood lead, and low birth weight); of these, two (childhood blood lead and low birth weight) are also available at the census tract level.

- M.G.L. c. 21E sites: 37
- “Tier II” toxics use reporting facilities: 36
- MassDEP sites with AULs: 15
- Wastewater treatment plants: 14
- Underground storage tanks: 11
- EPA facilities: 3
- Road infrastructure: Numerous major routes, including Interstate 90 (I-90) and Interstate 93 (I-93), US Route 1, and State Routes 1A, 3, and 3A
- MBTA bus and rapid transit: 101 bus stops, 10 rapid transit stops, and two commuter rail stops
- Other transportation infrastructure: railway tracks and seven ferry routes
- Energy generation and supply: one power plant

According to the output report for Phase 1 generated from the MA Resilience Design Tool previously included in the ENF, the Phase 1 site has a High exposure to sea level rise/storm surge, stormwater flooding due to extreme precipitation, and extreme heat. EJ populations near the site are likely also exposed to these climate risks; these risks are likely to also apply to the sites of the other phases of the Master Plan Project.

The Scope included in the ENF Certificate required the DEIR to provide an assessment of (former) EPA EJ Screen⁷ environmental indicators and identify any air quality related indicators in EPA EJ Screen that are elevated at or above the 80th percentile of statewide average and provide these data for a 1-mile radius around the site.⁸ According to the EJ Screen analysis included in the DEIR and displayed in Table 3 below, environmental burden indicators for diesel particulate matter (DPM), nitrogen dioxide (NO₂), and traffic proximity and volume are elevated above the 90th percentile, while others are reported as remaining below 80th percentile.

Table 3. EJScreen air-related indicators for one-mile DGA

	Percentile as compared to state	One-mile DGA weighted-average value	State Average
Particulate Matter (PM _{2.5})	48	6.54 mg/m ³	6.52 mg/m ³
Ozone	53	56.6 ppb	56.7 ppb
Diesel PM (DPM)	96	0.76 mg/m ³	0.31 mg/m ³
Nitrogen Dioxide	93	15.5 ppb	8.8 ppb
Traffic proximity ¹	94	16,000,000	6,100,000
Toxic releases to air ²	67	3,500	2,800

1) Traffic proximity value is the daily vehicle count divided by distance

2) Toxic releases to air value is an average annual toxicity-weighted concentration

⁷ Reproduced versions of the EJ Screen desktop tool may be found at alternative sites (including: <https://pedp-ejscreen.azurewebsites.net/>).

⁸ The Scope included in the ENF Certificate also required an analysis of EJ Screen indicators for any EJ populations that are anticipated to be affected by diesel truck traffic over a 5-mile radius (including travel along state and interstate highways). As noted, analysis of project impacts within five miles were not conducted because the project will not generate over 150 New daily truck trips.

The results of the baseline assessment indicate that the project site and surrounding areas are subject to a high level of existing environmental and public health burdens, including air-related exposures that exceed 90th percentile of statewide rates. Considering such existing burdens, project impacts, especially related to increased traffic and associated air emissions, should be carefully assessed throughout the Phase 1 and Master Plan development to ensure adequate mitigation.

Phase 1 Impacts and Mitigation

The DEIR included a mesoscale analysis of mobile-source air emissions from vehicular traffic generated by Phase 1 using the EPA's MOVES4 emissions factor model. The MOVES4 model calculates estimates of emissions for vehicles expressed in a volume per distance travelled. As detailed below, Phase 1 will generate 2,437 vehicle trips per day; this estimate includes 56 daily truck trips, which is a reduction of eight trips compared to the truck trip generation of the existing warehouse uses that will be displaced by Phase 1. The analysis estimated emissions of Volatile Organic Compounds (VOCs), Oxides of Nitrogen (NO_x), Carbon Dioxide (CO₂), Coarse Particulate Matter (PM₁₀), and Fine Particulate Matter (PM_{2.5}) under 2025 Existing, 2033 No Build, and 2033 Build conditions using data from the transportation study. The results of the analysis are summarized in Table 4.

Table 4. Mesoscale analysis results (tons per year) for Phase 1.⁹

Conditions	VOCs	NO _x	CO ₂	PM ₁₀	PM _{2.5}
2025 Existing	6.1	2.8	7,092	1.02	0.21
2033 No Build	5.9	2.4	8,023	1.20	0.20
2033 Build	6.2	2.5	8,090	1.24	0.21
Project-generated Emissions	0.3	0.1	67	0.04	0.01

As shown above, emissions of all pollutants (except CO₂ and PM₁₀) are lower under 2033 No Build conditions compared to 2025 Existing conditions due to general improvements in engine technology and associated reductions in air emissions from vehicular trips. However, despite general improvements in engine technology, 2033 Build conditions are anticipated to increase overall emissions for VOCs, CO₂, and PM₁₀ as compared to existing conditions. Under 2033 Build conditions, Phase 1 project-generated trips cause emissions to increase by approximately 4% to 5% compared to 2033 No Build conditions. Project-generated emissions of each pollutant (except for CO₂) will be well below the 1 tpy permitting threshold used by MassDEP for stationary sources. As detailed below, the traffic analysis did not identify any significant impact to vehicular operations at area intersections such degradation of level of service (LOS) at any intersection from an acceptable level (LOS A through D) to an unacceptable level (LOS E or F). Because the DEIR analysis determined that Phase 1 will not have significant

⁹ The mesoscale results tables in the DEIR (Tables 3-3 and 3-4) included a lower value for NO_x emissions under Build conditions than under No Build conditions. During the review period (email dated July 23, 2026 from Geoff Starsiak) the Proponent provided corrected values for NO_x emissions which are used in this certificate. The FEIR should include an updated summary of the Phase 1 mesoscale analysis with the corrected emissions estimates.

traffic impacts, the DEIR did not identify project-generated traffic volumes along any specific streets and intersections in EJ populations, and did not include an evaluation of potential mitigation measures to minimize mobile-source emissions at intersections within EJ populations. As noted, the Phase 1 site is not located within any EJ census block groups, and the traffic study did not include any areas or intersections within the surrounding EJ populations within the DGA. The Scope included in the ENF Certificate required analysis of emissions generated by project-generated vehicle trips under Master Plan (full build) conditions. This analysis was not provided because the needed data would be derived from a traffic study of Master Plan conditions, which has not been completed and will be evaluated through future project filings pursuant to the SRP. Future filings should account for the cumulative impact of Phase 1 together with future development proposed at the project site.

According to the DEIR, Phase 1 will have minimal traffic and associated air quality impacts that could otherwise impact nearby EJ populations. Additional analyses of traffic and air emissions will be conducted in for future phases in subsequent MEPA filings. During the construction period, the Proponent will implement measures to mitigate noise, air quality, traffic, and water quality impacts that could affect EJ populations and surrounding residential areas. According to the DEIR, neither the Master Plan Project nor Phase 1 is likely to exacerbate sea level rise/storm surge risks to EJ population because the nearest EJ population is located approximately 0.25 miles from the site and measures to protect the site from future flooding (by elevating the site) will be designed to tie into the surrounding neighborhood so that floodwaters are not redirected to off-site properties. As discussed in the Climate Resiliency section below, further analysis of off-site flood impacts should be provided in the FEIR.

The Master Plan Project and Phase 1 include the phased construction of a stormwater management systems on each block that will be designed with the capacity to manage flows from the 2070 24-hour, 100-year storm event (10.9 inches of precipitation based on current data) to minimize off-site flooding. The project also includes measures to minimize extreme heat by reducing impervious area on the Master Plan Project site by 6.12 acres upon completion of Phase 3, planting approximately 1,000 trees, and construction of low impact development (LID) measures such as rain gardens. According to the DEIR, Phase 1 and the Master Plan Project will result in a net benefit to the community by reducing impervious area by 1.03 acres in Phase 1 and by 6.12 acres under the Master Plan Project (full build conditions), which will reduce runoff entering the combined sewer system and, in turn, may minimize combined sewer overflows (CSOs); providing 11.5 acres of public open space (of which 2.76 acres will be provided in Phase 1), including over three acres of waterfront open space; constructing a new street grid with pedestrian and bicycle amenities, including along West First Street; providing housing on the site; and creation of jobs during the construction and operations phases. The FEIR should discuss commitments related to on-site affordable housing and whether the project will include jobs training programs. Further discussion of open space design should be provided in the FEIR and in future filings under the SRP. I note that the SRP requires future filings to comply with MEPA policies and protocols, including climate resiliency protocols, in effect at the time of filing and applicable to each future phase.

Chapter 91/Tidelands

The entire project site lies on filled tidelands associated with Boston Harbor. In the ENF, the Proponent asserted that only approximately 13 acres of the closest to Reserved Channel, including 2.48 acres within Block C (Phase 1), is subject to c.91 licensing and the rest of the filled tidelands on the site are landlocked tidelands not subject to licensing. Pursuant to 310 CMR 9.02, landlocked tidelands are filled tidelands entirely separated by a public way in existence as of January 1, 1984, except for that portion of such filled tidelands within 250 ft of the nearest high water mark. As requested by MassDEP in its comment letter on the ENF, the DEIR provided confirmation that Pappas Way is a public way that was in existence as of January 1, 1984. Comments from MassDEP on the DEIR concur that only portions of the site within 250 ft of the mean high water mark along Reserved Channel are subject to c. 91 licensing. The DEIR provided updated areas of the Phase 1 and Master Plan sites that are filled tidelands subject to c. 91 jurisdiction. According to the DEIR, 2.64 acres of the Phase 1 site are subject to c. 91 jurisdiction, including 2.4 acres of filled tidelands and 0.24 acres of flowed tidelands (below the mean high water mark of Reserved Channel). On the Master Plan site outside of Phase 1, approximately 11.49 acres of land on Blocks D, I and J are subject to c. 91 licensing. In addition, a total of 2.09 acres of flowed tidelands are located on the Master Plan site (outside of Phase 1), including 0.5 acres at Parcel K. According to the DEIR, all tidelands on Block C, and a small area of Block K are designated as private tidelands; filled tidelands on Massport-owned property (Blocks D, I, and J) and the majority of Block K are designated as Commonwealth Tidelands.

According to MassDEP, proposed uses in both Phase 1 and the Master Plan are nonwater-dependent uses and are therefore subject to the use limitations, setbacks, dimensional standards, and public use requirements at 310 CMR 9.1- 9.53. In Phase 1, only the development of Block C is subject to c. 91 licensing. The DEIR included a review of how Phase 1 will comply with the applicable c. 91 standards for nonwater-dependent uses on Commonwealth Tidelands. The buildings will be located more than 100 ft from the mean high water mark along Reserved Channel, will occupy less than 50% of the area of filled tidelands, and will not exceed the maximum site-specific height limit of 63 ft. According to the DEIR, the buildings will include ground-floor Facilities of Public Accommodation (FPAs) such as retail and other public amenity space, on no less than 75% of the ground floors of each building on Block C. In connection with Phase 1, the Proponent will construct publicly-accessible open space between Buildings C1 and C2 and a one-acre waterfront open space with a pedestrian walkway on the east side of Pappas Way adjacent to Reserved Channel. The Waterways Regulations (310 CMR 9.53(2)(a)) also require that the project provide one or more shoreline facilities that promote water-based public activity. According to the DEIR, the Proponent is evaluating the feasibility of shoreline facilities such as a touch and go dock for water shuttles and/or a publicly-accessible dock for use by small personal watercraft such as canoes and kayaks. The DEIR indicates that the required water-based activity may be provided as part of the Master Plan project rather than in Phase 1; the FEIR should review the permissibility of deferring this Phase 1 requirement to a later phase of the project.

Pursuant to the Waterways Regulations at 310 CMR 9.03(3), Massport and MassDEP entered into a Memorandum of Understanding (MOU) (dated March 15, 2001 and amended June

15, 2022) which guides the development of Massport's properties in South Boston for uses other than water-dependent industrial uses. The MOU allows Massport to prepare a Waterfront Development Plan (WDP) for a development area which identifies alternative dimensional and use standards to those required by the Waterways Regulations and offsetting public benefits; alternatively, a development project can conform to the baseline regulations. A portion of Block D (proposed to be developed in Phase 2) where Building D2 is proposed to be constructed is located on filled Commonwealth Tidelands owned by Massport, but does not directly abut Reserved Channel. According to the DEIR, the Proponent anticipates that Block D will be designed to comply with all applicable requirements of the Waterways Regulations and will seek c. 91 approval through the standard licensing process. However, the Proponent anticipates that a WDP will be prepared for approval by MassDEP that will establish alternative dimensional and use standards to guide development of Massport-owned Blocks I & J. The DEIR described the WDP review and approval process, which is initiated by the submission of a Preliminary WDP to MassDEP and CZM after which MassDEP will consult with Massport and CZM and publish a public notice to establish a 30-day public comment period. Following the comment period, Massport will incorporate comments received on the Preliminary WDP and prepare a Final WDP for MassDEP's approval. The Proponent will then submit one or more c.91 License applications which must demonstrate that the proposed development complies with the provisions of the Final WDP. As Blocks I and J are proposed for a later phase of development, the FEIR should clarify the timing of the submittals of PCNs for future development of blocks for which a WDP will be prepared. The FEIR should provide further justification for why a WDP can be extended only to a portion of the project site without inclusion of the Phase 1 site.

The DEIR proposes construction of a pile-supported hotel and a public marina on Parcel K (proposed in Phase 2), which consists entirely of flowed tidelands. As previously noted in the ENF Certificate, the Waterways Regulations at 310 CMR 9.32 specify that a nonwater-dependent use (such as a hotel) is allowed only on previously authorized wharves, piers, pile fields or other pile-supported structures, and not on new pile-supported structures. Comments submitted by MassDEP note that a WDP cannot be prepared for Block K because it is privately owned; therefore, it must comply with all standards in the c.91 91 regulations. According to the DEIR, the Proponent is continuing to evaluate the appropriate regulatory pathway for redevelopment of Block K, but no additional details are provided; as requested by MassDEP, the FEIR should provide a demonstration that a hotel could be permitted on Block K.

Public Benefit Determination

The entire land area of project site is comprised of filled tidelands, including 26.31 acres of landlocked filled tidelands and 13.71 acres of jurisdictional filled tidelands, is subject to the provisions of *An Act Relative to Licensing Requirements for Certain Tidelands* (2007 Mass. Acts ch. 168) and the Public Benefit Determination (PBD) regulations (301 CMR 13.00). Consistent with Section 8 of the legislation, I must conduct a Public Benefit Review as part of the review of EIR projects located on landlocked tidelands that entail new use or modification of an existing use. I will issue a PBD for Phase 1 within 30 days of the issuance of a Certificate on the FEIR.

As required by the Certificate on the ENF, the DEIR included an analysis of the public benefits of Phase 1 in accordance with the criteria listed in the PBD regulations.

1. *purpose and effect of the development*

Phase 1 will redevelop an urban waterfront site that is currently used largely for industrial uses from which the public is excluded into a mixed-use development containing publicly accessible, resilient waterfront open space, up to 935 new residential units, and approximately 84,000 sf of ground floor retail and/or restaurant use, and to activate the Phase 1 site with FPAs and public amenities. The anticipated effects of Phase 1 include the addition of substantial open space, improved multi-modal access, greater resiliency to climate change impacts, and landscaping that will promote public use of the site.

2. *impact on abutters and the surrounding community*

According to the DEIR, Phase 1 will benefit abutters and the surrounding community by transforming an underutilized, largely impervious site containing surface parking lots and industrial buildings into an active, mixed-use property, the design of which will incorporate resiliency measures aimed at mitigating and adapting to the future potential of flooding as well as the anticipated challenges of climate change. Phase 1 includes pedestrian, bicycle, and streetscape improvements along West First Street and may include a neighborhood grocery store.

3. *enhancement to the property*

The redevelopment of the Phase 1 site will improve upon the existing infrastructure and revitalize an underutilized urban waterfront area. Phase 1 will provide safe public access to improved open space at the water's edge, create new housing, office, and retail uses, and provide resiliency to site from anticipated sea level rise and inundation during coastal storm events.

4. *benefits to the public trust rights in tidelands or other associated rights*

Phase 1 will provide improved public access to the Phase 1 site, including the Reserved Channel shoreline along the southern boundary of Block C, which will be redesigned as a one-acre waterfront park for public use. Phase 1 will provide ground-level FPAs, open space, and bicycle and pedestrian facilities to encourage public use of the site.

5. *community activities on the development site*

Phase 1 will create a new network of publicly-accessible open spaces that will foster greater physical and visual connectivity between the surrounding neighborhood and the Phase 1 site, including the Reserved Channel shoreline, while also increasing activity of a waterfront property largely surrounded by industrial uses with pedestrian foot traffic and publicly accessible recreational opportunities. Phase 1 will provide publicly-accessible recreational, transportation, and retail and service activities on the site.

6. *environmental protection and preservation*

Redevelopment of the Phase 1 site will be done in accordance with all applicable local, state, and federal environmental protection regulations. Phase 1 will include measures intended to mitigate

potential environmental impacts, including: the management of stormwater and the associated improvements in water quality, site resiliency through raising the elevation of Phase 1, providing 25% of the open space and streetscapes with canopy trees for shading, native and salt tolerant plantings, raised first floor elevations, increased pervious areas, construction of energy and water efficient residential units, implementation of TDM program, and measures to mitigate construction period impacts.

7. public health and safety

New publicly-accessible open spaces, streetscape improvements, and pedestrian and bicycle facilities will ensure that Phase 1 promotes safe and healthy transportation options and recreation. Streetscape improvements such as lighting, landscaping, and curbing will encourage walking and enhance overall safety. The design of Phase 1 will incorporate universally accessible design features into building and landscape plans.

8. general welfare

Phase 1 will improve the general welfare of the public by prioritizing pedestrian access and through the creation of public open space and FPAs that encourage the community to safely gather, recreate, and enjoy the nearby waterfront. Streetscape improvements, including lighting, landscaping, generous sidewalks and bicycle accommodations, will encourage walking and cycling, helping to improve both public health and safety in the neighborhood. The proposed transformation of the Phase 1 site into a community of residential, retail, and mixed-uses will increase daytime and nighttime activity and promote public safety.

The FEIR should include a revised discussion of public benefits reflecting specific and conceptual public benefits to be provided by Phase 1, including any changes in response to the Scope and public comments. Each PCN to be filed for a future phase of development should include a description of how the phase will comply with the PBD standards.

Wetlands and Stormwater Management

The DEIR provided updated information about existing wetland resource areas at the site and potential impacts to wetlands; however, as detailed below, it did not quantify or provide a detailed assessment of impacts to wetlands resource areas for Phase 1. Approximately 6.7 acres of the Master Plan project site, including 2,464 sf (0.06 acres) in the portion of the Phase 1 site along the Reserved Channel shoreline, are located within the 100-year floodplain with a BFE of 12 ft NAVD 88 (LSCSF). Additional wetland resource areas at the Master Plan site include 2,250 linear feet of Coastal Bank, and narrow bands of Land Under the Ocean (LUO) and Land Subject to Tidal Action (LSTA) along the Reserved Channel shoreline

The Proponent previously estimated, in the ENF, that 447 lf of Coastal Bank will be permanently impacted by the project. The DEIR did not confirm this impact or quantify the impacts to other wetland resource areas. However, given the planned waterfront open space improvements and placement of fill to elevate the site for resiliency, it appears likely that the full extent of resource areas on the site will be impacted. The DEIR provided a general review of how both the Master Plan and Phase 1 projects will comply with the relevant performance

standards. However, for Phase 1, the DEIR did not provide a detailed analysis of impacts to wetland resource areas, description of mitigation measures, or review of compliance with performance standards based on actual proposed activities; this should be provided in the FEIR.

Only the commercial buildings proposed on Blocks I, J, and K, which are to be constructed in Phase 2, will be located in the 100-year floodplain (LSCSF). As detailed below, these buildings have been designed with first floor elevations of 16.8 ft NAVD 88 for resilience under future climate conditions; the proposed first floor elevations exceed the Massachusetts Building Code requirements for construction in coastal floodplains, which requires first-floor elevations for commercial buildings to be one foot above the BFE (12 ft NAVD 88 in this case). Below-grade portions of these buildings will be dry or wet floodproofed.

The DEIR provided estimates of impervious area under existing and proposed conditions which included watershed areas. During the review period, the Proponent provided updated areas of pervious and impervious areas which excluded the watershed and are used herein; these updated calculations should be provided in the FEIR. Impervious area within the Master Plan site will be reduced from 38.47 acres under existing conditions to 38.47 acres, a reduction of 6.12 acres; impervious area within the Phase 1 site will be reduced from 12.01 acres to 10.98 acres, a reduction of 1.03 acres.

According to the DEIR, under existing conditions the Master Plan site runoff discharges to the City's drainage mains in E Street and West First Street, which convey flows to the 84-inch diameter CSO within Pappas Way which discharges to Reserved Channel. At the southern end of Pappas Way, runoff is collected in catch basins that discharge directly to the CSO; northern sections of Pappas Way discharge into Reserved Channel through storm drain outfalls. Under proposed conditions, Blocks A and B will drain to infrastructure in West First Street; Blocks D, F, I, and J will connect to a drainage main in Pappas Way that will be reconstructed when Pappas Way is elevated for resiliency; and portions of Blocks E, G, and H will drain into new drainage infrastructure to be constructed in Roads 1, 2, and 3, and portions fronting E Street will drain into the storm drain in E Street. Because the project will reduce impervious area and, as described below, will provide stormwater retention and infiltration systems on each block that do not currently exist on the Master Plan or Phase 1 sites, it is anticipated that the amount of stormwater runoff will be reduced from the existing condition and that the existing drainage system has adequate capacity for Phase 1. According to the DEIR, as development of the site proceeds, the Proponent will assess the capacity of the surrounding drainage infrastructure to ensure that adequate capacity exists, and interim measures will be implemented to accommodate the stormwater runoff from a particular block if necessary.

For both the Master Plan Project and Phase 1, individually-designed stormwater management systems will be accommodated for each block during the appropriate development phase. Best Management Practices (BMPs) such as infiltration and detention infrastructure will be located at the surface as part of the landscape design, and/or beneath designated open spaces. If additional detention is required, stormwater infrastructure may be incorporated into buildings or below buildings. In addition, the stormwater management systems will include BMPs such as stormwater treatment devices, and deep-sump hooded catch basins. According to the DEIR, the stormwater management systems for both Phase 1 and the Master Plan will comply with the

Massachusetts Stormwater Management standards (SMS) and BWSC requirements by incorporating BMPs that will remove at least 80% of the Total Suspended Solids (TSS) in stormwater, provide infiltration of runoff to meet the Boston Harbor Total Maximum Daily Load (TMDL) for pathogens, and maintain pre-development peak discharge rates under the present-day 2-, 10-, 25-, and 100-year storm events under proposed conditions. According to the DEIR, the stormwater management systems will be designed with the capacity to handle flows from projected storms under future climate conditions. The DEIR did not provide drainage calculations or plans of the proposed stormwater management system. As requested by CZM and MassDEP, additional details of the Phase 1 stormwater management system should be provided in the FEIR so that its compliance with the SMS can be assessed.

Traffic and Transportation

As required by the Scope in the ENF Certificate, the DEIR included a transportation study for Phase 1 generally consistent with the EEA/MassDOT *Transportation Impact Assessment (TIA) Guidelines* issued in March 2014. The DEIR provided more general information about transportation under Master Plan Project conditions.

Study Area Roadways and Intersections

The DEIR described existing and proposed roadway, pedestrian, and bicycle conditions, public transit capacity and infrastructure, roadway and intersection volumes and roadway safety issues. The analysis reviewed future conditions and vehicular and transit operations under No Build and Build scenarios using a seven-year planning horizon. The TIA analyzed the transportation impacts of the project in a study area including the following 21 intersections¹⁰:

- West First Street at F Street (unsignalized)
- West First Street at D Street (unsignalized)
- New Cypher Street at E Street (unsignalized)
- Pappas Way at Site Entrance C (unsignalized)
- Fargo Street at Summer Street (unsignalized)
- Fargo Street at E Street (unsignalized)
- East/West Street at Pappas Way (unsignalized)
- West First Street/East Second Street at Dorchester Street (unsignalized)
- East First Street at Dorchester Street (unsignalized)
- Cypher Street/New Cypher Street at D Street (unsignalized)
- West First Street at D Street (signalized)
- Fargo Street at D Street (signalized)
- Summer Street at D Street (signalized)
- D Street at I-90 On-Ramp (signalized)

¹⁰ The list of study area intersections was developed in consultation with MassDOT and the City of Boston and excludes the following intersections that were listed in the ENF Certificate: Congress Street at Port Lane, Congress Street at Starboard Lane, Congress Street at Northern Avenue, Haul Road at Northern Avenue, Northern Avenue at D Street. According to the DEIR, these intersections were excluded because Master Plan project-related trips are not expected to materially affect these intersections.

- Congress Street at D Street (signalized)
- Congress Street at B Street/I-93 On-Ramp/I-90 Off-Ramp (signalized)
- Cypher Street/Richards Street at South Boston Bypass (signalized)
- Summer Street at Pumphouse Road (signalized)
- Haul Road at Pumphouse Street (signalized)
- Summer Street at Pappas Way/Drydock Avenue (signalized)
- Summer Street/L Street at East First Street (signalized)

The majority of the roadways within the study area are under the jurisdiction of the City of Boston; however, Haul Road, Pappas Way and E Street are owned by Massport, and the South Boston Bypass Road and the I-90 and I-93 Ramps are under the jurisdiction of Massachusetts Department of Transportation (MassDOT).

As described above, the eight blocks comprising the main body of the Master Plan Project site (Blocks A, B, C, D, E, F, G, and H) will be separated by a new street grid consisting of four new roads between Pappas Way and E Street (Road 1, Road 2, Road 3, and Anchor Road); the extension of F Street through the center of the site from Road 1 to Anchor Street; Road 4, which will extend the short distance from Pappas Way and Road 5 between Block I and J; and Road 5, which will extend parallel to Pappas Way from Anchor Road to Fargo Street. According to the DEIR, Road 1 and Anchor Street will serve as active frontage roads for buildings and open space in the interior of the site. Massport has commenced a planning and design process for a potential extension of F Street from the terminus at Anchor Street proposed by the Master Plan Project through adjacent Massport-owned land (north of the Master Plan Project site) to the intersection of Summer Street at Drydock Avenue. The potential off-site extension of F Street would provide a continuous link through the Master Plan Project site between the Raymond L. Flynn Marine Park (RLFMP) north of Summer Street and South Boston residential areas south of the Master Plan Project site.

In Phase 1, vehicular access to Blocks A and B will be via a proposed internal roadway named Road 1 which runs between Pappas Way and E Street and intersects the initial extension of F Street (which currently terminates at West First Street) onto the site. Access to and egress from parking facilities below Buildings A2 and B2 will be provided from Road 1, and additional vehicular access to Block B will be provided from an existing curb cut on E Street. Block C vehicular access will be provided via a proposed internal roadway (Road C) with a combined entrance and exit to a parking facility under Building C2 that will provide parking for both buildings on Block C.

As described in the DEIR, the intersection of proposed Road 1 and E Street on the east side of E Street will be offset by approximately 60 to 65 feet from the intersection of Cypher Street and E Street on the west side of E Street. According to the DEIR, this offset will discourage trucks using Cypher Street, which is a designated truck route, from driving into the Phase 1 site. As a result, it will encourage the use of E Street as the primary freight corridor between industrial uses in the RLFMP and Conley Container Terminal and the regional road system, and discourage heavy truck traffic on Pappas Way and the waterfront open space along Reserved Channel. However, the intersection of Road 1 and E Street will be designed with an open space area on Block B at the southeast corner of the intersection which would allow for a

future realignment of the intersection should a future transit service require such a modification. According to the DEIR, a potential future realignment of the intersection could accommodate simultaneous 40- and 60-foot bus movements to support potential bus service through the Master Plan site, including along F Street if it were to be extended to Summer Street in the future. The City recommends that the second of Road 1 closest to E Street be designed as a pedestrian-only way that could be modified in the future if necessary to provide a transit or vehicular connection to the Master Plan Project site; this alternative should be evaluated in the FEIR.

As noted above, the northern and southern ends of Pappas Way are proposed to be decommissioned to transform Pappas Way into a multimodal travel corridor and waterfront open space along the Reserved Channel with limited traffic by directing traffic onto F Street. The proposed closure will redistribute traffic flows between the South Boston neighborhood and the South Boston Waterfront by redirecting traffic currently using Pappas Way to E Street and, as discussed below, F Street. According to the DEIR, these changes may affect traffic patterns in the area in the following ways, which will continue to be evaluated during the design and build out of the Master Plan Project, including:

- Traffic distribution on north/south streets between Broadway and West First Street/East First Street in the South Boston neighborhood, including how vehicle traffic will be affected by one-way directionality of streets south of West First Street (F Street, E Street) and the Master Plan Site street network north of West First Street. Analysis of operational, safety, and parking impacts associated with converting from one-way to two-way travel operations will be necessary
- Design of a future Summer Street/F Street/Drydock Avenue intersection, along with any proposed roadway reconfigurations raised in documents such as the RLFMP Master Plan such as the creation of a new Haul Road/Drydock Avenue intersection. These improvements are intended to create a more integrated street grid north of the Master Plan Site, with a particular benefit for the Master Plan Site of facilitating a north/south transit corridor along F Street between Silver Line Way and West First Street
- A future connection of E Street with Summer Street at Pumphouse Road, which would likely make the Fargo Street/Summer Street intersection obsolete and could improve traffic operations along Summer Street

The FEIR should clarify whether the proposed closure of the ends of Pappas Way is dependent on the future extension of F Street beyond the Master Plan Project site described below.

As noted above, the Proponent will construct a short extension of F Street to an interim terminus at Road 1 in Phase 1, and is planning a further extension to Anchor Street in Phase 3. Massport, in turn, is evaluating the potential extension of F Street from its Anchor Street terminus proposed in Phase 3 to Summer Street. According to the Proponent, potential benefits associated with this roadway extension include:

- Creation of a new north/south corridor between West First Street and Summer Street, with potential expansion further to the north to Northern Avenue, which

- would relieve pressure on the D Street corridor for north/south travel
- Facilitate the opportunity to change the character of Pappas Way to create a more reduced speed and pedestrian friendly street along the Reserved Channel
- Improve intersection operations along Summer Street by extending E Street, connecting F Street, and terminating the Fargo Street and Pappas Way intersections
- Provide opportunity to provide Silver Line and other transit service to the Master Plan Project site and other areas south of Summer Street
- Result in a more rationalized urban street grid that improves overall traffic flow and connectivity.

In its comment letter, Massport recommends continued coordination among stakeholders regarding the planning and design of F Street to preserve flexibility for future transportation improvements and connections through future phases of the Master Plan Project. According to the DEIR, on-going planning and design efforts by Massport will determine the final design and potential timing of an F Street extension from Anchor Street to Summer Street and to Northern Avenue, including a connection to the Silver Line; the design of the intersection of F Street and Summer Street; and opportunities modifications to Pappas Way. According to the DEIR, potential transit service along the F Street corridor will be detailed in future filings for subsequent phases of the Master Plan Project. As detailed below, the FEIR should provide potential designs of F Street that facilitate its use for transit, and report on the status of planning and design for the off-site extension of F Street.

Trip Generation

Based on trip generation rates published in the Institute of Transportation Engineers' (ITE) *Trip Generation Manual* using Land Use Codes (LUC) 221 (Residential Mid-Rise), 495 (Recreational Community Center, used to represent a proposed wellness/fitness center on Building C1), 710 (Office), 822 (Retail), 850 (Grocery Store) and 932 (Restaurant), Phase 1 will generate 13,910 unadjusted adt. The unadjusted trip generation was converted to person-trips by applying average vehicle occupancy (AVO) factors for each use provided to the Proponent by the City. The number of person-trips was then adjusted to account for internal trip capture (trips taken between on-site uses without travel on area roadways) and the mode share goals for South Boston developed by the City. The person-trips associated with the auto travel mode were then re-converted to vehicle trips using the same AVO factors provided by the City. Finally, the number of trips associated with existing uses was deducted to establish the 2,334 Net New daily vehicle trips generated by Phase 1, as shown in Table 5. Phase 1 will generate a total of 56 daily truck trips, a reduction of eight trips compared to the 64 truck trips generated by existing uses.

Table 5. Phase 1 Net New trips by travel mode (from Table 7-13 in the DEIR).

Mode	Mode share	Daily Trips	AM Peak Period trips	PM Peak Period trips
Auto	26%	2,334	304	301
Transit	35%	4,333	531	491
Walk	26%	3,148	343	320
Bike	13%	1,569	171	160

The DEIR included a trip generation estimate for the Master Plan project using a similar methodology as used for Phase 1. Using the same ITE LUCs used for Phase 1, plus LUC 311 (Hotel), the Master Plan Project will generate 66,074 unadjusted adt. Using the same methodology as described above for Phase 1, this estimate was adjusted to generate the estimate of Net New trips by mode, including 7,524 daily vehicle trips, shown in Table 6. According to the DEIR, the Master Plan project will generate 244 daily truck trips, an increase of 14 New truck trips compared to the 226 truck trips per day generated by existing uses at the site.

Table 6. Master Plan Net New trips by travel mode (from Table 7-20 in the DEIR).

Mode	Mode share	Daily trips	AM Peak Period trips	PM Peak Period trips
Auto	20%	7,524	1,293	1,190
Transit	50%	21,987	3,211	2,801
Walk	20%	8,710	1,300	1,190
Bike	10%	4,262	643	585

According to the DEIR, existing uses, including warehouses, on the Master Plan site generate 226 daily truck trips, of which 64 daily trips are associated with the uses on the Phase 1 site. Existing uses on the Master Plan site generate 19 truck trips in each peak period, including 5 truck trips in each peak period associated with uses on the Phase 1 site.

Traffic Operations

Using adjusted adt numbers presented above, the DEIR included capacity analyses for intersections in the study area for Phase 1; due to the conceptual nature of the Master Plan project and future transportation conditions in the study area, no analyses were conducted for the Master Plan project. Transportation conditions for Phase 1 in the study area were analyzed under 2025 Existing, 2033 No Build, and 2033 Build scenarios. For roadway intersections, the TIA provided capacity analyses and level-of-service (LOS) designations for through traffic and each turning movement for all peak periods. The LOS reflects the overall operations of an intersection, including traffic speed, delay, and capacity. For urban intersections, LOS D reflects an acceptable level of operations; LOS E or F reflect significantly congested conditions and long delays. Traffic volumes for 2025 Existing conditions were established using turning movement counts (TMCs) collected at the study area intersections in December, 2025. The No 2033 Build 2032 condition includes the trip generation associated with 16 development projects in the vicinity of the project site. In addition, the traffic volumes at MassDOT-controlled intersections, including Cypher Street/Richards Street at South Boston Bypass and Congress Street at B Street/I-93 On-Ramp/I-90 Off-Ramp, were increased at a rate of 1% per year to provide a conservative estimate of future background traffic volumes. Based on consultation with MassDOT, the Massachusetts May Transportation Authority (MBTA), Massport, and the City, no changes to the roadway network were incorporated into the 2033 No Build scenario.

According to the DEIR, under 2025 Existing conditions, all unsignalized intersections in the study area operate at LOS D or better. However, the signalized intersections of Congress Street at D Street, Summer Street/L Street at East First Street, Cypher Street at D Street and West

First Street at D Street operate at an overall LOS of E or F during at least one peak period, and at least one turning movement at most intersections operates at LOS E or F during peak hours. Under 2033 No Build conditions, all unsignalized intersections will continue to operate at LOS D or better; however, the signalized intersections of Summer Street at Pumphouse Road, Summer Street at Pappas Way/Drydock Avenue, Congress Street at D Street, Summer Street at D Street, and Cypher Street at D Street will deteriorate from overall LOS D or better under 2025 Existing Conditions to overall LOS E or LOS F under 2033 No Build conditions during at least one peak hour.

The 2033 Build scenario for Phase 1 includes the addition of project-generated vehicle trips to 2033 No Build Conditions. According to the DEIR, the addition of project-generated trips will generally increase congestion and delays at many intersections. However, all unsignalized intersections under 2033 Build conditions will continue to operate under LOS D or better, and no signalized intersections that operated at an overall LOS of D or better under 2033 No Build conditions will deteriorate to LOS E or F.

Pedestrian and Bicycle Access

The DEIR described existing pedestrian and bicycle conditions along roadways in the portion of the study area south of Summer Street and in the residential areas south of West First Street and East First Street. Sidewalks are present along residential streets, E Street adjacent to the site and D Street. A sidewalk is present on the west side of Pappas Way (along the project site) only adjacent to Blocks C and I. A shared use path is located east of Pappas Way along Reserved Channel which connects to sidewalks on Summer Street and East First Street. The study area does not contain a well-connected network of bicycle facilities. The shared use path along Reserved Channel connects to a bike lane on Summer Street, but not to any bicycle facilities at its southern end on East First Street. Bike lanes are also present on D Street and A Street. According to Bicycle Level of Stress (BLTS) scores developed by the City, routes near the project site are generally rated as stressful for bicyclists due to high traffic volumes, loading activity, and lack of dedicated bicycle facilities. There are two Bluebikes stations in close proximity to the site, and additional stations at other locations in the study area.

