



Are you on board?

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May 3, 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 – Parcels O and P, 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 on Parcels O and P in the Raymond L. Flynn Marine Industrial Park (RLFMP) in South Boston. The PNF for this project was filed with the Boston Planning & Development Agency (BPDA) on April 2, 2021 and a public meeting was held on April 28, 2021.

A member of the Boston Harbor Now team attended the public meeting on April 28, 2021 and we now respectfully submit these comments on the revised plan.

Project Plan

The project proposes the demolition of the existing structure on Parcel O to contain a new, approximately 219,000 square foot life sciences/research and development building and as approximately 9,000 square foot adaptive reuse of the existing building on Parcel P to serve as amenity space for the tenants of the new life sciences/research and development building. The project will maintain the existing surface parking and no additional parking is proposed.

The project site is currently two parcels. The approved terms of the new ground lease with EDIC contemplate combining the two parcels into one lot. The resulting project site will include the area of roadway located between Parcel O and P (Au Bon Pain Way) and a portion of the roadway adjacent to Parcel P (Anchor Way). These roadways and adjacent sidewalks will be improved by the Proponent as part of the Project to support the operations of adjacent marine industrial tenants. The resurfaced roadways will remain under the control of the EDIC to

preserve access to and from the adjacent properties including the Boston Ship Repair's Dry Dock Number 3 property. Together with the roadways, the Project site will total approximately 115,023 sf (2.64 acres).

Consistency with Raymond L. Flynn Master Plan

According to the proponent, the project qualifies for a Minor Revision under the License for the RLFMP. The License provides for tracking new projects as they affect the overall percentage of uses in the RLFMP. There is currently no marine industrial use proposed for the site, nor was the former use a marine industrial use. The project filings provide that the project will maintain access to Drydock #3 and will not detract from the functioning of this important water-dependent industrial use.

The RLFMP plays an important role in preserving maritime industrial businesses in the City of Boston even as the 21st century needs of a working port continue to change and evolve. While we support the continued access to Drydock #3 as proposed in this plan, as well as continued support for the working port, we are concerned that there is no space set aside in this building for any water-dependent uses. With its location directly adjacent to the drydock, it would seem an ideal site for such a use. Other proposed developments nearby, even those without waterfront access, have found ways to support the working port in some direct way. 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 would encourage the proponents to think creatively about how to express that support within the confines of this building.

Further, the Master Plan Update envisioned a redesign of the intersection of Fid Kennedy/Massport Haul Road and Northern Avenue, which will convert the intersection from a roundabout to a four-way signalized intersection. This is an important intersection for the area, and we would encourage the proponent to consider supporting this project along with other developers in the park to improve access to their site and circulation in the area.

Open Space/Public Realm

The project includes tree plantings along Fid Kennedy Avenue designed to improve the pedestrian experience along the north side of the project. The public sidewalk will also be widened and elevated to improve pedestrian flow. The wind and shadow analyses for this portion of the site indicate that this stretch is likely to be cold and windy for parts of the year. We encourage the proponent to think about ways to mitigate these impacts for people relying on public transit to access the site and other members of the public so that the area can be welcoming year round. The amenities building on Parcel P should also be accessible to the public and provide a welcoming public use.

Resiliency

The project is designed such that the elevation of the new building on Parcel O will meet the City's 2070 Sea Level Rise Design Flood Elevation of 20.5 BCB for this site. Critical equipment

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 for the building 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 sea level rise for the RLFMP. This represents an important step towards achieving district-level protection from sea level rise.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron Toffler', with a stylized flourish at the end.

Aaron Toffler
Director of Policy
Boston Harbor Now