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June 23, 2017

Via email to frank.taormina@state.ma.us

Frank Taormina
Waterways Regulation Program
Department of Environmental Protection
One Winter Street, 5th Floor
Boston, MA 02108

Re: Boston Autoport, Waterways License Application #W17-4900-N and #W17-4899N

Dear Mr. Taormina,

Thank you for the opportunity to comment on the Diversified Automotive Waterways License Application. Boston Harbor Now staff has reviewed the accompanying project plans and was present at the June 16th public hearing for both the 100 Terminal Street Lot and the 291-441 Medford Street lot in the Mystic River DPA.

We support Diversified Automotive's proposed temporary use of a parking lot on filled tidelands in a Designated Port Area.

Project Description

Located at 100 Terminal Street and 291-441 Medford Street Diversified Automotive is proposing to use the sites for temporary parking of up to 144-160 and 136 vehicles respectively. The site is currently owned by Massport and under a long-term ground lease to Diversified Automotive. The proponent is seeking a 10-year temporary term license for the use of both lots.

Designated Port Areas

The Massachusetts Office of Coastal Zone Management (CZM) has established four Designated Port Areas within Boston Harbor: South Boston, Chelsea Creek, Mystic River, and East Boston. According to CZM's Policy Guide, the two central principles of the State's DPA policy are to promote water-dependent industries as an important sector of the State's economy and to prevent the loss of areas that have key characteristics:

- Access to a commercially-navigable waterway and associated developed waterfront;
- Backland space for industrial facilities and operations; and
- Land-based transportation and utilities intended for general industrial purposes (Policy Guide p. 68).

There are three types of uses allowed within a DPA boundary: 1) water-dependent industrial uses 2) supporting DPA uses and 3) temporary uses. Attachment A proposes to introduce the Terminal Street lot as temporary use within the Mystic River DPA.

Temporary Parking Lots

As longtime advocates of the working port, Boston Harbor Now recognizes the importance of continued investment in the working port. We also understand that maritime industrial businesses often lack the capital to invest in and improve existing infrastructure and often rely on additional income to maintain operations. The proposed temporary use of the parking lot has the potential to provide short-term benefits in support of the overall purpose of DPAs—to promote and maintain marine water-dependent industrial uses.

During the June 16th public hearing we were encouraged to learn that part of the temporary license condition includes the obligation to market the proposed lot to water-dependent uses before a follow up short-term license is issued. We agree with this assessment and look forward to reviewing the final license with special conditions calling for reasonable efforts to advertisement the propose lot to water-dependent industrial businesses.

Sincerely,



Jill Valdes Horwood
Director of Policy