The project includes construction of new on-site bicycle and pedestrian facilities that will promote the use of these modes of travel to and from the site, including sidewalks, paths, and bicycle facilities along new streets and open space to be provided at the site. Along the section of West First Street adjacent to the site (Blocks A and B), the proponent will construct a two-way bicycle lane and dedicated pedestrian space buffered from vehicular traffic on the project site adjacent to the north side of the street. The project will also provide bicycle parking and additional Bluebikes stations in accordance with the City's Bike Parking Guidelines and bikeshare requirements.

As noted above, mode share goals established for the project include 35% transit, 26% walking, and 13% bicycling for Phase 1, and 50% transit, 20% walking, and 10% bicycling for the Master Plan Project. Based on the project's trip generation, the Proponent estimates that there will be approximately 4,726 daily trips to and from the site by bicyclists and pedestrians in Phase 1, and 13,127 trips for the Master Plan Project. In addition, some portion of the residents,

employees and visitors of the site who use transit (4,52 daily trips in Phase 1 and 22,348 for the Master Plan Project) will walk or bike between the site and a transit station or stop. In light of the high non-auto mode shares established for the project, the FEIR should provide additional analysis of off-site routes likely to be used by pedestrians and bicyclists, including transit users, and identify any improvements that may be needed to ensure that the project's mode share goals are met.

Public Transportation

As noted above, Phase 1 will generate 4,333 New daily transit trips and the Master Plan project will generate 21,987 New daily transit trips. There are five MBTA bus routes with stops within 0.5 miles of the site, including Routes 7, 9, and 10 with stops 0.3 miles away and Routes 4 and 11 which have stops 0.5 miles away. In addition, three several MBTA Commuter Rail lines operate out of South Station, which is 1.2 miles away. According to the DEIR, 49% of project-generated transit trips are expected to be taken on the Red Line, 26% on the three Silver Line routes, 16.5% on the commuter rail, and 8.5% on Bus Routes 7, 9, 10, and 11 (no riders are projected to use Route 4).

The DEIR included an analysis of the capacity of these transit services to accommodate additional ridership generated by Phase 1. The analysis was conducted using the methodology established in the MBTA's 2024 Service Delivery Policy. The methodology compares utilization rates (which reflects the number of passengers on a bus or subway/rail car) based on projected ridership under No Build and Build conditions to determine if project-generated transit trips will cause any service trips to exceed capacity. According to the DEIR, only one trip on Silver Line Route 1 (during the PM peak period) will exceed capacity (by two passengers) due to the addition of Phase 1 transit riders. According to the DEIR, the MBTA's Bus Network Redesign project is expected to result in new service on D Street close to the site by Bus Route 12, which will cause a redistribution of project-generated transit trips from other routes onto Route 12. According to the DEIR, the Phase 1 project includes replacement of deficient sidewalks, curb ramps, and pedestrian crossings between the Phase 1 site and existing and future transit services along Broadway (Route 9, via F Street), D Street (future Route 12, via Cypher Street or West First Street dependent upon future bus stop location) and Summer Street (Route 7, via Pappas Way). Given the high mode transit mode shares established for Phase 1 and the Master Plan and the distances between stops and the site, these improvements are important to help ensure the project meets its mode share goals. In addition, as noted by the City and the Metropolitan Area Planning Council (MAPC), shuttle service between the site and transit stations is needed to facilitate the projected transit use for Phase 1 and the Master Plan Project. The FEIR should provide additional details of the proposed pedestrian and bicycle improvements, and review potential shuttle service and other measures to support transit use as detailed below.

An analysis of the Master Plan project's impacts on transit capacity was not completed because it would require significant assumptions about future ridership, routes, schedules, and head ways, and therefore would not provide a reliable assessment of future conditions. Future MEPA filings by the Proponent for Phases 2 and 3 will include assessments of the impacts of each phase on the transit system. As described above, Massport is evaluating a potential off-site extension of F Street to Summer Street and Northern Avenue which could provide a corridor for

Silver Line and other transit service to the Master Plan Project site in the future. According to the MBTA, there are currently no plans to provide service on F Street. However, as detailed below, in light of the important role that transit service on F Street could provide, the FEIR should evaluate potential designs of F Street at a conceptual level, including the potential to design F Street as a transit-oriented corridor.

Parking

There are 822 existing surface parking spaces at the Master Plan Project site. A total of 4,079 parking spaces are proposed in the Master Plan Project (3,257 New spaces), including 1,095 spaces in Phase 1; however, according to the DEIR, the number of parking spaces to be provided in future phases will be refined based on monitoring of Phase 1 parking usage.

Phase 1 will include a total of 1,095 spaces, including 463 New spaces and 632 existing spaces on the Phase 1 site that will be relocated into the proposed parking garages. Parking will be provided in enclosed, primarily below-grade garages that will serve each block. According to the DEIR, the proposed number of parking spaces in Phase 1 is below both the maximum that would be allowed under the City's parking guidelines (1,224 spaces) and the number of spaces calculated using the parking rates published in the ITE Parking Generation Manual, 6th Edition (2,521 spaces).

According to the City, off-street parking on the Master Plan Project site is governed by the South Boston Parking Freeze, which allows a maximum of 29,760 off-street parking spaces. Residential parking spaces in excess of one space per unit and all commercial parking are limited to this "bank" and require permitting through the Air Pollution Control Commission (APCC). According to the City, there were 1,064 spaces in the parking freeze bank as of August 23, 2023. Massport has its own allocated "bank" of spaces to distribute for its properties; however, the DEIR does not clarify if the Master Plan Project's parking supply will draw from Massport's bank. As detailed below, the FEIR should account for the proposed parking supply with respect to the available spaces under the parking freeze.

According to the DEIR, no parking spaces will be specifically allocated for proposed retail, restaurant, grocery, and wellness/fitness center uses. According to the DEIR, the peak parking demand for Phase 1 is projected to occur at 11:00 AM and the lowest demand at 9:00 PM. Parking operations will be actively managed to maximize the efficiency of parking, including shared parking based on peak occupancy times of day with the goal of incentivizing parking on-site rather than in the surrounding neighborhood. Parking will be managed by using the following techniques:

- Pricing based on local market rates
- Daily rather than monthly or annual pricing
- Real-time availability signage
- Unbundled parking
- EV charging stations in compliance with City of Boston regulations (EV charging stations at 25% of parking space), where applicable, and the Massport Sustainability

Design Guidelines (EV stations at a minimum of 10% of parking spaces and an additional 15% to be constructed as EV ready)

- Offering parking cash-out
- Preferential spaces for car-share or high occupancy vehicle parking.

Transportation Demand Management

The following TDM measures to be implemented by Phase 1 were previously identified in the ENF:

- Ongoing membership and participation in the local Transportation Management Association (TMA) and its programs.
- Provide real-time transit information in building lobbies per BTM review. Make available transit maps, schedules and other information relevant to commuting options.
- Staff will be available to coordinate TDM services.
- Provide marketing information on multimodal travel options and benefits to employees and visitors on an annual basis.
- Provide an information package on travel alternatives to new employees.
- Provide car-sharing spaces (e.g., Zipcar) subject to demand.
- Provide long-term covered and secure bicycle parking, and short-term bicycle parking for visitors in compliance with the BTM Bike Parking Guidelines, including provision of end-of-trip facilities for cyclists such as showers and changing facilities. Bicycle maintenance areas are proposed to be included, one area for each block proposed under Phase 1.
- Provide additional bike parking in response to demand.
- Provide consolidated off-street service delivery and loading facilities for all tenants.
- Provide service/loading dock manager to manage and coordinate service area and any curbside loading for buildings.

The DEIR proposed additional TDM measures, including the parking management measures described above, at least two annual events that promote multimodal travel, emergency ride home services or reimbursement, and participation in the MBTA Perq program. According to the DEIR, the Proponent will also evaluate measures such as provision of transit pass subsidies, parking pricing, carpool incentives, and support for micromobility. The Proponent will closely evaluate the provision of micromobility solutions such as e-bikes and e-scooters, including provision of rental equipment for tenants and charging infrastructure in bicycle rooms.

According to the DEIR, the Proponent will implement a transportation monitoring program to support compliance with the TDM program and assess the ability of the Phase 1 site to facilitate walking, bicycling, transit, and carpooling trips. As noted above, even higher non-auto mode share goals have been established for the Master Plan project. Future PCNs will include the results of transportation monitoring of Phase 1 to inform Master Plan project design and mitigation, including TDM commitments.

Water / Wastewater

According to the DEIR, the Master Plan Project will use approximately 820,842 gpd of water; however, no water usage for Phase 1 was provided. The Master Plan Project will generate a total of 745,470 gpd of wastewater, which is an increase of 722,062 gpd compared to existing uses. Phase 1 will generate 306,890 gpd of wastewater; however, the DEIR did not provide an estimate of New wastewater generation associated with Phase 1. The FEIR should provide updated water use and wastewater generation estimates for Phase 1 and the Master Plan Project. The FEIR should clarify the phasing of proposed water and sewer infrastructure, and whether any off-site water or sewer infrastructure improvements are proposed.

Under existing conditions, water is provided to the site via water mains in E Street, Summer Street, West First Street, and Pappas Way owned by BWSC. According to the DEIR, new connections to the BWSC water distribution system will be designed and constructed in accordance with BWSC requirements. According to the DEIR, the design of buildings proposed by the Master Plan Project will include water-conserving fixtures and sensor-operated sinks and toilets in common areas. In addition, landscaping will be designed with a mixture of drought-resistant trees, shrubs, and groundcover, and the irrigation system will include water-conserving features such as timers, soil moisture indicators, and rainfall sensors. The draft Section 61 Findings to be provided in the FEIR should include specific mitigation measures for Phase 1.

The existing sanitary sewer system on the site discharges flows to BWSC mains in E Street, Summer Street, West First Street, and Pappas Way. This system is connected to two CSO pipes which converge on the Master Plan Project site and discharge flows to a 72-inch pipe that is connected to an outfall in Reserved Channel. According to the DEIR, new connections to the BWSC sewer system will be designed and constructed in accordance with BWSC requirements. The Proponent will be required to mitigate its wastewater flows by removing infiltration and inflow (I/I) at a ratio of 4:1 (4 gallons of I/I removal for each gallon of wastewater generated by the project). According to the DEIR, the Proponent anticipates meeting this requirement by removing 2,888,248 gpd of I/I flows in the existing sanitary sewer system. Proposed laboratory uses that discharge chemicals or other industrial waste will require a Sewer Use Discharge Permit from the MWRA. In addition, as required by the MWRA, oil/gas separators will be installed in parking garages and loading docks.

Hazardous Waste

The DEIR provided an updated discussion of releases of oil and hazardous materials (OHM) on the Master Plan Project identified by Release Tracking Numbers (RTNs) that are regulated under M.G.L. 21E and the Massachusetts Contingency Plan (MCP) regulations at 310 CMR 40.00. In the ENF, the Proponent identified three RTNs applicable to the Master Plan Project. The DEIR identified 11 additional RTNs on the Master Plan Project site (a total of 14 RTNs), including four on the Phase 1 site. According to the DEIR, soil contaminants on the Master Plan Project site are primarily associated with historic fill placed on the site in the 1940s and/or releases of petroleum and other OHMs from past industrial and naval uses on the site. Specific soil contaminants from these historical sources consist primarily of metals, polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), and petroleum constituents.

According to the DEIR, assessments of contaminants in groundwater determined that concentrations of contaminants exceeding Reportable Concentrations are found in four discrete areas, including portions of Blocks A/B, D, and H, and within Pappas Way.

According to the DEIR, all of the RTNs have reached regulatory closure under the MCP. Two of the RTNs were closed with Activity and Use Limitations (AULs) placed on the sites to maintain a condition of No Significant Risk. One of the AULs was placed on a release area (RTN 3-0017742) that spans portions of Blocks A and D, and the other AUL was placed on a different part of Block D (in the location of RTN 3-0031529). According to the DEIR, the AULs require maintenance of a Protective Cover over the releases area to minimize the potential exposure to underlying contaminants and restrict certain uses, such as residential uses. In connection with the redevelopment of areas subject to AULs, the Proponent will undertake response actions which will achieve a Condition of No Significant Risk without the need for any use restrictions so that the AULs can be amended.

A Licensed Site Professional (LSP) will be responsible for ensuring that construction activities which disturb contaminated soil or groundwater are conducted in accordance with the MCP. The LSP will evaluate site conditions where activities are proposed in an area where an RTN has been assigned, and conduct additional soil, groundwater, and/or soil gas sampling as appropriate. A Release Abatement Measure (RAM) Plan will be prepared to describe how the project will be constructed in accordance with the MCP, including remediation activities, handling and disposal of contaminated soil and groundwater, and health and safety precautions. The RAM Plan will include provisions for monitoring dust and VOCs within and around the perimeter of the of the work zone and, if contaminated groundwater is encountered, pumping, treatment, and discharge of groundwater in compliance with an MWRA Temporary Construction Dewatering Permit or NPDES Dewatering and Remediation General Permit.

The following long-term mitigation measures may be implemented, if necessary, based on site-specific risk characterizations conducted by the LSP:

- Placement and maintenance of protective cover to minimize potential mitigate exposure to impacted soil
- Use of vapor barriers and sub-slab depressurization systems to mitigate potential for vapor intrusion into buildings in areas of where VOC contamination is present
- Implementation of AULs to prescribe allowable and prohibited uses and to require ongoing operation, maintenance and/or monitoring of the mitigation measures if necessary to achieve a condition of No Significant Risk

In accordance with climate change resiliency requirements added to the MCP regulations in 2024, a climate change vulnerability assessment will be prepared which assesses the vulnerability of the site to four primary exposure parameters (precipitation, sea level rise, extreme weather, and temperature change) so that appropriate mitigation measures can be incorporated into the design of response actions. The LSP will also assess soil and groundwater conditions in order to ensure that infiltration systems are not constructed in areas where infiltration could exacerbate groundwater contamination or cause migration of contaminants.

*Climate Change**Adaptation and Resiliency*

An output report from the MA Climate Resilience Design Standards Tool prepared by the Resilient Massachusetts Action Team (the “MA Resilience Design Tool”)¹¹ for Phase 1 was previously provided in the ENF. According to the output report, the Phase 1 project has a high exposure rating based on the project’s location for sea level rise/storm surge, extreme precipitation (urban flooding) and extreme heat. Based on the 60-year useful life identified for the Phase 1 project and the self-assessed criticality of the proposed buildings and roadways, the Tool recommends a planning horizon of 2070 and a return period associated with a 500-year (0.2% annual chance) storm event (with a projected weighted average wave action water surface elevation of 16.8 ft NAVD 88) with respect to sea level rise/storm surge and a 100-year (1% annual chance) storm event (10.9 inches of precipitation in 24 hours) with respect to extreme precipitation. The Tool does not identify return periods for proposed open space. The output report recommends planning for the 90th percentile with respect to extreme heat (which indicates an increase in extremely hot days as compared to a historical baseline). As noted above, the DEIR did not include an evaluation of the capacity and performance of the proposed Phase 1 stormwater management system under future climate conditions; this should be provided in the FEIR. As noted above, the DEIR did not describe proposed stormwater management systems for the Master Plan; however, the DEIR asserts that they will be constructed with the capacity to attenuate flows from the 2070 100-year storm event.

As noted above, building first floor elevations will be approximately 16.8 ft NAVD for non-residential buildings and approximately 17.8 ft NAVD 88 for residential buildings. In the ENF, the majority of the project site ground level was described as being constructed to an elevation of 15.8 ft. According to the DEIR (Chapter 10), the Master Plan and Phase 1 sites will be raised by 5 to 8 feet over existing conditions to approximately 16.8 ft NAVD 88, with Pappas Way and the open space on Block F to be constructed at elevation 15.8 ft NAVD 88, and the waterfront open space along Reserved Channel will be at elevation 12.6 ft NAVD 88 to allow access to the water.¹² These elevations are generally consistent with the weighted average projected wave action water elevation of 16.8 ft NAVD 88 for the 2070 500-year storm event identified by the Tool. According to the DEIR, the proposed site elevations will be established during construction of each phase of the project.

The DEIR included a coastal hydrodynamic modeling analysis to assess potential changes to flood patterns, including the extent and depth of flooding, flood velocity, and redirection of floodwater, under existing conditions and proposed conditions after the Phase 1, Phase 2, and Phase 3 sites are elevated for resiliency purposes. The analysis evaluated flooding under existing and proposed conditions for the present-day 100-year flood (elevation 10.2 ft NAVD 88) and the projected 2050 500-year storm event (peak stillwater elevation of 13.2 ft NAVD 88) and 2070 500-year storm event (peak stillwater elevation of 15.1 ft NAVD 88) using

¹¹ https://resilientma.org/rmat_home/designstandards/

¹² As noted above, the alternatives analysis in the DEIR included an alternative which would involve raising the site to elevation 16.8 ft NAVD 88 which was rejected because it would result in less open space and due to the cost of the volume of fill needed to achieve that elevation. The FEIR should confirm the proposed final site elevations.

projections from the Massachusetts Coast Flood Risk Model (MC-FRM). The analysis determined that the flood extents, including off-site flooding, will not increase under any modeled scenario, and that at each phase of development the site will experience significant reductions in flooding under proposed conditions (raising the site elevation to up to 16.8 ft NAVD 88). With respect to flood velocity and flood flow patterns, however, the analysis determined that at each phase of the project floodwaters will be redirected around the site under its proposed elevated condition and channelized along corridors such as Summer Street and toward E Street and Fargo Street, which in concert with increased velocities and flood depth under future conditions, will increase the likelihood of damage to some of the roads along the perimeter of the Master Plan Project site, including potential structural damage at one location along Fargo Street under Phase 2 and Phase 3 conditions. As noted by the Massachusetts Office of Coastal Zone Management (CZM), the analysis does not appear to have included the effects of precipitation-based flooding, including the effects infiltration, detention, storage and other conditions associated with the proposed stormwater management system. The DEIR did not identify measures to minimize these impacts; additional details of proposed conditions and analysis future flooding conditions should be provided in the FEIR as recommended by CZM and in accordance with the Scope below.

The City is partnering with the ACOE to potentially provide a district-wide flood protection system along Reserved Channel. As detailed in the Scope, the FEIR should provide additional information about potential district-wide flood resilience systems and how proposed on-site flood resilience will be designed to be consistent with and contribute to a district-wide system that offers protection to neighboring areas. The DEIR does not make clear whether future ACOE flood protection and/or other elevations or grading proposed from the waterfront to the development pads are assumed in the coastal flood modeling presented above. The FEIR should make these assumptions clear, and should address the documented impacts in the DEIR resulting from velocity changes and channelization of flows. To the extent future ACOE solutions or waterfront treatment may mitigate such impacts, the FEIR should discuss what interim solutions will be deployed until such long-term solutions are in place.

Greenhouse Gas (GHG) Emissions

The DEIR reviewed the proposed design of Phase 1 building envelopes and energy systems for each of the proposed uses, including office/laboratory/R&D space, residential, and retail/amenity. The DEIR described mitigation strategies that will be incorporated into the design of building space for each use, as described below.

In its comments on the ENF, the Department of Energy Resources (DOER) encouraged the Proponent to adopt high-efficiency measures into the design of the buildings, including:

- Residential buildings designed to Passive House standards
- In buildings with high ventilation requirements, space heating and cooling provided by heat recover chillers (primary), electric air source heat pumps (ASHP) sized to 25% of peak heating load (secondary), and gas space heating (tertiary)
- All-electric space heating and cooling using ASHPs in all building types other than highly ventilated lab/R&D space

- Low air infiltration, and glazed wall systems accounting for no more than 50% of the total building envelope in lab/R&D space (both highly and normally ventilated)
- Electric hot water heating (specifically electric ASHP water heating in residential and retail/amenity space)
- Electric cooking, washing, and drying in residential and retail/amenity space.

DOER's comments on the ENF indicated that no energy modeling would be needed in the DEIR if all of its recommendations were adopted by the Proponent. The DEIR asserts that the project will commit to implementing all of DOER's recommendations, with the exception of ASHP hot water heating, and therefore did not provide an energy modeling analysis. The DEIR provided an analysis in support of the Proponent's decision to use electric resistance hot water heaters in residential and retail/amenity space.

As detailed in DOER's comment letter, the DEIR did not provide clear and consistent firm commitments to adopt the recommended GHG reduction strategies; this should be provided in the FEIR. As detailed in the Scope below, the FEIR should include additional analysis if the Proponent chooses to adopt measures other than those recommended by DOER.

Electric resistance hot water heating is proposed to be used in all building types, including residential and retail/amenity space where DOER recommended the use of ASHP hot water heating systems. According to the DEIR, the use of ASHPs for domestic water heating is economically infeasible because their use would reduce stationary-source GHG emissions from Phase 1 by less than 1% but increase capital costs by 31%. As noted by DOER and the City, the conclusions of the Proponent's analysis are inconsistent with current building practices and at odds with the energy savings and GHG reductions measured for two recent multifamily projects in Boston. Furthermore, the Proponent's analysis uses an unusually low hot water usage and energy intensity, and as a result underestimates operational costs of electric resistance hot water systems.

According to the DEIR, Phase 1 buildings will be constructed with solar-ready rooftops. Parking facilities on privately -owned parcels (Blocks A and B) will provide EV charging stations at 25% of the parking spaces, and construct the remaining 75% of the spaces to be EV-ready, as required by the City; however, the DEIR indicates that the parking garage on Block C, which is owned by Massport, will comply with Massport guidelines which require EV charging stations at only 10% of the parking spaces and construction of an additional 15% of spaces to be EV-ready. As detailed in the Scope below, the Proponent should commit to the City's EV parking requirements for all buildings, or provide an analysis of why that mitigation measure is infeasible.

Mobile Source Emissions

As detailed above, the DEIR analyzed the project's mobile-source emissions of air pollutants, including GHG emissions in the form of CO₂, using the EPA's MOVES4 emissions model and data from the traffic study. The analysis calculated emissions in the transportation study area under 2025 Existing, 2033 No Build, and 2033 Build scenarios. The analysis determined that Phase 1-generated vehicle trips will generate 67 tpy of CO₂. To mitigate its

emissions of GHG, Phase 1 includes construction of EV charging stations and EV-ready parking spaces, and implementation of TDM measures, as described above.

Construction Period

The DEIR included a review of mitigation measures that will be implemented to minimize construction-period impacts. The Proponent will prepare one or more Construction Management Plans (CMPs) for review by Massport and the City. The CMPs will include detailed information about construction activities and schedules, specific construction mitigation measures to minimize air quality, water quality, transportation, and noise impacts. The DEIR identified the construction-period mitigation measures listed below.

- Air emissions: Provisions for fugitive dust suppression and containment will include measures such as wet suppression, minimizing movement of loose materials that could generate dust, street and sidewalk cleaning, and truck covers. Construction equipment will be fitted with emissions control devices and ultra-low sulfur diesel (ULSD) will be used in all trucks and construction machinery. The Proponent will require contractors to comply with the Massachusetts ant-idling law.
- Noise: A noise mitigation plan will be prepared to minimize generation of noise levels that would impact off-site receptors. Mitigation measures will include conforming to City work hour regulations; using appropriate mufflers on all equipment and ongoing maintenance of intake and exhaust mufflers; use of muffling enclosures on continuously-running equipment; selecting the quietest of alternative items of equipment where feasible; scheduling equipment operations to synchronize the noisiest operations with times of highest ambient levels and to maintain relatively uniform noise levels; limiting vehicle and equipment idling time; and locating noisy equipment at locations that protect sensitive locations by shielding or distance.
- Stormwater: Prepare and implement a Stormwater Pollution Prevention Plan (SWPP) in connection with the project's NPDES CGP, which will include the use of sedimentation and erosion controls.
- Transportation: Measures to minimize impacts on traffic flow and safety include preparation of a Construction Period Traffic Management Plan for review and approval by Massport and the City which identifies designated truck routes (including routes that avoid EJ populations to the extent feasible), temporary roadway improvements needed to accommodate construction vehicles, the use of police details to maintain traffic operations and safe conditions for pedestrians and bicyclists, scheduling any necessary road closures to off-peak hours, avoiding full or partial street closures to the extent possible, encouraging construction workers to use public transportation, and providing on-site parking for construction workers.
- Construction and demolition (C&D) waste: The contractor will prepare a Construction Waste Management Plan for each phase that will identify procedures and best management practices for the segregation, recycling, and reuse of construction and demolition materials, with the goal of minimizing the volume of landfilled waste.

The FEIR should review comments provided by MassDEP regarding standards and requirements associated with demolition, including asbestos handling, and include commitments to comply with all requirements.

SCOPE

General

The FEIR should follow Section 11.07 of the MEPA regulations for outline and content, as modified by this Scope. The Scope should be addressed within the context and issues detailed in the Review of the DEIR section above and, where relevant, comment letters. The FEIR should identify measures the Proponent will include to further reduce the impacts of the project since the filing of the DEIR, or, if certain measures are infeasible, the FEIR should discuss why these measures will not be adopted. Given that the comment period on the FEIR cannot be extended, I encourage the Proponent to circulate the FEIR well before it is published in the Environmental Monitor for comment. As detailed below, the FEIR should include a Response to Comments section which provides direct and substantive responses to comments received on the DEIR and the Scope below.

Project Description and Permitting

The FEIR should include updated site plans for existing and post-development conditions. Plans should be legible and provided at a reasonable scale. Plans should clearly identify all major project components, including buildings and roadways, open space areas, pedestrian and bicycle facilities, impervious areas, stormwater and utility infrastructure, and the additional information described below; in addition, the area of each of these components should be quantified. To facilitate review of the DEIR, plans should show and label each development block. The FEIR should include a plan showing all proposed open spaces by name as referenced in the DEIR, or as may be modified in the FEIR; quantify the area of each open space; describe proposed surface treatments, including the use of pervious pavers and LID measures; and quantify the area of impervious area and landscaped area within each open space. For both the Master Plan and Phase 1, the FEIR should provide a clear and consistent description of proposed uses and any changes, include a table that quantifies the area of each proposed use in each building as proposed in the ENF, DEIR, and FEIR. For both the Master Plan and Phase 1, the FEIR should provide, in tabular format, description of the project's temporary and permanent impacts to environmental resources, including but not limited to trip generation, parking, wetland resource areas, tidelands, land alteration, impervious area, water use, and wastewater generation as presented in the ENF, DEIR, and FEIR; to the extent that any of these quantified impacts have changed from those identified in the ENF or DEIR, the FEIR should specifically identify the reason for the change. As detailed below, the FEIR should articulate the existing and proposed site grades for each phase and full build conditions across the entire site, and provide plans and sections that clearly and consistently depict these conditions. The FEIR should include an update on the status of permitting, approvals, and agreements needed for both Phase 1 and the Master Plan Project. The FEIR should provide an update on any future commitments to land use mix for

future phases and should address the request in the City's letter for a commitment to higher residential uses.

The SRP specifies that Phase 1 must be fully described prior to issuance of the Certificate on the FEIR and that PCNs be filed to provide detailed project descriptions, assessments of environmental impacts, and identification of mitigation measures when designs of future phases are advanced. As required in the SRP, the FEIR should provide detailed assessments of the design of Phase 1 and its impacts and mitigation measures, including proposed site grading, open space design, wetlands impacts, stormwater management, water use, and wastewater generation.

The information and analyses identified in this Scope should be addressed within the main body of the FEIR and not in appendices. The relevant design features included in the Phase 1 Design Guidelines, attached to the DEIR as Appendix A, should be fully incorporated into the description of Phase 1 in the main body of the FEIR and assessed with respect to impacts and mitigation measures. In general, appendices should be used only to provide raw data, such as drainage calculations, traffic counts, capacity analyses and energy modelling, and such data and analyses should be summarized with text, tables and figures within the main body of the FEIR. Information provided in appendices should be indexed with page numbers and separated by tabs, or, if provided in electronic format, include links to individual sections. Any references in the FEIR to materials provided in an appendix should include specific page numbers to facilitate review.

Environmental Justice / Public Health

Ahead of filing the FEIR, the Proponent should renew and update their efforts to meaningfully engage with the community. As provided in the project PIP, the Proponent shall conduct at least one additional public meeting ahead of the filing the FEIR; the Proponent should focus meeting topics on responding to comments/feedback from the public, open-space and resiliency features, traffic impacts, and other mitigation commitments. In accordance with the SRP/PIP, the Proponent should continue to consult with the CAC prior to filing the FEIR; including coordination with CAC members to schedule the public meeting. The FEIR should summarize the discussion of each CAC and/or public meeting held since the issuance of the ENF Certificate, including the efforts to publicize the meeting; date, location, and time of the meeting; whether the meeting was held remotely, in person, or both; the number of attendees and their representation (e.g., residents, or representatives of community organizations or government agencies); whether interpreters were offered or provided and for which languages; and comments and questions raised and their resolution. It should describe whether feedback from the CAC and community at large was incorporated into the project design and/or provide explanations of why feedback could not be incorporated.

The FEIR should further evaluate traffic and associated air quality impacts of Phase 1 and consider the cumulative impacts of the full build-out of the Master Plan at a conceptual level. As total New traffic was estimated for the Master Plan Project in the DEIR (though without a full traffic study), the FEIR should indicate whether a similar approach could be used to estimate total new air emissions associated with New traffic impacts under full build conditions. As documented in the DEIR, surrounding EJ populations are already affected by air-related

environmental burdens and may be particularly vulnerable to incremental increases in emissions. The FEIR should identify additional measures to avoid, minimize, and mitigate air quality impacts throughout construction and operation of the site. Such measures should include, as applicable, routing construction and delivery trucks away from existing and proposed residential buildings; establishing and enforcing anti-idling and construction equipment emission-reduction requirements; using electric or other low-emission construction, landscaping, maintenance, and building-service equipment to the maximum extent practicable; and implementing construction dust-control and emissions-monitoring protocols. For proposed residential buildings, the FEIR should explore commitments to protecting indoor air quality, including appropriately located air intakes, enhanced filtration and ventilation systems, and potential indoor air monitoring commitments. The FEIR should describe the specific project benefits for EJ populations, including commitments related to on-site affordable housing, public open space and waterfront access, climate resilience, and job training and employment opportunities.

Open Space

The FEIR should include a separate chapter which consolidates the descriptions of proposed open space provided throughout the DEIR and includes detailed commitments for open space at each phase of the Master Plan Project. For Phase 1, the FEIR should provide plans and dimensions of proposed open space and the design of the West First Street adjacent to the project site, and describe landscaping, surface treatments, grading, uses and programming, structures including but not limited to seating, lighting, and shade structures, and any connections to open space or other facilities to be provided in future phases. The FEIR should include a discussion of the Reserved Channel Basin Loop Harborwalk Study being conducted by Massport and the City, and describe potential contribution to its implementation by the Proponent and future connections from proposed open space. The FEIR should review comments received on the design of West First Street streetscape and proposed open space throughout the Phase 1 and Master Plan Project sites, and discuss how or if the proposed design addresses recommendations submitted by commenters.

Tidelands

The FEIR should describe and provide plans showing proposed public benefits to be provided in Phase 1 to satisfy c. 91 regulatory standards, including shoreline public access improvements such as walkways and measures to promote water-based activity, and interior FPA spaced and programming. It should include a floor plan of Building C1 which shows the location and use of interior FPAs. The FEIR should provide plans showing the design of open space on Block C and describe proposed programming of the open space to demonstrate how the project will meet the c. 91 standards for open space on Commonwealth Tidelands. The FEIR should identify one or more water-based activities to be provided in Phase 1, as required by 310 CMR 9.53(2)(a), or provide an analysis demonstrating that this requirement could be deferred to a later phase in a manner consistent with the c.91 regulations. The FEIR should discuss the permitting pathway for the proposed pile-supported hotel on Block K; this information was required to be provided in the DEIR but was not.

The FEIR should provide further justification for why a WDP can be extended only to a portion of the project site without inclusion of the Phase 1 site. If one or more WDPs may be prepared for future development, the FEIR should their timing in relation to future MEPA reviews. The FEIR should provide an updated PBD for Phase 1 which reflects any updates to the project design since the filing of the DEIR and any changes made in response to the Scope and public comments.

Wetlands and Stormwater

The FEIR should quantify and provide plans showing impacts to wetland resource areas in Phase 1, and review how Phase 1 will meet the performance standards in the Wetlands Regulations. The FEIR should provide a more detailed description and plans of the proposed stormwater management system for Phase 1, including a Stormwater Report with calculations and detailed design specifications that demonstrate that the system will have the capacity to attenuate peak flows under future climate conditions. The FEIR should clarify whether any stormwater management or drainage infrastructure will be constructed in Phase 1 that is intended to serve future phases, and describe any connections between the Phase 1 drainage and stormwater management systems and those to be constructed in future phases.

Transportation

The FEIR should provide plans and sections of Pappas Way under proposed conditions for each phase, including existing and interim conditions. It should clearly describe which sections and at which phases Pappas Way will be relocated away from Reserved Channel in comparison to its existing alignment; if this will be done in phases, the FEIR should provide plans of the roadway alignment and describe how it will be constructed and function for pedestrians, bicyclists, users of open space, and vehicles in interim configurations. The FEIR should clarify whether the proposed closures of the ends of Pappas Way are dependent on the future off-site extension of F Street.

The FEIR should evaluate the feasibility of converting the western end of Road 1 (at the E Street intersection) to a pedestrian way which could be reconfigured in the future to facilitate potential future use by buses, as recommended by the City. It should assess potential impacts to future traffic operations as analyzed in the traffic study included in the DEIR associated with a pedestrian-only section of Road 1. The FEIR should provide update on ongoing discussions with the City, Massport, and the public regarding roadway reconfigurations on or near the project site, including the intersections of E Street with Road 1 and Cypher Street, and expected timelines for resolution of such issues. To the extent any realignments affect the Phase 1 site, final commitments should be reflected in the FEIR

As noted above, the Proponent has set high transit mode share goals for both the Master Plan Project and Phase 1, but there is limited transit service within close proximity to the site. According to the DEIR, the Proponent will make improvements to off-site pedestrian and bicycle facilities along routes between the Phase 1 site and local transit stops to facilitate transit use. The FEIR should identify the locations of these areas and describe the proposed improvements. The Proponent should consult with the MBTA regarding the location and design of modifications to

existing pedestrian routes to bus service; support for bus service near the site that will be needed to meet future ridership demand generated by the Master Plan Project, such as construction of bus priority infrastructure on Summer Street, D Street, and Broadway; and any off-site improvements that could impact MBTA infrastructure, including subsurface power infrastructure along Dorchester Street; the FEIR should review any consultation conducted with the MBTA and resulting design modifications. As recommended by the City, the Proponent should evaluate funding shuttle service between the site and transit stops. The FEIR should describe all Phase 1 TDM measures provide a firm commitment to implement them.

Given the potentially critical role that an off-site extension of F Street may have on supporting additional transit service to the site and providing new vehicular connections in the area under Master Plan Project conditions, the FEIR should include a discussion, with plans and cross-sections, of how F Street may be designed to accommodate Silver Line and other transit service in the future. As noted by the MBTA, there are no immediate plans to provide expanded service along F Street; however, the Proponent should consult with the MBTA regarding potential designs of F Street for accommodating multimodal travel. The FEIR should describe the expected contingencies (e.g., relocation of Massport or third party operations) that would enable a further extension of F Street and indicate any public processes that are under way to address those contingencies.

According to the DEIR, the Master Plan Project will include over 4,000 parking spaces. The FEIR should review the process by which the Proponent will assess the feasibility of reducing this parking supply through assessments of parking demand of future phases of the project and opportunities for shared parking. The FEIR should discuss the proposed parking supply with respect to parking caps established by the South Boston Parking Freeze. It should identify which spaces are subject to these limits, and whether any portion of the proposed parking supply will be taken from Massport's allotment of spaces. Consistent with the City's requirements, which exceed Massport's minimum standard, the FEIR should include a commitment to provide EV charging stations at 25% of the parking spaces and construct all other spaces to be EV-ready, or describe why doing so is not feasible.

Water and Wastewater

As noted above, the DEIR included inconsistent estimates of water use and wastewater generation, and did not provide any information about Phase 1 water use. The FEIR should provide updated estimates of New water use and wastewater generation, and explain any differences to previous estimates provided in the ENF and DEIR. It should describe the phasing of construction of water and sewer infrastructure. The FEIR should respond to comments submitted by BWSC and the City regarding the design of proposed infrastructure. For Phase 1, it should include commitments to remove I/I and describe water conservation measures.

