



Are you on board?

15 State Street Suite 1100
Boston, MA 02109
617 223 8667
bostonharbornow.org

February 10, 2023

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

Executive Office of Energy and Environmental Affairs

Attn: Alexander Strysky

100 Cambridge Street, Suite 900

Boston, MA 02114

Re: ISQ3 - 22 Drydock Avenue MEPA Project Commencement Form

Dear Mr. Strysky

Joseph Aiello
Grace Macomber Bird
Jamie M. Fay
Robert Golledge
Elizabeth Grob
Meaghan Hooper-Berdik
Bryan J. Koop
Ann Lagasse
Malia Lazu
Mary Kay Leonard
Shelagh Mahoney
Martin O'Neill
Elaine Richardson
Demetriouse Russell
Cathy Douglas Stone
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Katherine F. Abbott

Boston Harbor Now respectfully submits the following comments on the *22 Drydock Ave Project Commencement Notification (PCN)* prepared by Related Beal. Our organization has followed this project since its inception and most recently attended the remote site visit on December 21, 2022. BHN has previously submitted comments to the Boston Planning and Development Agency (BPDA) regarding the *22 Drydock Ave Project Notification Form (PNF)* on November 23, 2022.

Boston Harbor Now (BHN) has 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, designed to address the coastal impacts of climate change, have prompted a reimagining of the Raymond L. Flynn Marine Park (RLFMP). This shift allows for an increase in supporting uses, primarily on upper floors. Even with these formal policy changes, we envision that this area and other Designated Port Areas (DPAs) around the Commonwealth will support the existing and future maritime industries that strengthen our region while preparing for the challenges climate change will bring. We also 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.

As noted in our previous letter to the BPDA, Boston Harbor Now cares deeply about creating spaces that are resilient, welcoming, and, in DPAs, supportive of marine industrial development. We believe that this project, though primarily a general industrial use, can support marine industrial workers. We appreciate the proponent's intent to create a restaurant space that fits the needs of RLFMP workers without serving as a regional destination. Through the Chapter 91 process, we will evaluate the extent to which the design of this space, other lobby amenities, and the surrounding plaza create a welcoming environment for marine industrial workers as well as other workers and members of the public in the area. We are pleased to see that the proponent will be contributing



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money to the BPDA's Climate Resiliency Fund, which will develop proposals for district scale flood protection measures. These improvements are vital to protecting marine industrial businesses and other RLFMP tenants who share the same infrastructure.

Chapter 91 Requirements

We appreciate the proponent's clarity on the proposed food tenant in the February 6th, 2023 Memorandum. In alignment with our support for the marine industry and its workers, the incoming fast casual food vendor planned is tailored to serve the marine industrial workforce in the RLFMP. Although this use is designed with water-dependent industrial workers in mind, we are also happy to see that this will be available to the public. As a non-water dependent use within Chapter 91 jurisdiction, we expect this project to be welcoming to the public that uses it. Therefore, BHN supports incidental use of the restaurant by the broader public, and we hope that other amenities afforded to tenants of this site will also be extended to the public at large. In particular, we would like to see restrooms and the lobby open for public use.

The Public Realm

As stated in BHN's previous comments on this development, we are concerned by the proportion of the site that will be impervious. Based on our reading of the PCN, approximately 90% of the site will be covered with impervious surfaces, a reduction of only 2% from today's present level. Large contiguous hardscape areas can lead to increased heat island effects and storm runoff. Although we appreciate the proponent's commitment to creating a welcoming place to sit and rest, we believe that functional seating does not preclude open green space. As this project continues to develop, we would like to see more pervious surfaces on site, which will not only help mitigate the effects of climate change, but also create a more comfortable environment for people using the available outdoor space. We recommend selecting a planting palette that can weather potential damage from storms and coastal flooding and bounce back.

The Climate Resiliency Fund

The Climate Resiliency Fund provides a mechanism for the City to finance much-needed neighborhood-wide resiliency infrastructure that will protect the neighborhood's community, jobs, and infrastructure. At present, the Climate Resiliency Fund is structured to only charge this project if at least 50% of the RLFMP area under BPDA control is contributing to the Climate Resiliency Infrastructure costs. We would like to see every project, including this one,



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contribute to the fund regardless of the payment status of other properties. For the benefit of the entire district, including both the marine industrial tenants and other supporting businesses in the RLFMP, it will be imperative that every project cooperates to create the needed flood protection since the roads and other infrastructure are used by all.

We appreciate the opportunity to comment on this project and look forward to following its progress toward 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 that reads "Katherine F. Abbott".

Katherine F. Abbott
President and CEO
Boston Harbor Now