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Via email to: [lisa.engler@mass.gov](mailto:lisa.engler@mass.gov)

Lisa Berry Engler  
Massachusetts Office of Coastal Zone Management  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Re: Raymond L. Flynn Marine Park Master Plan Update

Dear Ms. Berry Engler,

Thank you for the opportunity to comment on the Raymond L. Flynn Marine Park (RLFMP) Master Plan Update. Boston Harbor Now was honored to be part of and contribute to the RLFMP Advisory Committee meetings held between October 2018 and June 2019. We commend the Office of Coastal Zone Management for bringing together a diverse group of maritime stakeholders to brainstorm, share ideas, and offer recommendations for the future of the Marine Park.

Based on Boston Harbor Now's research and working port publications, South Boston is the region's largest contiguous industrial zone, containing the majority of the Port of Boston in both jobs and revenue. Of the four inner harbor DPAs, the South Boston working waterfront has the potential to both benefit from and be threatened by new commercial and residential development.

We continue to support the Boston Planning and Development Agency's (BPDA) decision to evaluate the role of the RLFMP as a pivotal contributor to Boston's maritime industrial economy and to explore ways the RLFMP can be improved. For this reason, the primary goal of the Master Plan update should be to serve as a guide to incorporating new innovation-economy and flex-industrial spaces within the Park while protecting well-paying blue-collar jobs and future maritime industrial uses. Our brief recommendations follow.

The highest and best use for the Raymond L Flynn Marine Park, as noted in its Master License, is for marine industrial uses. We support proposed changes that will serve to enhance critical infrastructure and increase the viability of the working port and waterfront such as allowing supporting uses on pile-supported piers. This may include considering commercial trans-shipments from Logan Airport as a water-dependent industrial use and tightening the definition of research and development to maintain industrial capabilities and infrastructure.

### **Definitions & Uses**

One of the proposed changes in the Master Plan update is to increase the allowable proportion of supporting uses in the RLFMP from 33% to 49% and reduce marine-industrial uses from 67% to 51%. Currently, 2.7% of the RLFMP is home to commercial business. As proposed, the master plan update would suggest doubling these uses from the current 5% cap to a maximum of 10%. According to the BPDA, the main reason for this request is to increase revenue-generating properties to support maritime activities within the Park.

The proposed increase highlights the need to more clearly define business uses within the master plan and compare them with the same definitions used elsewhere in the industry.

Currently, the plan makes a distinction between commercial industrial and mixed industrial. Within the context of existing regulations, the difference between these two uses is difficult to understand. Unlike the more clearly defined uses in the existing DPA regulations, these slightly different categories do not provide the necessary clarity to evaluate how increasing the overall percentage within the Park will affect existing and future maritime businesses. Our recommendation is both to simplify the definition of uses and identify how a particular use will contribute either economic or services support to maritime business within the Park.

Throughout discussions of the advisory committee, there was a consensus that a key consideration for any proposed changes or additions to the Park was its compatibility with the maritime industry. For this reason, any activity defined as “supporting” should clearly identify how it intends to support the maritime industry, whether economically, through increased services, or some other named benefit. In the case of economic support, there should be clear guidelines as to how the support will be invested back into the Park for ongoing maintenance, improvements, and capital projects specifically benefitting the maritime industry.

Furthermore, a breakdown of the proposed uses, anticipated/possible revenue streams, and prioritized list of mitigation fund use would alleviate uncertainties the advisory committee expressed about entertaining a potential increase of the cap from 5% to 10%. Until there is a better understanding of these uses and expected revenues, Boston Harbor Now would not support doubling the cap as suggested in the updated master plan.

### **Ground Floor Uses**

Increasing the ground floor commercial uses has the unintended effect of increasing the commercial feel of the Park without truly supporting the maritime uses as is intended. While it may be true that some of these businesses support the industry, it is also true that continuing to increase the presence of non-maritime commercial businesses will increase the need for parking spaces (already at a premium), improved vehicular traffic flow, and enhanced pedestrian access, to name a few.

One suggestion was to offer some commercial uses during off-peak hours that would not naturally conflict with maritime activity. An existing example of commercial use during off-peak hours is the Blue Hills Pavilion concert venue. Although located within the boundary of the park, its operating hours are not typically in conflict with maritime activity. [Espaces Delhousie in the Port of Quebec](#) is another example of dual purpose space. A state of the art port terminal during the day converts into a spacious event venue that hosts everything from weddings to seminars to dance parties in the evening. All of the revenue-generating events provide financial support for the more traditional port activities.

The maritime industry as a whole tends to have a wide range of operating hours. A better understanding of “off-peak hours” as it applies to the Park is crucial before any consideration of expanding ground floor uses, exploring other income-generating opportunities, and inviting the public to the Park.

### **Truck Routes**

Increasing commercial activity and uses in the Park has the potential to significantly affect the maritime and marine-industrial-related businesses located within the Park, especially those dependent on established truck routes—the lifeline of Conley Container Terminal and the working port. Boston does not benefit from an existing railway system at the port. Moving goods in and out of the district and the city in a timely and efficient manner depends entirely on the trucking system and its dedicated routes, particularly around the terminal. Due to significant investment by Massport and collaboration with the trucking industry, cargo operations at Conley Terminal can load a truck and get it on the road in just over 30 minutes. In place of exclusive rail right-of-ways, truck routes enable goods from the port to move through and out of the city safely and efficiently.

Expeditious trucking operations keep the Port of Boston competitive and provide the much-needed edge to outperform nearby ports like New York/New Jersey. If trucks are negatively impacted by congestion or limited

maneuverability as they share space with other types of vehicles and vulnerable pedestrians, it hinders the effectiveness of the port and its operations. We indeed tend to focus on the effects of maritime activity and trucking operations as they are felt locally, but it is more significant that the benefits of these systems extend well beyond our city and outside of Massachusetts to the New England region and beyond.

Prioritizing truck routes and minimizing conflicts with non-commercial vehicles, pedestrians, and bicycles should be a key focus of any proposed changes to the existing master plan. Understanding projected uses and proposed increases of non-maritime traffic as contributors to additional traffic and congestion in the area are important considerations. This includes not only existing traffic but future projections as a result of any changes that are incorporated into the final master plan. For example, doubling the cap of commercial uses from 5% to 10% is very likely going to change the traffic patterns within the Park and impact existing truck operations.

Although Boston's maritime industrial sector and support services have changed over time, they remain a critical component of the region's socioeconomic well-being. Done right, the Master Plan Update for the Raymond L. Flynn Marine Park has the potential to increase the profitability and viability of the water-dependent industry by subsidizing infrastructure investments that would otherwise be unaffordable. We look forward to reviewing an updated set of BPDA recommendations for the RLFMP Master Plan Update.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathy Abbott', with a stylized, cursive script.

Kathy Abbott  
President & CEO