



Are you on board?

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May 7, 2021

Via email: aisling.kerr@boston.gov

Boston Planning and Development Agency
Attention: Aisling Kerr
One City Hall Square
Boston, MA 02201

Re: Project Notification Form – 24 Drydock Avenue, Raymond L. Flynn Marine Industrial Park

Dear Ms. Kerr,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Project Notification Form (PNF) for the project located at 24 Drydock Avenue in the Raymond L. Flynn Marine Park (RLFMP) in South Boston. The PNF for this project was filed with the Boston Planning & Development Agency (BPDA) on March 12, 2021 and a public meeting was held on April 27, 2021.

Members of the Boston Harbor Now team attended the public meeting, and the proponent presented the project at our most recent Harbor Use Public Forum on April 28, 2021. We now respectfully submit these comments on the PNF. As more fully described below, Boston Harbor Now appreciates the project's commitment to supporting the critical marine-industrial use of Drydock #3 and the operations of Boston Ship Repair as well as the idea of better connecting the Seaport with historically underserved, inland neighborhoods.

Project Plan

The Proponent proposes the demolition of the existing three (3)-story structure on the Project Site and the construction of a new, eight (8)-story, mixed-use building totaling approximately 235,500 square feet of marine industrial, life sciences/research and development, and supportive uses (the "project"). The project will provide 10,000 sf of office space to the Boston Ship Repair on the first floor to support water-dependent industrial use in the RLFMP.

Further, Cronin Drydock, LLC have partnered with three Boston non-profit organizations to provide training and workforce development space within the building and are working with

Massachusetts Convention Center Authority to expand the existing shuttle service and provide a new shuttle from Nubian Square to the RLFMP and other locations throughout the Seaport.

Before making any substantive comments on this project, we note that the Raymond L. Flynn Marine Park Master Plan Update (December 2017) has not received final approval from the Commonwealth. Though we are measuring the proposal against the guidelines set out in that document, it is unclear whether there will be any changes to the substantive requirements of that plan in the final version. The 2017 Update, however, does make it clear that supporting marine industrial uses is a primary goal for the Marine Park. The efforts made towards supporting the Drydock in this proposal, therefore, should be memorialized to ensure the future viability of this important asset.

Consistency with Raymond L. Flynn Master Plan

The project proposes water-dependent industrial use on the ground floor with 10,000 square feet being provided to Boston Ship Repair for office space. This is a critical component of the project, and will help to ensure the long-term viability of that water-dependent business, a primary goal of the RLFMP. The RLFMP plays an important role in preserving maritime industrial businesses in the City of Boston. This is the type of development envisioned by the 2017 Master Plan Update: “To harness the development pressure around the park and its inherent real estate value, a redevelopment approach is advanced for a multi-story, mixed-use building typology that has actually existed in the Park for some time. This building framework is one that establishes and requires high-bay industrial space on the ground floor and a range of upper-floor uses, such as research and development, light industrial and office that are compatible with water-dependent industrial uses.” Raymond L. Flynn Marine Park Master Plan Update, December 2017 (p. 6). We are encouraged that the proponent is devoting a portion of the ground floor of the building to water-dependent industrial use. The proponent has purchased Boston Ship Repair and has expressed their long-term commitment to revitalizing this critical water-dependent use that preserves the character and purpose of the working port. At the public meeting, Boston Ship Repair spoke supportively of the project, seeing it as a lifeline to their continued operation in Boston. We would urge the City and the proponent to memorialize this long-term commitment to an important water-dependent business in a way that ensures its viability for the long-term. Additionally, care should be taken to ensure that the project does not dedicate any portion of the current or future operational needs of the drydock to the building footprint.

Transportation and parking are also concerns that are addressed in the RLFMP Master Plan Update. The plan envisions protecting truck routes and enhanced public transportation services to the area. As noted in the Master Plan Update: “Since parking is limited, a large percentage of employees rely on the Silver Line. Improved service is crucial to on-going operations and for attracting new businesses and talent. Businesses expressed a need for additional routes or a collective transit system unique to the park itself.” RLFMP Update, p. 31. We applaud the proponent’s plan to provide improved transportation between Nubian Square and the Seaport area as well as the partnership with a transportation services company that will implement this service. As some details are still being developed, we look forward to learning more about the planned service and how it will respond to community needs for accessing the Seaport. We would also encourage the proponent to invest in improvements to the roadways (such as converting the roundabout at Fid Kennedy/Massport Haul Road and Northern Avenue to a four-way signalized intersection) as well as improvements to the Silver Line service, which, according to the PNF, has two stops within sixty feet of the proposed building. Finally, we are

excited that the proponent is investing in plans for water transportation service and infrastructure to serve the east end of the RLFMP.

Open Space/Public Realm

The project includes an improved public realm, particularly on the west side of the building, where a tiered plaza will be constructed. This open space will allow visitors to sit and eat lunch next to the building, and will provide some resilient flood protection as it steps up to the building itself. This will be a great addition to the public realm in this part of the City, and will provide views into the Seaport and the Drydock as pedestrian conditions are improved. A Bluebikes station will also be provided on this side of the building to reduce the traffic impacts of the building. Street plantings were proposed to improve the frontage along Drydock Avenue, but the proponent noted in the public meeting that there may not be room to expand the sidewalk. We look forward to seeing alternative public realm improvements for this section of sidewalk in the next phase of the design.

Resiliency

The project is designed such that the elevation of the new building will meet the City's 2070 Sea Level Rise Design Flood Elevation of 20.5 BCB for this site. Critical infrastructure will be raised an additional foot to 21.5 BCB. The rest of the site will remain at current elevations with no increase in surface parking. This is an appropriate plan to meet resiliency targets for the site.

Additionally, the proponent has committed to participate in the BPDA's newly created Climate Resiliency Infrastructure Fund, which will provide private-sector funding to mitigate the impacts of climate change for the RLFMP. This represents an important step towards achieving district-level protection from sea level rise and should be memorialized in a public permit.

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
Director of Policy
Boston Harbor Now