



Aisling Kerr
Senior Program Manager
Boston Planning and Development Agency
One City Hall Square
Boston, MA 02201
(delivered via email)

May 7, 2021

Subject: 24 Drydock Avenue (Raymond L. Flynn Marine Park), South Boston

Dear Ms Kerr,

Thank you for the opportunity to provide preliminary comments on behalf of the residents of the South Boston Waterfront for the Article 80 project located at 24 Drydock Avenue, Parcel L-1, in the Raymond L. Flynn Marine Industrial Park (RLFMP) in South Boston. The project site is located within a Designated Port Area (DPAs), a geographic area of critical importance to our state's marine industrial economies. The Project Notification Form (PNF) for this project was filed with the Boston Planning & Development Agency (BPDA) on March 12, 2021 and a public meeting was held on April 27, 2021.

The project will demolish the existing three story building on the Project Site and build a new eight story, mixed-use building totaling approximately 235,500 square feet. The project will provide 10,000 sf of office space to the Boston Ship Repair on the first floor to support water-dependent maritime industrial use in the RLFMP.

Change of Use for the parcel

The proposal is a change of use from Marine Industrial to Mixed Use. The RLFMP Master Plan and the RLFMP Master Plan Update both identified Parcel L-1-with 32,324 sf of land area, to have a much smaller building on-site and a use type of Maritime Industrial.

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The RLFMP Master Plan Update “reserved L-1 as part of Drydock #3 to provide increased flexibility and economy in accommodating potential ship repair work.” It also added L-1 parcel to the MER District. The MER District was established to protect significant maritime properties throughout the Harbor and whose allowable uses are dedicated to maritime dependent industrial.

We ask that the proponent and the BPDA provide more detail on this change of use so additional comments can be provided;

- Has the size of parcel L-1 changed to support a much larger building with an FAR of 4.0
- How has the height of the proposed building, in excess of MER District and Chapter 91 regulations, been agreed
- Is the Boston Ship Repair office space lease on L-1 to be joined with Parcel L or will it be maintained separately
- Will any change be made to the leases of the jetties that are part of Parcel L
- How will all the changes to this site impact the potential buildout of mixed-uses on other RFLMP parcels and whether the 75% water dependent use requirement is maintained or a minimum of 51% water dependent use requirement of RFLMP is approved.
- Are there any impacts to the Chapter 91 Master License for the RLFMP

We would also like to understand more about how the onsite workforce development training will support the maritime industry, especially within the RLFMP and in conjunction with the Port of Boston Economic Development Plan to maintain maritime jobs and expand maritime uses such as blue tech.

We also recommend that the allocation of the 10,000 sf onsite to support water dependent industrial use is codified to remain in effect, regardless of whether the current tenant, Boston Ship Repair, relocates elsewhere in the future. Accordingly, we urge DEP to require the Proponent to allocate 10,000sf onsite to support industrial water dependent use as an explicit condition of their future Waterways license or as an amendment to the Master Chapter 91 License. Again, this allocation must remain in effect for the duration of the license, regardless of whether the current proposed tenant, Boston Ship Repair, relocates elsewhere.

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Nonprofit Space

The proponent has designated 4,000 sf for use by non-profits to provide training and workforce development. The FPNA continues to advocate for a fully transparent approach to select the organizations who will benefit from these types of opportunities. We would support an independent BPDA managed model that utilizes an RFI / RFP to engage and ultimately select the non-profits. If the plan is for the proponent to manage their own process to select a tenant(s) of the non-profit space, their process should be outlined in significant detail to ensure there is fairness and transparency.

With regard to to the 4,000 sf, additional detail is needed including;

- The level of developer provided buildout that will be performed (at minimum a White Box)
- The length of the term the space will be made available
- The operational agreement for expenses, including expectations on rent and taxes. Past experience indicates that minimizing all of these expenses is in the best interest of the success of the non-profit(s) occupying the space.

