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bostonharbornow.org

July 16, 2019

Via email: page.czepiga@state.ma.us

Executive Office of Energy and Environmental Affairs (EEA) Attention: Page Czepiga 100 Cambridge Street, Suite 900 Boston, MA 02114

Re: Thompson Island Outward Bound Reserved Channel Dock Replacement, EEA #16048

Dear Ms. Czepiga,

Thank you for the opportunity to comment on the Environmental Notification Form (ENF) for the Thompson Island Outward Bound Reserved Channel dock replacement submitted by ESS Group for the Thompson Island Outward Bound Education Center (TIOBEC) on June 17, 2019. Boston Harbor Now has closely followed this improvement project and a member of our team was present during the July site visit.

We would like to applaud TIOBEC for proposing these significant improvements to the Thompson Island Docks. The proposed project provides a needed investment in this gateway to the Boston Harbor Islands. The existing ramp can be as steep as 45 degrees at low tide and the float is narrow. Issues like these reduce the quality of the existing visitor experience and limit the capacity for TIOBEC to expand programming for school groups and the public.

This is an important and worthwhile project not only for TIOBEC but also for the greater community and we fully support the proposed dock replacement. When it is completed, this proposed project will offer a better gateway experience for everyone visiting Thompson Island, one of the 34 islands in the Boston Harbor Islands National and State Park. As a member of the park partnership, Boston Harbor Now is committed to improving public access and the visitor experience at this location along with the larger gateways at Long Wharf (Boston) and Hewitts Cove (Hingham).

Project Description

The existing infrastructure at the project site has been in use for decades and requires an updated design to remain functional. The current ramp is not ADA compliant and spans 60 feet to connect the access pier to a 100 feet by 12 feet steel float. As proposed, the dock replacement will include two ramps attached to five floats, providing for more space between passengers and cargo. The 100-foot ADA-compliant ramp, intended for passenger use, will fluctuate up and down with the tides. The second ramp, intended to be used to load and offload cargo, will not be ADA-compliant at all tide levels. Several piles will be added in addition to those that are already onsite and will attach to the existing bulkhead.

Public Access

We commend this project for the ways that it will improve the quality of the island visitor experience. The ADA-compliant ramp will increase the range of abilities of the people that

can be served by TIOBEC. These renovations and upgrades will also allow TIOBEC to expand their operations, per their agreements with schools in the area, thereby providing access to Thompson Island to more than 20,000 students over the next five years.

As a part of the Boston Harbor Islands National and State Park and in conjunction with the project improvements, TIOBEC should ensure that it is clear to members of the general public that they are welcome on the island on Saturdays and Sundays. With this improved gateway facility, TIOBEC should do more to publicize this opportunity by installing appropriate signage on site indicating that a broader constituency can access the island on weekends. There are also a range of opportunities to share the dock access availability with a broader audience through social media and online web tools like bostonharborwalk.org. Boston Harbor Now would be happy to work with TIOBEC make the most of these opportunities.

Resilience

The project site sits in an AE zone as defined by FEMA. Given the nature of the project, the entire structure can come into contact with seawater without adverse effects. The most vulnerable assets are the floats, which may be lost or misshapen if wave heights exceed the tops of the piles during a storm. TIOBEC has designed the new piles to be at an elevation of 18.5 feet NAVD88, high enough that the floats will stay in place during very high tides or storm surge even with projected sea level rise in the coming years. TIOBEC should consider how severe storms or long term sea level rise will affect the parking lot adjacent to the dock as well as roadway access to the site in the event of more severe flooding. They should have a strategy to access the dock site within a reasonable time following severe storm events and work with abutting property owners on forward-looking solutions.

Implementation and Coordination

Because this project sits on Parcel C1 and C2 of Raymond L. Flynn Marine Park, there is active construction activity around the site. TIOBEC should work to minimize any conflicts between their contractors and other construction efforts in the area on land as well as on the busy Reserved Channel. Additionally, with TIOBEC's strong relationship with the Boston Police Department (BPD), which occupies the adjacent dock, the BPD should be consulted and kept abreast of each phase of the construction project throughout the project implementation.

We look forward to the construction of this project and the ways it will move us one step closer to realizing the vision of an accessible Boston waterfront for all. Thank you for the opportunity to comment.

Sincerely,

Kathy Abbott

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President and CEO of Boston Harbor Now