



Are you on board?

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March 26, 2020

Via email: alex.strysky@state.ma.us

Ms. Kathleen A. Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Attn: Alex Strysky

Re: EEA #8161 – Raymond L. Flynn Marine Park Master Plan Update
2 Harbor Street (Parcels T and T-1 of the RFLMP)

Dear Mr. Strysky,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Notice of Project Change (NPC) submitted by ICCNE LLC regarding the proposed redevelopment of 2 Harbor Street in Boston's Raymond L. Flynn Marine Park (RFLMP) in South Boston. The project will involve the construction of a new 10-story building containing 381,000 square feet of laboratory, research and development, office and supporting uses. A member of our team had the opportunity to participate in the site visit on February 24th, and we submit the following comments based upon the NPC and the site visit, as well as the supplemental information provided by the project proponent to the MEPA office.

Consistency with Raymond L. Flynn Marine Park Master Plan/Imagine Boston

The mission of the RFLMP is to serve as a protected area for industrial business and Boston-based jobs, which is bolstered by state regulations that require the majority of uses to be maritime industrial in nature. The Boston Planning & Development Agency's "Imagine Boston 2030" plan similarly identified this area as a vital waterfront job center capable of generating significant job growth in general and maritime industrial sectors. As an organization, we are supportive of maintaining a vibrant working port, including prioritizing areas which support and create water-dependent industrial uses where appropriate, as well as supporting uses in close

proximity. In keeping with the mission of this area, we support the proponent's plan to provide 32,000 square feet of upper-floor space dedicated to water-dependent industrial uses along with loading bays, truck access and staging areas, and materials handling facilities, such as freight elevators, sufficient to meet the needs of these types of uses. Indeed, this provision of space for water-dependent uses is mandated by a written determination by the Massachusetts Department of Environmental Protection that transferred such development from another parcel in the RFLMP (as noted in the proponent's NPC filing, page 1-17). We are encouraged that this is in the plan for the building from the start.

Transportation Infrastructure

As noted, the project is located in the Raymond L. Flynn Marine Park, in a part of South Boston that is experiencing rapid development and the associated transportation congestion that come with such an expansion. As a result, the area is currently under study by the Boston Planning & Development Agency and the Boston Transportation Department to devise a plan to better meet commuter needs in the Seaport. We are pleased to see that the proponent is pursuing a vibrant Transportation Demand Management strategy, including efforts to encourage the use of public transportation, bikes, and walking to/from the site. We would encourage the proponent to be cognizant of the project's impact and potential interference with Massport's Haul Road, which is near to the project site. Similarly, any public realm improvements that are envisioned for the site should be designed to minimize conflict with freight traffic and to separate users from the Haul Road.

In addition to efforts to reduce the traffic impacts of the project, the proponent has committed \$400,000 to transportation mitigation as part of the Article 80 process. As strong proponents of water transportation, we would encourage using some of these funds to explore an expansion of ferry service to the area. Currently, there is a pilot program operated by Bay State Cruise Company, managed by the Massachusetts Convention Center Authority, and funded by major employers in the Seaport, providing ferry service between the Fan Pier dock and Lovejoy Wharf, which is meeting expectations. The sponsors are considering potential expansion of that service. Mitigation funding could work in conjunction with the City's plans to reduce traffic on the roadways and expand and support a vibrant water transportation system in the City.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron Toffler', written in a cursive style.

Aaron Toffler
Policy Director
Boston Harbor Now