



Are you on board?

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January 10, 2020

Via email: [brian.golden@boston.gov](mailto:brian.golden@boston.gov)

Boston Planning and Development Agency  
Attention: Brian Golden  
One City Hall Square  
Boston, MA 02201

Re: Change of Use at Boston Waterboat Marina for Cape Air Seaplane Departures

Dear Mr. Golden,

Thank you for the opportunity to comment on the proposed change of use at Boston Waterboat Marina prior to the upcoming board meeting of the Boston Planning and Development Agency (BPDA). The proposed change of use, to accommodate docking for seaplanes operated by Cape Air, raises questions about the potential impacts on a significant number of passenger ferry routes around Long Wharf. We hope that these concerns will be carefully weighed by the members of the BPDA Board.

Boston Harbor Now is supportive of the proposal by Cape Air to operate flights via seaplane between Boston and New York City. We feel confident that their careful work with the United States Coast Guard and with Massport, as well as their long history operating at Logan Airport, has enabled them to establish appropriate flight paths. We also believe that the designated area for landings and take-offs between East Boston and the South Boston Waterfront is a safe place to do so and will have minimal interference with other vessels. Notably, the proximity of this designated area to the South Boston Waterfront lends itself to making a quick and direct trip to docking locations in the Seaport, such as Pier 4. If the planes dock there, they will be able to safely navigate at right angles to ferries and larger cargo ships while avoiding most novice sailors.

The proposal to dock the seaplanes at Waterboat Marina, which is owned by the BPDA, poses several potential problems. The actual section of dock they plan to utilize for boarding and

deplaning passengers, as well as the mooring locations they have leased to ensure safe navigation, have been thoughtfully selected. Navigating the waters just beyond the mooring field poses significantly more complications. Here, on a typical summer day, nearly 250 medium and large vessels on fixed schedules transport passengers from the north and south sides of Long Wharf to destinations around the Harbor. MBTA ferries going to Charlestown and Hull, ferries to Salem and Provincetown, ferries to the Harbor Islands, water shuttles to the Encore Casino, and other harbor tours are already departing through a restricted waterway. Given the configurations of docks and the routes, many vessels carefully maneuver past one another just beyond the end of Long Wharf as ferries from the south side travel north and ferries from the north side of the pier travel south and east. Water taxis navigate through this space as well. The congestion is carefully monitored and exceptional safety standards have kept this area operating at a level where thousands of people can reliably commute by boat from this unique transit hub and explore the harbor daily.

Boston Harbor Now is very supportive of finding ways to expand ferry service in and around Long Wharf. Introducing a seaplane into the intricate ballet of the ferries and water shuttles gives us pause. Although Cape Air is rightly excited to provide convenient transit-accessible air travel near a major job center, the small number of passengers served by the flights (a maximum of 72 per day) relative to the significant volume of ferry passengers who rely on those vessels for timely daily transit use makes us cautious about recommending seaplane service at this location. Understanding that the seaplanes are at the bottom of the maritime right of way hierarchy, we remain worried that their presence will complicate vessel traffic in this congested area. We would like the City to support the services at another site with fewer potential ferry conflicts.

Should the BPDA Board approve the change of use to allow seaplanes to dock at Waterboat Marina, we recommend allowing a one-year pilot with a maximum of four round trips per day. During that time, docking locations closer to the landing area, particularly in the South Boston waterfront, should be pursued. Any additional service at Long Wharf—more flights or a longer lease—should be contingent on feedback from water transportation stakeholders, primarily the ferry and water shuttle operators, who can confirm that their passenger services can continue to operate safely and on schedule.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott", with a stylized flourish extending to the right.

Kathy Abbott  
President and CEO