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Via email: [paul.j.sneeringer@usace.army.mil](mailto:paul.j.sneeringer@usace.army.mil)

Paul Sneeringer  
US Army Corps of Engineers  
New England District  
696 Virginia Road  
Concord, MA 01742

Re: Boston Harbor Islands Moorings Project, File No. NAE-2016-1616

Dear Mr. Sneeringer,

Thank you for the opportunity to comment on the Massachusetts Department of Conservation and Recreation's (DCR) permit application for the Boston Harbor Islands Moorings Project.

Boston Harbor Now is the legislatively authorized non-profit partner of the Massachusetts Department of Conservation and Recreation and an active member of the Boston Harbor Islands Partnership. In our capacity as DCR's legislated partner for the Boston Harbor Islands, we work with the Department to enhance and improve public access to the Boston Harbor Islands National and State Park. In the interest of transparency, Boston Harbor Now will be a partner with the Department in managing the moorings requested in the permit application. We anticipate that Boston Harbor Now's role will be to manage the reservation and payment system for the moorings.

As longtime advocates of public and park access, we are highly supportive of DCR's efforts to increase recreational boating access through the proposed moorings project. The expansion and enhancement of recreational boating opportunities is a critical piece of the overall success of Boston Harbor and the Islands. Our comments follow.

## **Project Description**

The planning process for the current proposal began in 2014 when DCR contracted with APEX Engineering and University of Massachusetts Urban Harbors Institute (UMass). APEX led the hydrographic work and engineer design while UMass focused on the non-engineering components (i.e. potential conflicting uses, anticipated boat traffic, wind and wave currents). At the time, DCR identified five potential Boston Harbor mooring locations. It is our understanding that a meeting of several Harbormasters was convened in September of 2014 to gather input and comments on the proposed design and location of the moorings.

As presented in the United States Army Corp of Engineers' (USACE) Public Notice, the moorings project proposed by the Massachusetts Department of Conservation and Recreation (the Department) will provide short-term mooring space for boaters visiting the Boston Harbor Islands National and State Park. Currently, there are 50 rental moorings authorized under a permit initially issued to Boston Harbor Now's predecessor organization the Boston Harbor Island Alliance. Boston Harbor Now transferred this permit to the Department to facilitate the expanded program proposed in this permit application. The permit application seeks to relocate the 50 existing moorings and install 111 additional moorings throughout the Boston Harbor Islands as follows:

- 11 moorings on Gallops Island,
- 25 moorings on Georges Island,
- 75 moorings on Peddocks Island, and
- 50 moorings on Spectacle Island.

When the project is complete, Boston Harbor will benefit from a total of 161 moorings and increased access for recreational boaters wishing to visit Boston Harbor and its Islands.

## **Ensuring Public Participation**

A core principle of Boston Harbor Now is to activate Boston Harbor through a wide variety of opportunities that include recreational boating and navigational access. We are highly supportive of the project's intent to provide much-needed mooring space on the Harbor Islands and improve the recreational boater experience and park access. This is an initiative that our organization (and previously as the Boston Harbor Island Alliance) has been a strong proponent of for over 15 years.

To ensure the success of the proposal, we ask that DCR address the following concerns in its response to comments:

- Detailed descriptions and renderings of the proposed mooring design,
- The proposed location of all moorings and alternate locations considered,
- All possible climate change impacts to the Boston Harbor Islands resulting from the proposed mooring installation,
- A complete list of environmental concerns, and

- Details of potential navigational hazards arising from the proposed moorings.

Before the USACE issues a final permit for the project, the Corp must ensure that all concerns voiced by interest parties (e.g. recreational boaters, commercial shipping sector, Harbor Pilots, maritime groups, and others) are satisfactorily addressed.

Thank you for the opportunity to comment. We look forward to the response to comments and continuing the public dialogue.

Sincerely,



Jill Valdes Horwood  
Director of Policy



Phil Griffiths  
Special Projects Manager