January 10, 2020

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,

Kathy Abbott
President and CEO