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August 29, 2023

Via email: alexander.strysky@mass.gov

MEPA Office

Attn: Alexander Strysky
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: EMS Seaport - 34 Drydock Notice of Project Change

Dear Mr. Strysky,

Boston Harbor Now respectfully submits the following comments on the *Raymond L. Flynn Marine Park Master Plan EMS Seaport Notice of Project Change* prepared by Beals and Thomas on behalf of Boston Public Facilities. Our organization has followed and submitted comments on the Raymond L. Flynn Marine Park (RLFMP) Master Plan Update drafts and has followed this project since its inception.

Boston Harbor Now (BHN) has continuously supported efforts by the City of Boston and the Commonwealth to create and maintain a vibrant working port around the Harbor in order to contribute to the region's economy and provide high-quality jobs in the maritime sector. The new EMS facility responds to the changes and job growth in the Seaport and while this critical public service will enable faster response times to in-water and waterfront emergencies, this land use further reduces the percentage of water-dependent ground floor uses in the district.

We recognize that development pressures combined with the need for significant 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. Although most of this area does not have the traditional waterfront public access that the Harborwalk provides and the proposed EMS Seaport is not a commercial development project, we believe our Harborwalk 2.0 framework of improving the climate preparedness, accessibility, and inclusiveness of harbor-adjacent properties still applies.



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Public Realm

The proponent has brought meaningful public benefits to this highly functional building. From placing public restrooms on the ground floor to maximizing the available gathering space, we appreciate that the proponent has prioritized the publicness of this site. The restrooms should have clear signage, and all amenities meant for the public, not just the restrooms, should be easily findable and welcoming. The chain link fence may be a deterrent for public gathering, and we suggest selecting a different fencing material that will serve the same safety purpose.

To add greenery to the site, the proponent has proposed adding about a dozen new trees and landscaping primarily clustered near the gathering space. We applaud the addition of shade and vegetation to this area. However, most of the site remains paved. Given benefits of reducing heat island effects and of preparing the site for different types of flooding, we suggest that asphalt paving be replaced with light colored gravel for light reflection and water permeability. Additionally, plants may be added to the proposed gravel sections. When choosing vegetation, the proponent should select native and salt-tolerant plants that can weather the potential damage from storms and coastal flooding and bounce back.

Coastal Flooding

Like the rest of the RLFMP, this site is vulnerable to coastal flooding. The proponent cannot elevate their site because of the design constraints necessitated by the ambulances that will be housed at this location. Instead, they have chosen to wet flood proof their building by incorporating flood vents and water-impervious materials into their ground floor design, outfitting the elevators with flood sensors, and locating their crew lounge, office, fitness, changing spaces, and all mechanicals to the second story or above. While this strategy is the most logical flood proofing measure for their site, the shared district infrastructure, like the roads leading in and out of the marine park, remains vulnerable. It is infeasible for this site to contribute to district-wide flood protection at present; yet, without a broader strategy, emergency services may be stymied by floodwaters, which are expected to be up to 2.5 feet deep during the 2030 1% storm based on the most recent state projections (Massachusetts Coastal Flood Risk Model). Although a solution should be forthcoming from the Boston Planning and Development Agency (BPDA), which will be using the RLFMP Climate Resiliency Infrastructure Fund to help finance the protection of shared district infrastructure, swift action will be needed to



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preserve the EMS facility's functionality. As the BPDA is still working on district plans, we urge the proponent to ensure their proposal remains aligned with the BPDA's designs and can adapt to future modifications.

Any additional elevation that can be added to the floor height now, even a foot, will reduce the frequency of high tide flooding affecting operations. Meanwhile, the equipment purchased for this site should be designed to operate on flooded streets.

Raymond L. Flynn Marine Park Master Plan Update

According to the proponent, "the latest draft of Table 7: Marine Industrial Park Master Plan: Future Buildout Land Use Matrix provided by EDIC [states] approximately 67.2% of the RLFMP is dedicated to Marine Industrial Use," which includes the site in question, 34 Drydock. While the proponent has stated that their use is water-dependent, it is not considered marine industrial, decreasing the balance of marine industrial space in the RLFMP to 67.1% of the park, assuming that the remainder of the site would be considered marine industrial. The site is presently 100% designated for Marine Industrial use, as it provides open space for users of the RLFMP.

While we support this project as a needed community resource, we wish to flag its compliance with the RLFMP Master Plan Update. As an organization that strongly believes in the importance of ports and the maritime industry to Boston's economy, we consider it essential that the agreed upon balance of uses be monitored and enforced. Though we believe the proponent has made a compelling case for their intended project, which serves as an accessory use to the surrounding waterfront industrial sites, we would like ensure that the BPDA and the Massachusetts Department of Environmental Protection (DEP) set clear standards to explain how this project is aligned with the goals and use balances established in the updated plan in a way that prevents further encroachment on the preservation of land explicitly for marine industrial uses. Should this project move forward, we hope to better understand how the proposed EMS facility affects the use balance of the RLFMP and how Master Plan compliance will be maintained.

This project can bring essential emergency services to a rapidly developing area that is currently underserved by such services. We appreciate that the proponents have made strides to create an inviting public realm in addition to providing a critical municipal resource. The creation of an EMS facility,



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though, is not enough to guarantee emergency services in extreme weather conditions if climate change impacts become more severe. Lack of district-wide flood infrastructure could upend services if ambulances cannot traverse floodwaters. We hope both the BPDA and the proponent can move forward to ensure that emergency services are able to provide consistent service in all weather conditions.

We appreciate the opportunity to comment and look forward to reviewing this project during the Chapter 91 process. We would be happy to speak with you further if there are additional questions.

Sincerely,

A handwritten signature in black ink that reads "Kathy Abbott".

Kathy Abbott
President and CEO
Boston Harbor Now