



Via email: Andrea.Langhauser@state.ma.us.

November 9, 2015

Ben Lynch
Andrea Langhauser
MassDEP Waterways Regulation Program
One Winter Street, 5th Floor
Boston, MA 02108

Re: Chapter 91 License Application, Fox Point -- Proposed Floats

Attn: Andrea Langhauser, DEP Wetlands and Waterways Program

Dear Mr. Lynch,

On behalf of The Boston Harbor Association (TBHA), thank you for the opportunity to comment on University of Massachusetts' Chapter 91 License Application for the Fox Point proposed floats. After reading the Chapter 91 license application and accompanying documents, our comments follow.

The proposed Fox Point docking facility expansion includes the installation of approximately 10,528 square feet of floats supported by 15 steel piles, an aluminum ADA-compliant ramp system, a four-pile gangway hoist trestle, a concrete landing pad, and two storage sheds. TBHA supports the expansion of the existing facility located at the University of Massachusetts Boston Campus and further commends the University for including our previous suggestions and comments into this final expansion proposal.

Use and benefits to the public

Fox Point docking facility is a year-round, multi-purpose facility located in Savin Hill Cove at the University of Massachusetts Boston campus. The current proposed use for the project site includes the University's Division of Marine Operations management of three vessels for research, training, transportation, and recreational purposes in Boston Harbor.

One of the major beneficiaries of the Fox Point docking facility is the University Sea Education Experience's fall and spring program, which is designed to stimulate water-related courses at UMass Boston and support faculty development in the marine and environmental sciences. As part of the program, university students can learn about the marine environment by taking water samples, viewing marine life, and conducting a variety of marine research activities. The program--which hopes to bring more students into contact with Boston Harbor aboard

university vessels--plans to complete construction of the expanded Fox Point floats before the Summer 2016 season.

In addition to supporting the Sea Education Experience program, the Fox Point facility and UMass Boston Waterfront Recreation Program provides students and the public free use of the kayaks and paddleboards for recreation. Additionally, fourteen Cape Cod Mercury sailboats are available for new and experienced sailors from UMass Boston and neighboring communities to sail in the harbor; sailing courses are available to students with a UMass Boston ID and to members of the general public via the community membership program. TBHA strongly supports continued water-dependent uses along the waterfront that benefit the community. This program will allow participants to enjoy our Harbor as well as to learn the necessary safety and maintenance procedures to ensure these activities do not interfere with other maritime activities, especially within the very active Boston Harbor area.

During the summer months, the dock facility is used on a more consistent and frequent basis. The twice-daily trips for university students can include historical harbor island tours, island drop off and pick ups, opportunities for tidepooling, and beachcombing. Additionally, the University makes periodic use of the Fox Point dock to introduce new university faculty to Boston's harbor and the surrounding areas. Connecting the community with the Harbor and activating the waterfront has been a core mission of TBHA and we strongly support UMass' effort.

Existing Conditions

The proposed project is located in a preliminary FEMA VE flood zone with a base flood elevation of +14 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 a VE zone, the dock is potentially at risk of structural damage due to the forces caused by high velocity wave action and storm surge.

Given the dock's standard design, the risk of storm-related damage is low. Future climate change-related storm events, however, might cause increased damage. Because the proposed project has no off-site alternatives that provide adequate and ready access to the vessels they are intended to serve, we encourage UMass to ensure that the proposed replacement floats are prepared for more extreme weather events. We support the proposed expansion and improvement of the now deteriorating facility as it poses a safety risk and environmental threat if left in its current condition.

Resource Areas

The proposed project is located within Land Under Ocean and a potential shellfish habitat. The MassGIS datalayer (Exhibit D of the license application) indicates that the taking of shellfish is prohibited in the proposed project area. The University contends that new construction will push the existing structures seaward and further away from the shellfish habitat area; the result is a reduction in adverse impacts to the habitat.

Water Transportation Initiatives

The University's Marine Operations team has expressed a willingness and interest to improve the current conditions of Fox Point to a fully ADA-accessible facility. Completion of this expansion project, together with improvements to the existing facility, and the ADA dock will help set the stage for much needed water transportation opportunities to and from Columbia Point and the rest of Boston Harbor.

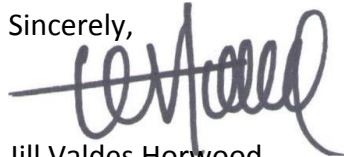
Construction methodology

Construction will be completed predominantly on the harbor side, with only the foundation for the gangway on the landside. The waterside removal and disposal of materials to an offsite facility, offsite construction of replacements floats, and refueling and storage of heavy equipment away from the site will help minimize impacts to coastal resource areas, avoid disruption to local vehicular traffic, and diminish debris on the landside of the facility.

We ask that best practices (e.g., spraying water on the ground surface) be used when laying the foundation for the gangway to reduce dust and other adverse impacts to the local community. Additionally, we specifically ask that special care be taken to ensure no construction materials and debris are inadvertently dumped into the Harbor during the duration of the expansion project.

Thank you again for the opportunity to comment. We look forward to the completion of this exciting project.

Sincerely,



Jill Valdes Horwood
Waterfront Policy Analyst



Julie Wormser
Executive Director