Transportation

The recent trend of mixed-use development vs. traditional water dependent use has considerably changed the type of traffic we see in the RLFMP from primarily trucks and vehicles to increased pedestrian and bicycle use. The development of 24 Drydock will bring in more than 800 employees a day to the site, the proponent expects almost 40% of these commuters to use walking or biking as their primary mode of transportation. The vehicle gateways into the RFLMP continue to be stressed. This project did not measure volumes and assess build impact on the two key intersections at Summer St & Drydock Ave and Northern Ave & Haul Rd. Commuters using vehicles will park in the Marine Park Garage on Northern Ave., approximately .3 miles from the site. The majority of the targeted transit ridership would use the SL2 MBTA transit route. The primary loading point would be South Station and the SL2 capacity at South Station currently performs at an unsatisfactory level of service without this buildout. Regardless of mode, the last mile for all employees will use Drydock Ave, Northern Ave and cross the complex intersection of Drydock Ave / Northern Ave / Tide St.

FPNA continues to be concerned with the safety of pedestrians and bicyclists in the RFLMP. The necessary pedestrian and cycling infrastructure investments Park wide to support the shift in development to mixed use has not been done.

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Plans have been developed for Northern Ave and a portion of Tide St, but funding and a construction schedule have not been established. There are no such plans for Drydock Ave.

We ask that the BPDA and the proponent consider;

- Using mitigation funding to drastically improve the complex intersection of Drydock Ave/Northern/Tide St for pedestrians crossing and for hard separation between cyclists and trucks.
- The prior proposed Northern Ave improvements supporting pedestrians and cyclists be fully funded and improvements along Drydock Ave to be developed and implemented.
- The two key vehicular gateways mentioned above should have traffic analysis performed on them.
- The BPDA needs to execute on its own study recommendations of;
 - Signalizing the intersection of Haul Rd, Northern Ave and Fid Kennedy Ave.
 - A new intersection to connect the Haul Rd to Drydock Ave.
 - The proponent of 24 Drydock should provide mitigation funding to both of these projects.
- Using mitigation funding to enhance the SL2 transit stop on Northern Ave., closest to the project site. Improvements should include additional seating, an expanded weather protection area and an on-time arrival and departure board.

Shuttle Service

The proponent has proposed a shuttle service utilizing 20 person capacity buses running 4 times an hour between the site and the Nubian Square MBTA station, in Roxbury. This service will provide convenient access to the project site for the residents of the Nubian Square area and allow for a simple connection to employees who would use the 14 bus routes that currently service that MBTA station. Although the shuttle would deliver riders to 24 Drydock, it is unclear how riders would connect to jobs throughout the Seaport and where those jobs would be available.

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FPNA would request the proponent to consider;

- Start this service when construction begins at the site and consider making it available for use by the general public.
- In line with making it a general purpose service, consideration should be given to relocating the pickup / drop off site to be adjacent to the SL2 stop on Northern Ave.

In conclusion, the proposed development is a significant departure from the RLFMP Master Plan and the RLFMP Master Plan Update currently under review by the Secretary of the Executive Office of Energy and Environmental Affairs. Although Boston's maritime industrial sector and support services have changed over time, they remain a critical component of the region's socioeconomic well-being. The shift on L-1 from 100 percent water dependent/maritime industrial use to less than 5% water dependent/maritime industrial needs further discussion. Furthermore, without knowing the recommendations of the RLFMP Master Plan Advisory Group and the Secretary's decision, it is difficult to provide more in-depth comments on this proposed change of use project.

We look forward to participating in future public dialogue.

Respectfully Submitted,

Tom Ready

cc:

Nick Collins - Massachusetts State Senate, 1st Suffolk District
David Biele - Massachusetts House of Representatives, 4th Suffolk District
Ed Flynn - District 2 Boston City Councilor
Michael Flaherty - At large Boston City Councilor
Daniel Padien - Waterways Program Chief, MassDEP

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