



Navigating our future.

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October 21, 2016

Via email to: Alexander.Strysky@state.ma.us

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs (EEA)
MEPA Office, Attn: Alex Strysky
100 Cambridge Street, Ste 900
Boston, MA 02114

Re: Conley Terminal Terminal Revitalization: New Berth 10 and Berth 11 Dredging Project
Environmental Notification Form

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Environmental Notification Form (ENF) submitted by Massachusetts Port Authority. Our staff attended the Conley Terminal awards ceremony on September 19th and hosted the Massport project team on September 28, 2016 at our monthly Harbor Use Public Forum. Our specific comments follow.

Project Description

According to the ENF, Conley Terminal is New England's only full-service container terminal, servicing over 1,600 companies. The Port of Boston is the 6th largest employer in Boston and provides 7,000 direct jobs and 50,000 total jobs in the region. For the second year in a row Conley Terminal has seen record-breaking volumes of cargo.

In response to the widening of the Panama Canal, the Port of Boston must increase both its channel depth and on-land infrastructure to accommodate substantially larger container ships. The new larger ships are about one and a half times the previous size and can carry over twice as much cargo. Container terminal capacity is based on the ability of berths to load/unload vessels, move/store containers, and the system of roadways serving the terminal. As presented in the ENF, the proposed revitalization of Conley Terminal includes:

- Construction of a new Berth 10 and three new, larger cranes
- Dredging of both the new Berth 10 and existing Berth 11 to a depth of -50 feet

- Expansion of existing Conley terminal
- Construction of the Thomas J. Butler Memorial Freight Corridor; and
- Completion of the Butler Memorial Buffer Park

The focus of the current ENF involves constructing Berth 10 and dredging Berth 11. As described in the ENF, alignment of container berths is essential to providing the safe, speedy, and flexible positioning of ships. Alignment of the proposed Berth 10 will be achieved through inserting 900 steel pipe piles. This proposed pile-supported method of construction is expected to have the least impact on Boston Harbor and its resources.

Due to Federal Aviation Administration height restrictions for Logan Airport, the new deepwater berths and cranes will need to be shifted westward along the Reserved Channel. Currently, the Boston Harbor Lobstermen's Cooperative uses the Cardinal Medeiros boat dock on the Reserved Channel for its operations. We understand that the location of the boat dock limits the ability of Berth 10 to be located far enough west to avoid these height restrictions. As a result, neo-Panamax ships may both be able to fully load a portion of their ships. To the extent that access to the boat dock is the source of this inefficiency, we wonder if Massport could instead compensate the Lobstermen's Cooperative for relocating so that supersized cargo ships entering the Port of Boston can be fully loaded.

Sustainability, Climate Resilient Design, and Sea Level Rise

As presented in the ENF, the majority of the project site is within the AE zone of the FEMA 100-year floodplain. Currently, Boston's high tide (mean higher high water) is approximately 11.2 feet BCB and our 100-year storm surge is about 5 feet.

As Massport is well aware, the recently released Climate Ready Boston report predicts that Boston's high tides will increase by 4 to 8 inches by 2030 and up to 1.5 feet by 2050 compared to 2000. Later predictions are more uncertain, as they are in part determined by future greenhouse gas emissions. Climate Ready Boston predicts that 2.4 to 7.4 feet of sea level rise can be considered likely by the end of this century. We believe that the climate preparedness regulations Massport has set for its properties fall within these predicted scenarios.

It is clear that Massport has given careful thought to sustainability, climate change, and sea level rise (Section 2.5.1 of the ENF). There are a number of good initiatives included in the ENF among them the implementation of an Environmental Management System, the Clean Truck program, LEED+ building design, reducing emissions, elevation of critical infrastructure, and wet flood-proofing areas of the terminal.

Buffer Park and Public Access

Part of the mitigation for the proposed expansion and construction at Conley Terminal includes the construction of the Butler Memorial Park, neighborhood Dog Park and creation of 95 on-street parking spots along East First Street. We support Massport's continued efforts to work with the South Boston community to minimize the potential impacts of its industrial working port activities and expected truck ingress/egress from Conley Terminal.

The Thomas J. Butler buffer open space is expected to open in 2017. The construction of the buffer park is an excellent opportunity for proponents to incorporate climate resilient design features in the face of future increased flooding events. We encourage the proponent to consider the buffer not just an excellent opportunity to provide much needed open space for the community but also as an additional opportunity to limit coastal storm flooding from entering South Boston community via Conley Terminal.

During the September 28th Harbor Use Meeting, a number of attendees inquired about the possibility of incorporating additional opportunities for public access along sections of the proposed project, within the constraints of public health and safety concerns. We would like to see pedestrian access enhanced along both sides of the Reserve Channel to the maximum extent it can be accommodated without public safety or security conflicts.

Proposed Dedicated Freight Corridor

As additional mitigation for the expansion of Conley Terminal, the existing East First Street truck route will be diverted to the proposed Thomas J. Butler Dedicated Freight Corridor and away from residential streets in South Boston. We understand the proposed freight corridor will run through the old Exelon Site and connect to Summer Street. In anticipation of future development on the Exelon site, we encourage the proponent to work with the new site owners to ensure that redevelopment of the Exelon site supports continued and uninterrupted use of the freight corridor.

We support the expansion of Conley Terminal, seeing these upgrades as essential in allowing the Port of Boston to continue to be an international maritime shipping hub.

Sincerely,



Julie Wormser
VP of Policy & Planning



Jill Valdes Horwood
Director of Waterfront Policy