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November 23, 2022

Via email: tyler.c.ross@boston.gov

Mr. James Arthur Jemison
Boston Planning and Development Agency
1 City Hall Square, Floor 9
Boston, MA 02203

Attn: Tyler Ross

Re: 22 Drydock Avenue Project Notification Form

Dear Mr. Ross

Boston Harbor Now respectfully submits the following comments on the 22 *Drydock Avenue Project Notification Form* (PNF) prepared by Related Beal. Our organization has been following this project since its inception and most recently attended the Boston Planning and Development Agency's (BPDA) virtual public meeting on November 16, 2022.

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 the coastal impacts of climate change have prompted a reimagining of the Raymond L. Flynn Marine Park (RLFMP), with a shift to allow for an increase in supporting uses, primarily on upper floors. Even with these changes, we envision that this area and other Designated Port Areas (DPAs) around the Commonwealth will support the existing and future marine industries that strengthen our region while preparing for the challenges climate change will bring. Additionally, we expect that robust working port areas will work in tandem with their surrounding communities to provide local residents with job and educational opportunities that allow both to flourish.

Based on the recommendations of the *Raymond L. Flynn Marine Park Master Plan Update*, this project has primarily existed as, and is proposed to be, General Industrial. As a supporting use, we believe that it is especially important that the proponent abides by the guidelines established by this document and supports both marine industrial uses and climate resilience infrastructure. We expect this project to contribute to the BPDA's RLFMP



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Climate Resiliency Infrastructure Fund and to collaborate with other marine industrial tenants in the park to support their needs. We appreciate that the proponent has already taken steps to sponsor the Boston Fisheries Foundation, and we hope to see continued support of other maritime groups and. Overall, we are excited for the additional public benefits this project will contribute, including support for the Pier 10 Ferry and creation of complete streets and hope that the outdoor space provided is both welcoming to the public and prepared for sea level rise and coastal storms.

Compliance with the RFLMP Master Plan

The RLFMP is one of a limited number of areas in Boston dedicated to maritime industrial uses. As outlined in the BPDA's new master plan update for the area, the park should have a mix of primarily marine industrial uses in addition to supporting uses that can help fund the necessary capital improvements to keep the area going. As a general industrial use project in a marine park dedicated to marine industrial uses, we expect this project to support the existing and future marine industrial tenants. We also appreciate that, in a similar vein, the proponent has committed to provide the Boston Fisheries Foundation with \$450,000 for a Fisherman's Relief Fund, Boston Seafood Festival, and a Boston Fisheries Foundation Museum; however, we would like to see a connection to support for fishing and other maritime jobs and workers continued in the operations of the proposed building. In alignment with our aspirations for significant development around the waterfront and throughout this industrial area, we request that the incoming food vendor provides foods at price points accessible to the marine industrial workforce in the RLFMP and the lobby provides amenities that are open to the public, such as public restrooms.

Consistent with the RLFMP, we also would like to ensure that the proponent contributes to district wide flood solutions for the area. Although we are pleased to see that the first floor has been elevated to Sea Level Rise Design Flood Elevation 21.5' BCB in accordance with Coastal Flood Resilience Overlay Design Guidelines, we would like to confirm that the proponent is also contributing to the BPDA's RLFMP Climate Resiliency Infrastructure Fund.

Expanding Connections to the RLFMP

We applaud the amount of consideration that has gone into supporting multimodal transportation access to the area. The proponent will be supporting the Seaport TMA to bring ferry service to nearby Pier 10. Ferry service to this dock can reduce traffic congestion and the need for parking in the Raymond L. Flynn Marine Park where trucks associated with maritime uses are now competing for street space with an increase in commuter vehicles. Although this area is served by Silver Line connections to South Station, water transportation can provide a one-seat ride to North Station. We



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would appreciate clarity on the level of financial support and formal involvement.

Additionally, the proponent will be providing shuttle bus service and creating a new stop along Northern Ave. As this project moves forward we would like further clarification on this service since the proliferation of private shuttle services gives us pause. The Massachusetts Convention Center Authority (MCCA) has gone to great lengths to consolidate shuttle services in the Seaport, and we want to ensure that new services are coordinated with nearby initiatives. For example, other proposed developments in this area, such as 24 Drydock Avenue, are planning shuttle services to this part of the district. We recommend coordinating with them to ensure that that routes are not redundant and to potentially allow for shared use of the proposed shuttle stop.

For cyclists visiting the site there will be a new protected bike lane along Northern Avenue that leads to stairs that have built in bicycles ramps to allow cyclists to roll their bicycles up to one of the 128 bike parking spaces located inside the building. The proponent has also committed to a 19-dock Bluebikes station as well as showers and lockers for building tenants who use active transportation modes to get to work.

Creating a Resilient Open Space

A key feature of this proposed design is the optimization of plaza space for outdoor seating. While we commend this effort, we hope to see fewer impermeable surfaces. Large contiguous hardscape areas can lead to increased heat island and storm runoff. With different furnishings, like Adirondack chairs or picnic tables, some of the paved areas may be converted to green space while still maintaining seating for users of the building and marine park more broadly. In addition to greening the outdoor space we recommend that the proponent utilize native salt tolerant plants to add vegetation to the site. We hope to see plantings that can weather the potential damage from storms and coastal flooding and bounce back.

We appreciate the opportunity to comment on this project and look forward to following its progress towards implementation. We would be happy to speak with you or the proponent further if there are additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Katherine F. Abbott".

Katherine F. Abbott
President and CEO
Boston Harbor Now