Climate Change

Adaptation and Resiliency

The FEIR should clarify proposed site elevations, provide plans and sections that clearly

depict existing and proposed conditions for each phase. The FEIR should provide the additional information requested in comment letters submitted by Massport, CZM, MassDEP, and the City, and if necessary, a revised or supplemental analysis of potential off-site impacts associated with the planned raising of the site for resiliency purposes. As recommended by CZM, the FEIR should assess the potential contribution of precipitation-based flooding to the coastal flooding scenarios modeled in the DEIR. The FEIR should provide a clear commitment to mitigating the documented impacts in the DEIR, including discussion of interim solutions in advance of other regional resiliency solutions that are in the planning phase.

The FEIR should provide more information about transition areas between existing and proposed grades transitions for each phase, including grading plans, cross sections, and a narrative describing these transitions so that potential flood pathway impacts can be evaluated. The FEIR should provide plans of areas of transition between proposed and existing on-site or off-site grades including any permanent or temporary retaining walls and connections to future City-wide coastal flood defense systems; this information should be provided in detail for Phase 1 and more conceptually for the Master Plan Project.

Given the scale and phased nature of the Master Plan Project, the proponent should continue to evaluate flood pathways within the context of the overall district-wide resilience strategy and demonstrate compatibility with future flood protection projects being advanced by the City, Massport, ACOE and other public agencies. The City recommends that the Proponent develop schematic plans reflecting a community-preferred design for flood resilience along the project's Reserved Channel shoreline that could be used as the basis of the design of a district-scale flood resilience system. The FEIR should describe how the Proponent will coordinate its design with the City, ACOE and Massport. As recommended by the City, the FEIR should review an alternative design which moves the line of flood protection closer to the shoreline of Reserved Channel.

As noted, the DEIR does not make clear whether future ACOE flood protection and/or other elevations or grading proposed from the waterfront to the development pads are assumed in the coastal flood modeling presented above. The FEIR should make these assumptions clear, and should address the documented impacts in the DEIR resulting from velocity changes and channelization of flows. To the extent future ACOE solutions or waterfront treatment may mitigate such impacts, the FEIR should discuss what interim solutions will be deployed until such long-term solutions are in place.

GHG Emissions

The FEIR should review DOER's comment letter, which is incorporated herein. It should provide clear and consistent commitments to implement the mitigation measures recommended in DOER's comment letters on the ENF and DEIR, including construction of Passive House-certified residential buildings, the use of ASHP hot water heating systems, all-electric heating and cooling systems, and limited wall glazing systems. Alternately, the FEIR should include the analyses previously identified by DOER in its ENF comment letter.

Mitigation and Draft Section 61 Findings

The FEIR should include a separate chapter summarizing all proposed mitigation measures, including construction-period measures, for Phase 1. The FEIR should review comments provided by MassDEP regarding standards and requirements associated with demolition, including asbestos handling, and include commitments to comply with all requirements for construction-period procedures and mitigation measures. This chapter should also include a comprehensive list of all commitments made by the Proponent to avoid, minimize and mitigate the environmental and related public health impacts of the project, and should include a separate section outlining mitigation commitments relative to EJ populations. The filing should contain clear commitments to implement these mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation. The list of commitments should be provided in a tabular format organized by subject matter (traffic, water/wastewater, GHG, environmental justice, etc.) and identify the Agency Action or Permit associated with each category of impact. Draft Section 61 Findings should be separately included for each Agency Action to be taken on the project. The filing should clearly indicate which mitigation measures will be constructed or implemented based upon project phasing to ensure that adequate measures are in place to mitigate impacts associated with each development phase.

Responses to Comments

As noted above, the response to comments on the ENF included in the DEIR did not provide direct responses and in many cases simply referred to a section of the DEIR or an Appendix. The FEIR should contain a copy of this Certificate and a copy of each comment letter received. The FEIR should contain a direct response to the scope items in this Certificate. To ensure that the issues raised by commenters are addressed, the FEIR should also include direct and substantive responses to comments to the extent that they are within MEPA jurisdiction; if necessary, references to specific pages of the FEIR and/or Appendices should be provided to support the direct response to the comment. The Response to Comments should not refer only to information previously provided in the DEIR. This directive is not intended, and shall not be construed, to enlarge the scope of the FEIR beyond what has been expressly identified in this certificate.

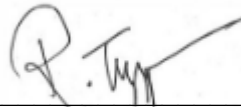
Circulation

The Proponent should circulate the FEIR to each Person or Agency who previously commented on the ENF or DEIR, each Agency from which the Project will seek Permits, Land Transfers or Financial Assistance, and to any other Agency or Person identified in the Scope. The Proponent may circulate copies of the FEIR to commenters other than Agencies in a digital format (e.g., CD-ROM, USB drive) or post to an online website. However, the Proponent should make available a reasonable number of hard copies to accommodate those without convenient access to a computer to be distributed upon request on a first-come, first-served basis. The Proponent should include correspondence accompanying the digital copy or identifying the web address of the online version of the FEIR indicating that hard copies are available upon request, noting relevant comment deadlines, and appropriate addresses for submission of comments. A

copy of the FEIR should be made available for review in the South Boston branch of the Boston Public Library.

July 31, 2026

Date



Rebecca L. Tepper

Comments received

06/01/2026	Maura Martinelli
06/26/2026	Jacqui Cloutier
06/27/2026	Larry Chan
06/29/2026	Molly Richards
06/30/3036	Claire Gendron
07/01/2026	Christopher and Caitlin Cook
07/07/2026	Division of Marine Fisheries (DMF)
07/09/2026	Boston Water and Sewer Commission (BWSC)
07/09/2026	Massachusetts Department of Environmental Protection (MassDEP)/Waterways Regulation Program (WRP)
07/10/2026	City of Boston Planning Department
07/13/2026	Phil Balboni
07/14/2026	David Winick
07/16/2026	Levi Reilly
07/19/2026	Michael D'Angelo
07/20/2026	Sharon Butler-ODwyer
07/21/2026	Brendan Linehan
07/21/2026	William J Higgins
07/23/2026	Massachusetts Office of Coastal Zone Management (CZM)
07/23/2026	Matt Martinelli
07/23/2026	Massachusetts Bay Transportation Authority (MBTA)
07/24/2026	Boston Harbor Now
07/24/2026	Conservation Law Foundation
07/24/2026	Massachusetts Department of Environmental Protection (MassDEP)/Northeast Regional Office (NERO)
07/24/2026	Metropolitan Area Planning Council (MAPC)
07/24/2026	Massachusetts Port Authority (Massport)
07/24/2026	Massachusetts Water Resources Authority (MWRA)
07/27/2026	Brooke Perault
07/27/2026	Jennifer Lange
07/30/2026	Department of Energy Resources (DOER)

RLT/AJS/ajs

June 1, 2026

Rebecca A. Tepper, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Re : Reserved Channel Master Plan Development Project EEA #16802

Hi Rebecca,

I am submitting comments regarding the above reference development proposal. I am a direct neighbor and my husband and two kids have been living on First Street for the past decade. We are generally excited for this project, hoping it is an improvement of the existing situation, which is lacking in a multitude of ways. I have reviewed the plans and have a few comments regarding same:

1. The setbacks from the street to the start of the buildings must be substantial. There are far too many instances of buildings on First Street that begin only a short distance from the street, with a very skinny sidewalk, forcing pedestrians and bikers to walk in the dangerous street with speeding cars. We need room for pedestrians, bikers, wheelchairs, and strollers to move in both directions on the sidewalk. This goes for the Pappas Way AND First Street, not one or the other. The plans for the "park" on the corner of Pappas Way and First Street are slated for phase 3, which is more than 20 years down the line. The time is now to insert distance between the streets and the start of the buildings. There must be room for street trees as well, as this area is completely void of trees or plantings along the street. The only trees that exist are invasive species that came in inadvertently; there are almost no planted trees. This has created a heat island effect down here.
2. There are multiple references in the plans to "retail *and/or* amenities". Amenities tend to service the building that they are in only and are not beneficial to the surrounding neighborhood in any way (i.e. gyms, lobbies, etc). These should be deleted and made for public retail only. My family and I have been living on this street since 2016, and I can assure you that there is nothing down here in the way of shops, restaurants, or grocery stores. There is not even a convenience store to buy milk. The purpose of living in a city is to be able to easily access things on foot or by public transportation. The places on Broadway are a bit of a walk, as are the stores in Seaport. There is currently nothing to benefit the neighborhood here in terms of retail and the area will be seeing a massive increase in residents which will need stores and food to walk to. We also need a

pharmacy. For the city to have any shot of making this a walkable city with less traffic, we need to make things walkable for residents.

3. Please provide room for 3-bedroom housing, which allows families to remain in the city. Our kids are in the Boston Public Schools, which is experiencing a huge decline in enrollment because families flee to the suburbs as soon as their kids hit school age, which results in further budget cuts to the schools. The families are leaving in part because their 2 bedroom units are too small to remain in, so when the point comes for baby #2, families move out for more space. We need families to be able to stay in the city to keep it a vibrant place to live for everyone, so that people can rely on a good public school system. People can walk to work too if they stay in the city, resulting in less traffic on the roads.
4. F Street should flow directly straight into Summer Street. This would make easy access between the Seaport, Downtown and South Boston. There is no reason why it can't do that—it seems that the parking lot at the army base has been put up as a reason why this flowthrough cannot happen, but I see only some plantings and a couple of cars parked there occasionally would be impacted. This would completely convert the neighborhood by creating a direct link between residential South Boston and the incredible job opportunities in Seaport and Downtown.

Thank you for your attention to this project. We look forward to working with the city, the state (including Massport) and the developers on a new and improved, hopefully vibrant and beautiful area of the city, for everyone to enjoy.

Best,



Maura Martinelli

407 East 1st Street

Boston MA 02127

Email address: mauranugent7@gmail.com

Cc: Lydia Polaski, South Boston neighborhood liaison to the Mayor's office

From: [Jacqui Cloutier](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: Reserve Channel Development Support - Jacqui Cloutier
Date: Friday, June 26, 2026 11:26:16 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Strysky,

I am a South Boston resident, and I am writing in support of the Reserved Channel Development proposal located along Pappas Way and West First Street.

This project represents an exciting opportunity to transform an underutilized industrial area into a vibrant neighborhood asset. Having lived in South Boston for the past three years, I frequently walk along the path bordering the proposed development, and my roommate walks it every day on her commute. We often talk about the area's tremendous potential and how exciting it would be to see it transformed into a more welcoming, accessible waterfront space for the community.

From what I've seen, the team has made a genuine commitment to engage with the community, listen to residents' feedback, and incorporate those priorities into the project. It's encouraging to see a proposal that reflects the needs and vision of the neighborhood rather than simply adding new development.

The Reserved Channel Development will provide many of the amenities our community has been asking for, including affordable housing, expanded public open space, improved waterfront access, and new opportunities for small businesses. Today, the area remains disconnected and underutilized, but this project has the potential to strengthen the neighborhood and deliver meaningful, long-lasting benefits for both current residents and future generations.

It also presents a unique opportunity to better connect South Boston and the Seaport, strengthening the relationship between two thriving neighborhoods. Improved pedestrian and bicycle infrastructure, enhanced street safety, and better waterfront connectivity will make it easier for residents and visitors to navigate the area while supporting local businesses and creating a more welcoming, accessible, and connected community.

Thank you for your time and consideration. I hope you will support the approvals necessary to get the project underway.

Sincerely,

Jacqui Cloutier

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Jacqui Cloutier
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27 June 2026

Ms. Tori Kim, *Assistant Secretary/Director, MEPA Environmental Justice*
Executive Office of Energy and Environmental Affairs (EEA)
MEPA Office
100 Cambridge St, Suite 900
Boston MA 02114

Cc: **Alexander Strysky**, *Senior Project Manager, MEPA Environmental Justice*

Re: **Reserved Channel Master Plan Development (aka RCD)**, EEA No. 16802
DEIR (Filed 05/28/2026)

Dear Ms. Kim:

Executive Summary of this letter — Not support two components of the Proponent's proposal in the DEIR that fall short of broader urban design and urban planning qualities, and threaten future opportunities to improve the broader environmental and community context in which the project is located and influences. Specifically,

1. Not Support Proposal to Maintain Pappas Way as a Roadway —

Comments and illustrations are presented to demonstrate the disadvantages, weaknesses, and contradictions of the Proponent's proposal to maintain Pappas Way as a vehicular access corridor, and presentations of alternative solutions that provide greater advantages and qualities of transforming the existing roadway into an integral part of an expanded park open space along the western edge of the Reserved Channel.

2. Not Support Proposal to Install a Bicycle Way on the North Side of West 1st Street —

Comments and illustrations are presented that demonstrate the disadvantages, weaknesses, and contradictions of the Proponent's recommendations for the north side of West 1st Street outside of the Proponent's southernly property line that will threaten, have a negative impact on the South Boston residential community, and obstruct opportunities to improve the south side of West 1st Street.

3. Conclusion

Lawrence A. Chan has served as a member of the Citizens Advisory Committee (CAC) since 2024, and is a resident within the Environmental Justice area of the project site. He is an urban designer with fifty years of professional experience on numerous design and planning projects throughout North America and Asia, a founder and president of his former architecture and urban design practice, Chan Krieger & Associates (1984-2010), and, before he retired, was a licensed architect from 1980-2020.

Larry is a Fellow of the American Institute of Architects with numerous award-winning design and notable project experience, including: planning, expanding, and redesigning the one-mile waterfront of Shanghai's Bund Esplanade; designing the General Aviation Terminal at Logan Airport for Massport; and preparing the campus master plan for UMass Boston that has been completing new buildings and open spaces in accordance with the master plan since 2010.

Larry has intermittently taught at several architecture schools, including: Harvard, MIT, Univ Arkansas-Fayetteville, Univ Calif Berkeley, UMass Amherst, and Wentworth Institute of Technology, and has been a guest design critic and speaker in each of Boston's six architecture schools. His public service includes serving twice on the board of the Boston Society of Architects, including as President in 2010, as a member of the Growth Management Advisory Board for the Maryland-National Capital Park & Planning Commission in Silver Spring MD, and as a member of the Comprehensive Plan Committee for the Town of Brookline MA.

1.0 Reserved Channel Park

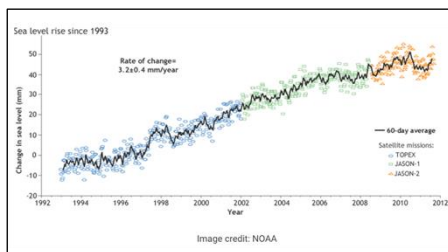
Missing Opportunity to Create An Exemplary Waterfront Park.

By retaining Pappas Way as a roadway, the proposed open space (Fig. 1.0a)—when fully completed—would consist of a central park in middle of the waterfront bookended by two small parks—one at West 1st St., and another at Summer St.—each connected to the central park by narrow walkways with no trees (Fig. 1.0b), and may not be too dissimilar to existing conditions (Fig. 1.0c).

In contrast, converting Pappas Way as park space could double the landscape to offer a wider greenway between West 1st St. and Summer St. (Fig. 1.0d), and create a consistently continuous park rather than three segmented pocket parks linked by barren walkways.

Excellent examples around the world demonstrate the attractiveness of waterfront parks without intrusions by roadways between buildings and their adjoining waterfronts (Figs. 1.0e-1.0j). The advantages are numerous, including:

- More room and flexibility to design landscape and recreational activities
- Maximum safety and access for pedestrians, families, children, elderly, and persons with mobility deficiencies
- Reduction of impervious road surface, air pollution, and road debris associated with the presence and use by vehicles
- Greater flexibility, resilience, and reduced potential extra costs when necessary to modify the landscape in response to accelerating rising seas (<https://www.science.org/content/article/greenland-loses-ice-global-sea-levels-will-rise-and-its-own-will-fall> | Science, Vol 391, Issue 6783) that may not be accounted for under current design and technical guidelines.

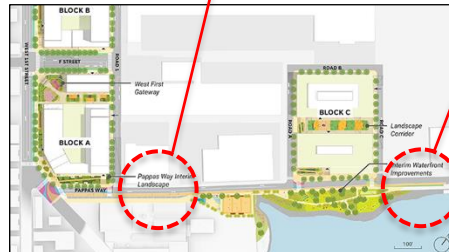


1.0k — Sea Level Rise, NOAA

<https://www.asoc.org/learn/antarctic-ice-and-rising-sea-levels/#impacts>



1.0a — Master Plan Open Space, RCD DEIR (5/28/2026), p 41



1.0b — RCD DEIR (5/28/2026), p 546



1.0c — Pappas Way/645 Summer St, 5/22/24
(photo by Lawrence A. Chan)



1.0d — Pappas Way added to Reserved Channel park space, RCD DEIR (5/28/2026), p 41 [edited]



1.0e — Ascension Paysagère, Rennes France



1.0f — Spaulding Hospital, Charlestown MA



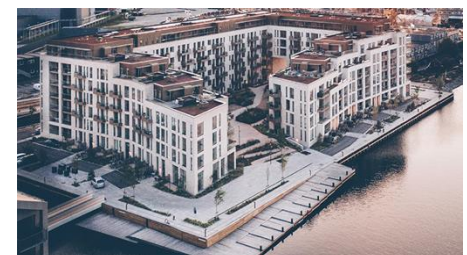
1.0g — Harbor Pt North Marina, Stamford CT



1.0h — Harbor Point Park, Baltimore MD



1.0i — South Waterfront, Portland OR



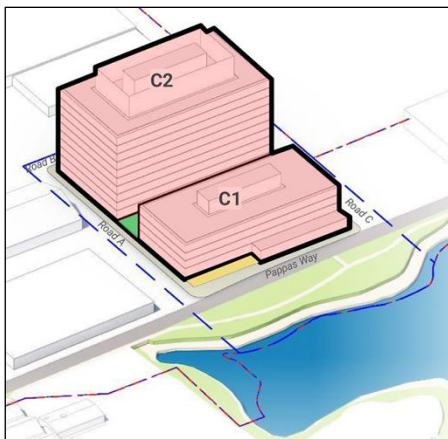
1.0j — The Residence, København, Denmark

1.1 Waterfront Edges

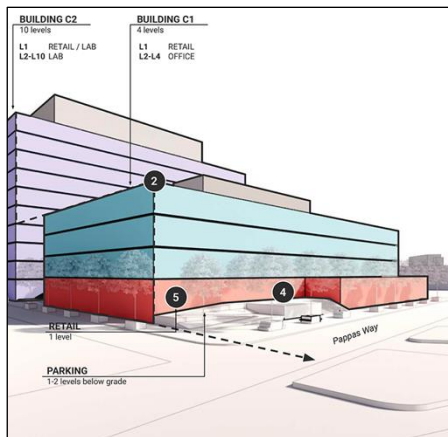
Buildings Built Along and Face Boston's Waterfronts Connect Directly to the Water's Edge Without Roads in Between

Unlike the Proponent's proposal for the Reserved Channel (Fig. 1.1a), prominent projects located along Boston's waterfront, from Fort Point Channel to Seaport, omits a road between the building and their adjacent waterfront (Figs.1.1c-1.1f) that help to promote:

- Symbiotic use and activities between buildings, open spaces, and the water's edge
- Flexibility to plant trees, design landscape, and plan active and passive open space activities
- Continuous commercial frontage and uses uninterrupted by lobbies, drop-off/pickup lanes, and temporary parking for gig service deliveries (Figs. 1.1b & 1.2g)
- Maximum pedestrian access and safety between buildings and waterfronts



1.1a — RCD DEIR (5/28/2026), p 602



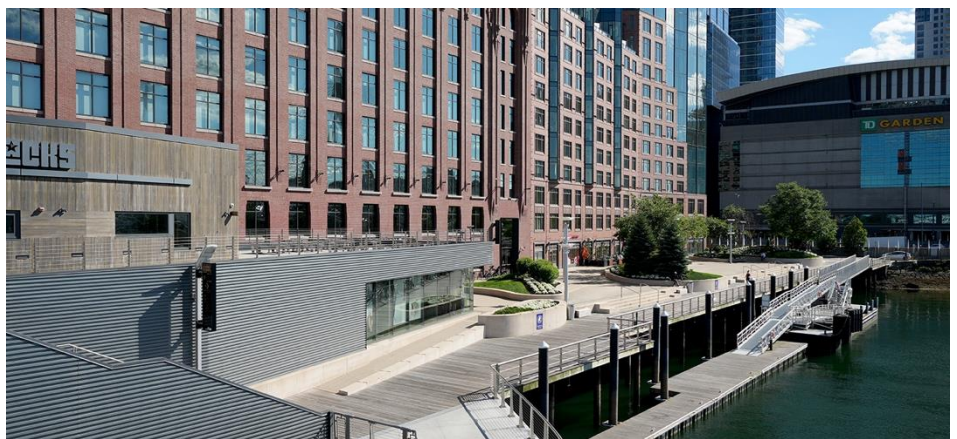
1.1b — RCD DEIR (5/28/2026), p 604



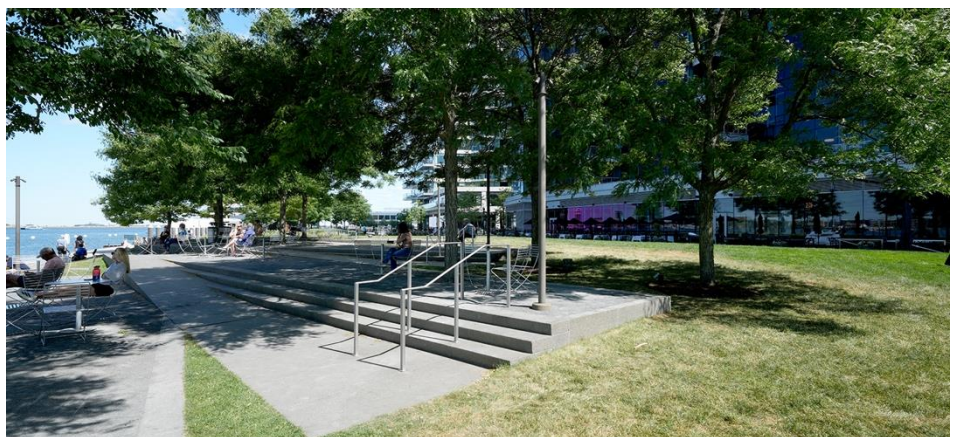
1.1c — 15 Necco Street (Eli Lilly and Company), Fort Point Channel



1.1d — 280 Congress Street (Atlantic, formerly Russia, Wharf), Fort Point Channel



1.1e — 1 Lovejoy Wharf (Converse World Headquarters), Lovejoy Wharf



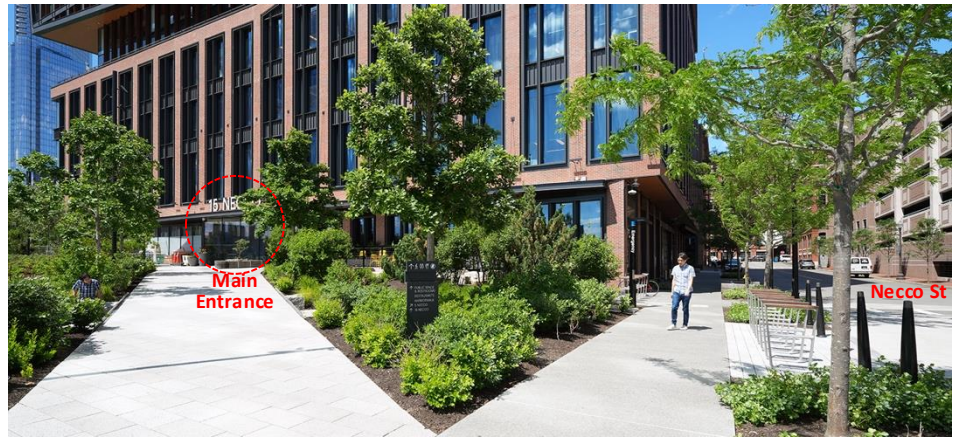
1.1f — 22 Liberty Way Residences, Seaport/Boston Main Channel

1.2 Waterfront Entrances

Main Entrances to Boston Waterfront Buildings Have Indirect Curb-side Locations Away from the Waterfront

Numerous Boston waterfront buildings have successfully located main building entrances away from direct curb-side drop-offs (Figs. 1.2a-1.2d) that maximize pedestrian safety, reduce pedestrian-vehicular conflicts (Figs. 1.2e-1.2f), and gain street frontage lost to lobbies and drop-off lanes (Figs. 1.2g-1.2h).

The examples demonstrate that a waterfront road is not only unnecessary and poses disadvantages, but are also unattractive and undesirable.



1.2a — 15 Necco Street (Eli Lilly and Company), Fort Point Channel



1.2b — 280 Congress Street (Atlantic, formerly Russia, Wharf), Fort Point Channel



1.2e — Old Atlantic Ave (255 State Street)



1.2f — 296 State St/Long Wharf (Marriott Hotel)



1.2c — 1 Lovejoy Wharf (Converse World Headquarters), Lovejoy Wharf



1.2g — 7 Pappas Way / 645 Summer St (existing)



1.2h — Building C1, RCD DEIR (5/28/2026), p 577



1.2d — 22 Liberty Way Residences, Seaport/Boston Main Channel

All photos by Lawrence A. Chan FAIA, except as noted.

1.3 Entrance Locations

Main Entrances to Buildings May Be Equally Prominent, Effective, and Accessible When Located Away from the Waterfront

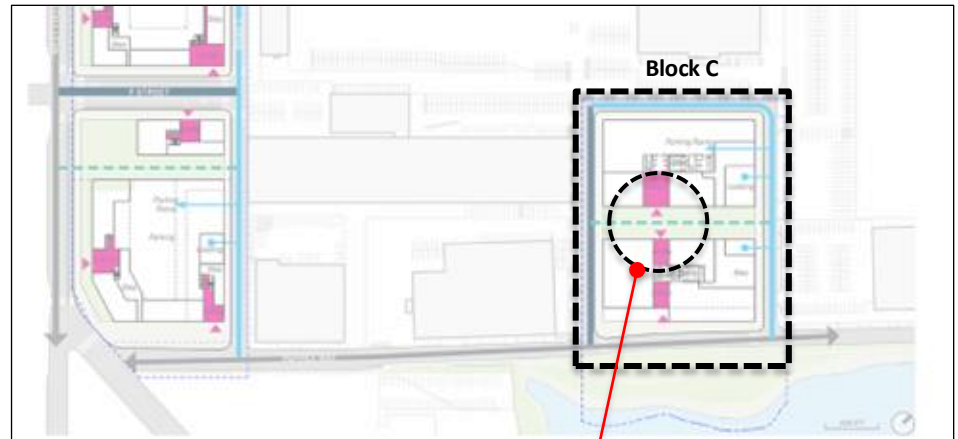
The DEIR illustrates that all Phase 1 and full-buildout buildings would have at least two to three side streets (Fig. 1.3a), and/or located adjacent to attractive secondary open spaces shared with another building (Fig. 1.3b), similar to, and demonstrated at, 5 and 15 Necco St. that face Ft. Pt. Channel (Fig. 1.3c).

As illustrated previously in Figs. 1.2a-1.2d, curbside drop-off/pickup may be accommodated along a side street. When necessary, the drop-off/pickup lane can terminate with a cul-de-sac (Fig. 1.2c) without looping between the building and waterfront. Similar or identical entrance orientations and street cul-de-sac solutions can be implemented for Blocks A, C, D, I, and J, and associated east-west side streets (Fig. 1.3d), thus eliminating the need to maintain Pappas Way as a roadway.

The DEIR indicates that Pappas Way may need to remain in place for the completion of RCD Phase 1, especially since remaining leases on adjacent properties adjacent to Blocks A, B, and C may preclude access to Block C during completion of Phase 1. Ideally, if some arrangement or permitting may be arranged with and through portions of relevant adjacent parcels to allow access to Block C and 645 Atlantic Ave.—such as an early extension of F St. or through existing Anchor St. (Fig. 1.3d)—then the closing of Pappas Way—and the creation of a larger Reserved Channel Park (Fig. 1.0c)—may be implemented and realized sooner.



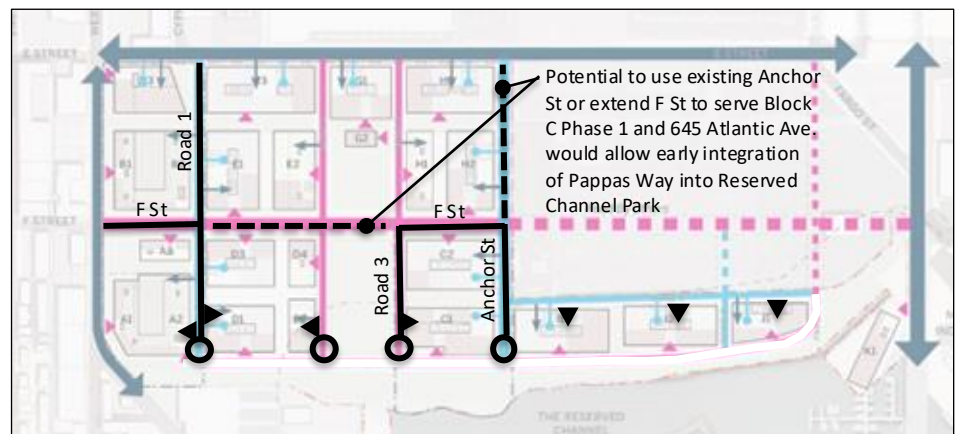
1.3a — Based Drawing: RCD DEIR (5/28/2026), p 207



1.3b — Based Drawing: RCD DEIR (5/28/2026), p 185



1.3c — Main building entrances to 15 Necco St & 5 Necco St from landscape corridor similar to C1 & C2



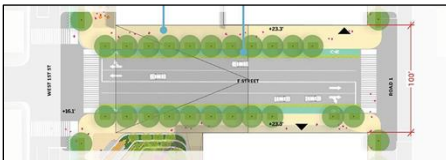
1.3d — Alternative building entrances & side streets. Based Drawing: DEIR (5/28/2026), p 207 [edited]

2.0 West 1st Street Today

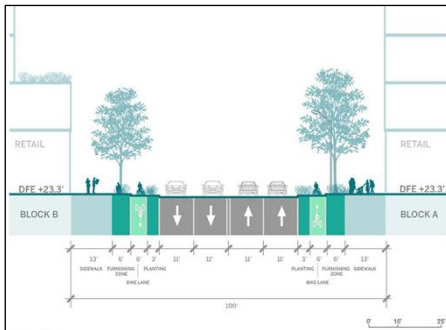
Plans To Improve West 1st Street Should Include the Southern Sidewalk.

Current conditions along both sidewalks of West 1st St. are unattractive, treeless, and offer little, if any, pedestrian amenities (Fig. 2.0a). The south side of the street is especially deficient, with broken or uneven surfaces, and ADA non-compliant (Figs. 2.0b & 2.0c)—negatively impacting local residents, pedestrians, families with children, elderly, and persons with mobility deficiencies who walk between homes, shops, services, schools, public transit, and work in Southie.

The DEIR demonstrates an appreciation of excellent street design within RCD's project boundaries illustrated by ideal characteristics and amenities to help create attractive, comfortable, safe, and pedestrian-friendly sidewalks and street corridors (Figs. 2.0d & 2.0e).

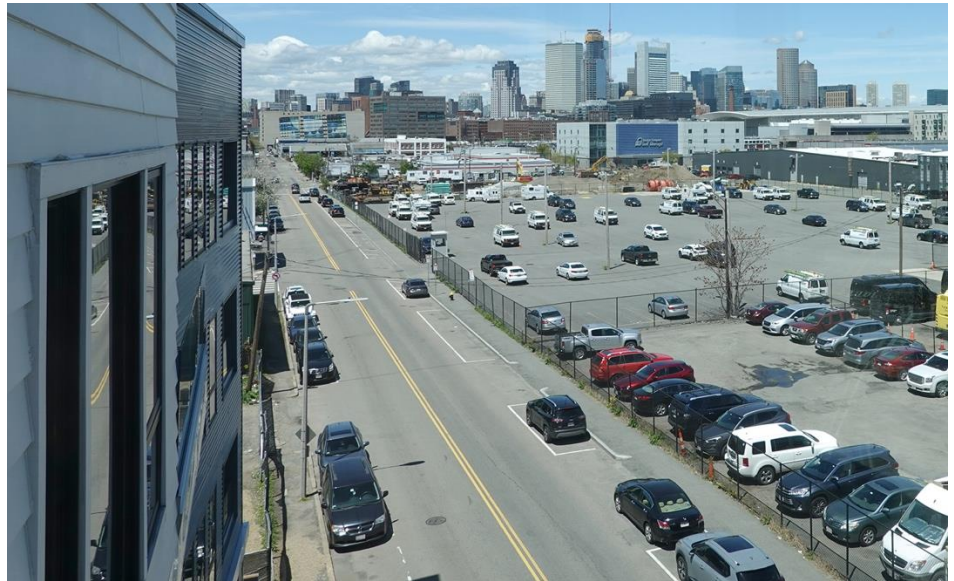


2.0d — *F St [Plan]*, RCD DEIR (5/28/2026), p 573



2.0e — *F St [Section]*, RCD DEIR (5/28/2026), p 574

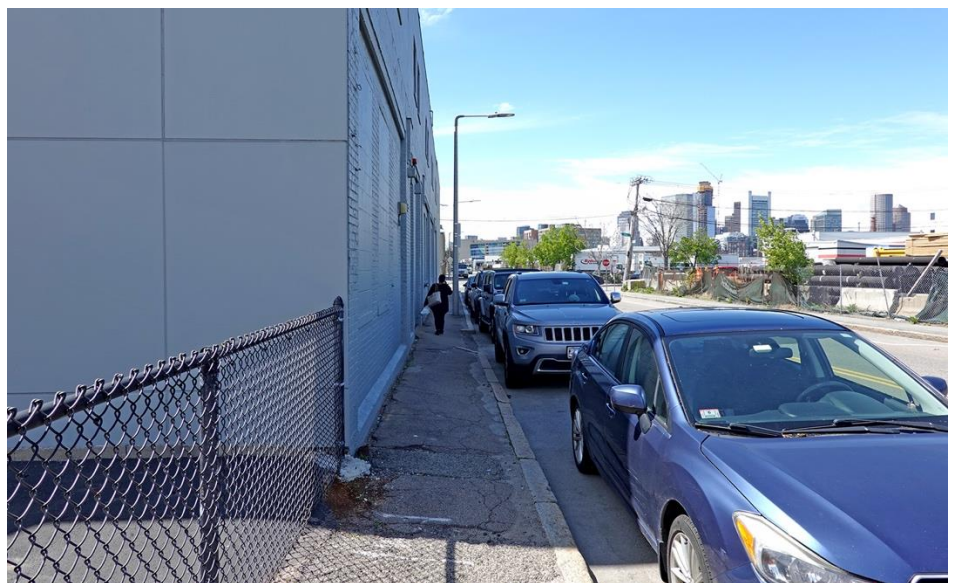
While the Proponent does not have responsibility to design and improve properties beyond RCD's property line, it is nevertheless essential to assure that any recommendations for the north side of West 1st St. will not negatively impact nor obstruct good design and improvements planned for the south side. This is explicitly implied by the East|West First Street Planning and Rezoning Initiative (EWFSPI) in Article 68 of the Zoning Code that envisions "First Street corridor as a vibrant, walkable mixed-use district." (RCD DEIR 1.4.1.6, p57)



2.0a — West 1st Street looking west from 405-407 West 1st St, South Boston MA



2.0b — West 1st Street looking west from F St, South Boston MA



2.0c — West 1st Street looking west from ~317 W 1st St, South Boston MA

All photos by Lawrence A. Chan FAIA.

2.1 West 1st Street As A New Boulevard

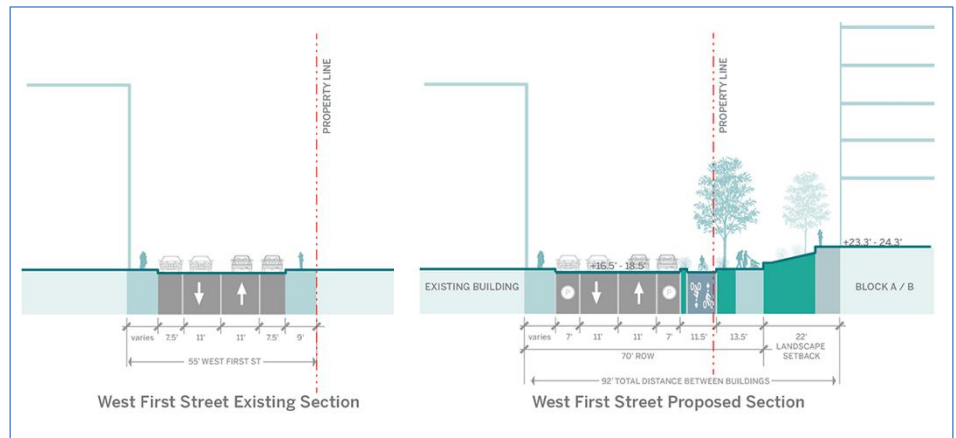
The Proposed Bicycle Lane On The North Side of West 1st Street Would Obstruct Improvements to the South Side from Achieving A Remarkable Corridor For The South Boston Neighborhood.

