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November 22, 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: 310 Northern Ave Chapter 91 Waterways Administrative Review

Dear Mr. Taormina,

Boston Harbor Now respectfully submits the following comments on the *310 Northern and 5 Fid Kennedy Chapter 91 Waterways Administrative Review* submitted by MCP 310 Northern LLC. Our organization has followed this project since its inception and submitted comments in June 2022 to the Boston Planning and Development Agency (BPDA). We have also met with the proponents one-on-one and they presented the project at a Boston Harbor Now Harbor Use Public Forum in March of 2023.

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



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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 commend this proponent for preserving water-dependent uses in the marine park by providing funding and implementation assistance to construct a new facility for the fish processing businesses relocated from the New Boston Seafood Center that had historically operated at the project site. The new facility is expected to be state-of-the-art and will modernize the operations of these displaced tenants. The relocation will also allow them to extend their ground lease. Should other general industrial developments displace existing water-dependent businesses, we hope they will pursue a similar model to ensure that the existing industries are maintained in the RLFMP.

We also appreciate that the proponent has taken measures to ensure their site design accommodates the needs of adjacent marine park tenants. As a part of their building design, the proponent has carved out a space along Seafood Way to allow trucks used by John Nagle Co. and Harpoon Brewery to continue their truck operations. The proponent has also created publicly available open space along Unnamed Access Road that should encourage pedestrian flows away from the Seafood Way truck operations. We appreciate the proponent's thoughtful delineation of different access routes for different modes of transportation to minimize pedestrian, cyclist, and vehicular conflicts. Collectively, these accommodations should help to preserve present and anticipated operations at the existing industrial sites.

### ***Public Access***

While this is not a district designed to attract visitors, we hope the proponent's open space and ground floor amenities can support the workers in their building and in nearby facilities in a way that feels open to all members of the public. The proponent anticipates providing 50,000 square feet of landscaped area on site, including the pocket park along



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Northern Avenue and the multi-use courtyard located along Unnamed Access Road between the two buildings. Though the phasing of this development has yet to be finalized, we hope that these public amenities are prioritized in the construction of the site. Both open spaces will have seating available to the public, offering marine industrial workers and the proposed building tenants alike a pleasant area to relax and spend time outside. We recommend providing shade and shelter opportunities next to seating areas so the space remains usable in various weather conditions.

As noted above, the multi-use courtyard is located on Unnamed Access Road to avoid truck traffic along Seafood Way; however, this benefit may make it challenging to find. In our previous letter, we recommended that signage directing people to the public open space, bicycle parking, and amenities from Northern Avenue and from Fid Kennedy would better segregate transportation modes and to welcome users to the courtyard. We also believe that outdoor spaces feel fully public when they also offer supportive indoor uses, including public restrooms and retail that will support both marine industrial and lab workers in the park.

### ***Climate Resilience***

Although this property does not have waterfront access, we appreciate the coastal flood resilience measures the proponent has proposed to reduce the risk of storm surge flooding at the project site. The proponent has elevated their first floor to 20.5 feet BCB, in accordance with the *Coastal Flood Resilience Overlay District* design guidelines, and their critical infrastructure to 21.5 feet BCB. Plantings will be salt tolerant, and the garage will be either wet- or dry-flood proofed, ensuring that the building and open space can recover in the event of inundation. We are also pleased to see that 50% of the exterior public open space has been elevated to 20 feet BCB. To further strengthen site resiliency efforts, we recommend the proponent routinely test and practice deploying the drive-over floor protection plates and other on-site deployables, which can be less reliable and subject to human error in flood events. Additionally, representatives of adjacent sites have requested burying power lines to reduce overhead conflicts, which we would support as an investment that increases the resilience of the area by preventing damage from trucks, wind, or other natural disasters.

### ***Shared Infrastructure***

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. We appreciate that this proponent, like other general industrial uses in the RLFMP, will contribute to the BPDA's Climate Resiliency Infrastructure Fund, which seeks to



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implement climate adaptation infrastructure for the marine park. In the more immediate term, significant improvements to the roadway system are also needed to ensure that existing tenants can thrive. We commend the proponent for providing over \$3 million to the City for transportation improvements in the RLFMP. For these infrastructure improvements to be effective, it is important that they be phased ahead of incoming general industrial development and, by extension, increased roadway demand.

In conclusion, we appreciate the efforts of this proponent to preserve the operations of marine industrial tenants in the park. The project, which will introduce general industrial uses to the RLFMP, will contribute financially to the needed shared infrastructure and implement building design elements that minimize disruption to existing businesses' operations. Strategic building cutouts will allow truck operations to continue along Seafood Way while new public realm and seating will provide workers in the area with a place of respite. To further support industrial area workers, public amenities, like public restrooms, should be well signed and available on the ground floor of the building. To support water-dependent and marine industrial business operations, we hope the proponent will work with the BPDA to ensure the timing of their project aligns with the BPDA's anticipated infrastructure improvements.

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