June 28, 2016

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
Attn: Holly Johnson, MEPA Office
100 Cambridge St., Suite 900 (9th Floor)
Boston MA, 02114

Re: Deer Island Public Access Facility Environmental Notification Form, EEA# 15521

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Deer Island Public Access Facility Environmental Notification Form for the proposed public fishing pier and parking area. After reviewing the environmental notification form and accompanying project plans, our comments follow.

The proposed Deer Island public fishing pier project includes the installation of an approximately 210 feet long by 12 feet wide structure with a 60’ by 16’ T-pier at the end, a 0.41 acre parking area, and an ADA-compliant ramp system. Boston Harbor Now supports the installation of additional public fishing piers in Boston Harbor and commends the MA Department of Fish and Game for expanding public benefits and access to the Harbor.

Use and benefits to the public
The Deer Island peninsula is approximately 96.81 acres and houses the second largest wastewater treatment facility in the country. The remainder of the island is dedicated to five miles of public walkways and trails for walking, jogging, sightseeing, picnicking, fishing and bicycling. There are several hiking/biking trails encircling the island including the highest one near the water tower that offers some of the best views of the city and Boston Harbor Islands. The island and its amenities are open to the public year-round from sunrise to sunset and can be accessed by car, bus, and/or ferry.

The proposed structure will be located on the Island off of Tafts Avenue with the entrance to the pier located along the Judge A David Mazzone Park Trail. The pier will extend approximately 226’ perpendicularly from the shore into the Deer Island Flats. To support the public use and access to the
pier there will be a 0.41 acre parking area across Taft Avenue. All portions of the proposed structure and parking lot will be ADA-compliant and handicap accessible. To maximize public benefits we suggest:

- Spacing pilings so that they do not impede water flow,
- Elevating piers above expected storm surge heights to avoid damage from waves,
- Providing adequate signage that includes hours of operation, list of permitted activities, and directions to other public amenities on the island including the hiking/biking trails along the HarborWalk.

Boston Harbor Now strongly supports continued water-dependent uses along Boston Harbor that will benefit the surrounding community and visitors alike. The construction of the Deer Island Public access facility will expand and support the public use for both recreational fishing and use of the public park. Connecting the community with the Harbor and activating the waterfront has been a core mission of Boston Harbor Now and we strongly support MA Department of Fish and Game’s effort.

**Existing Conditions**
The proposed project site is located within the FEMA Flood Zone VE with a base flood elevation of 12’ NAVD88. This VE flood zone is considered an area of high flood risk subject to inundation by the 1% annual-chance flood event with additional hazards due to storm-induced velocity wave action (a three-foot or higher breaking wave). Because of its location in the VE zone, the dock is potentially at risk of structural damage to the forces caused by high velocity wave action and storm surge.

We understand the proposed project will be designed to withstand coastal storms helping to minimize the opportunity for the structure to become a coastal hazard. While the pile supported design poses a low risk for storm-related damage, future climate change-related storm events may cause increased damage. We encourage the proponent to ensure that the proposed pier is prepared for more extreme weather events.

Thank you for the opportunity to comment. We look forward to the addition of another public fishing pier in Boston Harbor and surrounding islands.

Sincerely,

Julie Wormser  
VP Policy

Jill Valdes Horwood  
Waterfront Policy Analyst