



Are you on board?

15 State Street Suite 1100  
Boston, MA 02109  
617 223 8667  
[bostonharbornow.org](http://bostonharbornow.org)

**Board of Trustees**

Meaghan Hooper-Berdik  
Grace Macomber Bird  
Kevin Clarke  
Robert Delhome  
Jamie M. Fay  
Robert Gollodge  
Greg Herrema  
Ann Lagasse  
Malia Lazu  
Mary Kay Leonard  
Shelagh Mahoney  
Andrew McElwee  
James Miner  
Martin O'Neill  
Elaine Richardson  
Bud Ris  
Demetriouse Russell  
Nalini Sharma  
Cathy Douglas Stone  
Kishore Varanasi  
Richard Walker  
Betsy Wall

**Ex-Officio Members**

Katherine F. Abbott  
Rev. Mariama White-Hammond  
Michael Creasey  
Fred Laskey  
Rebecca Tepper  
Andrew Hargens

**Lifetime Trustees**

Governor Michael Dukakis  
Governor William Weld

**President & CEO**

Katherine F. Abbott

November 27, 2023

via email: [frank.taormina@state.ma.us](mailto:frank.taormina@state.ma.us)

MassDEP Waterways Regulation Program  
Attn: Frank Taormina  
100 Cambridge Street, 9th Floor  
Boston, MA 02114

Re: 24-26 Drydock Chapter 91 Waterways Administrative Review

Dear Mr. Taormina,

Boston Harbor Now respectfully submits the following comments on the *24 Drydock Waterways Administrative Review* submitted by Cronin Drydock LLC. Our organization has followed this project since its inception and submitted comments in May 2021 to the Boston Planning and Development Agency (BPDA). We have also participated in multiple site visits at Boston Ship Repair to learn more about the dry dock, and the proponent presented at a Boston Harbor Now Harbor Use Public Forum in September 2021.

Boston Harbor Now has continuously supported efforts by the City of Boston and the Commonwealth to create and maintain a vibrant working port around the Harbor that contributes to the region's economy and provides high-quality jobs in the maritime sector. We recognize that the need for significant investments in both maritime facilities and climate adaptation measures, combined with development pressures from the burgeoning Seaport district, have prompted a reimagining of the Raymond L. Flynn Marine Park (RLFMP). The BPDA's Master Plan Update called for increased square footage allocated to general industrial uses in the marine park, allowing these uses to be built as stand-alone buildings or on upper floors above new maritime and supporting uses.

Even with these formal policy changes, this district and other Designated Port Areas (DPAs) around the Commonwealth must support the existing and future marine industries that strengthen our region while preparing for the challenges climate change will bring. New general industrial development, in particular, should support their marine industrial counterparts. We also expect that all businesses in the working port will work with their surrounding communities to provide local residents with job and educational opportunities that allow both to flourish. Although most of this area does not have the traditional waterfront public access, we believe our "Harborwalk 2.0" framework—with its focus on climate adaptation and preparedness, accessibility, and inclusiveness on harbor-adjacent



Are you on board?

15 State Street Suite 1100  
Boston, MA 02109  
617 223 8667  
[bostonharbornow.org](http://bostonharbornow.org)

properties—still applies to the non-water dependent sites being developed within Chapter 91 jurisdiction here in the RLFMP.

### *Supporting Existing Marine Park Users*

Boston Harbor Now believes that any non-water-dependent uses developed within a DPA have a responsibility to protect and enhance the infrastructure needed to support marine and maritime industrial uses in the designated area. We expect general industrial development in the RLFMP to be designed to improve or, at minimum, not impede the operations of marine industrial users and provide financial benefits to maintain and enhance infrastructure that supports water-dependent industries. With a trio of general industrial lab developments proposed in the marine park, we want to ensure that the existing maritime uses are protected and preserved.

We applaud the proponent's commitment to revitalizing Boston Ship Repair (BSR), a water dependent industrial use in the RLFMP, by providing subsidized space and economic support to modernize aging infrastructure. These investments are cited by BSR as essential to remain competitive with other ship repair facilities and to attract and retain the workers needed to keep operations running. The proponent's commitment to a "\$10 million upfront payment to support the maritime activities on the BSR Premises in the form of capital improvement subsidies" following the groundbreaking of this development as well as training space and deeply subsidized ground floor office for BSR will support the continuance of their operations. We appreciate that these commitments align with the RLFMP Master Plan Update's goals of using private development to build new, state-of-the-art marine industrial space and are pleased to see this water-dependent use enhanced. An additional classroom space will be used to train students on ship repair, helping both BSR build a sustainable workforce and providing local residents with good jobs. If the proponent has not planned to do so, we recommend the proponent subsidize the classroom/training space for BSR in addition to the office space.

### *Public Access*

Although enhancing public access in the marine industrial park can be a challenging balancing act between providing amenities that support tenants of the area and being careful not to create a destination for the public, we commend the proponent for their thoughtful lunch counter and public realm improvements. The lunch counter, which is open to the public, will be targeted at marine industrial workers, as demonstrated by their discount program available to BSR employees. We applaud the program as a way to ensure that meals are available at an accessible price point for marine



Are you on board?

