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November 29, 2023

via email: frank.taormina@state.ma.us

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

Re: 22 Drydock Avenue Chapter 91 Waterways Administrative Review

Dear Mr. Taormina,

Boston Harbor Now respectfully submits the following comments on the *22 Drydock Avenue Waterways Administrative Review* submitted by Related Beal. Our organization has followed this project since its inception and submitted comments in June 2022 to the Boston Planning and Development Agency (BPDA).

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



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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.

Although this project does not aid any given maritime or marine industrial business in the RLFMP, it provides a substantial financial contribution to make needed transportation infrastructure improvements to the marine park. The proponent has committed \$1,400,000 for the RLFMP Transportation Advisory Committee Fund for transportation improvements identified in the Raymond L. Flynn Marine Park Master Plan Update and another \$400,000 to support Seaport water shuttle services. We appreciate these financial contributions.

We hope the money allocated for the RLFMP Transportation Advisory Committee Fund goes to infrastructure improvements that support the transportation needs of the marine industries in the area. Efficient and safe truck maneuverability has been a chief concern for tenants currently operating in the marine park, and infrastructure upgrades should enhance truck routes while supporting sustainable modes of travel for workers in the park. Ferry service to this area has the potential to reduce traffic of all kinds and the need for parking in the Raymond L. Flynn Marine Park, where truck trips associated with maritime uses are now competing for street space with increased commuter trips. Infrastructure implementation should be timed to ensure that the needs of marine industrial tenants are supported with improvements happening ahead of incoming development to preempt additional travel in the area and designed to ensure that roadways and intersections are wide enough to accommodate trucks used by current and future marine industrial tenants.

On-site, the proponent will create approximately 3,600 square feet of ground floor space devoted to food and beverage services that will support all workers within the RLFMP as a Supporting DPA Use. We appreciate that the food and beverage service will be open to all RLFMP tenants. In alignment with our aspirations for significant development around the waterfront and throughout this industrial area, we request that the incoming food vendor provide food 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 and Wi-Fi. Public amenities should



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additionally be well signed so that users are able to find and access them easily.

Additional Community Benefits

In addition to the benefits listed above, the proponent will contribute funds to other water-dependent causes that support maritime and marine industries. The proponent will dedicate \$200,000 to establish a Fisherman's Relief Fund for the Boston Fisheries Foundation, \$50,000 in working capital for the Boston Seafood Festival, and \$200,000 for the initial funding of a Boston Fisheries Foundation Museum. As the existing RLFMP tenants seek to minimize pedestrian and vehicle trips to the park, we appreciate the reasons for locating the physical museum and seafood festival elsewhere. Nonetheless, these features are critical to showcasing the importance of fishing and other maritime industries to the public. Though these benefits are focused beyond the existing RLFMP, they are well aligned with support of the working waterfront.

The proponent has also committed to constructing and leasing a portion of the ground floor for state-of-the-art lab and classroom space for Gloucester Marine Genomics Institute (GMGI) rent-free. GMGI is a non-water-dependent use, but it "is an important marine research facility that will facilitate teaching opportunities, provide access to local students and community groups, and offer a high-performance environment for learning." The non-profit research institute has a proven track record of training local high school graduates to become biotech lab technicians and providing hands-on training to high school and middle school students seeking research experience. Building on this contribution, the proponent is also dedicating \$200,000 to an endowment for job training at GMGI for military veterans returning from overseas and another \$200,000 toward the endowment for a marine biotechnology education program aimed at local Boston high school students. We commend the proponent for creating new, fully built-out, rent-free facilities for such a highly regarded organization in the spirit of Chapter 91 and the principles of the *RLFMP Master Plan Update*. By providing new space for GMGI in Boston and enabling them to continue connecting community members with good-paying jobs, the project helps realize a key aspiration for projects within Boston's working port.

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 project has been designed to comply with all Coastal Flood Resilience Overlay District (CFROD) requirements by constructing the building's ground floor with an approximate elevation of 15 feet (NAVD88), one foot above the applicable



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Sea Level Rise – Design Flood Elevation. We expect the garage to be wet or dry-flood-proofed and the proponent to practice deploying any on-site deployable flood infrastructure on a regular basis to test functionality and reduce user error. 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.

We appreciate that the proponent will add more green space to their site. Additional green space, in combination with permeable pavers and an improved storm water system, will significantly decrease overflow volumes and peak runoff rates discharging to the existing drainage system along Drydock Avenue. We recommend that plants selected for the site be native salt-tolerant species capable of weathering potential damage from storms and coastal flooding. Even with the additional plantings, which will minimize heat island impacts, we suggest the proponent provide shade and shelter opportunities next to seating areas so the space remains usable in various weather conditions.

In conclusion, we appreciate the myriad of contributions the proponent has made to support both the RLFMP and the broader community. This project will contribute significant financial investment to improve transportation infrastructure in the RLFMP, build lab space for GMGI, and create open space and food and beverage services that will support RLFMP tenants. To further 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 "Kathy Abbott", written in a cursive style.

Katherine F. Abbott
President and CEO
Boston Harbor Now