As noted in the DEIR, the East|West First Street Planning and Rezoning Initiative (EWFSPI) prioritizes “transforming both East First and West First streets into pedestrian-friendly, residential-scale streets through the use of setbacks that create wider sidewalks and accommodate street trees to enhance the public realm.” (RCD DEIR 1.4.1.6, p 57).

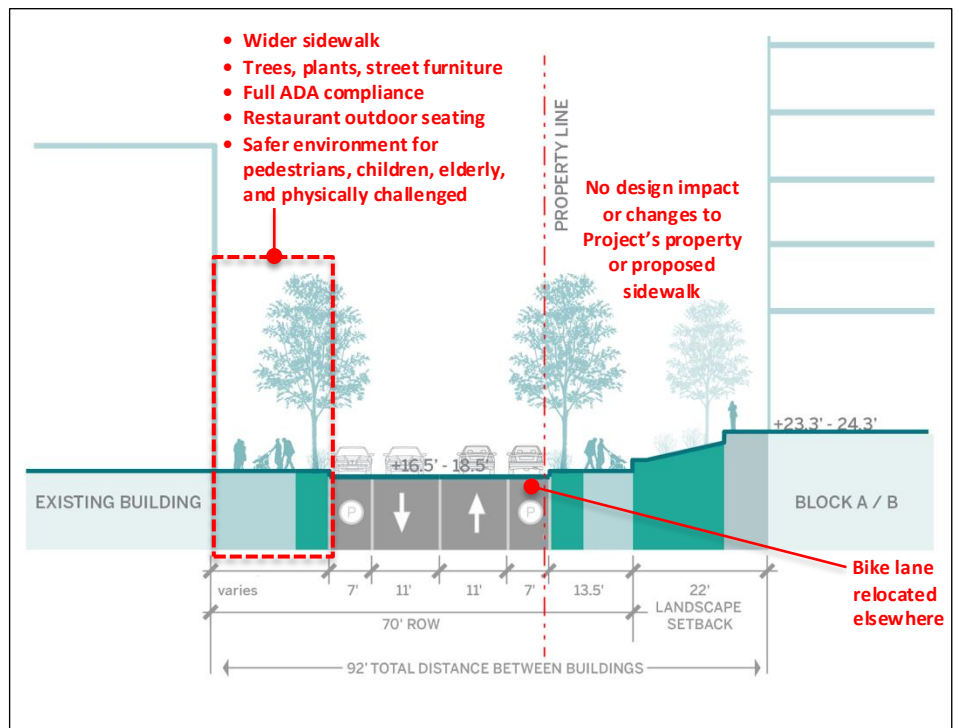
Although the DEIR proposal includes design improvements to the north side of West 1st St. that appears to fulfill EWFSPI priorities, its recommendation would leave no space to install comparable improvements on the south side of the street (Fig. 2.1a), such as wider sidewalks, street trees, and other pedestrian amenities—thus, obstructing the EWFSPI initiative and jeopardizing the health, safety, and welfare of South Boston neighborhood residents.

Since public space outside of RCD’s project property is not the Proponent’s responsibility, the Proponent should refrain from suggesting anything that may have a detrimental impact on its neighbors and not coordinated with other relevant initiatives, such as EWFSPI’s goal to advance “First Street corridor as a vibrant, walkable mixed-use district.”

Options to expand the south sidewalk is challenging since new residences have been completed. Limited choices include eliminating a lane used for parking, vehicles, or the bicycle lane proposed in the DEIR. Since the first two lane types are in place and heavily used and needed, it would appear that one solution is to forego installing the proposed bicycle lane and relocating the extra space to the south side of West 1st St. while shifting parking and vehicular lanes to the north side (Fig. 2.1b). Alternatively, a bicycle-sharing sidewalk on the south side may offer a flexible acceptable option as implemented elsewhere (Figs. 2.1c-2.1f).



2.1a — West 1st St Existing (left) & Proposed (right) Sections, RCD DEIR (5/28/2026), p 191



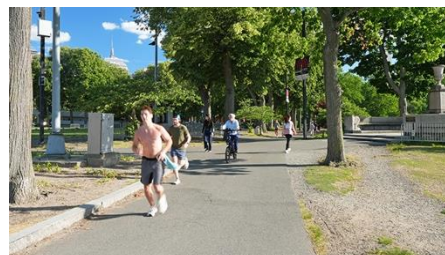
2.1b — Alternative Section for West 1st St, Base Drawing: RCD DEIR (5/28/2026), p 191 [edited]



2.1c — Pedestrian-bike sharing sidewalk, Charles River Dam Rd at Museum of Science, Cambridge MA



2.1d — Pedestrian-bike sharing sidewalk, Charles River Dam Rd at Museum Way, Cambridge MA



2.1e — Pedestrian-bike sharing path, Charles River Esplanade at Hatch Memorial Shell, Boston MA

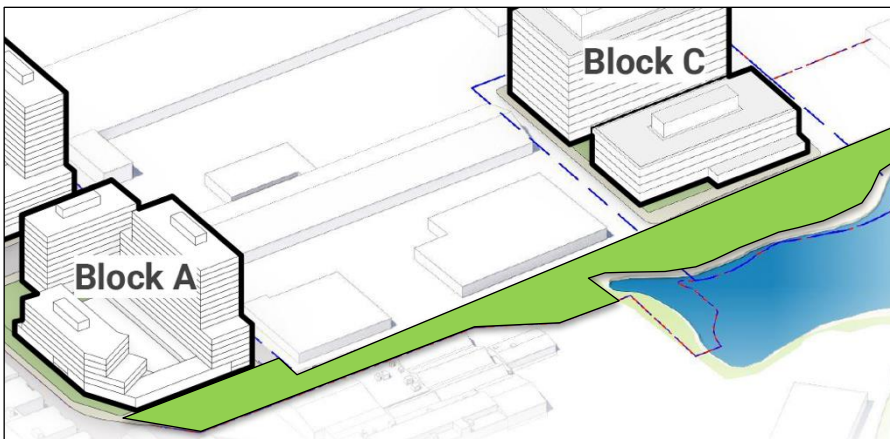


2.1f — Pedestrian-bike sharing path, Washington St at Brookline Ave, Brookline MA

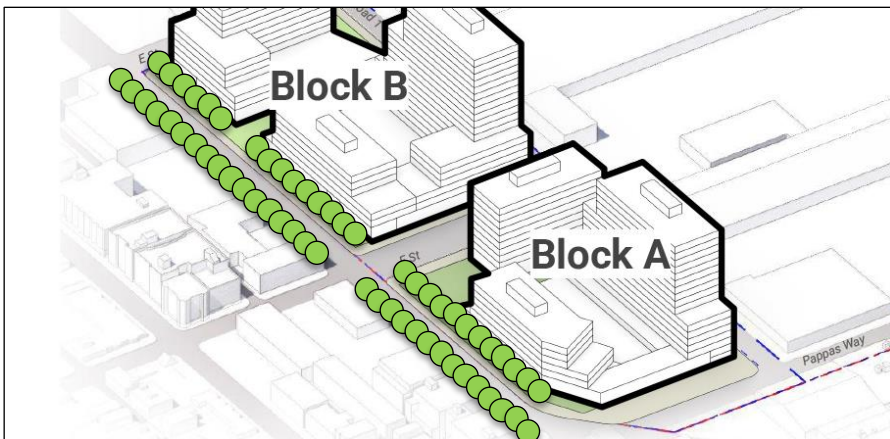
All photos by Lawrence A. Chan FAIA.



3.0a — Alternative RCD master plan. Based Drawings: RCD DEIR (5/28/2026), p 32 & 34 [edited]



3.0b — A verdant greenway on Reserved Channel. Based Dwg.: RCD DEIR (5/28/2026), p 587 [edited]



3.0c — A tree-lined boulevard for West 1st Street. Based Drawing: DEIR (5/28/2026), p 587 [edited]

3.0 Conclusion

This letter does not support maintaining Pappas Way as a roadway, but rather to transform it as landscape in order to expand Reserved Channel Park. This letter also does not support adding a bicycle lane outside the project's southern property line on the north side of West 1st St., but instead reallocate the space to widen the opposite side of West 1st St. for wider sidewalks, street trees, with or without a pedestrian-bicycle sharing lane.

Alternative concepts are presented to demonstrate advantages and benefits that would enhance the project, the surrounding community, and environmental conditions around the site, including:

- Broaden the breath, scale, potential, and prominence of the pedestrian greenway between the northern-southern halves of South Boston
- Generate additional value to new businesses, residents, and investors to the project and the Reserved Channel District
- Help promote the project to attract more development interests in adjacent parcels that would further add to the area's vitality, urbanity, importance, and livelihood
- Expand opportunities for programs, leisure, recreation, and open space resources for nearby community use, convention center functions, and entertainment activities

Great public spaces require a combination of sufficient scale, design quality, and intangible characteristics to achieve civic identity, place-making, and elevate its surroundings. In Boston, Copley Square, redesigned three times over the past 60 years and continues to appear mediocre and draws fewer people when compared to Post Office Square Park, completed 35 years ago. A more prominent Reserved Channel Park, complemented by an elegant new street boulevard leading to it, can better help advance, promote, and serve RCD, the Reserved Channel area, and the South Boston neighborhood.

I look forward to further participation in future CDC meetings and reviews of this exciting project, and look forward to seeing additional design and planning advances of the proposal by the Proponent.

Sincerely,

Lawrence A. Chan

Lawrence A. Chan FAIA
Principal, Chan Urban Design

From: [Richards, Molly](#)
To: nick.carter@boston.gov; [Stryisky, Alexander \(EEA\)](#)
Cc: BPerault@oxfordproperties.com
Subject: Reserve Channel Development - Full Support
Date: Monday, June 29, 2026 9:31:46 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Nick and Alex,

I'm a South Boston resident, and I'm writing to support the proposed Reserved Channel Development located along Pappas Way and West First Street.

This project is a great opportunity to turn an underused area into something that better services the neighborhood: a place with life, jobs, and spaces people can use day to day. From what I've seen, the team has taken the time to listen to residents, and local businesses, and that's reflected in the plan. This feels like a good opportunity to bring more life to the area, while still keeping the character of South Boston.

I support this project because it will:

- **Bring new housing (including affordable options) to the neighborhood**
- **Create jobs and support local businesses**
- **Improve streets, sidewalks, and overall safety in the area**
- **Add new public spaces and make the waterfront more accessible**
- **Help activate an area that currently feels industrial and underutilized**

At the end of the day, this is the kind of thoughtful investment in South Boston that can benefit the neighborhood long-term. I'd encourage you to move forward with the approvals and permits needed to get it going.

Thanks for your time and consideration.

Sincerely,

Molly Richards | Fidelity Investments

Financial Analyst | Operations & Services Group
245 Summer Street, Boston, MA 02205
molly.richards@fmr.com

From: [Claire Gendron](#)
To: nick.carter@boston.gov; [Strysky, Alexander \(EEA\)](#)
Subject: Letter of Support for Reserved Channel Development
Date: Tuesday, June 30, 2026 3:38:33 PM

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Hi Nick and Alex,

I hope you're both doing well! My name is Claire, and I'm a South Boston resident. I'm writing to share my support for the proposed Reserved Channel Development located along Pappas Way and West First Street.

I think this project is a great opportunity to turn an underused area into something that better services the neighborhood; a place with more activity, jobs and public spaces people can actually enjoy and use. From what I've seen, the team has taken the time to listen to residents and local businesses, and I think that comes through in the plan.

This feels like a great opportunity to bring more life to the area while still preserving the character of South Boston. I support this project because it will create jobs, support local businesses, add new public spaces that make the waterfront more accessible, and help transform an area that currently feels industrial and underutilized.

Overall, I think this is a positive investment in South Boston that will benefit the neighborhood for years to come. I encourage you to move forward with the approvals and permits needed to make it happen.

Thanks for your time and consideration!

Best,
Claire Gendron

From: [Christopher Cook](#)
To: [Strysky, Alexander \(EEA\)](#); nick.carter@boston.gov
Subject: Letter of Support for Reserved Channel Development
Date: Wednesday, July 1, 2026 5:10:48 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Nick & Alex,

We are writing to support the proposed Reserved Channel Development located along Pappas Way and West First Street.

This project is a great opportunity to turn an underused area into something that better services the neighborhood: a place with life, jobs, and spaces people can use day to day. From what I've seen, the team has taken the time to listen to residents, and local businesses, and that's reflected in the plan.

This feels like a good opportunity to bring more life to the area, while keeping the character of South Boston.

I support this project because it will:

- **Improve streets, sidewalks, and overall safety in the area**
- **Add new public spaces and make the waterfront more accessible**
- **Help activate an area that currently feels industrial and underutilized**
- **Bring new housing (including affordable options) to the neighborhood**
- **Create jobs and support local businesses**

This is the kind of thoughtful investment in South Boston that can benefit the neighborhood long-term. We encourage you to move forward with the approvals and permits needed to get it going.

Thanks for your time and consideration.

Best,

Christopher & Caitlin Cook
617-875-2184
199 West 5th Street

Sent from my iPhone

From: [Frew, Katelyn \(FWE\)](#)
To: [Stryisky, Alexander \(EEA\)](#)
Subject: Reserved Channel Master Plan Development
Date: Tuesday, July 7, 2026 1:45:31 PM
Attachments: [image001.png](#)

Hi Alex,

MA DMF has reviewed the DEIR for the Reserved Channel Master Plan Development. We are still awaiting a more detailed narrative and plan set of the proposed pile supported hotel (Building K1) along with the public marina. The DEIR states that this portion of the development is proposed for a later phase and will be evaluated in more detail in a future filing. Is this not considered project segmentation? DEP and Boston Harbor Now (BHN) have also requested additional information detailing the permitting pathway for this structure as it is only authorized on previous structures. Until we receive this information we can only recommend that the applicant follow standard Best Management Practices for pier and pile installation to minimize impacts that may be caused by noise and/or turbidity.

Thank you,

Kate

Kate Frew

Environmental Analyst
MA Division of Marine Fisheries
30 Emerson Avenue
Gloucester, MA 01930
(978) 491-6247



**Boston Water and
Sewer Commission**



980 Harrison Avenue
Boston, MA 02119-2540
617-989-7000

July 9, 2026

Secretary Rebecca L. Tepper
Executive Office of Energy and Environmental Affairs
Attn: MEPA Alexander Strysky
100 Cambridge Street, Suite 900
Boston, MA 02114

And

Ms. Zoe Duvall, Project Manager
Boston Planning Department
One City Hall Square
Boston, MA 02201

Re: Reserved Channel Development
Planned Development Area Block A1/A2

Dear Secretary Tepper / Ms. Duvall:

The Boston Water and Sewer Commission (Commission) has reviewed the Planned Development Area (PDA) for the proposed redevelopment project located at 370 West First Street in the South Boston neighborhood of Boston. This letter provides the Commission's comments.

The proposed project is located on an approximately 1.97-acre subdivision of an approximately 42-acre site bordered by West First Street, Pappas Way and land owned by the Massachusetts Port Authority. The project proponent OPG 370 West First Owner LLC (OPG 370), a Delaware limited liability company proposes to raze the site and construct a mixed-use residential development containing approximately 312,000 gross square feet. The building(s) will have approximately 287 residential units and ground floor retail space. Amenities include a deck on top of the podium and other exterior open space for use by residents. Parking for a maximum of 219 cars, and bicycle parking in compliance with the City's Bicycle Parking Guidelines.

For water service, the Commission owns and maintains one water main in Pappas Way and two water mains in West First Street. West First Street has two 16-inch ductile iron cement lined (DICL) water mains. The water mains were installed in 2011 and 2012. Pappas Way has a 12-inch DICL pipe that was installed in 2011. Pappas Way also has a 12-inch private DICL main that was installed in 2011. One 16-inch and one 12-inch water mains in each street is served are



connected to the Commission's Southern Low-Pressure Zone. The other water mains are served by the Commission's Southern High-Pressure Zone.

Sewers owned by the Commission are a 72-inch combined sewer overflow that extends southeasterly in West First Street that increases to an 84-inch pipe that continues northeasterly in Pappas Way. The other sanitary sewer in Pappas Way is a 10-inch pipe. West First Street also has a 42-inch sewer referred to as the South Boston Interceptor North Branch.

Daily water demand and wastewater generation for the proposed project were not stated in the PDA.

General

1. Prior to the initial phase of the site plan development, OPG 370 should meet with the Commission's Design and Engineering Customer Services Departments to review water main, sewer and storm drainage system availability and potential upgrades that could impact the development.
2. Prior to demolition of the building, all water, sewer and storm drain connections to the building must be cut and capped at the main pipe in accordance with the Commission's requirements. The proponent must complete a Cut and Cap General Services Application, available from the Commission.
3. All new or relocated water mains, sewers and storm drains must be designed and constructed at OPG 370's expense. They must be designed and constructed in conformance with the Commission's design standards, Water Distribution System and Sewer Use regulations, and Requirements for Site Plans. The site plan should include the locations of new, relocated and existing water mains, sewers and storm drains which serve the site, proposed service connections, water meter locations, as well as backflow prevention devices in the facilities that will require inspection. A General Service Application must also be submitted to the Commission with the site plan.
4. The Department of Environmental Protection (DEP), in cooperation with the Massachusetts Water Resources Authority (MWRA) and its member communities, has implemented a coordinated approach to flow control in the MWRA regional wastewater system, particularly the removal of extraneous clean water (e.g., infiltration/inflow (I/I)) in the system. The Commission has a National Pollutant Discharge Elimination System (NPDES) Permit for its combined sewer overflows and is subject to these regulations [314 CMR 12.00, section 12.04(2)(d)]. This section requires all new sewer connections with design flows exceeding 15,000 gpd to mitigate the impacts of the development by removing four gallons of I/I for each new gallon of wastewater flow. In this regard, any



new connection or expansion of an existing connection that exceeds 15,000 gallons per day of wastewater shall assist in the I/I reduction effort to ensure that the additional wastewater flows are offset by the removal of I/I. Currently, a minimum ratio of 4:1 for I/I removal to new wastewater flow added is used. The Commission will require proponent to develop a consistent inflow reduction plan. The 4:1 requirement should be addressed at least 90 days prior to activation of water service and will be based on the estimated sewage generation provided on the project site plan.

5. The design of the project should comply with the City of Boston's Complete Streets Initiative, which requires incorporation of "green infrastructure" into street designs. Green infrastructure includes greenscapes, such as trees, shrubs, grasses and other landscape plantings, as well as rain gardens and vegetative swales, infiltration basins, and paving materials and permeable surfaces. The proponent must develop a maintenance plan for the proposed green infrastructure. For more information on the Complete Streets Initiative see the City's website at <http://bostoncompletestreets.org/>
6. The water use and sewage generation estimates were not provided in the PDA. The Commission requires that these values be calculated and submitted with the Site Plan. OPG 370 should provide separate estimates of peak and continuous maximum water demand for residential, irrigation and air-conditioning make-up water for the project. Estimates should be based on full-site build-out of the proposed project. OPG 370 should also provide the methodology used to estimate water demand for the proposed project.
7. OPG 370 is advised that the Commission will not allow buildings to be constructed over any of its water pipes. Also, any plans to build over Commission sewer facilities are subject to review and approval by the Commission. The project must be designed so that access, including vehicular access, to the Commission's water, sewer and storm drains for the purpose of operation and maintenance is not inhibited.
8. The Commission will require OPG 370 to undertake all necessary precautions to prevent damage or disruption of the existing active water, sewer and storm drains on, or adjacent to, the project site during construction. As a condition of the site plan approval, the Commission will require OPG 370 to inspect the existing sewer and storm drains by CCTV after site construction is complete, to confirm that the lines were not damaged from construction activity.
9. It is OPG 370's responsibility to evaluate the capacity of the water, sewer and storm drain systems serving the project site to determine if the systems are adequate to meet future project demands. With the site plan, include a detailed capacity analysis for the water, sewer and storm drain systems serving the project site, as well as an analysis of the



impacts the proposed project will have on the Commission's water, sewer and storm drainage systems.

Water

1. OPG 370 should explore opportunities for implementing water conservation measures in addition to those required by the State Plumbing Code. Consider outdoor landscaping which requires minimal use of water to maintain. If OPG 370 plans to install in-ground sprinkler systems, the Commission recommends that timers, soil moisture indicators and rainfall sensors be installed. The use of sensor-operated faucets and toilets in common areas of buildings should be considered.
2. OPG 370 is required to obtain a Hydrant Permit for use of any hydrant during the construction phase of this project. The water used from the hydrant must be metered. Contact the Commission's Meter Department for information on and to obtain a Hydrant Permit.
3. OPG 370 will be required to install approved backflow prevention devices on the water services for fire protection, mechanical and any irrigation systems. Consult with the Commission's Manager of Engineering Code Enforcement, with regards to backflow prevention.
4. The Commission is utilizing a Fixed Radio Meter Reading System to obtain water meter readings. For new water meters, the Commission will provide a Meter Transmitter Unit (MTU) and connect the device to the meter. For information regarding the installation of MTUs, contact the Commission's Meter Department.

Sewage / Drainage

1. In conjunction with the Site Plan and the General Service Application OPG 370 will be required to submit a Stormwater Pollution Prevention Plan. The plan must:
 - Identify specific best management measures for controlling erosion and preventing the discharge of sediment, contaminated stormwater or construction debris to the Commission's drainage system when construction is underway.
 - Include a site map which shows, at a minimum, existing drainage patterns and areas used for storage or treatment of contaminated soils, groundwater or stormwater, and the location of major control structures or treatment structures to be utilized during the construction.



- Specifically identify how the project will comply with the Department of Environmental Protection's Performance Standards for Stormwater Management both during construction and after construction is complete.
2. Developers of projects involving disturbances of land of one acre or more will be required to obtain an NPDES General Permit for Construction from the Environmental Protection Agency and the Massachusetts Department of Environmental Protection. OPG 370 is responsible for determining if such a permit is required and for obtaining the permit. If such a permit is required, it is required that a copy of the permit and any pollution prevention plan prepared pursuant to the permit be provided to the Commission's Engineering Customer Services Department, prior to the commencement of construction. The pollution prevention plan submitted pursuant to a NPDES Permit may be submitted in place of the pollution prevention plan required by the Commission provided the Plan addresses the same components identified in item 1 above.
 3. The Commission encourages OPG 370 to explore additional opportunities for protecting stormwater quality on site by minimizing sanding and the use of deicing chemicals, pesticides, and fertilizers.
 4. The discharge of dewatering drainage to a sanitary sewer is prohibited by the Commission. OPG 370 is advised that the discharge of any dewatering drainage to the storm drainage system requires a Drainage Discharge Permit from the Commission. If the dewatering drainage is contaminated with petroleum products, OPG 370 will be required to obtain a Remediation General Permit from the Environmental Protection Agency (EPA) for the discharge.
 5. OPG 370 must fully investigate methods for retaining stormwater on-site before the Commission considers a request to discharge stormwater to the Commission's system. The site plan should indicate how storm drainage from roof drains will be handled and the feasibility of retaining their stormwater discharge on-site. All projects at or above 100,000 square feet of floor area are to retain, on site, a volume of runoff equal to 1.25 inches of rainfall times the impervious area. Under no circumstances will stormwater be allowed to be discharged to a sanitary sewer.
 6. The Massachusetts Department of Environmental Protection (MassDEP) established Stormwater Management Standards. The standards address water quality, water quantity and recharge. In addition to Commission standards, OPG 370 will be required to meet MassDEP Stormwater Management Standards.
 7. Sanitary sewage must be kept separate from stormwater and separate sanitary sewer and storm drain service connections must be provided. The Commission requires that existing



stormwater and sanitary sewer service connections, which are to be re-used by the proposed project, be dye tested to confirm they are connected to the appropriate system.

8. The Commission requests that OPG 370 install a permanent casting stating “Don’t Dump: Drains to Boston Harbor” next to any catch basin created or modified as part of this project. Contact the Commission’s Operations Division for information regarding the purchase of the castings.
9. If a cafeteria or food service facility is built as part of this project, grease traps will be required in accordance with the Commission’s Sewer Use Regulations. OPG 370 is advised to consult with the Commission’s Operations Department with regards to grease traps.
10. The enclosed floors of the parking garage must drain through oil separators into the sewer system in accordance with the Commission’s Sewer Use Regulations. The Commission’s Requirements for Site Plans, available by contacting the Engineering Services Department, include requirements for separators.

Thank you for the opportunity to comment on this project.

Yours truly,

John P. Sullivan, P.E.
Chief Engineer

JPS/RJA

cc: C. Rizzi, MWRA via e-mail
D. Devlin, BWSC via e-mail
S. McFee, BWSC via e-mail



Commonwealth of Massachusetts

Executive Office of Energy and Environmental Affairs

Department of Environmental Protection

Address: 100 Cambridge Street, Suite 900, Boston MA 02114 | Phone: 617-292-5500

Maura T. Healey
Governor

Kim Driscoll
Lieutenant Governor

Rebecca Tepper
Secretary

Bonnie Heiple
Commissioner

Memorandum

To: Alexander Strysky, MEPA Analyst

From: Frank Taormina, Waterways Regulation Program, MassDEP/Boston

cc: Daniel Padien, Program Chief, Waterways Regulations Program, MassDEP/Boston

Re: **EEA No. 16802 / DEIR / Reserved Channel Master Plan Development, (South) Boston, Suffolk County - Comments from the Chapter 91 Waterways Regulation Program**

Date: July 9, 2026

The Department of Environmental Protection Waterways Regulation Program (the "Department") has reviewed Draft Environmental Impact Report (DEIR) EEA No. 16802, submitted by Oxford Properties Group and Pappas Enterprises, Inc. (the "Proponent") to redevelop approximately 41.66 acres of land located north of West First Street, south of Summer Street, and west of the Reserved Channel (referred to as the "Reserved Channel Master Plan Development") on Filled and Flowed Tidelands of the Reserved Channel in (South) Boston, Suffolk County (the "project site").

Chapter 91 Jurisdiction, Process, and Regulatory Analysis:

As detailed in the DEIR, the 41.66 acre project site consisting of Blocks A through K, of which approximately 38.23 acres of land (Blocks B, C, D, E, G, H, I) are owned by the Massachusetts Port Authority ("Massport") and ground-leased to the Proponent, while the remaining approximately 3.43 acres (Blocks A and J) are owned by the Proponent.

The Department determines that the proposed project is nonwater-dependent pursuant to 310 CMR 9.12(2)(f)(1),(2),(3),(4),(6) (8) and 310 CMR 9.12(4), and all tidelands subject to licensing on the project site are Filled or Flowed Commonwealth and Private Tidelands pursuant to 310 CMR 9.02, as further detailed below.

Nearly the entire proposed project would be located on Filled Commonwealth Tidelands of the Reserved Channel, with some proposed work in and over Flowed Tideland (on Block K), outside of the South Boston Designated Port Area (DPA). However, the majority of the project site appear to be

located more than 250 feet from the project shoreline [i.e. mean high water (MHW) mark] and separated from the shoreline by Pappas Way, for which the Proponent has provided documentation in the DEIR to support their assertion this was a public way in existence on January 1, 1984. Accordingly, the majority of the project site appears to be located on Landlocked Tidelands and not subject to licensing pursuant to M.G.L. Chapter 91, Section 18 and 310 CMR 9.02.

The Department asked the Proponent in its ENF comments to survey 100 rods (1,650 feet) from the historic high water (HHW) mark so it could determine if Block K (which is owned privately by the Proponent) was in fact Commonwealth Tidelands as defined at 310 CRM 9.02. On Figure 5-1 of the DEIR, the Proponent surveyed 100 rods from HHW and confirmed that the majority of Block K is located within 100 rods of the HHW mark and therefore considered Private Tidelands, whereas the small portion located landward of the 100 rod mark is considered Commonwealth Tidelands.

The Department also asked the Proponent in its ENF comments to explain the process for licensing the Phase 1 project and the overall development (future phase projects) located in C.91 jurisdiction and demonstrate compliance with all applicable regulations at 310 CMR 9.00. In the DEIR, the Proponent confirmed that the Phase 1 project located in Chapter 91 jurisdiction (portion of Block C-1) will consist of a 4-story nonwater-dependent use building (mixed-use commercial) which is intended to meet all baseline Chapter 91 regulations at 310 CMR 9.00, including all nonwater-dependent use provisions at 310 CMR 9.51-53. The Proponent also intends to seek an extended term license for the Phase 1 building pursuant to 310 CMR 9.15(1)(b).

Future phases located in Chapter 91 jurisdiction (Block D, I, and J owned by Massport and Block K owned by the Proponent) will be subject to a Special Review Procedure (SRP) and Project Commencement Notice (PCN) filing with MEPA. Furthermore, the Proponent explained that they will seek a future Waterfront Development Plan (WDP) to be approved by the Department pursuant to the South Boston Memorandum of Understanding ("MOU") entered into, by, and between the Massport and the Department on March 15, 2001, as amended on June 15, 2022, to establish Substitutions for various nonwater-dependent dimensional/use provisions in 310 CMR 9.00 with commensurate Offsets and Public Benefits as defined in the MOU. The Proponent anticipates that a WDP will be approved by the Department for the future licensing of structures, fill, and uses on Blocks I and J located within Chapter 91 jurisdiction. At this time, however, the Proponent anticipates that the redevelopment of Block D will comply with all applicable provisions at 310 CMR 9.00 but may include Block D into a WDP if a Substitution from any applicable provisions is needed.

In Section 5-3 of the DEIR the Proponent noted that it is evaluating the appropriate regulatory pathway for the redevelopment of Block K, which is envisioned to be a pile-supported pier with hotel and public marina. Please note that because Block K is privately owned by the Proponent and not owned or controlled by Massport or leased by Massport to the Proponent, the Proponent cannot seek relief from M.G.L. Chapter 91 and 310 CMR 9.00 under the MOU. Instead Block K must fully comply with all applicable Waterways Regulations at 310 CMR 9.00 in order to be licensed under M.G.L. Chapter 91. The Final EIR should demonstrate how the build-out of Block K, specifically the proposed nonwater dependent use over Flowed Tidelands complies with the applicable provisions of 310 CMR 9.00.

Lastly, the Department asked the Proponent to demonstrate compliance with 310 CMR 9.53(2)(a) regarding facilities that promote water-related public benefits to activate Commonwealth Tidelands. In the DEIR the Proponent stated that they are evaluating the feasibility of such facilities, which may include “touch-and-go” dock/pier for water shuttles, and/or publicly accessible docking facilities for small hand launched crafts (e.g., kayaks, canoes, etc.), recognizing safety consideration associated with the industrial uses of the Reserved Channel and South Boston DPA located to the east of the Summer Street Bridge. The Proponent also noted that if such a facility is not a component of the Phase 1 Project (Block C) than it anticipates that such facilities would be planned, coordinated, and permitted as a component of a future phase of the overall Reserved Channel Master Plan Development.

Prior to submittal of the Preliminary Waterfront Development Plan (PWDP) for the future phase project, the Department recommends that the Proponent send a Draft PWDP to the Department for review and then schedule a pre-filing meeting with Department to discuss.

If there are any questions, please contact Frank Taormina at frank.taormina@mass.gov



City of Boston
Planning Department

To:

Massachusetts Environmental Policy Act Office
Executive Office of Energy and Environmental Affairs
Attn: Tori Kim

Re: City of Boston comments in response to the Reserved Channel Development Draft Environmental Impact Report

July 10, 2026

Ms. Kim,

The City of Boston Planning Department ("Planning") submits this comment letter to the Executive Office of Energy and Environmental Affairs, MEPA Office ("MEPA"), in response to the Draft Environmental Impact Report ("DEIR") for the Reserved Channel Development project ("Project"), submitted by the Oxford Pappas Group ("Proponent"), dated May 28, 2026, and published in the Environmental Monitor on June 10, 2026.

The comments below represent the City of Boston's ("City") consolidated feedback across various departments involved in the review of the DEIR filing, including: Boston Transportation Department, the Office of Climate Resilience and the MBTA. In addition to the specific comments outlined below, the following points are highlighted in an Executive Summary for additional emphasis and consideration.

Please do not hesitate to reach out to my office via Nick Carter, Development Portfolio Manager (nick.carter@boston.gov) in case of any questions or concerns.

Sincerely,

Signed by:

20D8C1779DAF46F...

Kairos Shen
Chief of Planning

CC:

Andrew Hargens, Chief Development Officer, Massachusetts Port Authority
Mark McGowan, Vice-President, Head of Development, Oxford Properties Group

PLANNING DEPARTMENT

One City Hall Square | Boston, MA 02201 | BostonPlans.org | T 617.722.4300 | F 617.248.1937
Michelle Wu, Mayor | Kairos Shen, Chief of Planning

Executive Summary

- To support the City of Boston’s efforts for implementing district-wide resilience solutions and to leverage a potential investment by the US Army Corps of Engineers (“USACE”), the City requests the Proponent to develop a community-preferred design option for resilience measures along the Reserved Channel. This would include planning and design, community engagement, feasibility studies, and a cost estimate commensurate with 35% schematic design (or funding in lieu of the same), and be developed in partnership with the City of Boston, Massachusetts Port Authority (“Massport”), and USACE. The design should be coordinated with other nearby district scale solutions for flood resilience and be delivered in final form by 2031 to enable future implementation by either USACE or the Proponent in the later phases of work.
- The City requests that the Proponent move the line of resilience protection closer to the water’s edge to ensure long-term viability of publicly accessible open space created along Reserved Channel. Open space along Reserved Channel should be designed to step up elevationally as quickly as feasible to minimize creation of “sacrificial” open space which will have limited use due to increasing exposure to flooding. Ideally the publicly accessible open spaces along the channel will be set at the Design Flood Elevation, or at a minimum be set above the level of 2070 astronomical high tide.
- To augment the existing transportation network, mitigate the project’s transportation impacts, and support the City’s goals for multimodal transportation in this area, the City requests the Proponent to provide or subsidize existing operations for a shuttle service connecting the Project to the Red Line, Silver Line, and other transit nodes in South Boston. The planning, design, and implementation details of this mitigation measure will be developed in conjunction with the City, other nearby property owners, development teams, and the Seaport TMA to ensure that publicly accessible shuttle services are available by the time the first phases of the project are completed.
- The Project site is within an area identified by the Boston Parks Department (“Parks”) as ‘beyond any park service area’ in the most recent Open Space and Recreation Plan. The City requests the Proponent to continue studying alternative open space designs to maximize opportunity for resilient, public-serving open space in Phase 1 and future phases of the project. In particular, the Proponent should look to maximize opportunity for resilient, public-serving open space at Block A, particularly open space located along the Pappas Way edge to prioritize the connection to Reserved Channel as a primary open space.

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Regulatory Review Context

The Reserved Channel project site contains approximately 41.66 acres located in South Boston, north of West First Street, south of Summer Street, and west of the Reserved Channel (the “Master Site”). The Master Site consists of approximately 38.23 acres of land, ground-leased by the Proponent from the Massachusetts Port Authority (“Massport”), and an additional approximately 3.43 acres owned in fee by the Proponent. The Proponent filed an Environmental Notification Form (“ENF”) with the Executive Office of Energy and Environmental Affairs, MEPA Office for a master planned project located on the Master Site (the “Master Project”), and a Special Review Procedure (“SRP”) established was established by MEPA on April 1, 2024 to govern review of the Master Project.

In parallel with the SRP, on November 17, 2023, the Proponent submitted a project notification form (“PNF”) for Article 80 review of a proposed project to be located on three blocks within the Master Site. The “Phase 1 Project Site” consists of approximately 12.86 acres in two areas of the Master Site. The first area, described as Block A and Block B, is located on the northeastern side of West First Street between Pappas Way and E Street and includes a fee-owned parcel containing approximately 1.97 acres and approximately 5.68 acres which are ground leased from Massport. The second area, described as Block C, is a 5.21 acre parcel located at 647B Summer Street and is ground leased from Massport.

The “Phase 1 Project” originally proposed by the Proponent consisted of eight buildings totaling approximately 1,739,000 sf of development. On Block A, the Proponent proposes to build a new commercial lab building, a new residential building, a civic pavilion and open space. On Block B, the Proponent proposes to build two new commercial lab buildings and a new residential building. On Block C, the Proponent proposes to build a new commercial lab building and a new mixed use commercial building.

The commercial lab building and residential building proposed to be built on Block A are located on fee-owned parcels; the Proponent proposes to develop these projects pursuant to a Planned Area Development Plan (“PDA Development Plan”). The remaining projects proposed by the Proponent to be developed in the Phase 1 Project are all located on land owned by Massport and ground leased by the Proponent; the Proponent has elected to undergo voluntary Article 80 review with respect to these projects.