15 State Street Suite 1100  
Boston, MA 02109  
617 223 8667  
[bostonharbornow.org](http://bostonharbornow.org)

industrial workers while also further emphasizing that the primary focus is on supporting water-dependent industrial operations and workers.

We appreciate that the outdoor space adjacent to the building can provide a welcoming space for people who work in RLFMP to enjoy their lunch and spend time outside. We recommend the proponent create opportunities for shade and shelter to protect users from extreme heat and other inclement weather. Large contiguous hardscape areas can lead to increased heat island and storm runoff. Therefore, we suggest decreasing the impervious surface and replacing it with more permeable surfaces and plantings, with a preference for salt-tolerant plantings given the surrounding flood potential. Signage identifying and directing people to the public amenities on site, including the overlook on Tide Street and the public restrooms, which we recommend locating near the lunch counter, should be placed strategically around the area.

The proponent has also created opportunities for the public to use their new facilities. As part of the development proposal, programming for the new building will allow nonprofits to use the classroom/training space when it is not needed by BSR, most likely on nights and weekends. We appreciate the opportunity to activate the ground floor during off-peak hours, and believe that inviting nonprofit use of the space during times of inactivity allows for efficient use of the new building while minimizing traffic congestion that may impede travel for marine industrial tenants.

### *Transportation*

Traffic congestion is a common concern for maritime and marine industrial businesses in the RLFMP, who fear additional vehicles and people in the marine park will mire their operations. The proponent has worked to minimize the traffic impacts of their site by forwarding alternative modes of transit. In addition to initial funding for a Pier 10 Ferry Terminal feasibility study, which helped jumpstart the City's current planned project, the proponent will reinstall the existing Bluebikes station after construction. We recommend the proponent sponsor the Bluebikes dock on their site or provide tenants with access to discounted memberships to the bike share program.

The most complex traffic-mitigation measure proposed by the proponent is subsidizing the operation of a free public shuttle between Nubian Square in Roxbury, the Project Site, and other locations in the Seaport area to increase access to jobs and training for underserved neighborhoods. We commend the proposed shuttle as a creative solution to reduce transportation barriers for Roxbury residents who may find it challenging to access potential job opportunities in the marine park. To ensure the shuttle program's



Are you on board?

15 State Street Suite 1100  
Boston, MA 02109  
617 223 8667  
[bostonharbornow.org](http://bostonharbornow.org)

effectiveness, the proponents must work with the community and transportation experts to determine the most efficient pick-up and drop-off locations. If Roxbury remains the focus of the initiative, we recommend one stop at Madison Park Technical Vocational High School to pick up and drop off students who are training for work in the maritime sector and another stop at Ruggles Station with its mix of transit options rather than centering the system on already-congested Nubian Square. Regardless of the final stops chosen, clear signage should demarcate pick-up and drop-off locations and ensure that the public has access to and awareness of this service. Though the primary intention of the shuttle is to transport workers from Roxbury to BSR, we hope that the shuttle will be made free to anyone wanting to use it. The proponent should advertise the opportunity to the broader Roxbury community ahead of the shuttle's operations in multiple languages and both with paper and digital postings.

### *Climate Resilience*

In accordance with the Coastal Flood Resilience Design Guidelines laid out by the Boston Planning and Development Agency, the proponent will elevate their first floor to 20.5 feet BCB and their critical infrastructure to 21.5 feet BCB. The building is also designed to accommodate a temporary four-foot-high perimeter flood-barrier system at limited necessary locations to provide continuous protection at the building perimeter during a flood event. We recommend the proponent routinely test and practice deploying the flood barrier system as deployables can be less reliable and subject to human error.

Infrastructure improvements to the shipyard and dry dock should be designed with climate change in mind. We appreciate that the building is prepared for coastal storm surge and hope that the proponent is making efforts to reduce flood risk on the remainder of the BSR site. New plantings should be salt tolerant. We also expect the proponent to contribute to BPDA's Climate Resiliency Infrastructure Fund, which seeks to implement climate adaptation infrastructure for the marine park. District-scale adaptation measures to address future flooding are crucial to protecting and preserving the marine industries, and other tenants in the RLFMP will require significant investment.

In conclusion, we appreciate the proponent's efforts to preserve and enhance BSR operations while developing a new building within the RLFMP. The project, which will introduce general industrial uses to the park, will provide needed office and space for BSR and provide them with financial support to make necessary long-term capital improvements. We are pleased to see that the ground floor of the building is tailored to support



Are you on board?

15 State Street Suite 1100  
Boston, MA 02109  
617 223 8667  
[bostonharbornow.org](http://bostonharbornow.org)

BSR and other marine industrial workers and will have classroom space that BSR and other nonprofit organizations can use. As advocates for expanded water transportation services, we wish to commend the proponent on their financial contributions to the Pier 10 Ferry Terminal feasibility study. Finally, the building design and contributions to the Climate Resiliency Infrastructure Fund can extend the longevity of the building and the marine park in the face of anticipated climate change impacts.

Thank you for considering these comments. We look forward to remaining engaged with this project through its implementation and welcome further conversations.

Sincerely,

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

Katherine F. Abbott  
President and CEO  
Boston Harbor Now