



Are you on board?

15 State Street, Suite 1100
Boston, MA 02109
617.223.8671
bostonharbornow.org

August 11, 2017

Via email to: Deirdre.buckley@state.ma.us

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

MEPA Office, Attn: Deirdre Buckley, EEA# 15730

Re: Autoport – Mystic Pier Expanded Environmental Notification Form, EEA# 15730

Dear Secretary Beaton,

Thank you for the opportunity to comment on the Autoport – Mystic Pier Expanded Environmental Notification Form. Boston Harbor Now staff has reviewed the accompanying project plans and was present at the August 2nd MEPA site visit in the Mystic River DPA. We support Diversified's request to market a portion of the Mystic Pier site to non water-dependent commercial office users.

Project Description

Located at 300 Terminal Street, Mystic Pier includes a one-story building (A), a two-story building (B), fueling station, and open water across approximately 515,697 SF. The site is currently owned by Massport and under a long-term ground lease to Diversified Automotive. As presented in the EENF, Diversified Automotive is requesting a change of use for the 60,000 SF mezzanine area of the one-story building.

Our comments are focused on two keys areas of interest:

- Ensuring the economic benefits of the commercial tenant support the maintenance and upkeep of maritime infrastructure and businesses, and
- Ensuring the new commercial use does not conflict with Existing maritime industrial businesses.

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.

Supporting uses can be industrial or commercial and must provide direct economic or operational support to water-dependent industrial businesses in DPAs. 310 CMR 9.02. The regulations consider commercial use compatible with DPAs unless the use conflicts with port operations or calls for excessive consumption of port space. Diversified is requesting to change the use of the 60,000SF mezzanine space in Building A and 60 parking spaces from a water-dependent use to a non-water dependent supporting use.

Commercial Office Use

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. We support Diversified's request to market a portion of the Mystic Pier site to nonwater-dependent commercial office users.

A non water-dependent tenant in the mezzanine space has the potential to provide much needed direct economic support to Mystic Pier and its water-dependent industrial businesses. During the August 2nd site visit, we were encouraged to hear that lease payments received from the proposed commercial office tenant will be directed towards maintenance and upkeep of critical infrastructure in support of existing water-dependent businesses on the Pier.

Conflict with Existing Maritime Tenants

Section 3.4.6 of the EENF identifies possible conflicts between existing industrial uses and a potential commercial tenant, including:

- The use of 60 spaces in the existing paved parking lot
- An additional 2,168 vehicle trips generated per day, and the
- Size of and composition of the proposed operator

As of the August 2nd MEPA site visit, the proponent had not yet secured a non water-dependent commercial office tenant. Diversified feels strongly that a showroom or similar operation would be an ideal use of the mezzanine space. We agree that a low volume business with less frequent visitors would be a preferable tenant for the area.

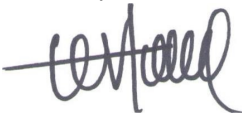
Earlier this year, Boston Harbor Now commented on Diversified Autoport's Waterways License Application #W17-4900-N and #W17-4899N proposing to temporarily use two areas on their site as parking lots. At the time, we agreed with Diversified that the proposed temporary use of the

parking lot had the potential to provide short-term benefits to existing maritime businesses. We support the temporary use of the parking lot and the current request to use 60,000 SF for commercial use. We see these uses as having the potential to provide short-term benefits in support of the overall purpose of DPAs—to promote and maintain marine water-dependent industrial uses.

Finally, diversified Automotive runs an impressive last-mile auto accessory operation at Mystic Pier. In 2016 alone, they processed and accessorized 63,000 vehicles to be sold in the New England region. To ensure supporting and temporary uses in this Designated Port Area offer the most economic benefits in support of this and other existing water-dependent industrial businesses, we encourage Diversified to develop an overall use management plan. This plan may minimize the need for future piecemeal change-of-use-requests and highlight the importance of an area-wide plan to make the most of existing working port resource areas.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Valdes Horwood". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

Jill Valdes Horwood
Director of Policy