On June 10, 2026 the project’s DEIR was published in the Environmental Monitor in response to the June 28, 2024 Certificate of the Secretary of Energy and Environmental Affairs on the Environmental Notification Form for Reserved Channel, filed on April 1, 2024.

Planning and Zoning

Planning Context

While the Phase 1 Project comprises only parcels in select sections of the Master Site, the entire site context must be commented on as street realignments and pedestrian, bicycle, and transit access points will need to be assessed at a greater than site scale. It is anticipated by the Proponent that additional acreage within the Master Site will be available for redevelopment in the future in coordination with a long term plan.

As described above, the Phase 1 Project Site comprises three sites within the South Boston Waterfront neighborhood. The three sites will be respectively referred to as Block A, Block B, and Block C, corresponding to the manner in which the Proponent has labeled them in the DEIR. Block A comprises fee-simple land, owned by the Proponent. Block A is bounded to the southwest by West 1st Street, to the southwest by Pappas Way and to the northwest by the proposed B Block including a proposed extension of F Street northeast into the site. There is an access road bounding the parcel to the northeast. Planning Department staff have recommended this road as an extension of Cypher Street extending southwest from the present terminus of Cypher Street at its intersection with D Street. Block A includes three buildings within the block, two residential buildings that will be built above a shared podium with ground-floor retail. One tower will be six-stories while the other will be 17-stories. It will also include an 11-story residential building with ground-floor retail.

Block B is located northwest of Block A and similarly bounded by West 1st Street to the southwest. To the northwest, Block B is bounded by E Street, and to the southeast, the block is bounded by the proposed extension of F Street into the development area terminating at the intersection with the service road that the Planning Department has suggested for the Cypher Street extension and realignment. This service road serves as the northeast boundary for the block, similar to Block A conditions. Block B comprises land owned by Massport and ground leased by OxP. The proposed development of Block B includes three buildings, two residential buildings with a shared podium and ground-floor retail. One tower will be 6-stories while the other will be 16-stories. It will also include a 15-story residential building with a ground-floor grocery store.

Block C is one block removed from Blocks A and B northeast along Pappas Way. Block C is bounded by Pappas Way to the southeast. The remaining three sides of Block C are bounded by service roads. Building proposals for Block C include one five-story mixed-use commercial building with ground floor

Facilities of Public Accommodation (as per Chapter 91 requirements), and one ten-story commercial research laboratory. Block C, like Block B is on land leased by the Proponent and owned by Massport.

The DEIR submitted by the Proponent to MEPA includes additional Blocks D through L, with information about square footage, use mix, site availability, and characteristics of the site. However, while site availability was noted, no proposed phasing has been issued for the development of these additional blocks

Additionally, while Blocks A, B, and C are identified as part of Phase 1 as an Initial Phase Project, no information regarding the development sequence of these blocks has been provided within the DEIR. The development sequence of these blocks is integral to the review process to assess potential impacts and associated improvements.

The following are existing planning and policy documents adopted at the City, Regional, and State level that ought to inform the Phase 1 Project. Priority in this comment letter is given to policies and plans adopted by the Planning Department and the City of Boston that provide direct feedback for the project. However, other City plans, and plans by Massport as well as the MBTA at the regional level, and the regulations of Chapter 91 at the state level are important to note as the redevelopment of the Phase 1 Project Site moves forward. Plans and Policies that are not highlighted can be found in Appendix A.

City Plans and Policies

Climate Action Plan

The 2030 Climate Action Plan is the City of Boston's roadmap to reducing carbon emissions and protecting the neighborhoods from the impacts of climate change, while centering climate justice. The Plan focuses on accelerating action in sectors with the greatest potential for near-term emissions reductions citywide. In particular, buildings and transportation are the City's two largest sources of greenhouse gas emissions. As the Master Plan and Phase 1 Project progress, they are expected to incorporate strategies supporting building electrification and sustainable public realm design.

The Climate Action Plan is grounded in two core and interconnected areas of work: mitigation and resilience – which frame every strategy and action identified. Mitigation efforts focus on rapidly reducing emissions from the sectors that contribute most to Boston's carbon footprint, particularly buildings, transportation, and energy. Resilience strategies are designed to protect people, infrastructure including new, existing, and historic assets, open space, and neighborhoods from the growing impacts of climate change, while strengthening the City's ability to adapt over time and creating pathways to good green jobs that support resilience and mitigation investments.

The 2030 Climate Action Plan was developed through an all-of-city approach that reflects all Bostonians. No single City department, organization, sector, or community can deliver climate solutions alone. The City worked in close collaboration with residents, institutional partners, community-based organizations, advocates, and technical experts to shape the strategies outlined in the Climate Action Plan. This collaborative process helped ensure that the Plan responds to on-the-ground realities, aligns with community priorities, and leverages the strengths of partners across the public, private, and nonprofit sectors to accelerate implementation. The priorities outlined in this Plan intersect with and reinforce other City initiatives, ensuring that climate action is integrated into how Boston plans, builds, and governs. The goal of the 2030 Climate Action Plan is to articulate a roadmap for the next five years to reduce greenhouse gas emissions, build resilience to climate impacts, and ensure that the benefits of climate action are shared by all.

Serving as a transitional site between the existing residential neighborhood in South Boston and the industrial uses at the Raymond L. Flynn Marine Park, the DEIR notes that the Master Plan Project site will incorporate bi-directional bicycle lanes, street trees, and dedicated pedestrian space that is buffered from vehicular traffic. These improvements are intended to enhance pedestrian and cyclist safety and comfort while improving connectivity through the site. The Master Plan Project site will also create multiple open spaces, including a waterfront open space along the Reserved Channel. These improvements generally support the City's 2030 Climate Action Plan by advancing a more walkable, multimodal site that reduces the reliance on vehicles. However, additional review is needed to assess these improvements including clearer differentiation between publicly accessible open space and private amenity space, as well as further alignment with the existing street and circulation network to ensure a coherent public realm system.

Imagine Boston 2030

Imagine Boston 2030 creates a framework for re-envisioning the City of Boston through the goals of affordability, equitability, and resilience. The plan categorizes Boston neighborhoods as one of three opportunity types: enhanced neighborhoods, mixed-use core, or expanded neighborhoods. Each of these three categories is present within the South Boston Waterfront Neighborhood. The proposed development area falls within the enhanced neighborhood category, although the area along West 1st Street is located on the edge between enhanced neighborhood and expanded neighborhood.

The intention of the plan with respect to enhanced neighborhoods is to improve the public realm, strengthen neighborhood services and connectivity, and encourage contextually sensitive development to improve urban vitality and to affirm each neighborhood's distinct identity. Within this context, Imagine Boston 2030 identifies the need to ensure housing affordability and to strengthen job access.

The live-work community proposed by the Proponent in the Phase 1 Project begins to align with these goals. The ratio of housing to lab and commercial space proposed in the Phase 1 Project is well-aligned with the needs of the neighborhood. While the Proponent has not submitted filings for the future phases of the Master Project, the Planning Department would like to see a similar use mix for the remainder of the Master Site. It is expected that the Proponent will work with The Planning Department and the Mayor's Office of Housing to ensure that the residential elements of the Phase 1 Project respond to the community needs for high quality housing for a variety of income levels.

Based on the information submitted in the MEPA ENF and DEIR, the future phases of the development project include a much lower proportion of residential space. The Planning Department recommends an increase in this ratio to improve the alignment of the use mix with the City's goals and needs expressed in *Imagine Boston 2030* and *Boston 2030: Housing a Changing City*. Additionally, an increase in residential use and subsequent decrease in proposed laboratory and R&D space would alleviate some of the potential stress on the transportation network and improve mobility around and through the Reserved Channel site. Residential uses should be considered in spaces with waterfront views in lieu of commercial, lab, and R&D space, as well as in areas that would benefit from the reduced floor plate size that residential buildings can offer when compared with laboratory space, such as in Blocks A and B, as well as Blocks I and J, in which a reduced building depth would allow Pappas Way to move further inland from the water's edge. The addition of a grocery store within Block B of the development site recognizes the importance of providing amenities for everyday needs as outlined in the enhanced neighborhood goals of *Imagine Boston 2030*.

The plan further recommends that enhanced neighborhoods invest in public realm and open space, improve transportation connections, and foster community gathering spaces. Within the context of these priorities, it is important that the proposed open space, both within the Phase 1 Site and in future phases of the Master Project, create open space that encourages connectivity and vibrancy within the Master Site, and a transportation network that encourages multi-modal uses.

Raymond L. Flynn Marine Park Final Master Plan

The Raymond L. Flynn Marine Park (RLFMP) is located to the northeast of the Master Site. While there is no overlap between the Master Site and the RLFMP area, the nature of the marine park requires its consideration in planning for adjacent areas, including the Phase 1 Project Site. RLFMP represents a marine industrial area within the City of Boston, part of which is included within the boundaries of a Massachusetts Department of Coastal Zone Management Designated Port Area (DPA). This industrialized area requires the availability of truck route connections from the interstate through the South Boston Waterfront Neighborhood into and through the marine park. The short and long term designs for Massport-designated truck routes such as Summer Street, the South Boston Bypass, and the Massport Haul Road should be considered with respect to the redevelopment of the Reserved Channel

site. The proposed extension of F Street into the Reserved Channel site within both the OXP and Planning Department proposed schemes should take into consideration the potential for the exposure of the adjacent South Boston and Dorchester Neighborhoods to truck traffic within the residential fabric.

The proposed width of F Street opens the street up to a potential for increased traffic from the RLFMP into the South Boston residential neighborhood opposite first street. The redevelopment proposal for the Phase 1 Project Site should be cognizant of the location of the site as a transition zone between the highly residential uses southeast of West First Street and the marine industrial uses within the DPA and greater Marine Park.

South Boston Transportation Action Plan

The South Boston Transportation Action Plan (SBTAP) will evaluate safety concerns in South Boston and focus the City's resources on proven strategies and people-first improvements to eliminate serious and fatal traffic crashes. The goal of the SBTAP is to build upon the vision and goals set forth in Imagine Boston 2030 and highlighted further in Go Boston 2030. The plan recommends actions that right size nine streets and redesign 21 intersections within the study area that directly abuts the proposed development site at West 1st Street. SBTAP planning goals also include the reduction of impervious surfaces and improved pedestrian and bicycle accessibility. Proposed changes to the transportation network that may have direct impacts on the Reserved Channel site include sidewalk setbacks within the study area that are needed to create a multi-modal corridor along 1st Street, the realignment of the Pappas Way/1st Street interaction to improve safety, and the addition of privately funded publicly accessible shuttles with City oversight operating along 1st Street from City Point to the Seaport.

The OXP proposal and Planning Department recommendations further diverge in the realignment of Pappas Way, as well in proposed changes to Fargo Street. The Planning Department recommended changes to Fargo Street in the long term development plan for the site are contingent upon the future availability of redevelopment land within the Reserved Channel area, particularly the proposed future USPS site. As changes to the USPS proposal are made, it is requested that any publicly available information regarding this portion of the Reserved Channel property are provided to the Planning Department such that decisions can be made based on the most recent information. Fargo Street is imagined as connecting straight through to Pappas Way, in lieu of the current east-west connection between E Street and Summer Street. Compared to the OXP design proposal, the Planning Department recommendation for Pappas Way shifts the street further inland in two different variations on a new alignment. The less extreme shift still moves Pappas Way further northwest of the alignment proposed by OXP, creating a wider pedestrian corridor along the Reserved Channel, and realigning the intersection of West 1st Street and Pappas Way to a 90° intersection.

While the DEIR notes that Pappas Way and East 1st Street will align to a 90° intersection, further review is necessary for approval as the current proposed design does not adequately resolve the current unsafe condition. In the more extreme condition, Pappas Way is moved even further inland such that Pappas Way continues straight southwest to intersect with West 1st Street nearly halfway between East 1st Street and F Street, approximately between the buildings C1 and C2. The more extreme realignment would interfere with the block structure proposed by OxP, orienting building backs and services towards the waterfront, but would also create more dimension for pedestrian-oriented spaces along the waterfront, as well as space for more resiliency measures to reduce available flood pathways inland from the channel.

Zoning

The site is located in the South Boston neighborhood, pursuant to Article 68 of the Zoning Code. The Massport owned land to the northeast of the development area (Block C) is located within a Waterfront Manufacturing subdistrict. The Massport owned land to the southwest of the development site (Block B), as well as the fee-owned land to the south of the development area (Block A) is located within a Local Industrial subdistrict.

The entire proposed development site is subject to a Restricted Parking District Overlay, the South Boston Industrial/Commercial Parking Freeze Zone as well as the Coastal Flood Resiliency Overlay District (CFROD), with a Sea Level Rise - Base Flood Elevation (SLR-BFE) of 19.5 feet (Boston City Base). The DEIR notes that the Master Plan Project proposes 4,079 parking spaces, while Phase 1 proposes 1,095 spaces. However, while this is below the BTM Parking Maximums set for the site, further constraints on this site include the Parking Freeze Zone and the Restricted Parking District Overlay. These spaces will need approval from the Air Pollution Control Commission.

The two tables below relay the regulations for each of the relevant zoning subdistricts. At this time, there is not enough information provided for the fee-simple parcel (Block A) alone to determine if zoning relief is appropriate. As additional block information was not provided as part of the Article 80 review process, similar analyses have not been completed for Blocks D through L.

Figure 1 - Zoning Waterfront Manufacturing Subdistrict

Zoning: Waterfront Manufacturing Subdistrict				
Dimensions / Uses	Zoning Subdistrict Requirements	Proposed Project	Relief Required?	Relief Recommended as Proposed?
Minimum Lot Size	None	Not provided	N	N/A
Lot Width	None	Not provided	N	N/A
Setback (front)	5' on First Street None elsewhere	Not provided	N	N/A
Setback (side)	None	Not provided	N	N/A
Setback (rear)	None	Not provided	N	
Height	65' Height alternatively regulated by Ch. 91 and FAA	C1: 64' C2: 153'	Y	
FAR	2.0	5.8	Y	
Useable open space/du	None	Exact dimensions not provided	N	N/A
Parking	BTD Parking Maximum	393 spaces		
Uses	Commercial (General Office) (C) Retail (A) Lab (A) Open Space (A)	Commercial (General Office) (C) Retail (A) Lab (A) Open Space ()	N	N/A

The Phase 1 residential portion of the proposed development area will be subject to a forthcoming Planned Development Area zoning overlay, per Article 80C of the Zoning Code.

Climate and Environmental

Coastal Flooding and Sea Level Rise Resilience

The proposed development site is located within the Coastal Flood Resilience Overlay District and will be subject to the effects of future coastal storms and sea level rise. As such, careful attention must be paid to the site and design of resilience features.

The DEIR states that “The Master Plan Project has developed a resilience approach that addresses the risks of coastal flooding, sea level rise, urban heat, and stormwater flooding. The proposed primary resilience adaptation measure is to elevate most of the Master Plan Site, new buildings, and new streets, while blending the new development into the existing urban fabric and enabling future connections to city-scale adaptation plans.” The Proponent should provide the 35% schematic design to U.S. Army Corps of Engineers standards as a base for the district scale resilience solution for the entire Master Plan site. This design should be coordinated with the City of Boston, Massport and USACE to tie into other nearby district scale solutions for flood resilience. The Proponent should deliver this design by 2031 to enable future implementation by either USACE or the Proponent themselves in the later phases of work. The Proponent should provide specifics about what “enabling future connections” entails, and what is the basis for this design concept. The Proponent should identify any coordination which has been undertaken with the City of Boston and the U.S. Army Corps of Engineers to inform this conceptual strategy to enable future connections to city-scale adaptation plans.

Planning has requested that the Proponent move the line of resilience protection closer to the water’s edge to ensure long-term viability of publicly accessible open space created along Reserved Channel. Planning requests that open space along Reserved Channel be designed to step up elevationally as quickly as feasible to minimize creation of “sacrificial” open space which will have limited use due to increasing exposure to flooding. Ideally the publicly accessible open spaces along the channel will be set at the Design Flood Elevation, or at a minimum be set above the level of 2070 astronomical high tide.

Figure 10.2 in the DEIT illustrates a “Connection Point to City Flood Defense System”, “Retaining Wall” and “Shoreline Retaining Wall”. The DEIR text provides no information about the retaining walls’ role in flood resilience.

Appendix F contains a Coastal Engineering Analysis which states “Given the scale and phased implementation of the project, it is important to evaluate how the proposed design influences coastal flooding behavior both within the project site and in surrounding areas.” The analysis is performed upon three design storm scenarios: 1. FEMA Present Day 100 year storm; 2. 2050 500 year storm; 3. 2070 500 year storm. The Planning Department requests that the Proponent provide analysis of the 2070 100 year

storm to support future coordination with the City of Boston, as that is the design storm used by the City of Boston in current resilience planning and coordination with the U.S. Army Corps of Engineers.

Proponent should coordinate with BWSC on Coastal Stormwater Discharge Analysis and the possible need for project area to support pumping and storage facilities

Table 13-2 Summary of Mitigation Measures for Phase 1, under the section of “Climate Resilience and Adaptation” identifies “Raising the elevation of the Phase 1 Site to variable heights with approximately

18,000 cubic yards of earth.” as a mitigation measure. Based upon DEIR text such as “To mitigate the risk of coastal flooding at the site level, the Master Plan Project proposes to...” and “The flood redirection modeling demonstrated that the overall proposed project design is effective in reducing flood risk within the project site...” It appears that the flood resilience priorities identified in the DEIR are focused upon protection of project-specific assets, therefore arguably not mitigation which pertains to measures intended to offset project impacts upon the site’s environmental and community context. The Proponent should clarify what, if any, flood resilience mitigation will be provided in each phase to the benefit of the South Boston community outside of the Master Plan Project area. The Proponent should clarify what, if any, flood resilience benefits will be delivered by the project to the South Boston community in each phase.

Planning has requested that the project provide a Harborwalk consistent with City of Boston standards at or near the edge of the entirety of the waterfront, including around Parcel K1.

Climate Sustainability and Resilience - Greenhouse Gas Emission Reduction

In support of Boston’s sustainable development and climate change resilience goals including Boston’s 2030 Climate Action Plan and Climate Ready Boston, the Planning Department requires the Proponent to comply with Boston Zoning Article 37 Green Buildings and Net Zero Carbon for both the fee owned and leased parcels and specifically has requested the following:

Neighborhood Sustainable Development

To ensure the Proposed Project is well integrated into the neighborhood and that the benefits of sustainability measures extend to the surrounding community, the Proponent will prepare a LEED for Neighborhood Development (LEED ND) assessment to be submitted prior to or with the first substantive 80-B building filing. The LEED ND assessment will focus on Neighborhood Pattern & Design and Green Infrastructure & Buildings and include a corresponding LEED Scorecard and supporting narratives. Site and building planning and design should prioritize strategies to reduce Heat Island sources and carbon emissions including passive building energy efficiency.

Green and Net Zero Carbon Buildings

- Each individual new building will comply with the City of Boston’s most current Article 37 Green Building and Net Zero Carbon of the Zoning Code and the standards thereunder at the time of first substantial building specific design filing for each building.
- To ensure comprehensive sustainability, all buildings will achieve LEED Gold certification and comply with building use specific Net Zero Carbon operation standards. Building design and construction will prioritize well insulated, low infiltration building enclosures with reasonable Window to Wall Ratios targeting 20% to 30%). Building systems will prioritize all-efficient-electric heat pump space and DHW heating systems. Residential, Commercial, and Civic use buildings will be fossil fuel free. Buildings requiring high ventilation may include fossil fuel heating to meet peak space heating loads but must prioritize heat pumps heating.
- To reduce building material carbon emissions, also known as embodied carbon, each building, at Schematic Design, will assess potential low carbon building structure and enclosure strategies including mass timber (and hybrid variations), and low carbon concrete, steel, and insulation materials and products.

DEIR Commitments and Comments

Section 1.5 - Public Benefit Summary, Neighborhood and Site Resiliency

The Master Plan Project is also committing to the City of Boston’s carbon neutrality goal by 2050 through targeting LEED Gold certification and exceeding the minimum requirements of the new Stretch Energy Code.

The Proponent should commit to LEED for Neighborhood Development Gold to ensure a comprehensive framework is utilized to assess and mitigate adverse environmental impacts including minimizing GHG emissions at the Master Plan and site redevelopment scale.

Section 2.2 - Planning Principals

All new buildings are anticipated to exceed Stretch Energy Code requirements, be solar ready, and target Leadership in Energy and Environmental Design (“LEED”) Gold certification, consistent with Massport sustainability objectives.

The Proponent should be clear that each building will be subject to the Massachusetts Stretch and Specialized Energy Codes and Boston’s Zoning Article 37 Green Buildings and Net Zero

Carbon and must comply with the standards thereunder at the time of first substantial building specific design filing for each building.

Section 11-11.2.1 - Greenhouse Gas and Proposed Design and Mitigation Commitments

In place of energy modeling for these buildings, the Proponent is committing to a series of GHG mitigation commitments per the MEPA GHG Policy “Opt-Out” provision.

The proposed GHG mitigation commitments appear inconsistent with current code complainant practices and industry norms. The two more notable commitments are the approximately 50% Window to Wall Ratio (WWR) and electric resistant DHW heating. For Stretch and Specialized Energy Code compliant buildings, the added heating / cooling burden of designs with excessive WWRs requires extraordinary high-performance glazing, curtain wall, and mechanical equipment systems. Similarly, the use of electric resistant DHW heating systems requires additional mitigation measures including solar PV installation to meet Passive House standards.

The City requires the Proponent to comply with current Zoning Article 37 Green Buildings and Net Zero Carbon standards at the time of first substantial building specific design filing for each building. Compliance with Article 37 and the Massachusetts Stretch and Specialized Energy Code for both fee owned and MassPort leased parcels should be minimum requirements for meeting the MEPA GHG Opt-out Provision and obtaining MEPA approvals.

Section 11.2.2 and Appendix G - Residential Domestic Hot Water System Analysis

This analysis demonstrates that, as of the time of the analysis, the energy reductions that could be achieved through the installation of the ASHP hot water heating are small in comparison to the additional costs that would accompany their integration into the building designs.

- The provided analysis, while substantial, does not include DHW usage rates, detailed Scopes of Work and equipment descriptions, and corresponding construction and operation cost information. While the typology modeled building performance is good, Residential Design Case EUI 22.7 kBtu/sf-yr and Retail / Amenity Design Case EUI 22.9 kBtu/sf-yr, the resulting DHW heating loads are inconsistent with current building practices. A review of two recent multifamily residential Passive House Wufi models submitted for building permit issuance indicate the DHW heating loads to be 21.9% and 22.5% of the total building energy load. Both of those buildings use HPHW systems and have comparable modeled EUIs of 22.47 and 20.32 kBtu/sf-yr.
- While additional information could shed light on the provided analysis, the results remain highly unique. Given the long buildout timeframe of the project, the limited utility of building typological analysis, and continuing improvements in HPHW systems, the Proponent should commit to all-efficient-electric building systems including the use of HPHW systems for DHW heating. Furthermore, the Proponent should assess integrated building and system designs and utilizing waste heat sources for DHW heating for each building at the Schematic Design phase.

Section 11.2.3 - Solar Readiness and Installation

For mixed fuel buildings (high ventilation buildings), the requisite solar installation will be sized and specified during permitting and installed during construction.

Building on-site solar PV is a low cost source for electricity and 100% renewable. The Proponent should commit to maximizing the onsite renewable energy generation potential of all buildings including optimizing roof top planning and design for system output with systems installed in conjunction with construction completion.

Embodied Carbon Reduction

The DEIR does not respond to the substantive carbon emissions due to building construction materials and products. Current best practices include projects identifying, assessing, and committing to use a range of low embodied carbon building materials and practices including mass timber for building super-structure, low/no carbon concrete, and low carbon building insulation and enclosure elements. Additionally, LEED Material credits for EPDs, regionally sourced materials, recycled material content, life cycle assessments and reduction in building embodied carbon performance set exemplary standards.

The Proponent should commit to preparing and providing an embodied carbon reduction plan including identifying multiple potential best practice solutions for future assessing, achievement of specific LEED credits, and overall embodied carbon reduction goals.

Urban Heat Island

The DEIR does not respond to the higher day and night time temperatures resulting from dense building configurations and common urban public realm conditions. Current best practices include building and site design strategies that utilize materials with high solar reflectivity indexes (SRI) and result in more extensive shade conditions. LEED Site and Pilot credits set exemplary standards for material SRI and shading conditions including cool roofs and cool walls.

The Proponent should commit to preparing and providing a Heat Island Reduction plan including assessing multiple best practice solutions for site, roof, and wall designs and achieving specific LEED Heat Island Reduction credit criteria.

Smart Utilities

The Boston Smart Utilities (BSU) Program aims to establish equitable, resilient, and innovative infrastructure in the City of Boston using the Article 80B Development Review process. Five Smart Utility Technologies (SUTs) across energy, water, telecommunications, and transportation broaden Smart City solutions. The following criteria apply to Reserved Channel Development; Green Stormwater Infrastructure (for projects 100,000 SF or greater), Traffic/Transit and Pedestrian Technologies, Smart Street Lights, and Advanced Energy Feasibility Assessment.

Planning requests the following; Identify potential locations within the masterplan for both above- and below-grade future energy infrastructure and identify how this infrastructure will interface with the existing infrastructure that will remain in-place throughout the redevelopment. Please explain how this infrastructure will integrate with the master plan's resilience, potential district energy strategies and preliminary coordination with Eversource . Detail any Low Impact Design (LID) strategies, such as stormwater retention/infiltration systems and permeable surfaces, might be impacted by the infrastructure or will serve as guiding principles for energy infrastructure locations. The project should provide significant storm water retention beyond the 1.25 inch Smart Utilities requirement. The proposed project should support onsite district-scale stormwater infrastructure including pumping and storage facilities

Transportation

In acknowledgment of the transformational opportunity provided by both the scale and location of the Proposed Project, hereto referred to as “Reserved Channel Site,” Planning and Design staff share the following long-term planning and design priorities. A successful project would deliver -

- A legible and contiguous network of new and improved multimodal connections,
- A network of new public open space, prioritizing waterfront open space meaningfully connected to the South Boston community,
- A mix of new uses that support a “complete neighborhood” in an evolving industrial context, and building forms that respond to established residential neighborhood scales.
- Commitment to coordinating with the City of Boston on important planning work, including MassPort’s F Street extension/transit study.

Transit Network

Transit serving the traditional South Boston neighborhood and Seaport/South Boston Waterfront circumvent the Site, increasing time and travel distances. The Reserved Channel site has no direct transit service but is within walking distance of several bus routes and MBTA services. Within one-half mile, these include MBTA Routes 4, 7, 9, and 10. The MBTA’s Bus Network Redesign project will bring new high frequency service to the D Street corridor with the new “T12” route, however there is no firm timeline for this service’s implementation; until the timing, routing, and service characteristics of the future T12 are confirmed, the project’s transportation mitigation should not rely on that service as the primary transit solution for the site.

New roadways and land uses proposed by the Reserved Channel development would generate a need and opportunity for transit. The DEIR, appropriately projects a future condition with a higher reliance on the transit mode to meet projected trip demands in both the Phase 1 and full build Master Plan condition. In Phase 1, the project is projected to generate ~4,300 daily transit trips and ~1,400 trips in the AM and PM peak periods. The analysis assumes that ~50% of transit trips will walk from the Red Line at Broadway Station, and another ~26% will walk from the Silver Line. Given the long walk distances, these assumptions are too high in the near term, particularly with the unknown timeline of the new D Street bus service. The Proponent needs to commit to subsidizing and working with other nearby property owners, development teams, the Seaport TMA, and the City, to ensure that **publicly accessible** shuttle services that are part of the City of Boston Link shuttle program are available to provide connections to the Red Line, and perhaps the Silver Line, by the time the first phases of the project are completed.

In addition to near-term shuttle commitments, the Proponent and Massport should commit to working with the City, MBTA, Seaport TMA, and nearby property owners on future transit planning for the Reserved Channel area. This should include shared analysis of transit demand by phase, future bus routing opportunities, potential F Street/Summer Street transit connections, shuttle-to-fixed-route transition opportunities, stop locations, passenger amenities, ADA accessibility, transit priority treatments, and funding or operating commitments needed to support transit service as development proceeds.

Vehicle Parking

Proposed Parking Supply

The proposed parking program and its allocation of spaces to uses is acceptable, as it adheres to the City's *Maximum Parking Ratios* for the site. As individual blocks or phases move forward, we anticipate that these interim conditions will also adhere to the maximum allowable spaces, per our guidelines.

The entire site is governed by the South Boston Parking Freeze which regulates off-street parking. The South Boston parking freeze allows a maximum of 29,760 off-street parking spaces. Residential parking spaces in excess of 1 space/unit and all commercial parking are limited to this "bank" and require permitting through the Air Pollution Control Commission (APCC). As of August 23, 2023, there are 1,064 spaces in the parking freeze bank. Massport has its own allocated "bank" of spaces to distribute for its properties, and the DEIR does not clarify if the project proposes to draw from this bank for its parking program. If this is the case, the Proponent should clarify with the APCC that this is also applicable to the non-Massport property that is included in the site. There also should be an update on remaining available parking within Massport's bank and how this relates to projected future parking demand from other Massport properties, including the proposed changes to Parcel 5C in the Marine Industrial Park now under consideration.

Parking Access

The proposed parking access locations in Phase 1 are appropriate. Restricting access from First Street, F Street Extension and Pappas Way, as well as shared access provided from single access points in Blocks A and C will limit conflicts with pedestrians and the public realm.

EV Charging Infrastructure

We appreciate the compliance with the City's *EV Readiness Policy* for the project's A1 and A2 buildings that are within the site's City of Boston "fee parcels". However, we encourage all parking throughout Phase 1 and the Master Plan to adhere to this policy which provides 25% of spaces with EV chargers and the remaining 75% of spaces with appropriate EV charging infrastructure, as opposed to 10% and 15% of spaces respectively on the remaining Massport-owned parcels.

Future Coordination

We appreciate the Proponent's commitment to Article 80 development review for individual buildings/phases. This will allow for future collaboration on transportation related details through design review and the execution of Transportation Access Plan Agreements (TAPAs) with the City. Through individual TAPAs, details on Transportation Demand Management measures, bike parking, appropriate mitigation elements, transportation design and access management can be further refined.

We respectfully request an evaluation of how the Pappas Way bike lane will connect from Phase 1 through Phase 3 to ensure it adapts smoothly to anticipated road network updates. Additionally, the

proposed parallel parking next to the inner side of the shared-use path on Pappas Way raises safety concerns for pedestrians and cyclists, and may call for an alternate layout. Since the Pappas Way open space is intended as a temporary plaza, there should be a clear timeline and activation plan across all three phases so the community can utilize the space throughout the development process.

Interagency Transportation Studies & Analysis

Because the Reserved Channel Site sits at the intersection of City streets, Massport-controlled roadways, industrial access needs, emerging residential growth, and future transit opportunities, all future transportation studies, mobility analyses, corridor plans, and mitigation planning related to the site should be scoped and developed in close coordination with the City, Massport, the Proponent, the MBTA, and other relevant public agencies.

Future transportation planning for the Reserved Channel Site should be conducted in close coordination with the City, Massport, the Proponent, the MBTA, the Seaport TMA, and other relevant public agencies. To date, the City has not been consistently included in planning efforts related to the broader site and surrounding Massport-controlled transportation network. Given the scale of the Master Plan, the phased nature of development, and the site's relationship to South Boston, the South Boston Waterfront, the South Boston Bypass Road, and future transit opportunities, this coordination should occur early and continuously. Future development permitting Article 80 filings and related Transportation Access Plan Agreements should build from this shared planning framework. The City should not be asked to evaluate individual buildings or phases without a clear understanding of how each phase fits within a coordinated long-term transportation strategy for the district.

Street Network

Internal Street Design

All internal streets should be designed to City of Boston standards and compliant with our *Complete Streets Guidelines*. The City prefers all internal streets be City of Boston public right-of-ways, particularly those that connect with and are extensions of existing City of Boston streets (i.e. F Street). The design of internal streets is critical to absorbing new vehicular trips generated by new land uses at the site, thereby minimizing adverse impacts on the neighborhood. They must also provide safe and convenient connectivity to the South Boston residential neighborhood and the South Boston Waterfront.

The street network should consider the following:

- Proposed internal street alignments be connected to existing street alignments via intersections designed for the safety of all users.
- Proposed internal street dimensions are requested to meet Complete Streets dimensional standards.

- Since new streets will be built over a long time period until full build out of the Master Plan is complete, Phase 1 streets need to be designed in anticipation of these long term needs.

F Street

The City supports the extension of F Street as a crucial network element for Phase 1, as well as the longer term vision of its extension for future phases of the Master Plan, and its eventual extension all the Way to Summer Street as a corridor that can accommodate robust bus transit service. In anticipation of this longer term extension of F Street, the Phase 1 design of the new intersection at West First Street should be refined to allow for the full signalization of this intersection.

The long-term F Street corridor should be planned as a future transit-supportive corridor, not simply as a local access street. Future design and transportation analysis should evaluate the ability of F Street to support bus priority treatments, transit signal priority, bus lanes, appropriately located bus stops, pedestrian crossings, bicycle connections, and reliable connections between South Boston, the Reserved Channel Site, the South Boston Waterfront, and Summer Street.

E Street

While E Street is a priority corridor for trucks accessing Cypher Street to connect to the South Boston Bypass Road, the Street today and (more so in the future after Phase 1 is complete and the Master Plan is realized) lacks dimension for safe and accessible improved sidewalks. A minimum of an additional 5' of dimension should be provided with Phase 1 and all future phases of the Master Plan. This will allow the project to deliver wider sidewalks with enough dimension for needed improved street lighting and accessible ramps where necessary. Like at F Street, E Street's intersection with West First Street should be designed to anticipate full signalization in the longer term.

Pappas Way

The proposed longer term Master Plan vision of severing Pappas Way between Road 1 and East First Street as well as between an extended Fargo Street and Summer Street is supported by the City. However, the proposed interim realignment of Pappas Way and East First Street for Phase 1 needs further review and approval by BTB and the Planning Department. The currently proposed modified design does not adequately resolve the current unsafe condition. Also of note, the proposed design of this segment of Pappas Way needs further refinement, as a 10' 2-way bike lane between a parking lane and travel lane is not a safe condition and will result in frequent vehicle incursion.

West First Street

The City appreciates the Proponent reconstructing and providing additional needed dimensions on West First Street from Pappas Way to E Street. However the 2-way bike accommodations on First Street need to increase from 8.5' to a minimum of 10' for safe operations. Additionally, the buffer between the parking lane and 2-way bike lane needs to be extended from 3' to 4' and should be an accessible surface (concrete), and not planted as shown. This allows for safe and accessible access to parked vehicles.

As is highlighted in the DEIR's Bicycle Level of Traffic Street analysis, West First Street's current condition is "most stressful" for cyclists. As an additional needed transportation mitigation element for Phase 1, the Proponent should design and construct an extension of their 2-way bike accommodations

on First Street from E Street to D Street within the existing public ROW. Doing so will result in a more complete bike network connecting the Harborwalk along Pappas Way to the recently completed Cypher Street bike accommodations from D Street to A Street via West First Street. Providing new and safe bike accommodations on First Street is also a priority recommendation in the City's South Boston Transportation Action Plan. The City is currently developing a refined concept design for bike accommodations on First St that the Proponent can utilize as a basis for design.

As noted above, First Street is a challenging corridor for safety for all modes as it has been transitioning from a historically industrial corridor to a mixed use corridor with new residential developments. With the Phase 1 project fronting on First Street, the Proponent should work with the City to make permanent improvements to the City's "tactical" safety improvement recently completed at the intersection of East First Street and West First Street, that are coordinated with the refined interim design improvements to Pappas Way and East First Street.

Road 1

The alignment of where Road 1 meets E Street continues to be unacceptable. The current alignment is unsafe and will operate inefficiently with the off-set Cypher Street. As there are no vehicular access needs from Road 1 for Building B3, this last segment between E Street and Building B2 should be pedestrian only. Removing this unsafe and conflicting vehicular connection will also coincide with Massport's goal of ensuring safe and efficient truck operations on E Street and Cypher Street. The dimension of this corridor, including the location of Building B3 should remain as proposed, thereby preserving the opportunity to make this vehicular and/or transit service connection to E Street and Cypher Street in future phases of the Master Plan if desired in the future. Future roadway connections to E Street and Cypher Street should be evaluated through a joint City, Massport, Proponent, and MBTA planning process to ensure that truck access, industrial operations, pedestrian safety, bicycle connectivity, and potential future transit service are not evaluated in isolation from one another.

