



Are you on board?

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August 11, 2017

*Via email to: [Lisa.Engler@state.ma.us](mailto:Lisa.Engler@state.ma.us)*

Lisa Berry Engler  
Boston Harbor Regional Coordinator  
Office of Coastal Zone Management  
251 Causeway Street, Suite 800  
Boston MA 02114-2136

Re: Notice of Intent to Review the South Boston Designated Port Area Boundary

Dear Ms. Berry Engler,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Notice of Intent to Review the South Boston Designated Port Area Boundary (DPA). As longtime advocates of the working port, Boston Harbor Now has participated in previous DPA boundary review processes, most recently for the Chelsea Creek DPA. Our policy team was present at the July 25th public information meeting hosted by CZM.

On June 20, 2017, Redgate Capital Partners LLC requested that the MA Office of Coastal Zone Management (CZM) initiate a single parcel boundary review for the 776 Summer Street project in South Boston. In its July 12th, 2017 response, CZM stated that it would undertake a broader review beyond the single parcel request. The area under review runs from the Summer Street boundary through Conley Terminal out to Castle Island for the Designated Port Area on the South side of the Reserved Channel across from the Black Falcon Terminal.

We agree with CZM that DPA boundary reviews should include groups of parcels instead of an individual project site. This approach guarantees a comprehensive review of all relevant factors affecting the suitability of the area to be included or removed from the DPA boundary. We commend CZM for its decision and look forward to participating in the public process.

#### **Designated Port Areas**

Designated Port Area policy emphasizes the promotion of economic uses of coastal resources. This focus includes prioritizing water-dependent uses that preserve port transportation and other commercial and

industrial development in or adjacent to areas where such development already exists. 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 prevent the loss of areas that have the following 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).

These key characteristics are found in very limited and diminishing portions of the waterfront. We must carefully evaluate these resources before they are permanently committed to or significantly impacted by non water-dependent projects that benefit from greater flexibility in both location and potential uses. (Section 25.01 (2) Purpose).

#### **Access to a commercially navigable waterway**

Conley Terminal is New England's only full-service container terminal, servicing over 1,600 companies. The Port of Boston is the 6th largest employer in Boston and provides 7,000 direct jobs and 50,000 total jobs in the region generating over \$4.6 billion in economic value.

Container terminal capacity is heavily dependent on the ability of berths to load/unload vessels, move/store containers, and the system of roadways serving the terminal. To keep up with Post Panamax ships that are one and a half times larger than existing vessels, the Port of Boston is committed to improving both its channel depth and infrastructure. Earlier this year, the Port was awarded \$58 million in President Trump's FY2018 budget and an additional \$18.2 million in discretionary funding from the US Army Corp of Engineers. Boston is the only port in the nation that received funding from both sources.

The proposed boundary review must take into consideration these funding sources and the long-term commitment they represent to improving Conley Terminal and the dredging of Boston Harbor. The boundary review should include an analysis of potential new maritime and marine related business that may be attracted to South Boston as a result of these improvements.

#### **Developed Waterfront**

As mitigation for the expansion of Conley Terminal, the old East First Street truck route was diverted to the Thomas J. Butler Dedicated Freight Corridor (DFC) and away from residential streets in South Boston. Today, the freight corridor runs through the old L Street Edison Power Plant and connects to Summer Street. The new split-parcel configuration of the power plant site warrants a thorough boundary review that includes an assessment of the configuration, size, access to and location of the shoreline after the construction of the Dedicated Freight Corridor.

#### **Land Based Transportation**

A key criterion for selecting lands for Designated Port Area is reasonable proximity to established road or rail links leading to major truck or arterial routes. (Section 25.04(2) Designation of Lands).

Boston Harbor Now is working on a study to understand the challenges to Boston's working port and Inner Harbor Designated Port Areas. Expert interviews consistently point to the clustering of maritime businesses and proximity to transportation infrastructure as critical to the success of our port, consistent with the intent of Section 25.04 (2).

There are more than 6,000 daily trips in and out of South Boston generated by a diverse mix of maritime and industrial businesses. A significant competitive edge for the Port of Boston is the speedy truck load/unload turnaround time. Unlike the larger New York and New Jersey ports, via the DFC Boston trucks on average exit Conley Terminal within 30 minutes. Efficient truck routes increase the value of goods transported through Conley Terminal. Any change to the current DPA boundary has the potential to detrimentally affect the DFC and cargo turnaround times.

Boston Harbor Now continues to support the clustering of lands within the Designated Port Area that are near truck routes and rail links. The proposed boundary review should include an analysis of existing and future truck traffic data to ensure that uses on existing lands within the Designated Port Area are not adversely impacted. Current truck routes servicing Conley Terminal and maritime industrial businesses must remain a priority.

During the upcoming consultation sessions, Boston Harbor Now would be pleased to share information we have collected through our DPA study. During the public information meeting, we were glad to hear CZM will reach out to interested stakeholders during the consultation period. We look forward to continuing the conversation in the coming months. Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Valdes Horwood". The signature is stylized and cursive, with a horizontal line crossing through the middle of the letters.

Jill Valdes Horwood  
Director of Policy