



Are you on board?

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Via email to: Alexander.Stryisky@state.ma.us

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge St., Suite 900 (9th Floor)
Boston MA, 02114

Attn: Alex Stryisky, MEPA

Re: Pilot Seafood Properties (Pilot 6), EEA#15832

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Pilot Seafood Properties at the Massport Marine Terminal (Parcel 6) Environmental Notification Form (ENF) for the proposed seafood processing facility, seafood shop, and union hall. After reviewing the ENF, attending a Boston Planning and Development Agency-hosted public meeting, and reviewing accompanying project plans, our comments follow.

In January of this year, Boston Harbor Now released *Boston's Working Port: A Foundation for Innovation*. The report found that stronger-than-expected consumer demand for seafood has led to an increase in the need for skilled, value-added seafood processing cluster in the South Boston Designated Port Area. According to Massport, Boston is one of four major American seafood processing hubs along with Seattle, San Francisco, and Miami.

Fish processing is an important contributor to the continued economic success of Boston's working port. Our organization highly values both the creation of new maritime industry and accessory opportunities within the Raymond Flynn Marine Park as well as the expansion of Pilot Seafood to the MMT. As a longtime advocate of the working port, we strongly support the continuation and expansion of maritime-industrial uses in the South Boston Designated Port Area.

Project Description

As described in the ENF, the proposed project site encompasses 6.5 acres of the much larger 42.7-acre Massport Marine Terminal (29.5 of which is currently undeveloped), and in turn is located within the Raymond L. Flynn Marine Park (RLFMP, formerly known as the Boston Marine Industrial Park). Shore Road, a 30-foot-wide Massport service road separates the project site from Boston Harbor.

The Boston Redevelopment Authority/Economic Development and Industrial Corporation of Boston currently own the site. They have a long-term lease agreement with Massport, who will sublease the parcel to the proponent. Because Massport currently controls the site and was granted a Chapter 91 Master License in 2005, the proposed facility, if deemed by MassDEP to be an entirely water-dependent industrial use, will not be required to apply for a Chapter 91 Waterways license.

The plan includes 110,000SF for two seafood processing and cold storage facilities, 466 garage and surface parking spaces, a 5,000SF over-the-counter seafood shop, and the 2,500SF International Longshoremen's Association (ILA) Union Hall. This entire proposal will contribute to the continued growth of the seafood processing industry and will support the continued existence of historic maritime industrial uses of the site.

Parking and accessibility

The ENF includes a traffic analysis that identifies peak business hours and parking needs for a limited area of the MMT. As proposed, the project will add 466 parking spaces to the RLFMP--an area with sustained parking demands. Approximately 60 garage spaces and 186 surface spaces will be reserved for Parcel 6 use, the remaining 220 will serve specific businesses in the RLFMP, Parcels 1, 2, 4, and 5.

We appreciate the proponent's effort to prioritize nearby maritime industrial businesses. We also understand that the fish processing industry and many MMT businesses operate on a 4am-3pm workday, during the evening, or on the weekends.

Flynn Cruiseport Boston is experiencing substantial passenger and vessel growth. In 2017 alone, Boston was the homeport of 64 ships and welcomed 388,222 cruise passengers. According to Massport, cruise ship expansion is expected to continue. Areas like the cruise cell phone lot along Fid Kennedy Ave and across Parcel 6 may benefit from additional parking areas during peak cruise season and on the weekends. A system that maximizes access to the proposed parking structure could provide economic benefits and create additional synergy between the needs of maritime industrial businesses, the growing tourism industry, and other neighboring activities.

Where appropriate, we encourage the proponent to expand garage access to all businesses within the RLFMP/South Boston Designated Port Area and the visiting public outside normal operating hours, in the evenings, and on weekends.

Water-Dependent Uses

Currently sub-parcel 6A and 6B include maritime industrial uses. Sub-parcel 6C will include a mixed-use parking garage. According to the ENF, the proponent plans to confirm with MassDEP that all of the proposed uses fall within the allowed Designated Port Area water-dependent or accessory uses categories. We strongly support the proponent's initiative and ask that the final determination from MassDEP be included in the Secretary's certificate or shared with commenting parties.

Lobster Tank

The documentation provided by the proponent for the lobster tank intake/drain system helped address a number of concerns about the proposed use. Figure 18 in the ENF is a depiction of a 36-inch drain pipe, though it is unclear if this refers to the lobster tank system. Future project filings should incorporate diagrams that depict the additional information filed on April 18, 2018 and include details like drain size, water flow, and proposed location.

As subject matter experts on fish habitat, potential contamination issues, and wastewater processing we defer to the Division of Marine Fisheries and the Massachusetts Water Resources Authority with regards to the discharge of lobster tank water and its effects on Boston Harbor.

Climate Preparedness

Beyond the FIRM map depicted in Figure 4 of the ENF, the current filing does not address site vulnerabilities or proposed resilient design. Our comments are based on information included in the Project Notification Form (PNF) filed with the City of Boston on February 28, 2018.

The project site is located within FEMA flood zone AE, land subject to coastal storm flowage. With sea levels predicted to rise between 2.4 and 7.4 feet by the end of the century, facilities built on this site will need to be prepared to withstand salt water flooding today and possible wave action in the future.

Section E.1 of the Climate Resiliency Checklist includes elevated site areas and elevated critical utility infrastructure as a climate preparedness measure. There is no indication of the proposed final elevation. We would strongly recommend that proponent follow Massport's Design Guidelines and raise critical utilities and system to 23.5 feet BCB. The proponent may also want to consider temporary flood barriers at building openings. As we experienced during the recent coastal flooding events, system like the Aquafence deployed along Congress Street were crucial and effective in keeping floodwaters out and protecting the building's interior spaces.

Neither the ENF nor the PNF, reference climate projections from any of the local climate change studies like the City's Climate Ready Boston, MassDOT's Boston Harbor Flood Risk Map, or CZM's report on climate change impacts. In the wake of recent Nor'easters and major storms like Hurricane Harvey, it is critical for industrial businesses along Boston Harbor to assess their vulnerability to rising seas and storm surge. Understanding the flood risks associated with harbor-based industries is a crucial step to identify better preventative measures in anticipation for more intense and frequent flooding events. Harvey was Houston's third 500-year flood in three years.

Thank you for your time and consideration.

Sincerely,



Jill Valdes Horwood
Director of Policy