Anchor Street / Remaining Internal Streets

Anchor Street has the long term potential through redevelopment to connect to D Street and should be redesigned to accommodate safe bike accommodations, as it represents the only likely east/west connection between Summer Street and First Street to provide a bike network connection.

The remaining proposed internal street network designs meet the spirit of our Complete Streets Guidelines.

Urban Design

The Proposed Project will be subject to review by the Boston Civic Design Commission. The Planning & Design Department reserves the right to request additional materials during the course of the review process in response to comments shared by the BCDC or other public commissions, which may affect the responses detailed in the DEIR. Excerpted BCDC Minutes can be found in Appendix A.

Public Realm and Open Space

Planning has requested that the Proponent further evaluate the proposed relationship between buildings and open space. Planning has requested that the Proponent study the following alternatives to maximize opportunity for resilient, public-serving open space at Block A, particularly open space located along the Pappas Way edge to prioritize the connection to Reserved Channel as a primary open space: 1. shifting Pappas Way northwest, maximizing open space on the channel side of Pappas Way in phase 1 and maximizing contiguous waterfront open space in the full-build scenario.; 2. eliminating the Pappas Way/West 1st Street connection in Phase 1 and replacing it with open space; 3. studying a massing alternative for block A where the density of A3 is absorbed into the A1/A2 building with the current footprint of A3 becoming open space; 4. study a massing alternative for block A which consolidates A1, A2, and A3 (respecting property lines) to eliminate the pocket park at E and West 1st Streets and increase the amount of open space and connection to the waterfront along the southeastern edge of block A (with similar amount of open space expansion in Block B).

The ground floor program should be carefully specified to support active frontages and contribute positively to the public realm, without resulting in the privatization of publicly accessible spaces.

Provide additional detail on how the Master Plan Vision described in Section 1.2.3 will benefit the community. The current plans do not adequately demonstrate how the publicly accessible open spaces will be programmed and activated. Please provide an open-space programming and activation plan that identifies proposed uses, amenities, events, and community activities, and explain how these elements support public use, community engagement, and the overall Master Plan vision through all three phases.

The site is within an area identified by the Parks Department as ‘beyond any park service area’ in the most recent Open Space and Recreation Plan. The plan references the providing of community programming in both the Waterfront Space and the First Street Open Space. The Proponent should communicate the types of publicly accessible open space program currently proposed. The Proponent should engage the Planning Department and Boston Parks and Recreation Department in discussion of how the site can and should support the open space needs of the community as identified in the City’s needs assessment.

The DEIR states that “the Master Plan Project will focus on meaningful public realm improvements outside of the Master Plan Site boundary” Clarification should be provided about the proposed scope and geographic extent of improvements “outside” the boundary.

The DEIR states that “the Master Plan Project has an anticipated goal to have at least 25% canopy coverage within the first five years of tree planting on the Master Plan Site”. This commitment is unclear as the timeline for the multi-phase Master Plan Site is over the course of decades. The Proponent should clarify what is the extent of site area for which the 25% coverage will be achieved.

Planning has requested that the build out of residential uses in Phases 2 and 3 prioritize the creation of contiguous residential districts within the project area with direct adjacency to primary open spaces and Reserved Channel. Planning is concerned about the proposed Block G open space which is located deep within the Master Plan Site and therefore potentially less welcoming to the greater public.

Planning appreciates the integration of vegetative buffers into the areas of grade change between the existing roadway at West First Street and the Block A/B development, as the vegetated buffers will be able to support heat and flood resilience in addition to supporting a welcoming, attractive condition. Planning does however have concerns about the amount of open space in Phase 1 which can support public-serving programs and encourage use of those spaces versus open space which primarily supports conveying pedestrians to retail opportunities.

Provide a detailed plan illustrating which open spaces are proposed to be publicly accessible, public inaccessible, and private amenity spaces, indicating the intended program for all publicly accessible open spaces including active uses vs passive uses and any environmental, resiliency, and sustainability functions, above or below grade.

In Figure 1-10 and 10-7, the open space located at West First Street and Pappas Way is not identified as a primary open space. However, this area, including the roadway and sidewalk improvements, should be developed as part of Phase 1, consistent with discussions held with the City and Proponent’s previous diagrams. Additional information regarding Phase 1 Tree Canopy Coverage diagram would assist in informing the assessment of site’s short-term urban and landscape design outcomes.

The Planning Department advocates for the Proponent to evaluate opportunities for public art and cultural programming. Special attention should be paid to public art, both indoor and outdoor. We encourage the Proponent to consult with local artists during the design period to allow for an integrated approach that supports the local creative community. Refer to MOAC’s ‘Guidance for Public Art on Privately – Owned Buildings or Sites’.

APPENDIX

A. Plans and Policies

City Plans and Policies

PLAN: South Boston Dorchester Avenue

The study area for PLAN: South Boston Dorchester Avenue (PLAN: Dot Ave) runs from Broadway MBTA Station to the north to Andrew MBTA Station to the south along Dorchester Avenue in the South Boston and Dorchester Neighborhoods. While the study area for this plan does not intersect with the Reserved Channel site, interactions between the two study areas should influence the design and planning process. PLAN: Dot Ave develops a strategy to implement a broader type of uses and a greater scale of development along Dorchester Avenue. Plan goals that may impact the Reserved Channel (one half-mile to the east of the Dot Ave study area) include, the promotion of significant new housing at a variety of price points and rental rates, and improved access to the South Boston Waterfront. The study area for PLAN: Dot Ave highlights an intended division of uses with 21st Century Industrial Use, such as Laboratory and R&D Space (use Zone 1) located to the west of Dorchester Avenue, and Residential (Use Zone 4), Residential with 1st Floor Retail (Use Zone 2), and Residential with select 1st Floor Retail (Use Zone 3) concentrated to the east side of the study area, closer to the Reserved Channel Development project site. This distribution of uses further supports the idea of the Reserved Channel site as a transition between the primarily residential nature of the specified area of South Boston, and the highly industrial concentration of uses in the Raymond L. Flynn Marine Park. The use mix and proposed master plan, including street network and network capacity, for the Reserved Channel site should adequately address this transitional context.

East|West First Street Planning & Rezoning

The East|West First Street Planning and Rezoning initiative codified zoning changes that envisioned the area around 1st Street as a mixed-use district. Plan priorities centered around context from the Seaport Public Realm Plan, such as the envisioning of both East and West 1st Street as a walkable, mixed-use, residential scale street through the use of setbacks to provide additional sidewalk area and street trees to create a pleasant pedestrian environment. The initiative also codified 1st Street as a transition zone between residential and local commercial and industrial uses. The proposed redevelopment of the Reserved Channel site seeks to affirm the residential mixed-use character of West 1st Street through the positioning of residential uses within proposed Blocks A and B. This context further affirms the need for a multi-modal design of West 1st Street.

South Boston Seaport Strategic Transit Plan

The South Boston Seaport Strategic Transit Plan study area boundary extends from West 2nd Street at its intersection with Dorchester Avenue to the intersection with the South Boston Bypass, where it shifts northeast to West 1st Street through the intersection with East 1st Street. This alignment forms the landward boundary of the area, which then extends to cover the entirety of the peninsula between the Fort Point Channel and Reserved Channel. The Plan evaluates the existing transit opportunities within the Seaport district within the context of the rapidly emerging and changing land uses within the area. Goals and objectives within the plan identify the need to expand transit, improve reliability, and equalize transit service for all users within the Seaport.

There are no transit stops within the Reserved Channel study area. The #7 bus line stops just outside the redevelopment parcels, at the intersection of Summer Street and Pappas Way. The #4 bus line stops nearby as well, at the intersection of Summer Street and D Street. The proposed Block A and Block B are approximately one-quarter of a mile from the #9 bus line, as it runs along West Broadway. Additionally, the site is about one-half mile from the nearest MBTA rail line stop, located at the Broadway MBTA Station, where access to the Red Line is provided. The next nearest transit access point is South Station, approximately one mile from the Reserved Channel study area, with access to the Silver Line bus service as well as the Red Line, Amtrak, and the Commuter Rail.

The Plan recommends the addition of several transit linkages including across the edges of the Reserved Channel site. Along D Street, the Strategic Transit Plan suggests the addition of two neighborhood bus/shuttle links - one between the Raymond L. Flynn Marine Park and Nubian Square via Broadway Station, and another between Fan Pier and UMass Boston and Columbia Point via D Street. Along Summer Street, between D Street and Pappas Way, the Plan suggests the addition of a bus/shuttle between South Station and the RLFMP via Summer Street and Seaport Boulevard as well as another connection for the RLFMP to Nubian Square shuttle. Also along Summer Street is a proposed bus/shuttle connection between Fan Pier and City Point via L Street.

Summer Street is proposed as an improved multimodal corridor within the South Boston Seaport Strategic Transit Plan. Recommendations within this proposal include the addition of bus/truck lanes and protected bicycle lanes to improve safety of all travel types. This project is intended for installation in two phases, the first as a near-term roadway striping and signage project, and the latter as a mid-term project including the capital reconstruction of Summer Street within the Seaport district.

Additionally, within the Plan, Cypher Street has been identified as a key street for pedestrian corridor-wide improvements, reinforcing the importance of the Cypher Street alignment and connection from the Gillette site along the Fort Point Channel through the Reserved Channel site.

Coastal Resilience Solutions for South Boston

Coastal Resilience Solutions for South Boston is part of the suite of Climate Ready Boston initiatives. The plan presents both near term and long term strategies to mitigate the effects of climate change at the South Boston Waterfront. The study area for this report extends around the entire perimeter of the South Boston and South Boston Waterfront Neighborhoods. The majority of the Reserved Channel site is expected to flood in the 9" Sea Level Rise (SLR) 1% Storm Event scenario. Modeling suggests that Boston will experience 9" of SLR (from the 2013 baseline condition) by the 2030s. Additionally, there are several modeled flood pathways through the site, creating entry points for tidal waters to reach other parts of the South Boston Neighborhood. By the 2070s, with 40" of projected sea level rise, it is anticipated that with current elevation conditions, portions of the Reserved Channel site will be subject to flooding at the average monthly high tide condition.

Coastal Resilience Solutions for South Boston priorities at the Reserved Channel development site include the alignment of flood protection along the shoreline and interior flood pathways to cut off the flood pathway. Strategies to approach this intention include the use of salt marsh along Pappas Way and the addition of seawalls at the most landward points of the channel as well as along portions of Pappas Way. As demonstrated in the January 25, 2024 presentation by the Proponent, the OXP design strategy incorporates several resilience-oriented approaches. Base assumptions by the development team include that the site and buildings will be elevated above current conditions to at a minimum meet the City's Design Flood Elevation (DFE). The PNF and DEIR contain the following provision for DFE and building-scale resilience:

- 19.1 feet BCB minimum site elevation (open space and streets) to avoid future regular monthly flooding during high tide events in 2070.
- 22.3 feet BCB elevation for the majority of the Proponent's Property (including most roadways excluding transition areas, sidewalks, and portions of the public realm) with the potential to tie into the proposed City of Boston coastal defense system.
- 23.3 feet BCB non-residential building Finish Floor Elevation ("FFE") and 24.3 feet BCB residential building FFE.

Despite the requirement for site elevation, the OXP design proposal commits to maintaining good connections to the surrounding neighborhood. The Proponent has proposed the use of pedestrian transition zones along West 1st Street to mitigate the dysconnectivity created by the elevation change.

The transition zone as proposed conflicts with the requested wider dimensions along West 1st Street. The Planning Department suggests that the Proponent evaluate shifting the transition zone away from

West 1st Street by an adequate dimension, or evaluate an alternative approach to site resilience that minimizes the need for a transition zone of the proposed width.

The PNF submitted for the project identifies the intention to infiltrate the minimum required 1.25 inches of runoff from stormwater flooding through an increase in site permeability. During the May 2, 2024 Scoping Session, the Proponent team further elaborated on the redevelopment of the site with the intention to infiltrate the 100-year (1%) 24-hour precipitation event for 2070 (as further described in the ENF and DEIR). Additional information is needed to understand how the proposed phasing of the redevelopment will affect the capacity for infiltration on the site as proposed.

Additionally, the shift of Pappas Way further inland, as recommended by the Planning Department Transportation team, would open up additional space along the waterfront for more resilience solutions to reduce flood pathways, while introducing increased waterfront open space, a more appropriate use of waterfront real estate than non-water dependent commercial uses. This suggested realignment of Pappas Way would offer additional opportunities to integrate the planning strategies of Heat Resilience Solutions for Boston, a Citywide planning initiative focused on mitigating the effects of extreme urban heat.

Regional Plans and Policies

South Station Expansion Plan

The South Station Expansion Plan anticipates that updates to South Station will be completed in 2025. South Station is the nearest service point for several modes of transit to the South Boston Waterfront. There is presently limited transit access at the Reserved Channel site, an issue that is addressed in sections of this letter. The completion of the expansion to the South Station Transportation Center is intended to improve transfers between all modes of transit, including the addition of direct connections between the rail and bus terminal. The project intends to generate a 50% increase in capacity for the new bus terminal and the addition of a protected bike storage room within the bus terminal to better accommodate multi-modal transit. As South Station serves a range of areas underserved by alternative transit options, the station improvements will also include additional wayfinding and accessibility within the station and adjacent transit nodes. Pedestrian travel routes between South Station and the Reserved Channel site should be well developed, reinforcing the need for additional dimension along First Street, and the recommended alignment of Cypher Street across the South Boston Waterfront.

The MBTA Focus 40 Plan identifies strategies and priorities for the MBTA system through the year 2040. The plan identifies forty new priority areas for new service or service improvements throughout the MBTA region, divided amongst three place types, major employment districts, inner core communities lacking rapid transit, and urban gateways. The South Boston Waterfront is recognized within these priority areas as a major employment district, with the need for transit reform characterized by its longer than average commute times, location just beyond the densest part of the rapid transit network, and presence of multiple shuttle providers to compensate for insufficient service. The addition of new residential, lab, and office space to the area through the Reserved Channel development aligns with the expectations of growth reported in MBTA Focus 40.

B. BCDC Minutes

Excerpted BCDC Minutes

Commissioners recommended the proposed project be further reviewed at the BCDC Design Subcommittee. The following are staff notes from the session.

LE—"42 acres is not something we review often, and it reminds me a bit of the Seaport's early days. There are tremendous opportunities here, not only on the site but also in the connections all the way back over to Fort Point and certainly along the waterfront in general."

AML—"As was observed, a lot is changing in this district. It would be helpful to look at some of the precedents, how we negotiate the change in use and the change in scale, and where we are in time." Referenced the proposed redevelopment of the Edison Power Plant at 776 Summer Street as an example of a site facing similar challenges - sea level rise, edges that must negotiate a significant change in scale, and adaptive reuse of industrial buildings.

JE—Appreciated high-level goals. Recommended that the Design Subcommittee focus on relating those goals to drivers of urban framework. Requested long sections and long perspective views to support evaluation of proposed building height. "Drawn to comments regarding connections. What is this connected to? What are other moments or landmarks in the neighborhood beyond that are relevant to better anchor or stitch this in more meaningfully to the neighborhood?"

SGS—The amount of information to learn about this site is somewhat overwhelming, but it's a really exciting opportunity. Opportunity to look at the whole site from a grading perspective, not just building by building, an opportunity that was obviously missed in the Seaport. As well the opportunities for flood resilience - both stormwater and sea level rise - that might be different given the scale of the proposed project. Asked for more information about the proposed project's relationship to water.

CM—Asked for more information about access to the site. What are the primary points of entry? What is planned for transportation access? What are the intended uses of the "civic pavilion?"

ML—"I am intrigued by this idea of really, really zooming out. As big as the site is, I want to zoom out and understand bigger patterns in the area. I know Summer Street is a big thoroughfare, West 1ST Street, but I think we need to understand the grid in this neighborhood and points of access, as CM was saying." Requested additional information about development (referred to the Edison Power Plant at 776 Summer Street and recently proposed projects on W 1ST Street) and other open space in the area. "Really understanding where the grid wants to be in relation to the new Cypher Street and F Street, I'm excited by the idea of pulling back Pappas Way too, but then you might get too close to F Street, truly

digging into those access points. And then open space, I know we have the D Street Park, how does that relate to

this space? I'm super excited by this project because it's a whole new district in our city, but I think we need to zoom out and understand urban design strategies before we talk about buildings."

DM - What's the strategy for resolving infrastructure on the site?

JE - Requested more information about the community process.

Public Testimony contributed by Laura Martinelli, Matt Martinelli

WR - "I want to ask the question whether we, BCDC, or others, are going to take a stand or express a stance about city building and what kind of city we want in this complicated parcel."

LE - Need to create a subcommittee review schedule. I heard a desire to "zoom out" in scale and understand better the zoning and other regional planning efforts relevant to the site and areas around the site. Looking for more information about the interim condition, for example, once Phase 1 is built out, how that would work with existing conditions elsewhere on the site, and the rationale for not including the waterfront open space in the Phase 1 proposed project.

From: philipbalboni@gmail.com
To: nick.carter@boston.gov; [Strysky, Alexander \(EEA\)](#)
Subject: Support for Reserved Channel Development
Date: Monday, July 13, 2026 9:33:22 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Carter and Mr. Strysky,

I have been the owner of the property at 270 West First Street in South Boston for 73 years, so I have had the benefit of a front row seat to one of the most amazing urban transformations in American history. Our property is located right across the street from the proposed Reserved Channel Development along Pappas Way and West First Street, and I am writing to you today to express my enthusiastic support for the RCD project.

RCD is likely to be the most important remaining redevelopment project in this area, turning a significant industrial site into a host of new uses that will improve and strengthen the neighborhood. With its new work/live opportunities and active spaces for the public, the RCD project is an important opportunity to bring much-needed economic investment, jobs, and improved environmental and site utilization to this key section of South Boston. It will be the lynchpin connecting the Seaport and waterfront community with the South Boston residential neighborhood and be a capstone in completing what may well be the most vibrant section of our city.

From what I have seen, the RCD team has been careful to listen to area residents and businesses and it will advance all of these important and needed objectives:

- **Bring new housing including affordable options to the neighborhood**
- **Create jobs and support local businesses**
- **Improve streets, sidewalks, and overall safety in the area**
- **Add new public spaces and make the waterfront more accessible**
- **Bring life to an area that is currently underutilized and badly in need of improvement**

As one of the property owners with the longest involvement in the West First Street and surrounding neighborhood, I am genuinely excited to welcome the RCD project. It's a thoughtful, very ambitious investment in South Boston which will benefit the neighborhood far into the future, and I encourage you to grant its necessary approvals for permitting and construction.

With best wishes, Phil Balboni

Philip S. Balboni
P. Christopher Associates LP
Managing General Partner
2 Atlantic Avenue, the Pilot House
Boston, MA 02110

Cambridge Office
132 Brattle Street
Cambridge, MA 02138
Mobile 617-590-5315

From: [Dave Winick](#)
To: [Nick Carter](#); [Strysky, Alexander \(EEA\)](#)
Subject: Support for Reserved Channel Development
Date: Tuesday, July 14, 2026 11:25:14 AM

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Dear Nick and Alex:

We are writing as the longtime owner-operators of Publico, an established restaurant just a few blocks away, to offer our support for the Reserved Channel Development along Pappas Way and West First Street in South Boston.

The project has undergone extensive public review and feedback in the community, and it will result in a positive and transformative development for the immediate and surrounding neighborhood. The master plan will improve the environmental conditions, create new public open spaces along Reserved Channel, and hopefully bring a supermarket to an underserved area. Its massive economic investment will bring new jobs, customers and patrons to our area, while helping to support and restore South Boston's longtime live-work culture. As a nearby business, and longtime property owners in South Boston, we are excited to see the first phase of the project start with the intersection of West First Street and Pappas Way, and we are pleased to offer our enthusiastic support for its approval.

Sincerely,

David Winick

Publico

11 Dorchester St, Boston, MA

Partner

781.718.6197

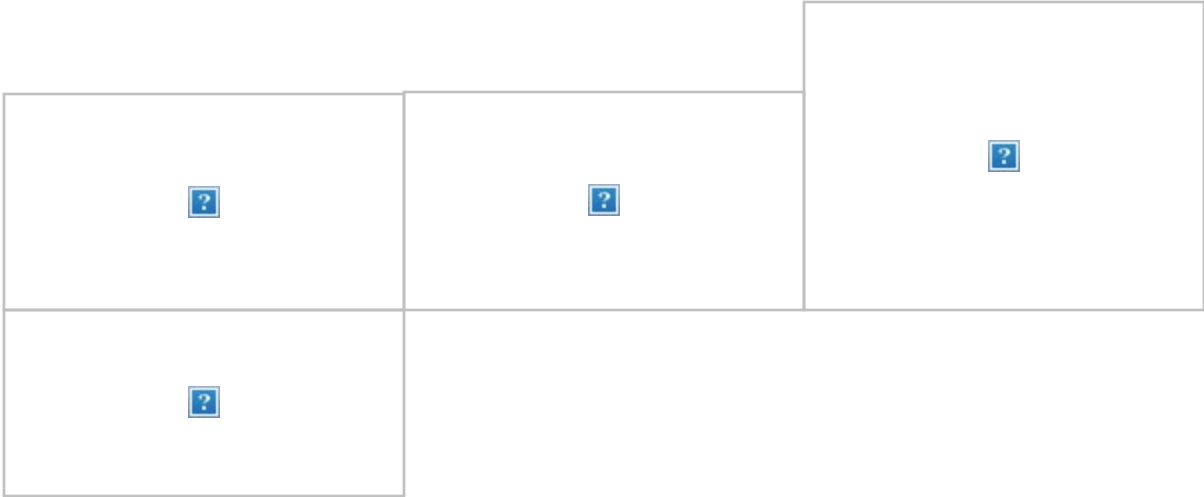
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781.718.6197 (cell)

TheCedarwoodGroup.com

PublicoBoston.com



From: [Levi Reilly](#)
To: [Stryisky, Alexander \(EEA\)](#)
Subject: Letter of Support for Reserved Channel Development
Date: Thursday, July 16, 2026 8:27:13 PM

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Dear Alex,

I'm writing to voice my support for the Reserved Channel Development proposed along Pappas Way and West First Street.

My wife, two young daughters and I live in South Boston and know this stretch of South Boston well. The site today is underutilized industrial land wedged between an established residential neighborhood and one of the fastest-growing job centers in the state. From an environmental standpoint, that is precisely where new density belongs: redeveloping here puts housing — both market-rate and affordable — next to jobs, transit, and existing infrastructure rather than pushing growth to the region's edges.

I'm also encouraged by how squarely the plan confronts the realities of building along Boston's waterfront. Coastal resilience and flood protection measures, upgraded stormwater management, and new tree canopy and green infrastructure are built into the site and public realm design rather than tacked on, and together they would leave the Reserved Channel edge better protected and cooler than the largely paved condition that exists now.

Finally, the project would open up a stretch of waterfront that the area's industrial history has long walled off. New publicly accessible open space and improved walking and biking connections along Pappas Way and West First Street would give neighbors meaningful access to the Channel for the first time in a long while.

The proponents have engaged extensively with residents, civic organizations, and local businesses, and the plan reflects that input. I respectfully urge MEPA to allow the project to advance through review.

Thank you for your time and consideration.

Sincerely,
Levi Reilly
52 P Street, South Boston
levi.r.reilly@gmail.com

From: [Michael D'Angelo](#)
To: [Strysky, Alexander \(EEA\)](#); nick.carter@boston.gov
Subject: Letter of Support for Reserved Channel Development
Date: Sunday, July 19, 2026 3:47:19 PM

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Dear Mr. Carter and Mr. Strysky,

As a longtime South Boston resident, I'm writing to share my support for the proposed Reserved Channel Development along Pappas Way and West First Street.

I've watched this part of the neighborhood remain largely industrial and underused for years, and I think this project is a great opportunity to create something that better serves both current residents and future generations. Rather than leaving the area disconnected from the rest of the neighborhood, this plan would bring new homes, businesses, jobs, and public spaces that people can actually enjoy and use every day.

What stands out to me is that the development team has taken the time to meet with residents and local businesses and has incorporated feedback into the project. That willingness to listen gives me confidence that they're trying to create something that's a good fit for South Boston, not just another development.

I also appreciate that the proposal includes affordable housing, improvements to the streets and sidewalks, better public access to the waterfront, and new open spaces. Those are the kinds of investments that make a neighborhood more livable and welcoming for everyone.

I believe this project will help revitalize an area that has long been overlooked while still respecting the character of South Boston. I hope you'll support and expedite the approvals needed to move this project forward.

Thank you for your time and consideration.

Sincerely,

Michael D'Angelo

**151 P Street, Unit 2
Boston, MA 02127**



Michael D'Angelo, Principal

michael@m-d-l-a.com // 203 592 4788
179 Lincoln Street // Suite 302 // Boston, MA

m-d-l-a.com // [Instagram](#)

Introducing Campanelli Golf; a division of MDLA

From: [Sharon](#)
To: [Nicholas Carter](#); [Stryisky, Alexander \(EEA\)](#)
Subject: Reserved Channel Development
Date: Monday, July 20, 2026 9:33:41 PM

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I am a direct abutter of the Reserved Channel Development along Pappas Way in South Boston, as I live on West 2nd Street between E and F Street, and I am writing to you in support of this development. I believe this project will improve this industrial sight along West First Street by converting it into housing and retail space. This area is in dire need for street improvements, including but not limited to: the sidewalks, crosswalks and green space. It will also provide many construction jobs, and full time jobs when completed.

Thank you for your attention to this matter,

Sharon Butler-O'Dwyer
323 West 2nd Street
South Boston, MA. 02127

From: [Brendan Linehan](#)
To: [Strysky, Alexander \(EEA\)](#); nick.carter@boston.gov
Subject: Pappas Way Project
Date: Tuesday, July 21, 2026 9:30:19 PM

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Access to shared message expires in [1 week](#)

Hello -

As a long time South Boston resident and home owner, I am writing in support of the Reserved Channel Development along Pappas Way in South Boston.

This project will improve an industrial site along West First Street into housing and retail spaces. It will make many street improvements on West 1st Street as well as provide many construction jobs and full time permanent jobs when completed. This section of West First St is in need of crosswalks and new sidewalks and as I understand it, this project will provide!

Thank you,
Brendan Linehan

WHI

WILLIAM HIGGINS INSURANCE

P.O. Box 51396 • Boston, MA 02205
(617) 269-4040

Dear Mr. Strysky,

July 21, 2026

I'm a local business owner in South Boston, and I'm writing to support the proposed Reserved Channel Development along Pappas Way and West First Street.

From a business perspective, this project represents a real opportunity to strengthen the neighborhood and create a more active, connected environment for both residents and small businesses. Today, much of this area is underutilized and doesn't fully contribute to the local economy or foot traffic that nearby businesses rely on.

What stands out to me is that the plan reflects input from the community—including nearby businesses—and aims to balance new growth with the character of South Boston. That kind of approach matters, especially for those of us who operate here day to day.

I support this project because it will:

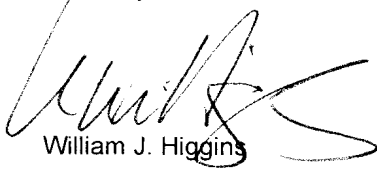
- **Bring more people and activity to the area**, which helps support local businesses and creates a stronger customer base
- **Improve infrastructure**, including streets, sidewalks, and overall accessibility, making it easier for customers, employees, and deliveries
- **Add housing**, helping support more businesses

Projects like this, when done thoughtfully, can have a meaningful impact—not just in the long term, but in supporting the everyday businesses that are already here.

I encourage you to move forward with the approvals needed to advance this project.

Thank you for your time and consideration.

Sincerely,



William J. Higgins

President

William Higgins Insurance Inc.

617-269-4040

billy@whinsurance.net



The Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
Office of Coastal Zone Management
100 Cambridge Street, Suite 900, Boston, MA 02114
www.Mass.gov/CZM | (617) 626-1200

Maura T. Healey
Governor

Kimberley Driscoll
Lieutenant Governor

Rebecca L. Tepper
Secretary

Alison Brizius
Director

MEMORANDUM

TO: Rebecca L. Tepper, Secretary, EEA
ATTN: Alex Strycky, MEPA Office
FROM: Alison Brizius, CZM Director
DATE: July 23, 2026
RE: EEA# 16802; Reserved Channel Master Plan Development;
Boston

The Massachusetts Office of Coastal Zone Management (CZM) has completed its review of the above-referenced Draft Environmental Impact Report (DEIR), noticed in the *Environmental Monitor* dated June 10, 2026, and offers the following comments.

Project Description

The Reserved Channel Master Plan Development is a proposed master-planned redevelopment of approximately 41.66 acres in South Boston, generally bounded by West First Street, Summer Street, and the Reserved Channel. The project consists of approximately 38.23 acres of Massport-owned land under ground lease and 3.43 acres owned in fee by the Proponent. The proposed project is being reviewed under a MEPA Special Review Procedure and includes both an overall Master Plan and an Initial Phase 1 Project.

The Master Plan proposes a phased mixed-use redevelopment consisting of 24 buildings across 11 development blocks, totaling approximately 5,998,000 square feet (sf) of new development. The proposed program includes residential, commercial research and laboratory, hotel, retail, maritime-industrial support, and publicly accessible open space uses, together with new streets, utilities, shoreline improvements, and other supporting infrastructure. Phase 1 includes redevelopment of Blocks A, B, and C, including approximately 935 residential units, 567,000 sf of commercial research laboratory space, 84,000 sf of retail and amenity space, publicly accessible open space, and associated infrastructure improvements.

As described in the DEIR, the project includes a comprehensive coastal flood resilience approach consisting of site grading, building and roadway elevations, shoreline improvements, retaining walls, stormwater infrastructure, and related measures intended to address coastal flooding, sea level rise, inland stormwater flooding, and urban heat effects. The DEIR states that these measures are intended to maintain public access and connectivity to the Reserved Channel waterfront while accommodating future connections to broader district-scale coastal flood resilience improvements.

Project Comments

Coastal Resource Areas and Resilience

The DEIR includes an engineering analysis of how coastal flood pathways are predicted to change as a result of the project phases. The coastal engineering analysis states that there will be floodwater redirected around the elevated site, which becomes concentrated along corridors such as Summer Street and toward E Street and Fargo Street. The analysis also states that increases in velocity and depth of floodwater increase the road damage percentages along some of the perimeter in future climate conditions. The analysis also states that structural damage could occur at one location along Fargo Street due to the proposed development under future climate conditions once Phase 2 or 3 are constructed. The analysis does not include the effects of precipitation-based flooding or stormwater analysis. The DEIR concludes that these impacts can be mitigated under future development scenarios. It does not appear that the proposed phasing and grading has been informed by the engineering analysis results. Additional information is needed to demonstrate that the proposed grading strategy and phased implementation will not adversely affect adjacent properties or infrastructure. The proponent should explain how localized increases in flood velocity and depth as well as channelization of floodwater flow paths and potential effects on adjacent transportation infrastructure and neighboring properties will be addressed. This could include short term measures to mitigate any impacts until the project can connect to a larger resilience approach.

The DEIR indicates that the site grades and buildings will be elevated 5-8 feet above the existing and adjacent grades and will transition to existing grades through retaining walls and other grade changes. More information is necessary regarding these transitions, interim site conditions, access and egress, and how floodwaters will behave during phased implementation. Additional grading plans, cross sections, and narrative describing these transitions would assist in evaluating potential flood pathway impacts and how the project transitions to the adjacent infrastructure and developed areas.

Given the scale and phased nature of the proposed Master Plan, the proponent should continue to evaluate flood pathways within the context of the overall district-wide resilience strategy and demonstrate compatibility with future flood protection projects being advanced by the City of Boston, Massport, and other public agencies.

Stormwater

The proponent should include additional information describing the Phase 1 stormwater management strategy, including the proposed drainage approach, major stormwater management components, how stormwater will be managed under interim conditions, how the proposed system integrates with the project's overall coastal flood resilience approach, and how Phase 1 integrates with the stormwater management plan across the entire Master Plan site. The proponent should summarize specifically how the proposed plan will address stormwater on site, including analysis of the capacity of the existing storm drain system and any proposed green stormwater infrastructure. Use of green stormwater infrastructure on site is recommended as feasible to promote infiltration and treatment before entering the storm drain systems or sheet flowing off the site.

Waterfront Development Plan

Future filings should demonstrate how shoreline improvements, public access, and resilience features support Chapter 91 public trust objectives while remaining compatible with future district-scale coastal resilience initiatives.

Federal Consistency Review

The proposed project may be subject to CZM federal consistency review and, if so, must be found to be consistent with CZM's enforceable program policies. For further information on this process, please contact Sean Duffey, Project Review Coordinator, at sean.duffey@mass.gov or visit the CZM website at <https://www.mass.gov/federal-consistency-review-program>.

AB/rh/jy

cc: Rebecca Haney, CZM
Frank Taormina, MassDEP

From: [Matthew Martinelli](#)
To: CSnowdon@epsilonassociates.com; [MEPA \(EEA\)](#); [MEPA-EJ \(EEA\)](#); [Strysky, Alexander \(EEA\)](#); [Kim, Tori \(EEA\)](#); [Hanson, Kate \(EEA\)](#); [Nick Carter](#)
Subject: DEIR COMMENTS ON RESERVED CHANNEL PROJECT
Date: Thursday, July 23, 2026 10:13:57 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Corinne - Below are my comments on the DEIR for Reserved Channel Project in Boston. The MEPA link isn't working for me. Could these be added?

Thanks,

Matt Martinelli

I'm writing as an abutter of the Reserved Channel development as well as a member of the CAC assigned to this project. While the revised plan makes changes asked for by the community, there are still areas for improvement to be considered during this DEIR.

1. PAPPAS WAY - Although there has been pushback about eventually closing Pappas Way to vehicular traffic by the end of the project (Phase 3 or later), the proponents need to build the blocks along Pappas Way to have the optionality to close Pappas Way to vehicular traffic. That can include similar builds as the current Eli Lilly-occupied lab along the water's edge.

2. RESERVED CHANNEL CONTINUITY OF OPEN SPACE USE - Boston Harbor Now is working on a study for use of Reserved Channel open space on the other side of the Reserved Channel (exploring bike paths, pedestrian paths, dog park space, and connectivity to this stretch of the Reserved Channel open space). The ultimate creation of the Pappas Way open space along the Reserved Channel should be interconnected to that of the other side of the Reserved Channel. This will allow for continual use along this area as a loop. This means that if there is a separate bike path and standalone pedestrian path, there should be something similar on the other side. I urge the proponents to work with Boston Harbor Now to allow for this type of loop.

3. CONTINUITY OF OPEN SPACE FROM RESERVED CHANNEL TO FORT POINT CHANNEL - The current plans for Gillette's 32 acres and other property along Fort Point Channel include a series of open space parcels from the Fort Point Channel to the South Boston Bypass Road. This space should align with the open space off the Reserved Channel in coordination with MCCA and other landowners to allow for one continuous green/open space connection between the two channels.

4. EAST 1 ST / PAPPAS WAY PARK - As an abutter of this space, I can speak to the desolate nearby park space (Buckley Playground) and overall lack of open space in the area. As an example, my son has to continually kick into a cement wall at a parking lot to practice his soccer. Open space/park is urgent, and I hope that the developer commits to creating this open space in Phase 1. Further, this space needs to be publicly accessible and free to use by the public. Recent "open space" in the Seaport such as pickleball courts, or even the Padel Ball space from the proponent on the site comes at a prohibitive cost.

5. VAGUE RETAIL / AMENITY SPACE - In the latest proposal, the developer has eliminated all promises of civic space (library, community space like a YMCA, even a satellite office for YES recreation organization), which should be noted. But more alarming is the

vagueness of retail/amenity space that leaves open the possibility that retail use could turn into an empty lobby or a walled-off private gym, which is not in the best interest of the public. Some minimums of retail in each block must be committed to. Further, the expansion of the grocery space to something closer to 25,000 square feet should be explored.

6. MAINTAIN BIDIRECTIONAL CYCLE TRACK ON WEST 1st ST - The hope for a bidirectional cycle lane on West 1st is to ultimately connect along all of First Street and down to Pleasure Bay/Castle Island. Moving that connection to Cypher St will remove that cycling connection to City Point as a possibility. The state should maintain that current plan for a bike lane on West 1st St.

