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May 6, 2022

Via email: [alexander.strysky@mass.gov](mailto:alexander.strysky@mass.gov)

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

Attn: Alex Strysky

Re: Raymond L. Flynn Marine Park Master Plan Update

Dear Mr. Strysky,

Boston Harbor Now respectfully submits the following comments on the *Raymond L. Flynn Marine Park Master Plan Update* prepared by the Boston Planning and Development Agency (BPDA). Our organization has been closely following this project since its inception and has previously submitted comments on its development in a May 2017 letter to the BPDA and again in a July 2019 letter to the Office of Coastal Zone Management (CZM). We have also served on the Raymond L. Flynn Marine Park (RLFMP) Advisory Committee and, most recently, watched a recording of the April 5, 2022 site visit.

Both Boston Harbor Now, and our predecessors at The Boston Harbor Association, have continuously supported efforts by the City and the State to create and maintain a vibrant working port in Boston in order to contribute to the region's economy and provide high quality jobs in the maritime sector. We recognize that development pressures combined with the need for major investments in both maritime facilities and adaptation measures that address climate change impacts have prompted a reimagining of this part of the City. Overall, we believe that this is a thoughtful plan for balancing those needs while preserving the essential functions of this maritime industrial district. As we've noted previously, we appreciate the opportunity to blend the innovation economy and flexible new industrial spaces with well-paying blue-collar jobs and future maritime industrial uses. We are particularly focused on the sequencing of infrastructure investments to ensure that the existing and future maritime uses have the means to survive and thrive as other uses emerge.



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### *Benefits of Clustering*

Today, the RLFMP and nearby parcels, including the Fish Pier, provide a home to a significant amount of seafood processing. Additional maritime activities happening on the edges of the Marine Park include the Black Falcon Cruise Terminal, which offers berthing to up to three vessels alongside supporting uses; the Boston Ship Repair, one of the few dry dock facilities of its size in the northeast; and the North Jetty, which is going to be repaired in order to accommodate a greater range of cargo at that location. These features make the Park a unique asset to the city and the region that benefit and diversify the economy. The current clustering enables significant truck and bus traffic and generates few complaints about the sounds or smells.

Fortunately, the changes proposed in the Master Plan Update largely preserve areas near the waterfront for maritime uses and cluster new industrial uses on the interior. This interior collection of parcels, which seem likely to be developed for research and development in labs, provides the added benefit of creating a new R&D cluster that might encourage lab buildings to converge here rather than being scattered throughout residential parts of the city. The proximity of these buildings can also sustain a small number of commercial businesses to serve the needs of workers in these buildings without creating destination retail that would draw additional pedestrian and vehicular traffic into the industrial district.

### *Change of Uses*

The adjustment to the percentage of allowable uses, as measured on the ground floor, has responded to the needs of existing tenants and is focused on supporting maritime use. Previous drafts proposed reducing marine-industrial uses from 67% to 51% and increasing commercial uses to 10%. The final version indicates that the Marine Park's present ground floor usage is 75% marine industrial use, and it is proposed to be 67.8% in the future. Meanwhile, other industrial uses are proposed to increase from 21.9% to 29.1% with commercial use being just 3%. In addition to these requirements, we want to ensure that these proportions and their functionality are monitored by the BPDA or the State in order to ensure that ground floor spaces designed for maritime tenants remain affordable to them and are consistently designed to meet their unique needs.



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### *Infrastructure Investments*

Many of the changes in use for the plan are premised on the need for significant investments in the area to improve maritime infrastructure, design better transportation infrastructure, and implement climate adaptation measures. These are commendable goals with transparent value-capture mechanisms. The new funds established by the BPDA are precedent-setting, and we hope that they are replicated in other parts of the City where coordinated funding can enable bolder solutions and important capital investments.

The Maritime Capital Reserve Fund is unique to designated port areas (DPAs) like this one, but it may also be applicable to changes in the DPAs in East Boston, along Chelsea Creek, and along the Mystic River where new development can contribute to the financial sustainability and operability of maritime infrastructure along the coastline. Many potential projects were proposed for the use of these funds, and we hope to see a clear process for prioritizing the investments that serve the existing and emerging maritime uses. The North Jetty and the Marine Cargo Terminal stand out as the most pressing projects for implementation.

The Resilience Fund is a similarly commendable feature of this plan that will leverage private dollars to pay for climate adaptation measures in the district. The existing maritime properties would not have been able to make climate adaptation investments at the scale proposed on their own; however, by their very nature, many of the coastal protections recommended elsewhere in the city will be at odds with water-dependent uses along the shoreline for this district. We expect that this will be addressed by flood protection measures. We are similarly excited that this model will be used for developing district scale solutions across property boundaries, but we are concerned that the number of new projects already in the design and construction phase prior to selecting an alignment for flood protection measures will limit where the needed adaptation infrastructure can be built.

Transportation investments are also critical. Ensuring that the maritime tenants are able to move goods in a timely manner is key to the longevity and economic vitality of this inherently marine-industrial district. New non-maritime growth in the district should be limited until the infrastructure upgrades have been made. The Chapter 91 process or another point in development review may be appropriate benchmarks for checking that



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necessary infrastructure projects are being completed prior to or at least concurrently with the increase in non-maritime buildings and uses.

As private development and infrastructure investments take place in the RLFMP, we will continue to monitor the balance of uses and investments made in the needed maritime, resilience, and transportation infrastructure. Although not addressed in the plan directly, we also hope that the parts of the park with higher rates of employment and multistory buildings offer a public realm that remains consistent with the character of the park while offering respite to the people working there.

We appreciate the opportunity to comment and will continue to remain engaged in the development of the RLFMP as projects adhering to the Master Plan work their way through the BDPA's development review process as well as Chapter 91. We would be happy to speak with you further if there are additional questions.

Sincerely,

A handwritten signature in black ink that reads "Katherine F. Abbott".

Katherine F. Abbott  
President and CEO  
Boston Harbor Now