Thanks for your consideration,
Matt Martinelli
407 E. 1st St.
Boston, MA 02127



Maura Healey, Governor
Kimberley Driscoll, Lieutenant Governor
Phillip Eng, Interim Secretary of Transportation and General Manager
and CEO of the Massachusetts Bay Transportation Authority



July 23, 2026

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
100 Cambridge Street, Suite 900
Boston, MA 02114

Attention: Rebecca Tepper, Secretary

**RE: Reserved Channel Master Plan Development
EEA No. 16802**

Secretary Tepper,

The MBTA encourages and supports transit-oriented development, a proven strategy for smart, sustainable growth, reducing traffic congestion, and increasing transit ridership. The MBTA appreciates the opportunity to comment on the Reserved Channel Master Plan Development. The MBTA has reviewed the Reserved Channel Master Plan Development documents dated May 28, 2026. The Reserved Channel Master Plan Development parcel assemblage is along bus routes #4 and 7 serving Summer Street and the southern end of the proposed development will be supported bus routes #9 & 10 along Broadway. The development is also within walking distance of the Silver Line. The MBTA has concerns related to safe customer access and operations including potential future geometry and layout considerations to support improved bus service. This letter includes comments made by the MBTA's Transit-Oriented Development (TOD) and Service Planning teams. The MBTA appreciates the opportunity to provide comments on the proposed project and looks forward to collaborating with the project team and MEPA to mitigate construction impacts and increased ridership in supporting the successful implementation of this transit-oriented development.

MBTA Comments

Public Transit Impact and Mitigation

As the project introduces mixed-use density within walking distance of MBTA services, the MBTA encourages the proponent to consider potential mitigation measures to support public transit use. The MBTA looks forward to discussions with the City of Boston, MEPA, and the project team. Particularly, on how the project can contribute to supporting costs of the necessary infrastructure improvements that will benefit prospective residents, visitors, and future employees of the project and the Reserved Channel neighborhood of South Boston. This may include subsidized transit passes for residents through the MBTA's Perq Program, support for first/last mile connections, and implementation of the MBTA Bus Priority. The MBTA is pleased to see that the proponent is incorporating bicycle facilities to support first/last mile connectivity. In addition to the proposed site work, the MBTA encourages the project team to consider additional public realm enhancements beyond their immediate frontage such as improving key pedestrian routes connecting the site to Broadway, Summer Street, and D Street.

Specifically, MBTA requests the support of the proponent to further the MBTA's [Bus Priority Vision](#), which identifies Summer Street, D Street, and Broadway as priority corridors due to existing service and planned service increases under the Bus Network Redesign service plan. Due to this planned service increase, MBTA requests the proponent's support to ensure high-quality bus priority infrastructure is constructed on Summer Street, D Street, and Broadway to ensure current and future service increases are frequent and reliable as planned. Support is requested to further the Frequent Bus Route (FBR) service along D Street with the new Route 12 connecting the Seaport to Andrew Square and Longwood Medical Area,

While the MBTA does not have immediate plans for service expansion along F Street, the Authority encourages the project team to consider public realm enhancements that utilize guidance provided in the MBTA's [Bus Stop Design Guidelines](#) that could serve the development. Ensuring that roadways provide sufficient clear space for accessible bus stops and street furniture can ensure future compatibility with potential bus service.

Clearances for MBTA Safety and Operations

The project is in proximity to MBTA bus service routes and minimizing temporary and permanent adverse impacts to MBTA operations and infrastructure are essential to safety. In planning, design, and construction, the project should be mindful of general concerns raised by constructing along MBTA service routes and infrastructure, including:

- Impact to pedestrian routes to bus stops and potential service interruptions that may arise from construction access gates and delivery schedules,
- Modifications to existing pedestrian access routes to bus service, and
- Potential impact to MBTA subsurface power infrastructure along Dorchester Street that is within the public way.

The project should schedule time to meet with the MBTA to discuss roadway and utility work that could impact subsurface infrastructure.

Coordination Request

Due to the proximity to MBTA bus routes #4, 7, 9, & 10, the Authority requests the project team coordination regarding elements that may impact public transportation ridership, bus stops or shelters, infrastructure, and/or operations.

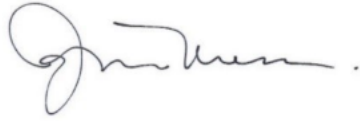
Moving Forward

The MBTA requests that the project team schedule a follow-up meeting to discuss the items outlined here.

Continued partnership with the City is a key component in identifying opportunities to support a safe transit system that can serve the Reserved Channel neighborhood of South Boston community as it

continues to develop. If you have any questions regarding these issues, please feel free to contact Joe Blankenship, Director of TOD Planning at (857) 378-6648 or by email at jblankenship@mbta.com.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Mecca", followed by a period.

Jennifer Mecca, Deputy Chief, Transit-Oriented Development

cc: J. Blankenship, Director of Transit-Oriented Development Planning
R. Mann, Senior Director of Real Estate
R. Duverge, Deputy Director of Real Estate Permitting & Planning
M. Folts, Senior Manager of Transit-Oriented Development Planning



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July 24, 2026

Via email: alexander.stryisky@mass.gov

Alexander Stryisky
Massachusetts Environmental Policy Act Office
100 Cambridge St, Suite 900
Boston, MA 02114

Re: Reserved Channel Masterplan Draft Environmental Impact Report (EEA #16802)

Dear Mr. Stryisky,

Boston Harbor Now respectfully submits the following comments on the Reserved Channel Masterplan Draft Environmental Impact Report (DEIR).

Boston Harbor Now's mission is to ensure that Boston Harbor, its waterfront and islands are accessible and inclusive, and that these special places are properly adapted to the risks of climate change. We advocate for climate resiliency measures that contribute to district-scale flood protection and improve ecosystem services, as well as waterfront activation that welcomes everyone, especially those who have been historically excluded. We do this through a variety of initiatives, including the Stone Living Lab, with the goal of realizing our Harborwalk 2.0 vision of a vibrant, welcoming, and resilient coastline along Boston's 47-mile waterfront.

After reviewing the DEIR filing by Oxford Properties Group and Pappas Enterprises, Inc. (collectively, the "Proponent"), we are pleased to see a number of meaningful commitments that will enhance this property into a vibrant public destination for the people of South Boston and the City of Boston. In particular, we appreciate:

- The project's vision of transforming this industrial waterfront into a resilient, publicly accessible district centered on new open space, improved waterfront access, and multimodal connections.
- The commitment to 11.5 acres of publicly accessible open space on the waterfront, including a continuous network that will enhance the Harborwalk and reconnect South Boston residents with the Reserved Channel.
- The prioritization of residential units based on community feedback to the Environmental Notification Form.
- A phased approach to development that prioritizes delivery of Harborwalk improvements, waterfront recreation, and publicly accessible open spaces as early as possible.

Boston Harbor Now | PO Box 961712 | Boston, MA 02196

Public Realm Benefits, Design, and Activation

In the 12.86 acre Phase 1 site, we encourage the Proponent to emphasize interim waterfront improvements, shared-use paths, flexible recreational spaces, programmable lawns, and early activation of the waterfront while preserving flexibility for future resilience investments. Implementing these amenities in the earliest phases will provide meaningful public benefits long before full project buildout is complete. While we understand that the Pappas Way open space improvements will be implemented over phases over the next decades, we encourage the Proponent to center the community's desire for the eventual closure of Pappas Way to incorporate the roadway into a larger waterfront open space. This could operate similar to the Charles River Esplanade, allowing emergency access when necessary by creating a mixed use pathway wide enough to accommodate vehicles. In addition, we recommend that funding is dedicated to operate, maintain, and program the park space. We also call for the proponent to actively engage and collaborate with community leaders, public schools, neighborhood associations, and nonprofit partners to ensure all visitors and neighbors experience equitable access to the park and waterfront and a sense of belonging at the site.

We urge the proponent to refer to the [Boston Waterfront Partners' Equity Rubric](#) to ensure the project meets benchmarks towards a “more inclusive waterfront, one in which people from BIPOC, lower-income, non-English speaking, LGBTQ, disabled, and other marginalized groups feel a sense of belonging” on our waterfront (BWP Equity Rubric for Waterfront Development, 2025). When designing the 3.04 acre waterfront open space, we encourage the Proponent to also refer to Boston Harbor Now's [Visualizing Harborwalk 2.0](#) design guidelines, which detail best practices for creating accessible, welcoming, and resilient waterfront spaces and multi-use pathways. Examples of centering equity in waterfront design and development include strategies that make this regional destination feel safe and inclusive through lighting, shade, multilingual signage, full ADA accommodations, affordability, community relevancy, and the elimination of features that could cause users to feel unwelcome or excluded.

Public amenities include Facilities of Public Accommodation (FPAs) required under the Massachusetts Public Waterfront Act (M.G.L. Ch. 91) and regulations, which should remain open to the general public, and be accessible at the street level. FPA spaces onsite should include gender-inclusive public restrooms with baby-changing stations, drinking fountains, free Wi-Fi, and furnishings. FPAs should include civic and cultural gathering spaces and meeting rooms available for public use. Gathering spaces should have a user-friendly, multilingual, online booking system so that they are truly accessible to groups that plan to use them. We hope to see these elements incorporated into this project and enumerated in future planning documents and phases of review.

Transportation Connections

We know from regular participation in community engagement and separate meetings around the adjacent project for the Harborwalk Basin Loop that transportation to and through the site is a key priority for the neighborhood. This project has the potential to create safer, more active transportation connections between the South Boston residential neighborhoods and the Seaport district, and we support the Proponent's plan to extend F Street as the primary thoroughfare through the site, with Pappas Way serving as the main bike and pedestrian oriented pathway along the Reserved Channel waterfront. We ask the Proponent to detail how they will work with the MBTA around the future integration of bus service planned along new roadways, particularly on F Street and Road 1. We appreciate the inclusion of bike and pedestrian infrastructure throughout the site, and support the future plan to disconnect Pappas Way from East First Street/West First Street to create a new open space.

Future filings should detail how walkways throughout the site will be safe for multi-purpose transportation modes, with lighting, intentional layouts, and signage regarding speed and pedestrian right of way. Given the proliferation of electric bike/scooter/skateboard traffic throughout urban environments, the proponent should consider separated bike and scooter lanes as well as speed and use limits in high activity areas.

We appreciate the participation of the Proponent in the previously mentioned, ongoing planning process to create design concepts for completing the Harborwalk Basin Loop around the entire Reserved Channel, which will tie into this Masterplan site at the boundary of the project site which borders the Southwest portion of the Reserved Channel. We encourage the Proponent to continue coordinating with the Basin Loop project team, which includes South Boston elected officials, Massport and City of Boston staff, ARUP, and Boston Harbor Now, to ensure that proposed Harborwalk improvements and elevations will tie into design concepts for that connection. We also urge the Proponent to work with Eversource, who recently acquired the abutting parcels to this project site and will be a key stakeholder in completing a continuous Harborwalk loop around the Channel. We ask the Proponent to clarify whether the proposed improvements to the project site at the Southwest corner of the Reserved Channel are limited to landscaping, or if the Harborwalk is intended to continue along this edge and tie into a future Basin Loop connector.

Site Resilience

We support the Proponent's plan to elevate all new building and streets to City of Boston 2070 flood projections, with "sloped areas, landscaped terraces, steps, ramps, and other landscaped transitions that are integrated into the open space design to maintain accessibility, provide amenities (i.e., planting, seating, etc.) and enhance

connectivity to surrounding neighborhoods” (Reserved Channel Masterplan DEIR, 2026). We also appreciate that stormwater improvements to the site will discharge into BWSC separate sewers, as to not increase combined sewer overflow discharges into the Reserved Channel.

We encourage continued coordination of the project's resilience strategy with the U.S. Army Corps of Engineers' ongoing Boston Coastal Storm Risk Management (CSRMS) Study, which will release draft alignments for this area in July 2026. Designing shoreline improvements, Harborwalk infrastructure, and public open spaces to integrate with future regional coastal protection investments will maximize long-term public access, recreation, and climate resilience while avoiding the need for costly future modifications. The DEIR appropriately identifies the importance of connecting to future regional climate resilience efforts, and we encourage the Proponent to continue advancing this coordination through subsequent phases of review.

Boston Harbor Now is grateful for the opportunity to comment on this project and looks forward to participating in the upcoming MEPA and Chapter 91 processes to discuss ways to furnish, activate, and create a more welcoming public realm. We would be happy to meet to discuss our recommendations.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott", written in a cursive style.

Kathy Abbott
President & CEO

July 24, 2026

Via electronic mail: alexander.stryisky@mass.gov

Secretary Rebecca Tepper
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Attn: MEPA Office, Alexander Stryisky
Boston, MA 02114

Re: Written Comments on Reserved Channel Master Plan Development Draft
Environmental Impact Report, EEA #16802

Dear Secretary Tepper,

Conservation Law Foundation (“CLF”) appreciates this opportunity to comment on the Draft Environmental Impact Report (“DEIR”) submitted by Oxford Properties Group and Pappas Enterprises (together, “the Proponents”) for the Reserved Channel Master Plan and Phase 1 development. CLF protects New England’s environment for the benefit of all people and uses the law, science, and the market to create solutions that preserve our natural resources, build healthy communities, and sustain a vibrant economy. CLF’s advocacy includes participation in proceedings that impact equitable access to and climate resilience of the Commonwealth’s tidelands. CLF comments here to request further information from the Proponents regarding the Project’s stormwater management plan, Chapter 91 compliance, and waterfront park design.

I. Stormwater Management Plan

CLF appreciates the Proponents’ improved commitment to green stormwater management solutions in the DEIR. Green stormwater infrastructure—such as rain gardens, bioswales, and vegetated rooftops—has extensive co-benefits, including extreme heat mitigation and improved pedestrian comfort. CLF encourages the Proponents to further explore the viability of vegetated rooftops as part of their stormwater management plan. CLF further encourages the MEPA Office to require the Proponents to assess the viability of pervious pavement throughout the Project Site and make a commitment to pervious pavement wherever possible in their final environmental impact report (“FEIR”).

CLF is concerned by the Proponents’ proposal to relocate and replace an existing combined sewer overflow (“CSO”) within the Project Site. *See* DEIR at page 6-11. The odors and bacterial

contamination from CSOs threaten public health and detract from a positive waterfront experience. Scientists and regulators have long recognized these harms, and modern sewage systems separate sanitary sewer systems from stormwater flows. Relocating an outfall in our modern era seems counterintuitive to the Project’s goals and counterproductive to BWSC’s efforts to reduce and eliminate CSOs elsewhere in the system. In the FEIR, the Proponents should work with BWSC to analyze whether an alternative stormwater management plan would allow this CSO to be eliminated, rather than replaced within the Project Site.

II. Chapter 91

In the FEIR, the Proponent must provide additional information on the location, layout, and intended use for facilities of public accommodation for Phase 1 and, ideally, the Master Plan. When filing an EIR, a proponent is required to provide “a detailed description and analysis of the nature and location of the Project including the type, size, and proposed use of the Project . . . [and] a description of the physical characteristics of the Project . . . at an appropriate level of scale and detail.” 301 CMR 11.07(6)(e). CLF was pleased to see that the Proponents provided greater detail on their Chapter 91 compliance and waterfront design and programming in the DEIR. However, it is not enough to say that “no less than 75% of Building C1 interior ground floor square footage will be devoted to FPAs” and “programming of FPAs . . . and the activation of public and publicly accessible open space that provides a range of amenities serving a diverse population.” *See* DEIR at page 5-10, 5-16. FPAs are a required amenity under the Chapter 91 regulations, and the dimensional layout and location of FPAs is part of the physical characteristic of this Project’s proposed use. FPAs must be described at the level of scale and detail appropriate for this stage of permitting so that agencies and the public may provide adequate input on the Project’s environmental impact and mitigation measures, as they relate to waterfront access.

III. Waterfront Park Design

With respect to waterfront park design and pedestrian access, CLF encourages the MEPA Office to require the Proponents to analyze the feasibility of converting Pappas Way into a fully pedestrian path with emergency vehicle access, akin to the Charles River esplanade, upon the completion of the F Street extension and Road 5. The Proponents already plans to close a portion of Pappas Way between Road 1 and West First Street to allow for expanded open space and a broader pedestrian network and to transition Pappas Way to “a more recreational street with limited traffic.” DEIR at p. 7-57. While these design changes are an excellent step forward in responding to community feedback and improving pedestrian connectivity to the waterfront, the Proponents could go further.

Pedestrian circulation between the waterfront park and Master Plan Site would be much improved by transitioning Pappas Way into a fully pedestrian and cycle path in Phase 3 by eliminating the sharp barrier that two lanes of traffic and an additional lane of street parking would

pose. Vehicular access for residents, visitors, and service vehicles would be preserved by the F Street extension, new frontage roads, and Road 5, while Pappas Way could provide a fully protected path for foot traffic and recreators traversing the waterfront park and open space on Blocks F and G. In the alternative, CLF encourages the Proponent to explore the viability of transitioning Pappas Way in this manner along Blocks D, F, and C, while keeping vehicular access along Blocks I and J. In this scenario, vehicles would be routed along the frontage roads while prioritizing pedestrian connectivity along the majority of the waterfront park and open space. Either adjustment would preserve the Project's functionality while furthering the Project's goal to connect the South Boston neighborhood to the South Boston Waterfront, produce an inviting pedestrian network, and deemphasize Pappas Way as a vehicle corridor.

Finally, CLF wishes to voice support for the Proponents' evaluation of shoreline facilities that will promote water-based public activity, such as water shuttles and publicly accessible docks. *See* DEIR at p. 5-10, Table 5-2. We encourage the Proponent to engage the community in this analysis and incorporate community feedback when prioritizing waterfront touch points. CLF also encourages the Proponent to adopt the [Harborwalk 2.0 design standards](#) developed by Boston Harbor Now to promote pedestrian access in a climate resilient, equitable, and accessible manner. We look forward to seeing additional details about the waterfront park's design and programming in the Chapter 91 licensing stage.

IV. Conclusion

CLF is encouraged by the details presented by the Proponent in this DEIR and hopes the Proponent will incorporate our comments and community input to further strengthen the capacity of this Project to improve resilient, safe, and equitable waterfront access to the South Boston neighborhood.

We appreciate this opportunity to comment and look forward to further engagement as the Project progresses.

Sincerely,



Breanne Frank
Associate Attorney, Community Resilience
Conservation Law Foundation



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 150 Presidential Way Woburn, MA 01801 • 978-694-3200

Maura T. Healey
Governor

Kimberley Driscoll
Lieutenant Governor

Rebecca L. Tepper
Secretary

Bonnie Heiple
Commissioner

July 24, 2026

Rebecca L. Tepper, Secretary
Executive Office of
Energy & Environmental Affairs
100 Cambridge Street
Boston MA, 02114

RE: Boston
Reserved Channel Master Plan
EEA # 16802

Attn: MEPA Unit

Dear Secretary Tepper:

The Massachusetts Department of Environmental Protection Northeast Regional Office (MassDEP-NERO) has reviewed the Draft Environmental Notification Form (DEIR), filed by Epsilon Associates on behalf of Oxford Properties Group and Pappas Enterprises, for the proposed Reserved Channel Master Plan in Boston.

The revised proposed project consists of the phased (Phase 1 (Blocks A, B, C), Phase 2 (Blocks D, J, I and K), Phase 3 (Blocks E, G, H)) redevelopment of an approximately 41.66 acre site in South Boston into a mixed-use waterfront district containing approximately 6 million square feet of residential, commercial research/laboratory, hotel, retail, and publicly accessible open space. The proposal establishes a long-term master planning framework that incorporates climate resilience measures, including site elevation, green infrastructure, expanded open space, and infrastructure improvements, while allowing future phases to proceed through MEPA's Special Review Procedure. Phase 1 encompasses approximately 12.86 acres and includes residential, laboratory, and retail development, together with proposed streets, utilities, and open space intended to establish the project's urban, transportation, and resilience framework. Revisions since the Environmental Notification Form (ENF) include a substantial increase in residential development, enhanced public spaces and bicycle facilities, modifications to building layouts and open space, continued coordination of transportation improvements, and the development of Phase 1 design guidelines in response to agency and stakeholder feedback.

This information is available in alternate format. Please contact Melixza Esenyie at 617-626-1282.

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Wetlands

The proposed Master Plan includes phased site elevations to reduce long-term risks associated with sea level rise, tidal inundation, and coastal storm flooding. Because the site is largely developed with impervious surfaces the proposed project primarily involves redevelopment of previously disturbed land. Site grading will be completed in phases, with transitional slopes connecting new elevations to existing grades along phase boundaries.

According to the DEIR, the Reserved Channel shoreline is stabilized by existing coastal engineering structures, including stone revetments, a concrete seawall, and a granite block seawall. The landform behind these structures is classified as Coastal Bank, extending approximately 2,250 linear feet along the site, with approximately 4.9 acres of associated 100-foot buffer zone located within the project area. Because the Coastal Bank is fully armored and non-eroding, it does not function as a sediment source for coastal beaches, dunes, or barrier beaches. Instead, its primary function is storm damage prevention and flood control by providing a stable vertical buffer against coastal storm waters. Regulatory review indicates that the storm damage prevention and flood control performance standards applicable to Coastal Banks under 310 CMR 10.30(6)–(8) apply to the proposed work, whereas the provisions for coastal beaches under 310 CMR 10.30(3)–(5) do not. The project is designed to maintain and enhance coastal flood resilience through site elevation while preserving the protective function of the existing armored shoreline. No portion of the Master Plan is located within Priority Habitat of Rare Species or Estimated Habitat of Rare Wildlife as mapped by the Massachusetts Natural Heritage and Endangered Species Program.

The project is located partially within Land Subject to Coastal Storm Flowage (LSCSF), with approximately 6.7 acres of the site mapped within the FEMA 100-year coastal floodplain (Zone AE) based on the July 3, 2024 Flood Insurance Rate Maps. According to the Coastal Engineering Analysis provided in the DEIR, overall, the proposed phased site elevation improves flood protection within the project site but will redistribute flood flows to surrounding streets and infrastructure. The results indicate that future flood conditions will become increasingly concentrated along the site perimeter under the 2070 scenario, highlighting the importance of evaluating the potential effects of increased off-site flood velocities and concentrated flow paths on adjacent properties, transportation infrastructure, public access, and emergency access during extreme coastal storm events.

MassDEP is aware that the City of Boston has been working with the USACE since 2022 to develop a flood protection plan for 16 miles of Boston's 47-mile coastline in five neighborhoods and that a draft plan, or Draft Feasibility Study, will go out for public comment on July 24, 2026 with an estimated submittal of a final plan to Congress in 2028. Since it is uncertain when this plan will be finalized, the Final Environmental Impact Report (FEIR) should include an evaluation of measures to avoid or minimize off-site hydraulic impacts. The Applicant should identify mitigation measures, such as temporary deployable flood barriers, floodwalls, or other engineered flood control features, that would eliminate or substantially reduce the modeled increases in flood flow velocities and redirected flood pathways along adjacent roadways and properties. The FEIR should demonstrate, through revised hydraulic modeling, that the proposed mitigation measures effectively minimize adverse off-site flood impacts and do not transfer flood hazards to neighboring properties, public infrastructure, or emergency access routes under future design storm conditions.

As stated in the DEIR, a stormwater management system has not been designed for the project at this time. The DEIR states that stormwater management will be incorporated for each individual phase through individual designs. It is stated that generally the proposed redevelopment will reduce impervious surface coverage, resulting in decreased stormwater runoff volumes and lower peak discharge rates compared to existing conditions. Infiltration and detention infrastructure will be utilized through landscape design and beneath designated open spaces. The DEIR indicates that the stormwater management system will be designed to meet the Massachusetts Stormwater Standards to the Maximum Extent Practicable (MEP) and satisfy the Boston Water and Sewer Commission's (BWSC) requirement to recharge the first 1.25 inches of runoff from impervious surfaces. Therefore, MassDEP is unable to provide comments on the proposed stormwater management system and its compliance with the stormwater management regulations at this time.

Massachusetts Contingency Plan (MCP, 310 CMR 40.0000)

The DEIR identifies multiple Massachusetts Contingency Plan disposal sites within the Master Plan Site associated primarily with historic urban fill and releases from former industrial and naval uses, including petroleum, formalin, sulfuric acid, chlorine and sodium hypochlorite, and mineral-oil dielectric fluid. The DEIR states that the disposal sites have achieved regulatory closure, although two sites remain subject to Activity and Use Limitations, and that additional soil and groundwater characterization and appropriate MCP response actions will be incorporated into redevelopment.

Contaminated Soil and Groundwater

The project proponent is advised that excavating, removing and/or disposing of contaminated soil, pumping of contaminated groundwater, or working in contaminated media must be done under the provisions of MGL c.21E (and, potentially, c.21C), the Massachusetts Contingency Plan (MCP, 310 CMR 40.0000), and all other applicable federal, state, and local laws, regulations, and bylaws. If permits and approvals under these provisions are not obtained beforehand, considerable delays in the project can occur. The project proponent may be required to submit appropriate plans to MassDEP managing contaminated media, which describe the proposed contaminated soil and groundwater handling and disposal approach, and health and safety precautions. If contamination at the site is known or suspected, the appropriate tests should be conducted well in advance of the start of construction and professional environmental consulting services should be readily available to provide technical guidance to facilitate any necessary permits. If dewatering activities are to occur at a site with contaminated groundwater, or in proximity to contaminated groundwater where dewatering can draw in the contamination, a plan must be in place to properly manage the groundwater and ensure site conditions are not exacerbated by these activities. A Licensed Site Professional (LSP) must be employed or engaged to manage, supervise or actually perform the necessary response actions at the site.

Air Monitoring

Dust and/or vapor monitoring and controls are often necessary for large-scale projects in contaminated areas. The need to conduct real-time air monitoring for contaminated dust and to

implement dust suppression must be determined prior to excavation of contaminated soils, especially those contaminated with compounds such as metals and PCBs. An evaluation of contaminant concentrations in soil should be completed to determine the concentration of contaminated dust that could pose a risk to health of on-site workers and nearby human receptors. If this dust concentration, or action level, is reached during excavation, dust suppression should be implemented as needed, or earthwork should be halted.

Ambient air monitoring at the site perimeter and near areas of excavation and management of soils contaminated with volatile organic compounds should be implemented using field instrumentation capable of detecting low concentrations (for example; 1 part per billion by volume in the case of trichloroethylene (TCE)). A detailed air monitoring program should be developed prior to excavation activities to include monitoring frequency, action levels, sampling the indoor air of nearby structures, as needed, and mitigation measures.

Capping of Contaminated Soil

If capping of contaminated soil is needed to achieve a level of No Significant Risk, MassDEP recommends the following capping design criteria for those soils categorized as S-1 pursuant to 310 CMR 40.0933. In unpaved areas, a minimum of three feet of clean soil should be placed over the contaminated soil. This protective layer of clean soil should be separated from the underlying contaminated soil by a geotextile or combination of materials, which will provide both a brightly colored visual marker and a permeable fabric to separate the clean soil from the contaminated soil. In paved areas, a minimum one-foot cap consisting of clean soil, road base and the pavement layer should be placed over the contaminated soil. Similar to unpaved areas, the contaminated soil should be separated from the clean soil or road base using a visual marker and geotextile. In such cases, an Activity and Use Limitation (AUL), prepared in accordance with 310 CMR 40.1012 would be necessary to identify the maintenance requirements of the cap. As needed, MassDEP may approve alternative capping design proposals that incorporate more robust capping components on a case-by-case basis.

Potential Indoor Air Impacts

Parties constructing and/or renovating buildings in contaminated areas should consider whether chemical or petroleum vapors in subsurface soils and/or groundwater could impact the indoor air quality of the buildings. All relevant site data, such as contaminant concentrations in soil and groundwater, depth to groundwater, and soil gas concentrations should be evaluated to determine the potential for indoor air impacts to existing or proposed building structures. Particular attention should be paid to the vapor intrusion pathway for sites with elevated levels of chlorinated volatile organic compounds such as tetrachloroethylene (PCE) and TCE, if present. MassDEP has additional information about the vapor intrusion pathway on its website at https://www.mass.gov/lists/policies-guidance-technical-support-for-site-cleanup?_ga=2.165003519.1902262297.1534291448-758575996.1534291448#vapor-intrusion-.

New Structures and Utilities

Construction activities conducted at a Disposal Site shall not prevent or impede the implementation of likely assessment or remedial response actions at the site. Construction of structures at a contaminated site may be conducted as a Release Abatement Measure if assessment and remedial activities prescribed at 310 CMR 40.0442(3) are completed within and adjacent to the footprint of the proposed structure prior to or concurrent with the construction activities. Excavation of contaminated soils to construct clean utility corridors should be conducted for all new utility installations.

Parties proposing the installation of one or more stormwater management systems within a Disposal Site boundary should ensure the final proposed design is evaluated by an LSP prior to installation. Systems that feature onsite infiltration discharge points or retention basins have the potential to influence or modify the existing shallow groundwater flow regime. Onsite stormwater infiltration may have an amplified influence on underlying groundwater flow if/when these proposed discharge points are located beneath large areas of impervious surfaces (i.e. parking lots). As such, an LSP should evaluate proposed stormwater infiltration point source location(s) to confirm nearby and/or underlying areas of groundwater contamination are not exacerbated by onsite stormwater management.

Climate Change Resiliency

In 2024, MassDEP established climate change resiliency regulations in the Massachusetts Contingency Plan. Pursuant to the MCP's Response Action Performance Standards, environmental response actions should incorporate climate change resilience to the extent practicable and consistent with response action requirements (see 310 CMR 40.0191(3)(f)). Furthermore, a Permanent Solution shall ensure a level of control of each identified substance of concern at a site or in the surrounding environment such that no such substance of concern shall present a significant risk of harm to health, safety, public welfare or the environment during any foreseeable period of time, considering existing site conditions and reasonably foreseeable future changes in site conditions, including anticipated impacts associated with climate change (see 310 CMR 40.1005(1)). As necessary, involved parties should review factors contributing to the project's climate impact vulnerability, as further described in the Commonwealth's 2023 State Hazard Mitigation and Climate Adaptation Plan referred to as the ResilientMass Plan, available at: <https://www.mass.gov/info-details/2023-resilientmass-plan>.

Activity and Use Limitations

An AUL is a legal document that is recorded or registered at the appropriate Registry of Deeds and identifies site conditions that are the basis for maintaining a condition of No Significant Risk at a property where contamination remains after a cleanup. The AUL identifies permitted and allowable site uses and activities that may occur at a property while maintaining No Significant Risk. The AUL also identifies restricted uses and activities, which could result in the exposure of people at or near the Disposal Site to remaining contamination if such activities were to occur. The project proponent is advised that in cases where proposed activities would not be consistent with a level of No Significant Risk and/or an existing AUL, additional cleanup and the amendment or termination of the initial AUL and implementation of a revised AUL would be necessary before the proposed activities could occur.

With the exception of 310 CMR 40.1067(5)(a), submittal of a Release Abatement Measure Plan or a Phase IV Plan to MassDEP is required prior to conducting remedial actions within an area subject to an AUL pursuant to 310 CMR 40.1067(5)(b) or (c).

Redevelopment in Areas of Former Landfills or Burn Dumps

As noted earlier, appropriate tests should be conducted well in advance of the start of construction if contamination at the site is known or suspected. While redevelopment of former landfills or burn dumps often results in a beneficial reuse for the community, it also comes with common environmental challenges that should be considered during the assessment and pre-construction phases of the project. Sufficient assessment should be conducted in areas of former landfills or burn dumps to include the following contaminants of concern:

- **Asbestos:** The presence of asbestos containing materials (ACM) and asbestos contaminated soils is commonly found within landfill waste materials. Pre-characterization for the presence of ACM and/or asbestos contaminated soils is recommended. The project proponent is advised to determine the need to manage such materials under the MCP as well as the Asbestos Regulations at 310 CMR 7.15.
- **Methane Gas:** Methane is produced in landfills through the decomposition of organic waste materials. Assessment for the presence of methane gas is recommended to determine the risk of harm to safety pursuant to 310 CMR 40.0960 and the need for gas mitigation and controls such as gas ventilation systems and/or impermeable gas barriers.
- **Dioxins & Furans:** Burning of chlorine- and carbon-containing materials at burn dumps or disposal of fly ash from waste incineration have commonly resulted in elevated concentrations of chlorinated dibenzo-p-dioxins (dioxins) and chlorinated dibenzofurans (furans) in soil. If such burning or ash disposal activities are known or suspected, an assessment of dioxins and furans in soil at the site is recommended.
- **PFAS:** Products and materials containing per- and polyfluoroalkyl substances (PFAS) have been and are being disposed of at landfills, often resulting in releases of PFAS to the environment. Assessment of PFAS in soil and groundwater in areas of former landfills is recommended.
- **Other contaminants of concern** commonly found at former landfills include heavy metals, volatile organic compounds, semi-volatile organic compounds, and 1,4-dioxane.

Solid Waste

MassDEP's current *Massachusetts 2030 Solid Waste Master Plan—Working Together Toward Zero Waste*, issued in October 2021 identifies a key goal to reduce solid waste disposal by 30% by 2030 and 90% by 2050. MassDEP encourages the Proponent to review the plan to identify project management and operational practices that will assist the Commonwealth in meeting its material

management goals. More information on the *Solid Waste Master Plan* and yearly update reports can be found at: <https://www.mass.gov/guides/solid-waste-master-plan>.

Waste Ban

Section 310 CMR 19.017 *Waste Bans* of the Massachusetts Solid Waste regulations prohibit the disposal of certain construction-related wastes in Massachusetts, including, but not limited to, metal, wood, asphalt pavement, brick, concrete, clean gypsum wallboard. Further guidance can be found at: <https://www.mass.gov/guides/massdep-waste-disposal-bans>.

MassDEP regulations also ban disposal of food and other organic wastes from businesses and institutions that dispose of more than ½ ton of these materials per week. The ban is one of MassDEP's initiatives to help achieve our goal of further reducing food waste by 500,000 tons annually by 2030. Diverted food waste may be composted, converted to energy (through anaerobic digestion), recycled, or reused. Additional information, including a full list of banned materials, can be found at: <https://www.mass.gov/guides/massdep-waste-disposal-bans>.

C&D Recycling

Many construction and demolition materials are currently banned from disposal or transfer for disposal in Massachusetts (<https://www.mass.gov/guides/massdep-waste-disposal-bans>). Therefore, MassDEP encourages the Proponent to make a significant commitment to construction and demolition (C&D) waste recycling activities as a sustainable measure for the project and to assist in complying with waste ban requirements. MassDEP considers an asphalt, brick, and concrete (ABC) rubble processing or recycling facility (pursuant to the provisions of Section (2)(b) under 310 CMR 16.03), the Site Assignment regulations for solid waste management facilities), to be exempt from the site assignment requirements, if the ABC rubble at such facilities is separated from other solid waste materials at the point of generation. In accordance with 310 CMR 16.03(2)(b), ABC can be crushed on-site with a 30-day notification to MassDEP. However, the asphalt is limited to weathered bituminous concrete (no roofing asphalt), and the brick and concrete must be uncoated or not impregnated with materials such as roofing epoxy. If the brick and concrete are not clean, the material is defined as C&D waste and requires either a Beneficial Use Determination (BUD) or a Site Assignment and permit before it can be crushed.

Pursuant to the requirements of 310 CMR 7.02 of the Air Pollution Control regulations, if the ABC crushing activities are projected to result in the emission of one ton or more of particulate matter or other pollutant to the ambient air per year, and/or if the crushing equipment employs a diesel oil fired engine with an energy input capacity of three million or more British thermal units per hour for either mechanical or electrical power which will remain on-site for twelve or more months, then a plan application must be submitted to MassDEP for written approval prior to installation and operation of the crushing equipment.

Asbestos

Pursuant to 310 CMR 7.15 the removal of asbestos from the buildings must adhere to the special safeguards defined in the Air Pollution Control regulations. An asbestos survey to identify all asbestos containing materials (ACM) shall be conducted by a Massachusetts Department of Labor Standards certified Asbestos Inspector. All identified ACM shall be abated prior to demolition activities. The Proponent is required to submit to MassDEP an Asbestos Removal Notification (Form AQ04 (ANF-001)) at least 10 working days prior to initiating work for any project involving asbestos abatement, removal, or disposal. If any ACM will need to be abated through non-traditional abatement methods, the Proponent must apply for and obtain approval from MassDEP, through Application BWP AQ36 - Application for Non-Traditional Asbestos Abatement Work Practice Approval.

Pursuant to 310 CMR 7.09, for any Construction and Demolition, except in a residential building with fewer than 20 units, the Proponent is required to submit to MassDEP a Construction/Demolition Notification (Form BWP AQ06) at least 10 working days prior to initiating work. MassDEP Asbestos, Construction and Demolition Notifications can be found at: <https://www.mass.gov/guides/massdep-asbestos-construction-demolition-notifications>.

Pursuant to 310 CMR 19.061, disposal of ACWM within the Commonwealth must be at a facility specifically approved by MassDEP. The Proponent is advised that asbestos containing waste materials (ACWM) are a special waste as defined in the Solid Waste Management regulations. There are specific ACWM disposal exceptions for intact vinyl asbestos tile (VAT) and asphaltic-asbestos felt and shingles. The disposal of the ACWM outside the jurisdictional boundaries of the Commonwealth must comply with all the applicable laws and regulations of the state receiving the material. Pursuant to 310 CMR 16.05, ACM including VAT, and/or asphaltic-asbestos felts or shingles may not be disposed of at a facility operating as a recycling facility.

Recycling Infrastructure

MassDEP supports voluntary initiatives to institutionalize source reduction, materials reuse, and recycling into operations. Adapting the design, infrastructure, and contractual requirements necessary to incorporate reduction, recycling and recycled products into existing large-scale developments has presented significant challenges to recycling proponents. Integrating those components into developments during the planning and design stage enables the project's management and occupants to establish and maintain effective waste diversion programs. For more guidance on how to reuse building materials, see <https://www.mass.gov/lists/managing-construction-demolition-cd-wastes>. Free assistance is available from RecyclingWorks in Massachusetts, a recycling assistance program funded by MassDEP – see www.recyclingworksma.com for more information.

The MassDEP appreciates the opportunity to comment on this proposed project. Please contact Kristin.Divris@mass.gov at (508) 887-0021 for further information on wetland issues. Please contact Andrew.Clark@mass.gov at (617) 947-2245 for further information on Massachusetts Contingency Plan (MCP, 310 CMR 40.0000) issues. Please contact John.MacAuley@mass.gov at (978) 815-0423 for further information on solid waste, demolition and construction, and asbestos issues. If you have any general questions regarding these comments, please contact me at John.D.Viola@mass.gov or at (857) 276-3161.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

John D. Viola
Deputy Regional Director

cc: Brana Simon, Massachusetts Historical Commission,
Eric Worrall, Kristin Divris, Andrew Clark, John MacAuley, Jill Provencal, Tyler Ferrick,
MassDEP-NERO



July 24, 2026

Secretary Rebecca Tepper
Executive Office of Energy & Environmental Affairs
Attention: Alexander Strysky, MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Reserved Channel Master Plan Development, EEA No. 16802

Dear Secretary Tepper:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews these projects for consistency with *MetroCommon 2050*, MAPC's regional land use and policy plan, as well as with Complete Streets policies and design approaches.

MAPC has a long-term commitment to alleviate regional traffic and environmental impacts, consistent with the recommendations of *MetroCommon 2050*, including *reducing vehicle miles traveled and the need for single-occupant vehicle travel through increased development in transit-oriented areas and walkable centers*, and *improving accessibility and regional connectivity*. Furthermore, the Commonwealth has a statutory obligation to reduce greenhouse gas (GHG) emissions by at least 50% from 1990 levels by 2030, 75% by 2040, and 85% by 2050 to achieve net zero emissions by 2050, a commitment that MAPC wholeheartedly supports.

Oxford Properties Group and Pappas Enterprises, Inc. (collectively, the Proponent), propose a mixed-use redevelopment of approximately 41.66 acres of land (the Master Plan Project) in South Boston, bounded generally by West First Street, Summer Street, E Street, and the Reserved Channel. The Project site includes approximately 38.23 acres of land leased from Massport and approximately 3.43 acres owned in fee by the Proponent. The Draft Environmental Impact Report (DEIR) evaluates the development of the Master Plan Site at two interrelated scales: (1) the Master Plan Project, which establishes a comprehensive framework for the full buildout over multiple phases; and (2) the Phase 1 Project, which represents the first phase of development.

At full buildout, the Master Plan Project proposes approximately 6 million square feet (sf) of new development across 11 development blocks and 24 buildings. The proposed program includes approximately 4,080,000 sf of commercial research and laboratory uses, 1,500,000 sf of residential uses (approximately 1,578 dwelling units), 205,000 sf of hotel space (approximately 224 keys), and 218,000 sf of retail and amenity uses.

Development of the Master Plan Site will commence with Phase 1 (the Phase 1 Project), which is designed to establish the framework for the broader Master Plan Project. The Phase 1 Project will encompass approximately 12.86 acres of the Master Plan site and includes three development blocks—Blocks A, B, and C—generally located along West First Street and Pappas Way, adjacent to the Reserved Channel. The Phase 1 Project will consist of approximately 935 residential units, 567,000 sf of commercial research laboratory space, and 84,000 sf of retail and amenity space. Parking for Phase 1 is proposed to include approximately 1,095 parking spaces. In total, the Master Plan Project proposes approximately 4,079 parking spaces.

MAPC recommends the following actions pursuant to the Proponent's submittal of the DEIR:

Incorporate more specific Transportation Demand Management (TDM) commitments in the Section 61 findings and overall mitigation strategy.

Transportation Demand Management (TDM) is a portfolio of strategies to reduce demand for single-occupancy vehicle travel and promote alternative means of transportation, including transit, walking, and biking. A robust TDM program will therefore be critical to ensuring that the Proponent can deliver on its ambitious multimodal transportation and mode share goals, while also reducing driving and parking demand to the fullest extent possible.

MAPC is pleased to see the Proponent commit to TDM at a high level, including membership in the Seaport Transportation Management Association (TMA). However, the details of the proposed TDM program in the DEIR are vague; the Section 61 findings and proposed mitigation only note "Transportation demand management measures that will be determined for each block or building... as each building or block is developed or completed." While MAPC understands that exact TDM measures for specific blocks or buildings may need to be determined on a case-by-case basis in the future, more details are needed up front to proactively ensure the TDM program's success more broadly. MAPC therefore recommends that the Proponent make explicit commitments to several TDM measures as part of the Section 61 findings and the Project's broader mitigation commitments. These measures align with TDM best practices across planning contexts and should include the following:

- Parking demand management tools, including pricing based on local market rates, daily rather than monthly or annual pricing, unbundled parking, offering parking cash-out, and deployment of shared parking strategies.
- Monitoring of parking utilization during the Phase 1 Project and the Master Plan buildout.
- Funding of publicly accessible shuttle services to complement the existing transit network, address transit gaps, and provide first- and last-mile connections.
- Funding and installation of BlueBikes stations to further improve bicycle access and provide first- and last-mile connections.

These measures are detailed further in the following recommendation sections of this letter:

- *Further reduce parking at the site, monitor parking utilization, and commit to a parking management plan.*
- *Better meet the mode share goals of the project by funding publicly available shuttle services.*
- *Further improve bicycle and pedestrian access by funding and installing BlueBikes stations.*

Further reduce parking at the site, monitor parking utilization, and commit to a parking management plan.

The Proponent proposes 1,095 parking spaces as part of the Phase 1 Project, with 64% of those spaces allocated for residential uses and 36% of those spaces allocated for commercial uses. At full buildout, the Master Plan Project will have 4,079 parking spaces. MAPC recognizes and appreciates that the amount of parking proposed for Phase 1 falls below the amount allowed by the City of Boston's maximum parking requirements and is also less than half of what ITE projections would recommend. Nonetheless, the provision of over 1,000 parking

spaces for Phase 1 and over 4,000 parking spaces at full buildout will still generate significant vehicular traffic to and from the Project site (3,236 net new daily vehicular trips are projected for the Phase 1 Project and 8,936 net new daily vehicular trips are projected for the Master Plan Project). MAPC encourages the Proponent to explore opportunities to further reduce the amount of parking proposed.

While MAPC appreciates the Proponent's commitment to actively monitor the Phase 1 Project to support compliance with the Transportation Demand Management (TDM) program and evaluate the Project's progress toward its mode share goals, it is equally important that parking utilization be monitored. Monitoring parking utilization is essential for evaluating the Project's overall transportation strategy and identifying any necessary adjustments as part of the Master Plan Project.

The DEIR notes that a final parking management plan for the Project may include proven tools to manage parking demand, including pricing based on local market rates, daily rather than monthly or annual pricing, unbundled parking, offering parking cash-out, and deployment of shared parking strategies. MAPC is pleased to see consideration of these measures and encourages the Proponent to adopt more explicit commitments to them in the Section 61 findings.

Better meet the mode share goals of the project by funding publicly available shuttle services.

The Proponent projects "aspirational" mode share goals for both the Phase 1 Project and the Master Plan Project. For the Phase 1 Project, the Proponent proposes mode share of 27% driving, 35% taking transit, 25% walking, and 13% biking; for the Master Plan Project, the Proponent proposes mode share of 25% driving, 45% taking transit, 20% walking, and 10% biking. MAPC applauds this commitment to multimodal transportation with high levels of people taking transit, walking, and biking and relatively low levels of people driving. At the same time, MAPC believes that additional measures that ensure effective first- and last-mile connections to and from the project site, such as shuttle services, will be necessary to ensure that the Project can deliver on these ambitious mode share goals.

The Proponent notes the lack of transit services in the immediate proximity of the Project site, even as roadways and neighborhoods nearby are served by MBTA bus lines, the Silver Line, and the Red Line. Ensuring effective first- and last-mile connections to and from the Project site will therefore be critical to ensuring that the Project will achieve its proposed transit, walking, and biking mode shares. In the long term, the Proponent's proposed F Street extension may support new transit services, but no such services are planned at this time. To address transit gaps in the near term, and to reduce the demand for parking and driving, MAPC encourages the proponent to commit in the Section 61 findings to funding publicly accessible shuttle services that will access and complement the existing transit network and provide non-automotive access to and from the Project site. These shuttle services can be adjusted in the future as the F Street extension opens and potential new transit options come online.

Further improve bicycle and pedestrian access by funding and installing BlueBikes stations.

MAPC applauds the Proponent's commitment to providing bicycle and pedestrian connectivity to and within the Project site, including 2-way bike lanes on West First Street, new waterfront paths along Pappas Way, and new street grids that are designed to the City of Boston's Complete Streets design standards. These measures will all

support the Project's ambitious walking and biking mode share goals. To further support these efforts, MAPC encourages the Proponent to commit in the Section 61 findings to funding and installing BlueBikes stations throughout the Project area. BlueBikes will not only promote additional bicycle access to and within the Project site; they will also provide important first- and last-mile connections to and from nearby transit services.

Coordinate with the City of Boston and Massport to ensure truck access on the site.

MAPC appreciates that the Proponent recognizes the importance of truck access. Consistent with the Boston Planning Department's (BPD) position, MAPC believes that as the Phase 1 Project and Master Plan Project move forward, continued coordination with the City of Boston and Massport will be important to ensure that:

- Truck route connections between I-90 and the Raymond L. Flynn Marine Park are maintained to support ongoing maritime and industrial operations.
- Redevelopment of the Reserved Channel site is coordinated with planning for Massport-designated truck routes, including Summer Street, the South Boston Bypass, and the Massport Haul Road.
- Truck operations remain safe and efficient while minimizing impacts on adjacent residential neighborhoods in South Boston and Dorchester.
- Future roadway connections, including E Street and Cypher Street, are planned through a collaborative process involving the City of Boston, Massport, the MBTA, and the Proponent. This coordination should support developing an integrated transportation network that supports truck access, maritime and industrial operations, pedestrian and bicycle safety and connectivity, and potential future transit service.
- The Phase 1 Project and the Master Plan Project should clearly identify locations for truck parking, staging, loading, and pick-up/drop-off activities that minimize conflicts with other roadway users.

Improve climate resilience and mitigate against coastal flooding by connecting to the regional flood protection system and developing a community-preferred design option for resilience measures.

According to the DEIR's analysis based on the Massachusetts Coastal Flood Risk Model (Woods Hole Group), the project site will be subject to future flooding under the year 2070 model scenario. The principal flood mitigation measure proposed in the DEIR is a significant elevation of the project site. The DEIR documents the efficacy of this proposal. However, the flood protection measures for this site need to be coordinated with adjacent sites that will be part of a City Flood Defense System. The DEIR is not clear on how future connections will be supported by the mitigation proposed for this site. The Final Environmental Impact Report (FEIR) should provide more detail on the design for connecting to the regional flood protection system. For example, Figure 10.2 in the DEIR illustrates a "Connection Point to City Flood Defense System", "Retaining Wall" and "Shoreline Retaining Wall," but the DEIR does not provide a description of the basis for this design and how it will function.

In coordinating MAPC's review of the DEIR with the City of Boston, we understand that the BPD is requesting that the Proponent develop a community-preferred design option for resilience measures along the Reserved Channel. This would support the City of Boston's efforts for implementing district-wide resilience solutions and to leverage a potential investment by the US Army Corps of Engineers. Given the scale of the proposed project

**Metropolitan Area Planning Council (MAPC) comments on
Reserved Channel Master Plan Development, Draft Environmental Impact Report, EEA No. 16802**

and the need to carefully integrate it into district-wide resilience measures, MAPC supports this request to develop a community-preferred design option for resilience measures.

Thank you for the opportunity to comment on this project.

Sincerely,



Lizzi Weyant
Executive Director

cc: Andrew G. Hargens, Massport
 Kairos Shen, BPD
 David Mohler, MassDOT



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July 24, 2026

Secretary Rebecca Tepper
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
Alex Strysky, EEA #16802
100 Cambridge Street, Suite 900
Boston, MA 02114

Subject: DEIR Reserved Channel Master Plan Development (EEA #16802) South Boston

Dear Secretary Tepper:

On behalf of the Massachusetts Port Authority (Massport), thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Reserved Channel Master Plan ("Master Plan") project in South Boston. Oxford-Pappas ("OxP" or "Proponent"), an existing Massport ground lease tenant, proposes to develop a mix of residential, lab, commercial, and open space uses in three phases over the next 15 to 20 years ("Project"). The Project site consists of approximately 38.2 acres owned by Massport and ground-leased to OxP and 3.4 acres owned by OxP outright (in fee) (the "Master Plan Project Site"). The Master Plan is proposed in three phases, with the timing of each phase being largely dictated by the expiration dates of various to be developed leases for existing space tenants currently on the development site.

Massport appreciates the substantial effort undertaken by the Proponent to advance the Master Plan since the filing of the Environmental Notification Form (ENF) in April 2024, including continued coordination with Massport, MEPA, the City of Boston, agency stakeholders, members of the public, and the Citizens Advisory Committee (CAC) established through MEPA's Special Review Procedure. The DEIR represents meaningful advancement in the areas of transportation planning, climate resilience, public realm design, infrastructure planning, and community engagement.

Massport remains broadly supportive of the Project and its potential to deliver substantial public benefits, including a substantial number of new residential units, growth in employment and tax bases, expanded and improved public open space (including a substantial increase in tree canopy, resiliency, and waterfront access improvements, transportation improvements, and increased economic activity within South Boston. As the environmental review proceeds, Massport encourages continued refinement and evaluation of the following areas:

Transportation, Mobility, and Connectivity

Given the scale and duration of the Master Plan buildout, Massport recommends continued coordination with the City of Boston, MassDOT, MBTA, and adjacent landowners to evaluate cumulative transportation impacts, future transit service needs, bicycle and pedestrian connections, curb management strategies, and the timing of transportation mitigation measures. Particular attention should be given to ensuring that transportation infrastructure improvements are appropriately phased with development activity.

In addition to the transportation improvements described in the DEIR, Massport continues to evaluate long-term transportation network enhancements throughout the area. This includes the ongoing study and evaluation of a potential future extension of F Street northward to Summer Street and further connecting with Northern Avenue by tying into the existing Massport Haul Road. This enhancement of the area roadway network would dramatically improve neighborhood connectivity, circulation, and access within the waterfront district for all modes, including public transit. As future phases of the Master Plan advance, Massport encourages continued coordination among stakeholders to preserve flexibility for potential future transportation improvements and connections that may be identified through ongoing public planning efforts.

Climate Resilience, Adaptation, and Coordination

Massport supports the district-scale resilience framework presented in the DEIR and encourages continued refinement of flood protection strategies, grading plans, waterfront edge treatments, and long-term operations and maintenance responsibilities. Resilience improvements should be designed to integrate effectively with broader neighborhood and regional coastal resilience initiatives and provide benefits beyond individual development parcels. The Proponent should continue to coordinate with the U.S. Army Corps of Engineers and other public agencies regarding ongoing and future coastal storm risk management efforts within the Reserved Channel and South Boston. Massport notes that long-term resiliency planning for the Reserved Channel will require a coordinated, district-wide approach that relies on both public and private infrastructure investments.

Massport is currently advancing a Reserved Channel Basin Loop Harborwalk Study in partnership with the City of Boston, which advances potential Harborwalk connections and improvements adjacent to the Master Plan Project Site. As the Master Plan progresses, Massport encourages continued coordination between the Project's open space and resiliency strategies and the findings of the Basin Loop study to help ensure compatibility with future district-scale flood protection measures and waterfront infrastructure planning.

Infrastructure and Utility Coordination

The Project will require substantial utility, roadway, and public realm investments in multiple phases. Massport encourages the Proponent to continue coordinating with relevant stakeholders infrastructure planning and implementation to ensure that public infrastructure improvements are delivered in a manner that supports future development phases while minimizing disruptions to neighbors, the broader transportation network, and nearby maritime industrial operations.

Maritime and Economic Development Considerations

Massport appreciates the inclusion of maritime support and economic development uses within the Master Plan. As future phases advance, Massport encourages the Proponent to explore opportunities to accommodate and support maritime-related businesses, workforce development initiatives, and commercial activities that complement the adjacent E Street truck route and the broader industrial waterfront economy.

Phasing and Future Review

As noted during prior MEPA review, the Master Plan will be implemented over an extended timeframe through multiple phased of development. Massport supports the Special Review Procedure framework and expects future Project Commencement Notices and associated review materials to provide updated analyses reflecting then-current transportation conditions, climate projections, infrastructure demands, and regulatory requirements. This approach will ensure that future phases remain responsive to evolving conditions and public policy objectives.

Massport looks forward to continuing its collaboration with the Proponent, MEPA, the City of Boston, and other stakeholders as the Project advances. While Massport supports of the Master Plan and the Phase 1 Project, Massport will continue to evaluate future development parcels, infrastructure commitments, lease modifications, and ground lease structures through its normal review and approval processes, including approval by the Massport Board where applicable.

Please contact me at (617) 568-3103 or at ahargens@massport.com if you would like to discuss Massport's comments in more detail.

Sincerely,

Andrew Hargens

Andrew G. Hargens, AICP | LEED AP
Chief Development Officer
Massachusetts Port Authority

cc: M. McGowan - Oxford Properties
J. Loveluck, N. Stephens, T. Butler, B. Washburn, C. Busch - Massport



MASSACHUSETTS WATER RESOURCES AUTHORITY

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2 Griffin Way
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July 24, 2026

Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge St, Suite 900
MEPA Office, Alexander Strycky
Boston, MA 02114

Subject: EOEEA #16802 – Draft Environmental Impact Report
Reserved Channel Master Plan Development
Boston, MA

Dear Secretary Tepper,

The Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) submitted by Oxford Properties Group and Pappas Enterprises, Inc. (collectively, the “Proponent”) for the Reserved Channel Master Plan Development (the “Project”) in Boston, Massachusetts. The Project is located in South Boston, north of West First Street, south of Summer Street, and west of the Reserved Channel (the “Master Plan Project Site”). The Project Site consists of approximately 38.23 acres of land, ground-leased by the Proponent from the Massachusetts Port Authority (“Massport”), with an additional approximately 3.43 acres owned in fee by the Proponent. The Master Plan Project Site will include approximately 4,079,000 square feet (sf) of commercial office and research laboratory uses, approximately 205,000 sf of hotel space planned with facilities of public accommodation anticipated to include a public marina, approximately 1,496,000 sf of residential uses, and approximately 218,000 sf of retail and/or amenities uses, including surface parking lots and staging areas.

MWRA previously commented on the Project Environmental Notification Form (ENF) on May 22, 2024. MWRA’s comments on this DEIR continue to relate to the need for Infiltration/Inflow (I/I) Removal and Toxic Reduction and Control (TRAC) discharge permitting.

Wastewater

The DEIR reports that the Master Plan Project at full-build is expected to generate an increase of net new sanitary flows of approximately 722,062 gallons per day (gpd), which is an increase of almost 700,000 gpd from existing flows.

According to the BWSC storm drain and sewer maps, the Project Site is served by a separate, privately owned storm drain system. Flows from the Project Site are conveyed to

BWSC's South Boston Interceptor North Branch ("SBI-NB"), which in turn conveys flows to BWSC's Boston Main Interceptor. The sanitary flows are eventually carried to MWRA's Columbus Park Headworks in South Boston, which directs flows to the Deer Island Treatment Plant. The SBI-NB serves both separate sewer areas, such as the Project area, and combined sewer areas of South Boston. Stormwater entering the sewer system from combined sewer areas can exceed the capacity of the SBI-NB, causing surcharging of the SBI-NB that can contribute to combined sewer overflows (CSO) to the Reserved Channel and the Fort Point Channel in large storms.

To ensure that the Project's wastewater flow does not increase system surcharging or overflows in large storms, the Proponent should work with BWSC to develop a plan for ensuring a 4:1 offset of the Project's wastewater flow as required by MassDEP regulation; that is, by removing four gallons of stormwater and/or infiltration and inflow (I/I) from a hydraulically related sewer system(s) for every gallon of new wastewater flow. Increasing wastewater flow to the South Boston sewer systems without the state-required offset can compromise the sewer system and water quality benefits of MWRA's \$912 million region-wide CSO control plan, including water quality improvement in the Reserved Channel and the Fort Point Channel. The DEIR states that the Proponent intends to mitigate the increased wastewater flows in accordance with Boston Water and Sewer Commission (BWSC) and Massachusetts Department of Environmental Protection (MassDEP) policies in effect at the time of each building permit of water service activation in accordance with its then generated flows. It is anticipated that the Master Plan Project will mitigate the impacts of the development by removing approximately 2,888,248 gpd of I/I present in the existing sanitary sewer system.

The DEIR further states that the Proponent is committed to I/I mitigation which may include monetary contributions or mitigation measures, the specifics of which will be determined as each building's systems are reviewed by BWSC. MWRA strongly encourages the Proponent, in collaboration with BWSC, to identify specific projects that would offset discharge and make every effort to implement the projects before discharge begins.

TRAC Discharge Permitting

MWRA prohibits the discharge of groundwater into the sanitary sewer system, pursuant to 360 C.M.R. 10.023(1) except in a combined sewer area when permitted by the Authority and the BWSC. The Project Site has access to storm drains and is not located in a combined sewer area. Therefore, the discharge of groundwater, stormwater, surface water, or roof runoff to the sanitary sewer system associated with this Project is prohibited. The Project must secure the appropriate permit type for its upcoming construction activities. The DEIR acknowledges this comment.

A Sewer Use Discharge Permit is required prior to discharging industrial process wastewater, laboratory wastewater, laundry effluent, or photo processing wastewater from office, high-tech, R&D, hotel, laboratory or commercial space associated with the Project into the MWRA sanitary sewer system. For assistance in obtaining this permit, a representative from the proposed laboratory/R&D/commercial space should contact Molly Rounds, Industrial Coordinator in the TRAC Department, at (617) 305-5638 or Molly.Rounds@mwra.com. The

Proponent should submit the completed MWRA Sewer Use Discharge Application form and its attachments via standard mail to Molly Rounds, Industrial Coordinator, MWRA, TRAC, 2 Griffin Way, Chelsea, MA 02150. In addition to the hard copy submittal, the application form and its attachment(s) must be submitted via email to TRACPermits@mwra.com. The commercial company or laboratory is required to have an MWRA Sewer Use Discharge Permit prior to discharging process and/or laboratory wastewater into the MWRA sanitary sewer system. The DEIR acknowledges this requirement.

On behalf of the MWRA, thank you for the opportunity to provide comments on this Project. Please do not hesitate to contact Hillary Coolidge of my staff at (857) 324-0554 or Hillary.Coolidge@mwra.com with any questions or concerns.

Sincerely,



Colleen Rizzi, P.E.
Director
Environmental and Regulatory Affairs

cc: John Viola, MassDEP
Adam Horst, BWSC

Dear Nick Carter and Alex Strysky,

I am writing to express my support for the proposed Reserved Channel Development along Pappas Way and West First Street.

While I am relatively new to living in South Boston, Boston has been an important part of my life for many years. I grew up just outside the city, began my career here, and have watched more and more friends choose South Boston as their home. It has become a place people are proud to be part of because of its strong sense of community, character, and energy.

This project feels like a meaningful opportunity to turn an underused area into something that better serves the neighborhood: a place with more life, jobs, public space, and everyday uses for residents, workers, and visitors. From what I have seen, the project team has taken the time to listen to residents and local businesses, and that consideration is reflected in the plan.

I appreciate that the proposal aims to bring new activity to the area while still respecting the character of South Boston. That balance matters to me, and I believe this plan has the potential to strengthen the neighborhood in a thoughtful way.

I support this project because it will bring new housing to the neighborhood, create jobs, support local businesses, improve streets, sidewalks, and overall safety, add new public spaces, make the waterfront more accessible, and help activate an area that currently feels industrial and underutilized.

At the end of the day, this is the kind of thoughtful investment that can benefit South Boston for years to come. I hope you will support the approvals and permits needed to move the project forward.

Thank you for your time and consideration.

Sincerely,

Brooke Perault

(508) 808 – 0399

beperault@gmail.com

From: [Jennifer Lange](#)
To: nick.carter@boston.gov; [Strycky, Alexander \(EEA\)](#)
Subject: Letter of support
Date: Monday, July 27, 2026 12:47:40 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern.

I'm a South Boston resident for over 25 years, and I'm writing to support the proposed Reserved Channel Development located along Pappas Way and West First Street.

This project is a great opportunity to turn an underused area into something that better services the neighborhood: a place with life, jobs, and spaces people can use day to day. From what I've seen, the team has taken the time to listen to residents, and local businesses, and that's reflected in the plan.

This feels like a good opportunity to bring more life to the area, while still keeping the character of South Boston.

I support this project because it will:

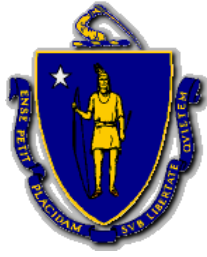
- **Bring new housing (including affordable options) to the neighborhood**
- **Create jobs and support local businesses**
- **Improve streets, sidewalks, and overall safety in the area**
- **Add new public spaces and make the waterfront more accessible**
- **Help activate an area that currently feels industrial and underutilized**

At the end of the day, this is the kind of thoughtful investment in South Boston that can benefit the neighborhood long-term. I'd encourage you to move forward with the approvals and permits needed to get it going.

Thanks for your time and consideration.

Sincerely,

Jennifer Lange
788 East Broadway, apt 2b
South Boston, MA



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF
ENERGY AND ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENERGY RESOURCES
100 CAMBRIDGE ST., SUITE 1020
BOSTON, MA 02114
Telephone: 617-626-7300
Facsimile: 617-727-0030

Maura Healey
Governor

Kim Driscoll
Lt. Governor

Rebecca Tepper
Secretary

Elizabeth Mahony
Commissioner

31 July 2026

Rebecca Tepper, Secretary
Executive Office of Energy & Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02114
Attn: MEPA Unit

RE: Reserved Channel Master Plan Development, Boston, MA, DEIR #16802

cc: Jo Ann Bodemer, Director of Energy Efficiency, Department of Energy Resources
Elizabeth Mahony, Commissioner, Department of Energy Resources

Dear Secretary Tepper:

We've reviewed the Draft Environmental Impact Report (DEIR) for the proposed project. The project consists of the following:

- 10 residential multifamily buildings, total of 1.496M-sf, 1,578 dwelling units (number of units per building ranges from 66 to 291)
- 12 office buildings, total of 4.089M-sf. Both normally ventilated office and highly ventilated life science buildings are anticipated.
- 1 hotel, 205,000-sf
- All 14 of the buildings described above will also include between 4,000-sf to 30,000-sf of ground floor retail/amenity spaces in each building. Total retail/amenity space is 218,000-sf.

Executive Summary – Section 61 Findings

The project describes using exemplary decarbonization measures including Passive House, efficient electrification of space heating, and most other measures recommended in our Environmental Notification Form (ENF) comments. These commitments are captured in the Section 61 findings (Table 13-2 of the DEIR). The DOER takes Section 61 Findings as project commitments, including the commitment to obtaining Passive House certification consistent with the Specialized Code.

We note that commitment descriptions in Chapter 11 of the project narrative are not as clear and firm. We recommend that the next submission revise Chapter 11 to include only clear and firm commitments consistent with Section 61 Findings, including the commitment to obtaining Passive House certification for all residential multifamily units, consistent with the requirements of the Specialize Code.

Executive Summary – Domestic Hot Water Heating

Heat pump water heating remains a measure that the DOER recommends but is not yet a commitment, however. Heat pump water heating would provide significant cost and emissions benefits compared to currently proposed electric resistance water heating. A switch from proposed electric resistance to heat pump water heating would:

- Reduce residential operating costs by **\$2.28M per year, a 29% reduction (\$1,447/unit)**
- Reduce residential operating emissions by **29%**
- Increase MassSave rebate from \$3,750/unit to \$4,500/unit. This is an increase of **\$1.18M** when applied to all 1,578 units

The DEIR provided capital costs for electric resistance and heat pump water heating options. Using the capital costs provided in DEIR, simple payback of a swap from electric resistance to heat pump is **3 years**. The cost to build and operate a heat pump system over 25 years is **\$50M less** than the cost to build and operate the proposed electric resistance system.

The DEIR describes little value in swapping from electric resistance to heat pump water heating. However, this is based on an unusually low hot water use energy use intensity (EUI) of about **1 kBtu/sf-yr**. This value should be about **25 kBtu/sf-yr**, based on an extensive study¹ of measured domestic hot water use in over 100 multifamily buildings.

Domestic Water Use in Multifamily

Domestic hot water use accounts for about 30-50% of a residential building's overall energy use based on a recent study¹ which measured domestic hot water energy use of more than one hundred in-service buildings. Measured domestic hot water end use energy consumption was consistently about **25 kBtu/sf-yr**. This is shown in the figure below, reproduced from this study. Because all the buildings in this study use natural gas for hot water production, domestic hot water end use

¹ "Net Zero Ready Multi-Family Buildings: How Are We Doing", *ASHRAE Winter Conference*, 2025, Arena, Skiba, Misquitta, Martello (*Arena et al*)

demand is about **20 kBtu/sf-yr**. (Calculated as 25 kBtu/sf-yr x 80% typical efficiency of fossil fuel hot water production.)

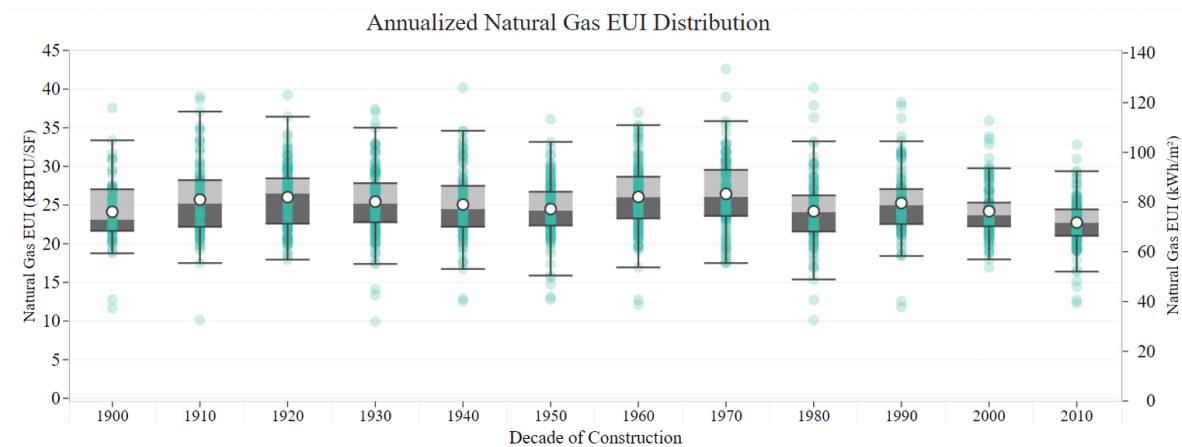


Figure 3. DHW energy consumption for bins of ten years from 1900 to 2010 for NYC multi-family buildings over 25,000 ft². Each label on the x-axis is the start of the decade the bin represents.

Based on these measured results, it's recommended that the proponent use domestic hot water demand of **20 kBtu/sf-yr** for water heating evaluations.

Heat Pump vs Electric Resistance Water Heating – DEIR Results

The DEIR included an analysis of electric resistance compared to heat pump water heating, including an estimate of capital costs and operational costs for both approaches. The DEIR concludes that swapping from planned electric resistance to heat pump water heating has little value and a long payback. However, these findings are based on unusually low domestic hot water use which greatly underestimate operational costs. The DOER revised the DEIR cost/value analyses using more accurate hot water consumption (based on 100+ buildings' actual water use), as follows:

Reserved Channal Master Plan Development, DEIR No. 16802
Boston, Massachusetts

area of multifamily	1,496,000	sf	from DEIR
number of units	1,578	units	from DEIR
area per unit	948	sf/unit	calculated
Proposed Design - total building consumption	22.7	kBtu/sf-yr	from DEIR
Proposed Design - hot water consumption	1.0	kBtu/sf-yr	from DEIR
Proposed Design - all consumption less hot water	21.7	kBtu/sf-yr	calculated
Measured - hot water consumption (gas)	25.0	kBtu/sf-yr	Arena et al (ASHRAE Publication, 100+ buildings, measured)
Fossil fuel efficiency	0.80		Typical fossil fuel efficiency
Measured - hot water demand	20.0	kBtu/sf-yr	calculated
Electric resistance efficiency	1.0		typical electric resistance
Heat pump efficiency	2.2		typical heat pump
Hot water consumption (electric resistance, using measured HW demand)	25.0	kBtu/sf-yr	calculated
Hot water consumption (heat pump, using measured HW demand)	11.4	kBtu/sf-yr	calculated
Total building consumption (electric resistance, using measured HW demand)	46.7	kBtu/sf-yr	calculated
Total building consumption (heat pump, using measured HW demand)	33.1	kBtu/sf-yr	calculated
Total building consumption (electric resistance, using measured HW demand)	20,475,733	kWhrs/yr	calculated
Total building consumption (heat pump, using measured HW demand)	14,496,835	kWhrs/yr	calculated
cost per kWhr	0.382	\$/kWhr	typical MA 2026
Total building operating cost (electric resistance, using measured HW demand)	7,821,730	\$/yr	calculated
Total building operating cost (heat pump, using measured HW demand)	5,537,791	\$/yr	calculated
difference (all MF)	2,283,939	\$/yr	calculated
difference (per unit)	1,447	\$/yr	calculated
Operation cost reduction	29%		calculated
Emissions reduction	29%		calculated - same as cost reduction b/c all electric
electric resistance capital cost	10,570,000	\$	from DEIR, "most likely" cost
heat pump capital cost	18,527,000	\$	from DEIR, "most likely" cost
MassSave central heat pump adder	750	\$/unit	www.masssave.com
MassSave central heat pump adder	1,183,500	\$	calculated
heat pump capital cost (after MassSave)	17,343,500		calculated
difference (all MF)	6,773,500	\$/yr	calculated
simple payback	3.0	years	calculated
25 year total cost elec resistance (capital + 25 x op)	206,113,247	\$	calculated
25 year total cost heat pump (capital + 25 x op)	155,788,271	\$	calculated
difference (all MF)	50,324,976	\$	calculated
difference (per unit)	31,892	\$	calculated

In summary, a swap from electric resistance to heat pump water heating would:

- Have a 3-year payback
- Save residents \$2.28 M per year in operating costs (\$1,447/year per dwelling unit)
- Reduce multifamily total building emissions by 29%
- Qualify the project for \$1.18M MassSave rebate adder
- Save over \$50M over 25 years (calculated as: 25 years of operational savings netted against additional heat pump capital cost)

Based on these findings, we recommend air source heat pump water heating for all residential construction.

Mitigation Commitments – Revise Chapter 11 to be Clear and Firm

Chapter 11 of the DEIR lacks clarity and firmness that we'd expect for a project that is opting to avoid evaluations and analysis. Some examples of lack of clarity include (bold added):

- “Buildings planned to be designed to be capable of meeting code required high-performance building standards (e.g., Passive House **or equivalent**).” (Page 11-3)
- “Mechanical systems **are anticipated** to be all-electric **where technically and economically feasible**, consistent with applicable codes at the time of permitting. **At this time**, natural gas use for space and domestic hot water heating is not anticipated.” (Page 11-3)
- “Space heating and cooling **expected** to be provided by air source heat pumps (“ASHP”) connected to a water loop served by heat recovery chillers.” (Page 11-3)
- “Glazing ratios **are targeted** to be approximately 50% of façade area **or such ratio as determined optimal through detailed energy modelling**”. (Pages 11-2 and 11-3.)

We recommend the descriptions in Chapter 11 be revised to match the descriptions contained in Table 13-2 of the Section 61 commitments, to avoid confusion. In addition, we recommend revising the Table 13-2 commitment description for Passive House which currently reads “Buildings will be designed for Passive House Certification” and replacing with “Buildings will be Passive House Certified, consistent with the requirements of the Specialized Code”.

Sincerely,
Massachusetts Department of Energy Resources



Becca Edson
Architect



Paul F. Ormond, P.E.
Energy Efficiency Engineer